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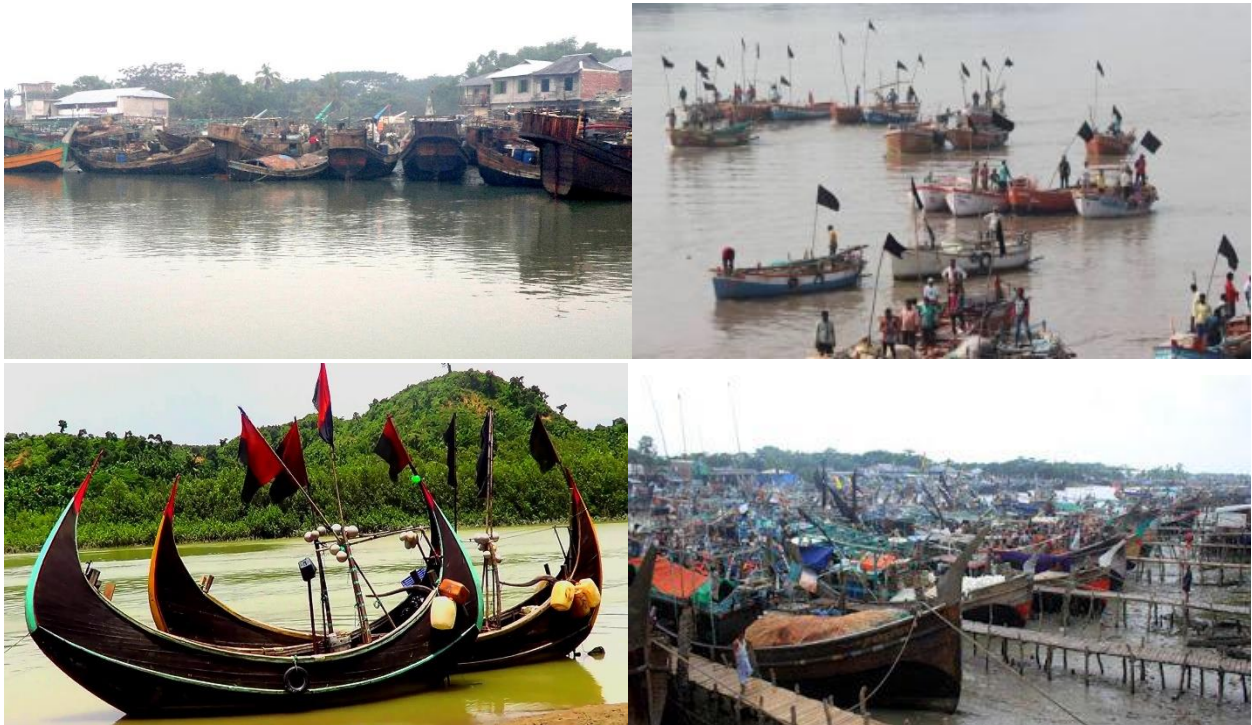
Ministry of Fisheries and Livestock, Bangladesh

Department of Fisheries)



Bangladesh Sustainable Coastal and Marine Fisheries Project
(BBSCMFP)

RESETTLEMENT POLICY FRAMEWORK (RPF)



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Department of Fisheries, Dhaka, Bangladesh

**Bangladesh Sustainable Coastal and Marine Fisheries
Project
(BSCMFP)**

RESETTLEMENT POLICY FRAMEWORK (RPF)

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List of Acronyms

AI	: Alternative Income
AIGA	: Alternative Income Generating Activities
AIS	: Automatic Identification System
ARAP	: Abbreviated Resettlement Action Plan
BDT	: Bangladesh Taka
BFDC	: Bangladesh Fisheries Development Corporation
BP	: Bank Procedure
CC	: Climate Change
CDD	: Community Driven Demand CHT : Chittagong Hill Tracts
CISF	: Community Infrastructure and Support Fund
CISW	: Community Infrastructure Support Window
CLAC	: Central Land Allocation Committee
COM	: Community Operational Manual
DC	: Deputy Commissioner
DRR	: Disaster Risk Reduction
DLI	: Disbursement-Linked Indicators
DMC	: District Management Commute
DoF	: Department of Fisheries
DPP	: Development Project Proforma
E&S	: Environmental and Social
EA	: Executing Agency
EEZ	: Exclusive Economic Zone
EFM	: Ecosystem-based Fisheries Management
EP	: Extreme Poor
ESMF	: Environmental and Social Management Framework
EWS	: Early Warning System
FAO	: Food and Agriculture Organization of the UN
FCG	: Fisher Credit Group
FCMC	: Fisheries Co-Management Committees
FGD	: Focus Group Discussion
FVG	: Fishers' Village Group
GAP	: Gender Action Plan
GIS	: Geographic Information System
GoB	: Government of Bangladesh
GRM	: Grievance Redress Mechanism
GRS	: Grievance Redress Service
GSDS	: Gender and Social Development Specialist
HACCP	: Hazard Analysis and Critical Control Point
HDC	: Hill District Council
HH	: Household
ID	: Identity
IDA	: International Development Association
IDF	: Institution Development Fund
IDW	: Institution Development Window
IoL	: Inventory of Losses

IPF	: Investment Project Financing
IUU	: Illegal, Unreported and Unregulated
JCC	: Joint Command Centre
LFW	: Livelihood Finance Window
LTP	: Livelihood Transformation Program
M&E	: Monitoring and Evaluation
MCS	: Monitoring, Control and Surveillance
MFA	: Marine Fisheries Academy
MFSCP	: Marine Fisheries Surveillance Check-Post
MFV	: Model Fishers Village
MMO	: Mercantile Marine Office
MoF	: Ministry of Finance
MoFL	: Ministry of Fisheries and Livestock
MoL	: Ministry of Land
MPA	: Multiphase Programmatic Approach
MPR	: Monthly Progress Report
NATP	: National Agricultural Technology Project
NGO	: Non-government Organization
NSF	: Nutrition Support Fund
OP/BP	: Operational Policy/ Bank Procedure
OTG	: One-Time Grant
PAF	: Project Affected Families
PAP	: Project Affected Person
PAVC	: Property Assessment and Valuation Committee
PCR	: Polymerase Chain Reaction
PD	: Project Director
PDO	: Project Development Objective
PL	: Post-Larvae
PMU	: Project Management Unit
POM	: Project Operational Manual
PTA	: Professional Transition Assistance
PTF	: Professional Transition Fund
R&D	: Research and Development
R&R	: Rehabilitation and Resettlement
RAP	: Resettlement Action Plan
RDF	: Revolving Development Fund
RPF	: Resettlement Policy Framework
SDF	: Social Development Foundation
SDS	: Social Development Safeguards
SEC	: Small Ethnic Community
SECDF	: Small Ethnic Community Development Fund
SECDP	: Small Ethnic Community Development Plan
SHAB	: Shrimp Hatchery Association of Bangladesh
SIA	: Social Impact Assessment
SME	: Small and Medium Enterprise
SMP	: Social Management Plan
SPF	: Specific Pathogen Free
TIG	: Technical Implementation Group

ToT	: Training of Trainers
UP	: Union Parishad
ULB	: Urban Local Bodies
UNO	: Upazila Nirbahi Officer
UPCC	: Upazila Project Coordination Committee
USD	: United States Dollar
VGD	: Vulnerable Group Development
VGf	: Vulnerable Group Feeding
VMS	: Vessel Monitoring System
WB	: World Bank

Executive Summary

Overview of the BSCMFP: The 'Bangladesh Sustainable Coastal and Marine Fisheries Project (BSCMFP)' is a two-phased proposed investment by the Government of Bangladesh (GoB) and the International Development Association (IDA) of the World Bank Group. The project will be implemented in the coastal and marine areas of Bangladesh by the Department of Fisheries (DoF), as the lead executing agency, under the guidance of the Ministry of Fisheries and Livestock (MoFL). The project aims to sustainably increase coastal and marine fisheries' contribution to the economy, poverty reduction through improving management of coastal and marine fisheries and aquaculture and fishing communities' access to alternative livelihoods activities in an environment friendly manner.

The phase I BSCMFP will be implemented in 5 (five) years with a preliminary budget envelope of around USD 240 million from IDA contribution and cover 75 upazilas of 16 coastal districts. Phase I of the project will have four components focusing on: (i) enabling sustainable fisheries sector investments and growth; (ii) improving infrastructure and production practices; (iii) community empowerment and livelihoods transformation; and (iv) project management and monitoring. **Along with the DoF, DoF proposes the Social Development Foundation (SDF) under the Ministry of Finance (MoF) as the co-implementer of the Component-3: Community Empowerment and Livelihoods, where this Resettlement Policy Framework (RPF) is a part, through a Community Driven Demand (CDD) approach.**

Phase II of the project will be considered and its budget envelopes defined based on successful implementation of the reform project put in place under Phase I.

Target beneficiaries: The project target groups of beneficiaries are the fishers, poor and extremely poor fisheries-dependent households. Marine and coastal fisheries resource is immensely significant to the livelihoods of the coastal communities, which are quite varied and influenced by socio-economic and physical environment of the coastal area. There is a considerably low presence of small ethnic communities in the coastal areas covered under the project.

Project interventions and potential resettlement impacts: The project will take up certain small-scale rural infrastructure rehabilitation/ repair works as well as certain livelihoods interventions in the target communities. There is likely to no or least possibility of new private land acquisition, hence these interventions might not induce adverse and unintended social impacts including loss or diminished means of livelihoods. If there is any inadvertent insignificant impact, those are foreseen as reversible and mitigable. The social risks and impacts those foreseen at this stage are based on preliminary concept and several community consultations, which may not be the precise reality to face during implementation of the project. As a safeguard measure, a resettlement policy framework (RPF) has been prepared for implementation level guidance in assessment of impacts, preparation of resettlement plan and implementation of the same.

Following basic categories of involuntary resettlement impacts may take place under this project, though acquisition of resources, structures, land and large-scale loss of livelihood are highly unlikely as there is likely to no or least possibility of new private land acquisition and no loss of public infrastructures:

- a) Loss of access to land by formal and informal users;
- b) Loss of physical structures and trees on land resumed for project works;
- c) Loss of business income due to displacement;

- d) Loss of wage income due to relocation of businesses;
- e) Loss of network; and vulnerability to local power elites
- f) Loss of public infrastructure.

Legal and policy framework: The project’s potential resettlement impacts will be managed under the legal and regulatory framework of the country and the World Bank operational policy on involuntary resettlement (OP 4.12); specially considered, Constitutional Provisions, the Acquisition and Requisition of Immovable Property Act 2017, The Chittagong Hill–Tracts (Land Acquisition) Regulation, 1958, Property Transfer Act 1882. A policy review has been done for development of the project resettlement policy framework (RPF). The broad principles of the RPF are as below:

Involuntary Resettlement: (i) The adverse impacts on persons affected by the project would be **avoided** to the extent possible. (ii) Where the adverse impacts are unavoidable, the project-affected persons will be assisted in improving or regaining their standard of living. Vulnerable groups will be identified and assisted to improve their standard of living. (iii) All information related to resettlement preparation and implementation will be disclosed to all concerned, and community participation will be ensured in planning and implementation. (iv) The persons affected by the project who does not own land or other properties but have economic interest or lose their livelihoods will be assisted. (v) Before taking possession of the lands and properties, compensation and assistance will be made to those who are eligible to receive the entitlements. (vi) Appropriate grievance redress mechanism will be established at project level to ensure speedy resolution of disputes.

Voluntary land donation: The project may seek to obtain using voluntary acquisition approach following the World Bank principles: (i) the infrastructure must not be site specific; (ii) the donation should not be more than 10 percent of the area of any holding and require no physical relocation of people; (iii) the land required must be identified by the affected community but with technical assistance from the project authority; (iv) the land in question must be in the absolute ownership of the donor free of encumbrances; (v) there should be a verification protocol of the act of voluntary donation and verification of voluntary acceptance of mitigatory measures in case of loss of income; (vi) if community services are to be provided under the project, land title must be vested in the community, or appropriate guarantees of public access to services must be given by the private titleholder; and (vii) grievance mechanisms must be available.

Eligibility and entitlements: Involuntary acquisition of private land will be fully avoided and in critical circumstances unavailability of existing land for small scale local infrastructure construction, voluntary donation of land may be approached by the community. However, involuntary displacement of authorized and unauthorized users of existing available land or the land taken through voluntary donation will be managed as per the RPF by preparing and implementation of Resettlement Action Plan (RAP). The following entitlement matrix (Table ES.1) will be followed for the RAPs.

Table ES.1: Compensation and Entitlement Matrices.

Loss and impacts	Entitled Persons	Entitlements	Application Guidelines and responsibilities
Residential and commercial structures	Displaced leaseholder Informal land users	Compensation for structures at replacement cost; Transfer and reconstruction allowance.	DoF will determine the replacement cost of structures with the help of property assessment and valuation committee (PAVC) in accordance with existing government regulations;

Loss and impacts	Entitled Persons	Entitlements	Application Guidelines and responsibilities
		Assistance for finding alternative sites.	PAVC will also guide inventory of loss of structures for quantity and type by construction materials. DoF will determine and pay compensation for structures. Transfer allowance per household/shop. Transfer allowance and relocation assistance will be applicable for full loss of structures of a household or shop/business without any scope for continue in remaining structure.
	Tenants of residences and businesses premises	Alternative housing allowance Shifting allowance	Alternative housing allowance will be determined by PAVC. Shifting allowance for household or shop.
Business, income and employment	Displaced business operators Wage employee	Business restoration allowance. Assistance for finding alternative business sites. Employment in reconstructed enterprise or in project civil works.	DoF will determine the business restoration allowance with the help of PAVC; DoF/Co-implementer will assist the displaced businesses identifying alternative business sites or job placements.
Vulnerability	Poor women and other vulnerable households	1. Additional financial assistance equivalent to 3 months' subsistence cost for the incumbent household. Employment opportunities project civil works.	Vulnerability will be determined following the data on income, gender and disability of the household heads; DoF/ Co-implementer will facilitate priority of the vulnerable household members for employment in civil works and in job placements.
Construction related impact	Anybody impacted by civil works contractor's activity	Compensation as per RPF	The affected persons will approach NCC notifying the impacts in writing with copy to the contractor; GRC will facilitate and assist the affected persons; Contractor will pay the compensation determined by PAVC.

Consultation and participation: The project has adopted an all-inclusive participatory approach that promotes citizen engagement in project process. As part of ESMF preparation, 12 FGD sessions were organized in the 07 (seven) coastal districts involving project beneficiaries viz: fishers, fish farmers, fish traders, DoF field level officers, local Union Parishad representatives. Both male and female stakeholders were consulted through these meetings. Additionally, teachers, businessmen, village leaders, and local government members, farmers, and fishers were consulted individually.

Consultations as part of the implementation would be the direct interactions of the implementation agency with the target group beneficiaries, affected persons and the local communities as mentioned above including the ethnic communities. Community engagement will be continued in the project implementation stages using

two-way process through inform, consult, collaborate and empower mechanism. All consultation proceedings will be appropriately documented and feedback considered in the implementation process.

Grievance redress mechanism (GRM): The DoF will establish a three-tier grievance redress mechanism (GRM) under the project to receive, hear and resolve grievances associated with the project implementation including social and environmental considerations. The Gender and Social Development Specialist (GSDS) in the PMU will be the contact person at DoF. All complaints and grievances will be received at the Upazila level project coordination committee and necessary measures will be taken to resolve the complaint. In case the issue is not resolved at the Upazila level, the case records will be referred to the District level committee. PMU will be the final resort at the project level. However, aggrieved person has the option to adopt judicial procedure. In cases where vulnerable persons are unable to access the legal system, the GoB will provide legal support to the vulnerable person (s). As well as, the PMU will assist the vulnerable person (s) in getting this support from the GoB. The PMU will also ensure that there is no cost imposed (such as for travel and accommodation) on the aggrieved person if the person belongs to the vulnerable groups. The monitoring will cover all stages of planning and implementation.

Implementation arrangement: The implementation of the social management plans (SMP, RPF, SECDP, GAP and LTP) is the responsibility of Project Management Unit (PMU) of the DoF (herein after referred as DoF). Since DoF doesn't have in-house capacity, project will hire the services of a Gender and Social Development Specialist (GSDS) to support DoF in implementation of the social management plans. DoF will designate the GSDS as departmental focal person on social development and safeguards (SDS) Focal Person to coordinate with field offices of DoF, the communities, consultants and the World Bank.

Monitoring and evaluation: The DoF is primarily responsible for monitoring to ensure conformity to the requirements of the RPF. The monitoring will cover all stages of planning and implementation. The monitoring will be carried out through the compliance reports that will form a part of Monthly Progress Reports (MPR) and regular visits by the GSDS of the PMU. During implementation, meetings will be organized by DoF inviting all actors for providing information on the progress of the project work. The monitoring indicators will be adopted under the Monitoring and Evaluation (M&E) system integrating involuntary resettlement management.

RPF Budget and financing: The DoF will arrange the funds (reflected in their DPP) from the Government of Bangladesh and ensure to use these funds for the disbursement of compensation payment and other assistances. The Project will determine the annual inflation rates to be applied to all cash entitlements.

1. INTRODUCTION

1.1 Background

Fisheries are vital for Bangladesh's food security and are central to the livelihoods of millions of fishers and stakeholders along the production chain. However, as in most other developing countries, Bangladesh's coastal and marine fisheries sector is experiencing ever-increasing fishing efforts despite the current lack of stock data to back this up. Inadequate infrastructure in post-harvest handling, processing and marketing of harvested fish, and inadequate monitoring, control and surveillance of marine fisheries and food safety regulation on marketing chain, insecure investment environment and poor management are constraints on sustainable fisheries development. In this context, the Government of Bangladesh (GoB) is looking to increase the role that coastal and marine fisheries and aquaculture play in the country's economic growth involving the Ministry of Fisheries and Livestock (MoFL) and the Department of Fisheries (DoF) under enhanced role, capacity and investments. DoF is looking for ensuring sustainable stock management and improving livelihoods of the fishers and fisheries-dependent households in the coastal areas. GoB, with support from the World Bank (WB), is planning to undertake the Bangladesh Sustainable Coastal and Marine Fisheries Project (BSCMFP), with an aim to increase economic contribution of coastal and marine fisheries as well as ensure sustainability in the sector including poverty reduction.

This Resettlement Policy Framework (RPF) has been prepared to address involuntary resettlement impacts (if any) of the proposed project, in compliance with the national regulatory as well as WB policy requirements. The RPF has been prepared based on an initial social assessment of the project. An Environmental and Social Management Framework (ESMF) has also been prepared separately.

DoF is the lead Executing Agency (EA) of the overall project and upon approval from the Ministry of Fisheries and Livestock the Social Development Foundation (SDF) under the Ministry of Finance (MoF) will be the co-implementor along with DoF for community level activities for livelihood transformation of the poor and vulnerable fishers and fisheries dependent households.

1.2 Rationale and Objectives of the RPF

The project will take up certain rural infrastructure works as well as certain livelihoods interventions in the target communities. There is likely no or least possibility of new private land acquisition, but there is a possibility that these interventions might induce adverse and unintended social impacts. The project may use existing DoF lands, private/ community lands already used by the community for fisheries activities or new lands obtaining through voluntary donation for small-scale infrastructure works for construction/ rehabilitation/ upgrading of fish landing centers, post-harvest processing facilities, and/or rehabilitation of existing water canals. However, exact location of sites of these infrastructures will be known only in the implementation level. Social risks and impacts those have been foreseen at the project appraisal are based on preliminary concept and may not be the precise reality to be faced during implementation. This RPF has therefore been prepared for relevant policies, guidelines, codes of practice and procedures to be adopted while implementing the project.

This RPF will also serve as the guideline for the staff designated by the implementing agencies, mainly, the DoF to oversee and monitor the social safeguards compliance of the project components coming under their

implementation responsibility. The RPF will be a living document and will be reviewed and updated periodically, as needed. The specific objectives of this RPF will be to guide DoF and Co-implementer with the following:

- (1) Social screening for identifying potential social implications of project interventions on involuntary resettlement;
- (2) Carry out social impact assessment and community consultation;
- (3) Inventory of loss of assets and impacts
- (4) Preparation and implementation of resettlement plans
- (5) Provision resources and institutional arrangement including grievance redress; and
- (6) Providing monitoring of management if involuntary resettlement occurs.

1.3 Methodology for the RPF

The RPF has been prepared following the national relevant legislations and the World Bank operational policy on involuntary resettlement (OP/BP 4.12) based on review of secondary information and feedback from community consultations at the local level. The RPF provides the necessary background for social considerations, a checklist of potential social issues of the project activities to be considered and built into the design of the project so that socially sustainable implementation can take place.

1.4 Presentation of the RPF

In addition to this chapter, the RPF has been presented through Chapter 2 for description and potential resettlement impacts of the project; Chapter 3 for legal and policy framework; Chapter 4 for eligibility and entitlements of affected persons; Chapter 5 for discussion on preparation and implementation of Resettlement Plan; Chapter 6 for consultation, participation and disclosure requirements and Chapter 7 for implementation arrangements including GRM, M&E and budget.

1.5 Approval, Disclosure and Updating of RPF

This RPF will be adopted by DoF in due process within the MoFL subject to concurrence by the World Bank on review of the draft RPF shared by the DoF. DoF will disclose the RPF in their official website along with a Bangla translation. The original English version of the RPF will be authorized by DoF for disclosure in the World Bank portal before appraisal.

For unanticipated impacts identified during project implementation and not covered under the eligibility and entitlement provisions of this RPF, new and additional eligibility and entitlement provisions will be determined in accordance with the safeguards requirements of OP 4.12 of World Bank's Involuntary Resettlement and the applicable legal framework of Bangladesh. The standards agreed and established for the eligibility and entitlement provisions of this RPF shall be maintained and may be raised, but not lowered in this RPF or any subsequent RAP.

2. PROJECT DESCRIPTION AND RESETTLEMENT IMPACTS

2.1 Project Location and Resources

The BBSCMFP is a two-phased proposed investment by the Government of Bangladesh (GoB) and the International Development Association (IDA) of the World Bank Group. The project will be implemented in the coastal and marine areas of Bangladesh by the Department of Fisheries (DoF), as the lead executing agency, under the guidance of the Ministry of Fisheries and Livestock (MoFL). The project aims to sustainably increase coastal and marine fisheries' contribution to the economy, poverty reduction through improving management of coastal and marine fisheries and aquaculture and fishing communities' access to alternative livelihoods activities in an environment friendly manner.

The Phase I of BBSCMFP will be implemented in 5 (five) years and have a preliminary budget envelope of around USD 240 million from IDA contribution and cover 75 upazilas of 16 coastal districts. Along with the DoF, upon approval from MoFL, the Social Development Foundation (SDF) under the Ministry of Finance (MoF) will be the co-implementer of the Component-3: Community Empowerment and Livelihoods, where this Resettlement Policy Framework (RPF) is a part, through a Community Driven Demand (CDD) approach. Phase II will be considered and its budget envelopes defined based on successful implementation of the reform project put in place under Phase I.

2.2 Project Components

A Series of Projects (SOP) approach is best suited to support the WB engagement on a wide range of fisheries issues within longer time horizon. SOP offers opportunities for sequencing and scaling project interventions to address immediate and longer-term challenges while augmenting the wealth generated from one of Bangladesh's most important sources of natural capital. Likewise, SOP will allow for expanding the sector's governance foundation through strong citizen engagement, which improves sustainability and can lead to generation of significant economic value from fisheries resources and economic benefits distribution. Hence, the economic potential of coastal and marine fisheries contribution to poverty reduction in coastal communities is enormous.

Inputs for the definition of Phase II investments will be drawn on the outputs of Phase I activities. At the point of transition between MPA Phase I and Phase II, a set of milestones will determine the readiness to launch scaling-up of sector investments. Examples include, completing large fishing vessel registration and fisher's IDs; deploying functional monitoring, control and surveillance (MCS) system with 100 percent industrial vessel and 50 percent with artisanal vessel coverage; updating the National Fisheries Sector Policy; and adopting regulations on co-management and preparing fishery plans in at least 30 communities. The follow-up phase would be realized by scaling-up of the successes of Phase I and closing infrastructure and technology gaps.

The project will support GoB in designing, establishing, and effectively operating fisheries management systems for sustainable utilization of coastal and marine fishery resources. Project financing will be provided for fisheries governance and management systems, infrastructure, and other value-chain investments aimed at increasing the sector's productivity. The BSCMFP Phase I will focus on bringing fisheries policies, regulations, and management capacity up to a level needed to enable stock recovery and opening the space for responsible private-sector investments in the sector.

Phase I of the project will have four components focusing on: (i) enabling sustainable fisheries sector investments and growth; (ii) improving infrastructure and production practices; (iii) community empowerment and livelihoods transformation; and (iv) project management and monitoring. It is further

expected that BSCMFP Phase II will maintain the same 4 component structure but will significantly shift the focus and resource allocation (as compared to Phase I) from component 1 to components 2 and 3.

Component 1: Enabling Sustainable Fisheries Sector Investments and Growth

The component builds on the GoB commitment to update and expand the 2006 National Fisheries Plan to better account for the country's enlarged EEZ and enable critical public-sector infrastructure improvement and technology investments by supporting a set of policy, institutional, research, and MCS measures aimed at reducing overfishing. Activities to be carried out under this component are structured in three sub-components to support the DoF in providing the enabling regulatory, institutional, and financial frameworks and incentive mechanisms for increased sector growth based on (1) more effective management of coastal fisheries with responsibilities shared between DoF and artisanal fishing communities and (2) improved sector transparency, integrity, and accountability. This will be anchored in a broad-based stakeholder engagement, namely within the artisanal and industrial fisheries and those involved in fishing, fish processing, and fish marketing. The project investment envelope will support preparation of management plans and background research, assessments, training, design and implementation of control and monitoring systems, as well as the procurement and installation of infrastructure and equipment for the DoF and other national fisheries research institutions. This component is divided into three sub-components, each of which has set of activities and are as follows:

Sub-component 1.1: Stock Assessment and Development of National Fishery Management Plan

Stock Assessment: Addressing a critical management gap, the subcomponent will invest in fishery-independent data collection and stock assessment for shrimp, demersal, and pelagic stocks. More specifically, leveraging earlier Islamic Development Bank and FAO preparatory work, support will be extended to DoF-led shrimp and demersal stock survey and capacity building efforts as well as for completion of pelagic stock surveys in partnership with the FAO-Nansen program.

Strengthening of catch monitoring systems: Catch monitoring systems would be developed and implemented for both industrial and artisanal fisheries to help verify, track, and update stock data. These systems will cover: (i) on-board observers for industrial and semi-industrial vessels; (ii) catch measurement at landing sites for non-/ mechanized artisanal fishers; and (iii) recording of catches in coastal areas. This outcome is linked to the strategy for Sub-component 1.3: MCS Capacity-Building for IUU Reduction.

Preparation and update of national fisheries management plans: The project will support DoF to prepare participatory national fisheries management plans (zonal and/or species-based) and to implement them based on the 'precautionary principle', to be refined by stock assessments and in consultation with the different fishers' and boat-owners' associations (industrial, non-/mechanized artisanal). Development of fisheries management plans will enable DoF to revise the nation's fisheries policies and regulations based on scientific evidence so that they can address the current context and requirements – e.g. fleet control, MCS and legal enforcement, co-management, and conflict resolution among stakeholders in the sector. The management plans will include appropriate guidelines on gears to be used, fishing locations, catches sizes, species and by-catch. Plan preparation will be supplemented by training for expanding the knowledge of DoF in coastal fisheries management, community outreach and extension, and ecosystem-based fisheries management (EFM).

Sub-component 1.2: Enabling environment for investments in sustainable fisheries

Strengthening fishery policies, legal and regulatory framework: The proposed project will support the DoF to review and update national fisheries policies, legal acts, and regulations. This will be done in consultation with the different fishers' and boat-owners' associations (industrial and artisanal) and relevant government entities, such as the Bangladesh Coast Guard, Bangladesh Navy, Bangladesh Police, Chittagong Port Authority and Bangladesh Customs, MMO and other stakeholders. The supporting regulations to be developed under the upcoming 'The National Marine Fisheries Policy 2015' (currently awaiting Cabinet approval) will provide clear and necessary measures for: (i) vessel registration and fleet capacity management; (ii) licensing management system, (iii) stock monitoring; (iv) MCS enforcement, including joint coordination (e.g. information-sharing and division of responsibilities) with other government entities; (v) co-management by small-scale fishers' associations; and (vi) conflict resolution among different fishers (e.g. to address illegal trawler entry into coastal waters) and regulatory powers for responding to fisheries management needs as they arise.

Reducing investment risks due to regulatory and enforcement gaps: The proposed project will improve the DoF's law enforcement capacity to ensure leveled and predictable investment environment. DoF will receive project support for establishing a legal team and training for functional assessment to determine and carry out the steps necessary for improving its organizational effectiveness in enforcement and prosecution of both domestic and international IUU fishing cases. Assistance will be provided to clarify and institutionalize independent regulatory and law enforcement functions. Project support will be provided for consultation with the Ministry of Law, Justice and Parliamentary Affairs; Law and Justice Division; and judges in the judiciary on new legislations and law enforcement. Training on marine fisheries management and mariculture, co-management, international fisheries negotiations, and licensing and enforcement will be provided to respective DoF staff as well as actors from other institutions involved in maritime domain management. In addition, specialized training for judges and court staffs in the Law and Justice Division of the Ministry of Law, Justice and Parliamentary Affairs will be provided to cover the new legislation for higher levels of prosecution with greater penalties. This will be supplemented by awareness-raising programs on fisheries control issues for effective law enforcement and prosecution. In parallel, DoF's capacity for conflict resolution will be strengthened, including through the establishment of a functional grievances redress mechanism for both artisanal and industrial fishers.

Sub-component 1.3: MCS development for IUU Reduction

Strengthening of fishers and boat registration: The proposed project will support the expansion of the current fishers' ID card system to all artisanal fishers. This includes scaling up the monitoring and reporting conducted by the DoF and other GoB entities on industrial and artisanal fleet regarding sizes, catch, location of vessels, gears, and other aspects. This monitoring serves to verify or update information, control fishing, and achieve sustainability in fisheries. The DoF fishing craft database will be linked to a GIS display and produces visual reports on the locations of vessels by size and gears used. The DoF Fisher's ID Card database will also be linked to GIS coordinates to show locations of artisanal fishers. The project will further support improving coordination and effectiveness of the registration responsibilities currently split between DoF and MMO.

Development of a Joint Coordination Center (JCC): JCC coordinated by the DoF and involving the other policing and enforcement authorities in the marine and coastal sectors (Bangladesh Coast Guard, Bangladesh Navy,

Bangladesh Police, and Bangladesh Customs, MMO), will be established to coordinate Vessel Monitoring System (VMS) and Automatic Identification System (AIS) monitoring, patrolling, information-sharing, enforcement and reporting activities. The project support to JCC will include physical and communications infrastructure, as well as development of protocols and guidance manuals for information-sharing, division of responsibilities, and lines of command among the entities.

Development of information systems for MCS: The project will invest in design, implementation and training for an integrated information system for effective MCS that will include: (i) introducing AIS coverage to the artisanal vessels and universal VMS for the industrial fleet; (ii) implementation of the current Fisher ID system; (iii) a land-based catch monitoring system; and (iv) an on-board observer program for industrial vessels. The investment package will include technical assistance to respective authorities to use the MCS systems (namely the DoF, Bangladesh Coast Guard, Bangladesh Navy, Chittagong Port Authority, Bangladesh Police, and Bangladesh Customs) and enhance coordination and information-sharing in enforcement. A major portion of the investments will be allocated for procurement and installation of the JCC's physical infrastructure and MCS equipment (e.g. for the DoF, Coast Guard, and River Police and in close coordination with the Navy). This package will be in conjunction with training for fishers' and boat-owners' associations on the use of the MCS information system technologies. With the help of Automatic Identification System (AIS), the zones proposed for management can be monitored at low cost and with fewer staff. Selected fishers can be given access to the AIS, and those guards can report any vessel that is in the wrong place or is using illegal nets. This activity will benefit from the experience of the small-scale co-management activities at the level of sub-district multi-local governmental committees supported by the World Fish-DoF implemented EcoFish project.

Component 2: Improving Infrastructure and Production Practices

This component will address the need for investments in multi-dimensional and integrated support for value chain development by supporting improved immediate post-harvest handling and sanitary practices for reduced post-harvest losses, productivity increases, higher product quality, and improved food safety. This component is aligned with the targets of PDO indicator #3. The component will finance investments for improving compliance to standards; establishment of appropriate infrastructure, including cold chain, intermediary handling, and storage facilities (landing sites, depots, collection centers, processing facilities, wholesale markets); use of transport boxes (plastic, polystyrene) during distribution; training on international requirements to meet export standards; facilitating contact with buyers; and support in capacity development along the value chain to follow good practices, among others. The project will support the necessary infrastructure, such as roads and electricity where needed, to sustain the value of investments. The current state of enforcement practices suggests that both market management and fish/food inspection processes are not optimal, especially in terms of controlling quality and safety. The component will support measures for improving genetic quality, biosecurity, and disease control in shrimp hatcheries that are expected to significantly reduce exposure of coastal aquaculture to devastating disease outbreaks and production crashes, while generating further productivity increases of up to 20 percent. In parallel, this will enable additional economic gains by scaling up the cultivation of the higher-market-value tiger shrimp (*Penaeus monodon*). To this end, the project will also build upon and coordinate closely with the on-going

NATP-II complementary work on promoting technology innovation and quality in development of inland fisheries and fresh water shrimp aquaculture.

Infrastructure investments will be implemented in partnership with the private sector where feasible, and will be phased-in in conjunction with the progress of sector management reforms supported by the project, including reducing incentives for additional overfishing by increasing the sector's value. In capture fisheries, the initial efforts will focus on the semi-industrial and motorized artisanal fleet and will be extended to the industrial fleet in sync with the progress of the management reforms. The activities under this component will be implemented under three sub-components, each of which has set of activities and are as follows:

Sub-component 2.1: Infrastructure Improvements for Capture and Culture Fisheries

Infrastructure Improvements Capture: The project will finance infrastructure improvements of landing sites to create the enabling conditions for enhancing the value added in fish processing and marketing chains. For instance, potable water will be necessary for making ice and handling marine or aquaculture species and quality road and/or rail infrastructure and access to reliable electricity are essential for access to markets and operation of export chains. Ice made of potable water will be made available at all points along the value chain -- i.e. production, intermediary nodes (collection centers/depots/landing sites), markets and processors, where fish is handled or changes ownership.¹ Furthermore, chill stores² will be constructed at different nodes to store iced fish at cool temperatures, as this increases the fish value and helps prevent cross-contamination.

Capture fishery landing sites and market infrastructure: The project will finance works and engineering for: auction hall building for auctioning fresh water and marine fish; small-scale fish packing facilities for marine fish to be auctioned off in different localities; small-scale traditional fish landing facilities for fish to be retailed locally; and rehabilitation of selected Bangladesh Fisheries Development Corporation (BFDC) facilities. Demonstration investments under BSCMFP Phase I will target selected sites (e.g., six capture fisheries landing sites that include the new Chittagong wholesale market landing site, Cox's Bazaar, and two semi-industrial fishery landing sites in each of the southeast, central, and western coastal regions) aiming at improving the landing site/port access, fish handling, food safety, and marketing. If these efforts are successful, BSCMFP Phase II will further scale-up this work to other locations in the central and western coastal regions.

Infrastructure Improvements, Culture: Financing will be provided for works for desalting and rehabilitating of canals -- essential for restoring the hydrological infrastructure (dated back to the 1983 WB project) in the Southwest coastal belt. The economic impact is estimated to result in potential increase of farm incomes by 25 percent in the short term. Rehabilitation of canals will increase the technical capacity of SMEs to scale commercial Bagda farming and increase survival and growth rates of three key species (Bagda, Golda and Mud crab) throughout the coastal zone. Support will be provided to expand access to basic utilities,

¹At the processing end of the export chain, the EU approved factories will have appropriate flake ice-making equipment and storage facilities.

² Chill stores hold product at 0-4°C, with fish normally stored in ice in plastic bins. Cold stores hold product at below -18°C, with fish normally wrapped in plastic inside cardboard cartons. Cold stores should not be used to freeze products – blast, plate or IQF freezers should be used for this purpose, before placement in cold stores.

overcoming one of the major obstacles for aquaculture to increase the yield per unit area due to limited availability of 3-phase electricity for pond aeration.

All infrastructure investments will be subject to detailed screening against environmental, social, and disaster risk reduction criteria, including rehabilitation of silted water supply canals and repair of sluice gates to improve water quality and circulation. Where feasible the project will promote green infrastructure technologies for seafood production that also support broader ecosystem services and improve coastal defenses, such as mangrove rehabilitation and artificial sea grass and oyster beds. Services for design and supervision and works will be financed under this sub-component.

Sub-component 2.2: Value chain and food safety

This sub-component will support measures to increase the post-harvest value of catch. The economic effect of infrastructure improvements of aquaculture landing sites would diminish without a significant boost of the knowledge on hygiene and safety practices of key value chain actors, which in turn will directly impact the quality of marketable catch and fisher's livelihoods. Therefore, project investments will promote compliance with food safety standards and adoption of good aquaculture practices that are critical to sustain the value of capital infrastructure improvements.

Bridging the regulatory skills gap: Based on a skills gap assessment, a full cadre of inspectors will benefit from learning opportunities offered through a 'training of trainers' (ToT) model on best-practices for the enforcement of handling and safety regulations. The model will help train fishers, port and landing site and market operators in best practices for handling and food safety. In parallel, a longer-term capacity solution will be sought in partnership with the Marine Fisheries Academy (MFA) and University of Chittagong. A wide range of skills will be needed in the post-harvest sector to maintain quality and ensure food safety, such as: fish handling skills (on boats, in markets, depots, landing centers, at farms and depots, etc.); good hygiene perquisites and practice relevant to all parts of the chain; hazard analysis and critical control point (HACCP) approach to ensure food safety; good aquaculture practices including food safety; traceability in the value chain; use of ice and refrigeration engineering (practical levels); cold store management; trading in fish to ensure quality and safety and management of fish markets. Augmenting its training, and technology- and infrastructure-improvement investments, the sub-component will further support a national multi-year health consumer-awareness campaign on the importance of hygiene and food safety in the fish and aquaculture sector. This will help drive the demand for hygiene and safety changes in the sector, thus contributing to improved public health and stimulating national-market oriented economic growth from the fisheries sector.

Support to Research and Innovation: The activities under this subcomponent will boost innovation and will be instrumental to build Bangladesh's applied marine science and technology capacity by strengthening the government-academia-industry interfaces. Advanced technologies are available at commercial scale in neighboring countries, but the GoB has not been able to use funds for risky experiments. Projects, mostly donor-funded, are the main vehicle for innovation. The initial costs of innovations can be large, and the time needed to establish and scale up the technologies may go beyond five years – the maximum duration of most development projects. In conjunction with research organizations and universities, this subcomponent will pilot technologies that can offer environmentally sustainable growth in the fisheries sector and generate significant employment. The project will facilitate partnerships and support R&D through the National Skills

Development Council and other national capacity development institutions and universities that have capacity for delivery of vocational training programs on priority topics, such as on good practices in aquaculture, fishing, post-harvest practices (including food safety and quality), and in marketing, environmental safeguards, and social and business skills of direct relevance to the long term interests of the fisheries and aquaculture sectors.

Sub-component 2.3: Boosting Coastal Aquaculture Productivity

There is large scope for boosting export earnings from aquaculture through implementing a discrete set of aquaculture investments that will increase the productivity of aquaculture in the coastal zone. To this end, BSCMFP Phase I will support pilot solutions to address the low survival and poor growth performance attributable to poor genetic quality of brood stock and high disease burden in the seed sold to farmers for stocking, by investing in: a) policy and regulatory reform to permit the importation of specific pathogen free (SPF) Black tiger shrimp (*Peneaus monodon*) brood stock and their use by private hatcheries; b) establishment of a centralized brood stock management and breeding program for cultured crustaceans; and c) development of a hatchery certification system so quality brood stock released to private sector hatcheries are properly handled and managed to maximize benefits and minimize risks. The three species³ (Bagda, Golda, and Mud crab) that are most likely to generate significant positive impacts for low-income coastal communities are those with the highest prices and greatest export market demand. The three species have different markets and producer groups, and the project interventions and support can assist a wide range of users and employ a diverse range of people in the value chains.

In conjunction with these reforms, the project will finance investments aimed at addressing the poor genetic quality of brood stock and high disease burden in the seed sold to farmers for stocking. These will further strengthen the government regulatory and oversight capacity in the monitoring and control of infectious crustacean diseases and include: a) upgrading of laboratory facilities for polymerase chain reaction (PCR) and other relevant testing; b) training of laboratory and field staff in sampling protocols and handling; c) establishing a routine visiting and monitoring system; d) establishing an early warning system for disease outbreaks; e) establishing a functioning private hatchery certification program; and f) establishing or participating in breeding programs for faster growth and disease resistance in Golda, Bagda and Mud crab. Successful pilot work from BSCMFP Phase I will be brought up to scale across the coastal belt under Phase II.

Component 3: Community empowerment and livelihoods

This component will use a community driven demand (CDD) approach to support fishers' livelihoods transformation through a holistic support package including financial resources, investments in infrastructure, assets, and capacity building to help poor fisher households break out of the poverty cycle and transform their livelihoods and communities. The package will involve asset transfer and one-time cash grant

³*Peneaus monodon* (Bagda) – a commercial export product that can generate quality jobs and taxable revenues to support broader economic growth. ROI 200%.

Macrobrachium rosenbergii (Golda) – integrated into medium scale farming systems, these generate significant farm revenues by serving mostly local markets and supporting domestic value chains. ROI = 150%.

Scylla serrata/olivacea (Mud Crab) – produced from hatchery seed by very low income, small-scale operators and amenable to women's and other vulnerable groups needing to generate family support revenues through production of a high value per weight product that can be produced with local materials. ROI = 79.2%.

through which the fishing community can secure their livelihoods outside of fishing. This component is aligned with the targets of PDO indicators #4, 5 and 6. An upfront detailed feasibility assessment will be carried out to inform community-specific interventions learning from previous donor support to alternative livelihoods for fishers that ultimately proved unsustainable due to a failure to assess the business, finance, and/or market feasibility of proposed livelihood activities. A household approach will enable the gender equitable distribution of resources to enhance coping capabilities for both men and women. Ultimately, this holistic transformation will be critical not only to achieve poverty reduction in fishing communities, but also to reduce fishing effort and destructive fishing practices and thereby enable more sustainable fisheries management. Component 3 comprises two sub-components: (i) Sub-component 3.1 – Fishing Community Institutions and Alternative Livelihood Development and (ii) Sub-component 3.2 – Business Development and Market Linkages for Alternative Livelihoods, each of which has set of activities, which are as follows:

Sub-Component 3.1 Fishing community institutions and alternative livelihood development

This sub-component will provide support to poor fishing communities to establish community institutions and strengthen their capacity to benefit from project resources such as grants, savings groups, and loans, and to work with DoF on co-management of near-shore coastal fisheries resources (under Component 1)⁴. The following activities will be implemented to attain the component objectives:

Development and Strengthening of Fishing Community Institutions: Project funds will be directed to fishing communities to establish and build capacity of village institutions. The process will begin with a participatory identification of poor fisher households through which the community members will use objective and clearly verifiable criteria to identify the poor and extreme poor fishing households--the primary beneficiaries of this component. To ensure that the livelihood support targets the poor and extreme poor fisher households, technical assistance will be provided for a detailed livelihood needs assessment to determine their current income from fishing and livelihood needs/ capacities/ skills.

Operation of Fishers' Village Group (FVG): FVG sub-committees will manage the day-to-day affairs of the FVG. These will include an Executive Committee that will implement the decisions of the FVG; a Fishers Committee⁵ that will contribute to co-management; a Fisher Credit Group (FCG) to manage a revolving loan fund for fisher livelihoods; sub-committees on Procurement, Finance, and Infrastructure to manage grant funding for basic public infrastructure; and a Social Audit Committee that will independently monitor the FVG activities and verify the use of village funds. All committees will be led by elected members of the FVG, with priority given to the poor and extreme poor fisher households. Resources from an Institution Development Window (IDW) will be granted to support these institutions, including for core training of members on the Community Operations Manual (COM).

⁴ The last preparation mission (August 2017) confirmed that since co-management activities need to be led by DoF and contribute to the governance activities under Component 1, co-management activities under Component 3 will focus on social mobilization of poor fishers, including training to build their awareness of fisheries management and regulations. Once an artisanal boat licensing system and appropriate legal/institutional reforms are in place because of support provided under Component 1, then additional co-management activities, such as boat and gear buy-backs can be implemented without the risk that owners will use the buy-back funds to purchase more boats/gear. Similarly, legal reforms to recognize the property rights of fishing communities need to be finalized to provide these communities with an incentive to participate in fisheries monitoring and enforcement.

⁵ Where existing fishers' associations or other community-based fisheries management organizations exist, these will form or be integrated into the Fishers Committee under this project to avoid duplication and ensure legitimacy.

Basic Community Infrastructure and Transformed Livelihood: Project support in the form of a grant will be directed to each FVG to build basic community infrastructure. The resources will be directed from a Community Infrastructure Support Window (CISW), which FVG will use to procure, build, and manage their priority infrastructure investments. The FVG will first conduct a participatory infrastructure needs assessment to identify critical basic community infrastructure (e.g. small roads, tube wells, small labor-saving devices to improve fish/crop processing). The Infrastructure sub-committee will then work with the Procurement and Finance sub-committee to prepare a procurement plan and operations and maintenance plan for the priority community infrastructure.

Financial support to poor and extreme poor fishing households: Three types of financing will be provided to help the transition out of capture fishing to alternative livelihoods (e.g., livestock production or small businesses), or practice more sustainable and legal fishing: (1) a one-time grant (OTG) to the poorest and most vulnerable fisher households to allow them to purchase or rent key household and/or livelihood assets, such as fishing nets or livestock, and to help them break out of the vicious cycle of debt to fish wholesalers and informal moneylenders; (2) members of the poor and extreme poor fishing households will be supported to establish community savings groups, with priority given to women's savings groups to ensure that both women and men benefit from livelihood support even though most fishers are men, and (3) loan funds through the Livelihood Finance Window (LFW)– a revolving loan fund to support fisher households in adopting either livelihoods outside of capture fishing or sustainable capture fishing practices using legal and non-destructive technologies.

Training on fisheries management, nutrition, climate change, and agriculture: Core skills supporting village institutions and community members in the transition process will be organized through extension agents and trainers to train community members on a variety of topics essential for improving community fisheries, livelihoods, and health, as well as fisheries resilience to climate change and natural disasters. Training topics could include fisheries laws and regulations, including sanctuaries, bans, etc.; basic accounting to help fishers maintain their own loan and production records; behavioral change communication and nutrition activities for women related to fish, and agricultural production practices and technologies. Awareness-raising and behavioral change interventions will promote the adoption of improved dietary practices during critical stages of the life cycle, including pregnancy, breastfeeding, early childhood, and adolescence, when nutrition plays a formative role in determining health and developmental outcomes. These interventions will increase household knowledge of nutritional needs and locally available nutrient-rich foods/ supplements.

Establishment of fisheries co-management: Support to the foundation for community-based fisheries co-management will include a prototype of model fishing villages where fishers have clearly defined near-shore fishing territories and community cohesion is high. Model fishing villages will be established (e.g., 1 per upazila) where interventions and support will be prioritized. Fishers Committee members will complete a participatory mapping of their fisheries resources and will establish Fisheries Co-Management Committees (FCMC) comprising members from several adjacent villages to work with DoF on fisheries management plans and fisheries policy dialogue supported under Component 1.

Gender-equitable and sustainable growth: The project will support generation of data and knowledge to advance the productive and inclusive engagement of workers in the transitioning process, especially women who have a higher likelihood of working on the margins. Activities will include (i) expanding the collection

and availability of gender-disaggregated sector data, (ii) filling knowledge gaps crucial to understanding the constraints and opportunities women and men face in various fisheries and mariculture value chains, and (iii) a skills assessment to identify vocational and training needs to meet the future growth needs of the sector. Moving into BSCMFP Phase II, this knowledge work will be essential for validating investments priorities, ensuring inclusiveness and job creation, value chain development, and overall sectoral growth.

Sub-component 3.2 Business Development and Market Linkages for Alternative Livelihoods

This sub-component will support fisher households, and especially youth in fishing households, to transition out of fishing, by providing a holistic package that facilitate access to job-related training and employment in conjunction with business development, market and financial support. It will empower fisher households and link them to producers with resources and organizations outside their home villages. Activities will be anchored in the capacity of community institutions and will therefore they start in year two or three of the project. Specific activities include:

Build and strengthen producer organizations and market access in fishing communities: Project support will be provided to FVG members to establish producer groups (e.g. fish producers, vegetable producers, poultry producers, etc.) and acquire skills to enhance their ability to obtain competitive prices for their inputs and produce. Facilitation of market linkages with producers will include interaction between FVG members and traders/ processors of products in the down- and up-stream value chains. This will benefit entrepreneurs whose financing needs exceed the capacity of the project loans to access affordable finance from outside financial institutions.

Expand vocational training and employment opportunities: Project support will be directed to enhance the opportunities of youth in fishing households to access wage employment. While it will take time to improve the low average literacy rates and school graduation rates in fishing villages, this activity aims to jumps-start this process by providing youth in poor households with a comprehensive package of training, social support, and access to employers to help them successfully transition out of fishing into self- and wage employment, including outside their village. Remedial training and skills development will be provided to unemployed and underemployed youth in FVG member households to start their own businesses. The activity will also develop partnerships with private firms and associations in e.g. the service sector, telecommunications, technology, garments, and agribusiness sectors and with vocational training institutions and skills development/job creation initiatives to benefit youth in FVG member households.

Component 3 will be implemented in a targeted set of villages, initially targeting up to 450 clusters across up to 14-16 districts to ensure that recipients benefit from technical and facilitation support backed by sufficient resources and capacity building. Priority districts and upazilas have already been identified by DoF based on their relative incidence of poverty, proportion of fishers out of the total population, average proportion of total household income from fishing, and proximity to the coast (list of districts and upazilas identified by DoF by 8/31/2017). Unions and villages will be selected by a site selection committee at the outset of the project implementation phase based on the same criteria, in addition to the presence of existing micro-finance institutions and communities' expressed interest in participating in the project.

Component 4: Project Management and Monitoring

The component will provide funds for establishing and operation of project management, monitoring and evaluation structure within the DoF that is fully integrated within the institutional capacity assistance under Component 1. Specifically, this will include staffing and recurrent costs of the project management unit (PMU); establishment of financial management and procurement management systems acceptable to the World Bank; implementation of the communication plan and the activities related to Access to Information (AI); implementation of governance and accountability actions; monitoring and evaluation (M&E) and third-party audits; stakeholder coordination; and special evaluation studies.

A Technical Implementation Group (TIG), consisting of a team of technical staff, will be responsible for technical guidance and coordination at interdepartmental and interagency levels, provision of technical assistance to DoF's front-line offices and outside executing partners at the district and upazila (sub-district) levels, and overseeing technical implementation quality. The aim is to ensure technical quality, consistency in approaches, and knowledge exchange. At a higher level, MoFL would establish a Program Steering Committee, chaired by the Secretary, MoFL and including representation from key Ministries, to provide policy guidance and facilitate inter-ministerial collaboration, especially with counterpart agencies with which MoFL shares licensing oversight.

The PMU will operate based on approved POM and implementation schedule, which will be updated as necessary during mid-term implementation review. To retain and build on the capacity developed through the project, DoF divisions' technical knowledge will be tapped on a regular basis. The PMU will work with other organizations as service providers for the implementation of Component 3 based on agreed implementation protocols. The PMU will operate within the staffing plan and budget limits determined by annual plans approved at the level of Project Committee. A system for M&E of project results will be established at the outset of the project implementation, which will produce semi-annual reports on project implementation and funds utilization.

2.3 Land Acquisition and Resettlement Impacts

Involuntary acquisition of private land will be fully avoided for any activity under the Project. In case small quantum of land is at all required for some activities such as, markets, hatchery, processing plant, etc., it may be acquired on a voluntary basis on willing buyer-willing-seller terms, where permissible.

2.3.1 Voluntary Land Donation

In case project comes up with the requirement of private land for small infrastructure, project will approach Union Parishad (UP) or the Urban Local Bodies (ULB - Municipalities and City Corporations). UP Chairman/ Ward Councilor, in turn will interact with the land owners and facilitate voluntary donation of land required for the project. This use of voluntary donation option will be limited to small parcels of land. Under no circumstances, the title holder will be subjected to any pressure, directly or indirectly, to part with the land. The consultation process and the agreement will be thoroughly documented by the project. These actions are expected to minimize adverse impacts on the local population and help in project benefits reaching all sections of community. However, transfer of land under voluntary donation will be subject to application of the national laws relevant to property transfer – Transfer of Property Act 1882 amended in 2004 and the World Bank principles on voluntary donation.

2.3.2 Negotiated Land Purchase

In case land is not available through voluntary donation, land will be purchased by the project on willing buyer – willing seller basis. The land price offered will be at replacement value. The physical possession of the land will be taken only after price offered is fully paid and mutation done. The land to be purchased must be free of all encroachment and other encumbrances.

2.4 Potential Resettlement Impacts of the Project

All activities under the project have been proposed within existing available land of DoF. There is least likelihood of acquisition of new land for the project and the existing land for envisioned small infrastructures rehabilitation are largely unused public land without any encroachment. However, since sites are not identified and exact boundary of the civil works will be known only in the implementation stage, it is assumed that involuntary displacement of people might be involved for clearing the project sites. Project's resettlement impacts are therefore, likely to associate with the Component 2 for activities including rehabilitating secondary water canals, improving access to basic utilities, small-scale infrastructure/ building construction for post-harvest collection centers, and production input support. Infrastructure facilities include a hall building proposed for auctioning of fresh water and marine fish; small-scale fish packing facilities for marine fish to be auctioned at different localities; small-scale traditional fish landing facilities for fish to be retailed locally; and rehabilitation of selected BFDC facilities.

Except for dredging of silted landing site in Chittagong river, rehabilitation of secondary water canals is a small-scale infrastructure activity. There will be no rehabilitation work on polders. Likely small-scale, localized waste management issues associate with markets but in all cases improvement to current situation. Stock assessment and monitoring of fish catch under Component 1 may induce reduction in volume of fish trade and employment in the sector and push part of the fishers and fisheries dependent families into other occupations. Access to marine resources is excluded from the provisions of OP/BP 4.12 involuntary resettlement. Component 3 of the project has however, been designed to work with the communities for livelihood transformation of the affected fishers and fisheries dependent families.

Potential resettlement and livelihood impacts under each of the component activities have been anticipated to be minimum. Component specific social impacts including involuntary resettlement and livelihoods impacts have been summarized in the table 2.1.

Table 2.1: Potential Resettlement and Livelihood Impacts of the Project

PROJECT COMPONENT and Activities	Potential Social Impacts
COMPONENT 1: ENABLING SUSTAINABLE FISHERIES SECTOR INVESTMENTS AND GROWTH	
Sub-component 1.1: Stock Assessment and Development of National Fishery Management Plans <ol style="list-style-type: none"> 1. <i>Stock assessment</i> 2. <i>Catch monitoring</i> 3. <i>National fisheries management plans</i> (zonal and/or species-based) based on the 'precautionary principle', to be refined by stock assessments and in consultation with 	Reducing and controlling allowable catch can induce transition of some fishers out of fishing. This is not a safeguard issue as access to marine resources is excluded from the provisions of OP/BP 4.12. However, it is

<p>the different fishers' and boat-owners' associations (industrial, non-/mechanized artisanal)</p>	<p>legitimate issue and Component 3 is specifically designed to address it.</p>
<p>Sub-component 1.2: Enabling conditions for investments in sustainable fisheries</p> <ol style="list-style-type: none"> 1. Regulatory update to introduce "precautionary principle" 2. Institutional capacity building for improved regulatory control and enforcement 3. Institutional capacity for conflict resolution / establishment of a functional grievances redress mechanism for artisanal and industrial fishermen. 4. Establishment and equipment of strategically located coastal surveillance centers. 	<p>Same as above. However, policy interventions investment risks management will create positive social impacts.</p> <p>Construction of small scale infrastructure may induce involuntary displacement of formal and informal users of existing land</p>
<p>Sub-component 1.3: MCS development for IUU Reduction 1.</p> <ol style="list-style-type: none"> 1. A Joint Command Center (JCC) 2. An <i>integrated MCS system</i> for improving safety of life at sea and enabling effective fisheries managed. This will include (i) introducing Automatic Identification System (AIS) coverage to the artisanal vessels, (ii) universal VMS for the industrial fleet; (iii) implementation of the current Fisher ID system; (iv) a land-based catch monitoring system; and (v) an on-board observer program for industrial vessels. 	<p>Interior building rehabilitation activities will not induce any involuntary resettlement but issues of inclusion, gender, public health risks and labor influx may be associated.</p>
<p>COMPONENT 2: Improving Infrastructure and Production Practices</p>	
<p>Sub-component 2.1: Infrastructure Improvements for Capture and Culture Fisheries</p> <ol style="list-style-type: none"> 1. <i>Infrastructure Improvements, Capture:</i> Financing will be provided for infrastructure improvements of landing sites and associated markets: a hall building for auctioning of fresh water and marine fish; small-scale fish packing facilities for marine fish to be auctioned at different localities; small-scale traditional fish landing facilities for fish to be retailed locally; and rehabilitation of selected BFDC facilities. 2. <i>Infrastructure Improvements, Culture:</i> <ol style="list-style-type: none"> a. Support for works for rehabilitating secondary canals b. improving access to basic utilities c. small scale infrastructure/building construction for collection centers d. production input support 	<p>This is the main construction-related component with the largest potential social safeguards issues. Except for dredging of silted landing site in Chittagong, everything else is again small-scale infrastructure, with average footprint of the building commensurable with the buildings to be constructed in Comp 1.</p> <p>In addition to buildings, support for (el. Utility) connections and or secondary canal and water sluice gates rehabilitation. No work on polders.</p> <p>No land acquisition but construction of small scale infrastructure may induce involuntary displacement of formal and informal users of existing land.</p> <p>There may also be issues of inclusion, gender, public health risks and labor influx associated with the activities.</p>

<p>Sub-component 2.2: Value chain and food safety</p> <ol style="list-style-type: none"> 1. Training 2. Research focused on mariculture development 	<p>No involuntary resettlement or livelihoods impacts are expected.</p>
<p>Sub-component 2.3: Boosting Coastal Aquaculture Productivity</p> <ol style="list-style-type: none"> 1. Brood stock quarantine and certification 2. Upgrading of laboratory facilities 3. Grant facility for mariculture piloting establishing or participating in breeding programs for faster growth and disease resistance in Golda, Bagda and Mud crab. Successful pilots will be scaled up across the coastal belt under Phase II project. 	<p>No involuntary displacement issues will be associated. There may also be issues of inclusion, gender, public health risks and labor influx associated with the activities.</p>
<p>COMPONENT 3: Community Empowerment and Livelihoods</p>	
<p>Sub-component 3.1 Fishing Community Institutions and Alternative Livelihood Development</p> <ol style="list-style-type: none"> 1. Community Driven Demand (CDD) in 450 villages, focusing on community mobilization 2. CDD EPAs (Entry Point Activities) in 100 (MFV) villages involving small community works under the Community Infrastructure Support Window (CISW), 3. Training, including CC/ DRR, alternative livelihoods, fisheries management, improved nutrition linked to fish, etc. 	<p>Standard CDD livelihoods improvement program – no involuntary resettlement issues are expected. Small infrastructure construction may be involved on existing available land upon confirmation of negative social attributes.</p>
<p>Sub-component 3.2 Business Development and Market Linkages for Alternative Livelihoods</p> <ol style="list-style-type: none"> 1. Vocational training 2. Placement support 3. M&E 	<p>No involuntary resettlement impact is associated. However, the program will follow all-inclusive selection and placement approach.</p>
<p>COMPONENT 4: Project Management and Monitoring The component will provide funds for establishing and operation of project management, monitoring and evaluation structure within the DoF</p>	<p>This component will be conducive for involuntary resettlement screening, assessment and management. Adequate staff resources will be ensured with DoF for social safeguards management in project cycle.</p>

3. LEGAL AND POLICY FRAMEWORK

3.1 Resettlement Policy Framework (RPF)

The project does not envisage any involuntary acquisition of private land, however, recognizes potential involuntary displacement effects associated with small-scale local infrastructure construction and rehabilitation. Small parcels of land may also be taken for project civil works on voluntary donation or direct purchase approach. The project therefore adopts a legal and policy framework for management of potential involuntary resettlement impacts relating to the project interventions. This RPF has been prepared under the provisions of the national legal and regulatory framework relevant to land acquisition and resettlement in Bangladesh, and the World Bank's operational policy on Involuntary Resettlement (OP 4.12). Land Acquisition in Bangladesh is governed by the Acquisition and Requisition of Immovable Property Act, 2017. Land transfer on willing buyer and willing seller approach is governed by the Transfer of Property Act 1882 amended in 2004 by the Act 26. However, there are gaps in requirements between the two sets of instruments - Bangladesh legal and regulatory framework (as stated herein) and the World Bank OP 4.12 on Involuntary Resettlement, this framework provides measures to reconcile and address the gaps in a manner consistent with OP 4.12 compliance requirements.

3.2 National Legal and Regulatory Framework

Infrastructure development projects using lands in Bangladesh is designed and implemented under the legislative and regulatory framework to compensate the affected persons due to land acquisition using the power of eminent domain. Whenever it appears to the Government that any property in any locality is needed or is likely to be needed for any public purpose or in the public interest, the property is acquired using existing laws and regulations. Land acquisition as of September 2017, was governed by the Acquisition and Requisition of Immovable Property Ordinance, 1982 (Ordinance II of 1982). The ordinance has now been replaced with the new act, "The Acquisition and Requisition of Immovable Property Act, 2017 (Act 21 of 2017) supersedes earlier laws including the Land Acquisition Law of 1894 and others that have been in force between 1947 and 1982. In addition to the Act 21 of 2017, acquisition of any land or forest area in Chittagong Hill- Tracts (CHT) districts requires consent under the Chittagong Hill-Tracts (Land Acquisition) Regulation 1958, the CHT Regional Council Act 1998 and the Forest Act (1927). There is no national policy in Bangladesh governing social effects of infrastructure development projects on the project area communities. However, the Constitution of Bangladesh provides some rights to the affected persons, communities and groups those are not upheld in the Ordinance II of 1982 which is the instrument followed for land acquisition.

3.2.1 Constitutional Provisions

The fundamental rights under the Constitution indicate the general guidelines for a policy on resettlement/rehabilitation of citizens adversely affected (whatever be the mechanism) due to any activity of the State. Article 40 of the constitution states categorically that every citizen has the right to practice any lawful occupation which implies that anything impeding such right (a) should not be done or (b) there should be supplementary measures to make recovery of the losses incurred by the citizen. Resettlement and rehabilitation of adversely affected people due to infrastructure projects very clearly falls within this requirement for supplementary measures. However, as per Article 42, sub-clause 2, no law with provision of

compensation for acquisition of land can be challenged in a court because such compensation has been inadequate. However, under World Bank OP 4.12 Involuntary Resettlement, every affected person will have access to a project specific Grievance Redress Mechanism for dispute resolution before the matter is moved to the courts. Complaints, the resolution process and the outcome will be reviewed by the project proponents as well as the Bank. Until the dispute is resolved the funds for the disputed asset must be held in an escrow account (top-up payments due from the project agency can be held until the project closes; the amount placed with the DC may be held for 10 years or more if necessary).

3.2.2 The Acquisition and Requisition of Immovable Property Act 2017

The principal legal instrument governing land acquisition in Bangladesh is the Acquisition and Requisition of Immovable Property Ordinance, 1982 (Ordinance II of 1982 with amendments upto 1994), which recently replaced by the new law (Act 21 of 2017) and other land laws and administrative manuals relevant to land administration in Bangladesh. According to the Act and the formal Ordinance, whenever it appears to the Government of Bangladesh that any property in any locality is needed or is likely to be needed for any public purpose or in the public interest, the Government can acquire the land provided that no property used by the public for religious worship, graveyard and cremation ground. The 1982 Ordinance/ Act 21 of 2017 requires that compensation be paid for (i) land and assets permanently acquired (including standing crops, trees, houses); and (ii) any other damages caused by such acquisition. The Deputy Commissioner (DC) determines (a) market value of acquired assets on the date of notice of acquisition (based on the registered value of similar property bought and/ or sold in the area over the preceding 12 months), and (b) 200% premium on the assessed value for land and 100% for non-land assets on the land due to compulsory acquisition. There are also provisions for payment of crop compensation to tenant cultivators.

The law specifies methods for calculation of market value of property based on recorded prices obtained from relevant Government departments such as Registrar (land), Public Works Department (structures), Department of Forest (trees), Department of Agriculture (crops) and Department of Fisheries (fish stock). Given that people devalue land during title transfer to minimize tax payment, compensation for land paid by DC including premium largely remains less than the actual market price.

The Ministry of Land (MoL) is authorized to deal with land acquisition. The MoL delegates some of its authority to the Commissioner at Divisional level and to the Deputy Commissioner at the District level. The Deputy Commissioners (DCs) are empowered by the MoL to process land acquisition under the Ordinance and pay compensation to the legal owners of the acquired property. Khas (government owned land) lands should be acquired first when a project requires both khas and private land. If a project requires only khas land, the land will be transferred through an inter-ministerial meeting following the acquisition proposal submitted to DC or MoL, as the case may be. The DC is empowered to acquire a maximum of 50 standard bigha (6.75 ha) of land without any litigation where the Divisional Commissioner is involved for approval. Acquisition of land more than 50 standard bigha is approved from the central land allocation committee (CLAC) headed by the chief executive of the Government of Bangladesh proposed by the MoL.

The land owner needs to establish ownership by producing record-of-rights to be eligible for compensation under the law. The record of rights prepared under 4.143 or 144 of the State Acquisition and Tenancy Act 1950 (revised 1994) are not always updated and as a result, legal land owners have faced difficulties trying to “prove” ownership. The affected person (AP) has also to produce rent receipt or receipt of land

development tax, but this does not assist in some situations as a person is exempted from payment of rent if the area of land is less than 25 bighas (3.37 ha).

3.2.3 The Chittagong Hill–Tracts (Land Acquisition) Regulation, 1958

Most of the land in CHT belongs to the Government either as reserve forest or as unclassified state forest. The CHT Regulation I of 1900 was the sole legal instrument for the governance and administration of the Hill Tracts. Under the regulation, the DC could resume land even though settlement of the same might have been given earlier. The rule prescribed payment of compensation for various interests as in the case of land acquisition. To expedite the acquisition of land in CHT, the Government made the CHTs (Land Acquisition) Regulation, 1958. This regulation has provision for payment of compensation for requisitioned property. The compensation may be fixed by agreement or by rules framed on this behalf.

3.2.4 The CHT Regional Council Act, 1998

The National Parliament of Bangladesh in 24 May 1998 passed the Peace Accord 1997 as the “CHTs Regional Council Act, 1998 (Act 12 of 1998). In addition to re-establishing peace, the Accord recognized the ethnic people’s right to land, culture, language, and religion. The Accord set out detailed provisions for strengthening the system of self-governance in the CHT, and redressing the most urgent land-related problems including resolution of land disputes by a commission on land, the transfer of authority for land administration to the hill district councils (HDCs), the cancellation of lease granted to non-residents during the conflict period, the distribution of land to ethnic or “SECs” villages, and the strengthening of customary land rights. Under this Act, no lands, hills and forests within the control and jurisdiction of the HDCs shall be acquired or transferred by the government without consultation and consent of the Regional Council. No law will be executed in the region which is not developed and enacted in consultation and agreement with the SECs peoples in CHT. A ministry on CHT Affairs was established by appointing a Minister from among the SECs (communities of hill districts). An Advisory Council from the CHT region assists this ministry.

3.2.5 Transfer of Property Act, 1882

The Transfer of Property Act, 1882 (with amendments in 2004) provides for legal requirements and procedures for voluntary donation of property. Under the provision of sections 122 to 126 of the Act, a person (called donor) can transfer certain existing moveable or immovable property voluntarily and without consideration to another person (called donee). However, this gift or voluntary donation must be executed during the lifetime of the donor. Such voluntary transfer of moveable or immovable property must be affected by a registered instrument signed by or on behalf of the donor, and attested by at least two witnesses.

3.3 The World Bank Involuntary Resettlement Policy

The World Bank’s policy on involuntary resettlement takes the position that if development induced displacements are left unattended, it often gives rise to severe economic, social, and environmental risks: production systems are dismantled; people face impoverishment when their productive assets or income sources are lost; people are relocated to environments where their productive skills may be less applicable and the competition for resources greater; community institutions and social networks are weakened; kin groups are dispersed; and cultural identity, traditional authority, and the potential for mutual help are

diminished or lost. This policy includes safeguards to address and mitigate these impoverishment risks to people affected by infrastructure projects.

The involuntary resettlement safeguards cover physical displacement (relocation, loss of residential land, or loss of shelter) and economic displacement (loss of land, assets, access to assets, income sources, or means of livelihoods) because of (i) involuntary acquisition of land, or (ii) involuntary restrictions on land use or on access to legally designated parks and protected areas.

The overall objectives of the Policy are given below:

- Involuntary resettlement should be avoided where feasible, or minimized, exploring all viable alternative project designs. Where it is not feasible to avoid resettlement, resettlement activities should be conceived and executed as sustainable development programs. Providing sufficient investment resources to enable the persons displaced by the project to share in project benefits. Displaced persons should be meaningfully consulted and should have opportunities to participate in planning and implementing resettlement programs.
- Displaced persons should be assisted in their efforts to improve their livelihoods and standards of living or at least to restore them, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.
- The Policy defines the requirement of preparing a resettlement plan (when the project site/s is/are clearly known) or a resettlement policy framework (where exact site is not known), to address involuntary resettlement. This policy includes safeguards to address and mitigate these impoverishment risks.

The key Principles of World Bank Involuntary Resettlement Policy are:

- The need to screen the project early in the planning stage,
- Carry out meaningful consultation,
- At the minimum, restore livelihood levels to what they were before the project, improve the livelihoods of affected vulnerable groups
- Prompt compensation at full replacement cost is to be paid,
- Provide displaced people with adequate assistance,
- Ensure that affected people who have no statutory rights to the land that they are working and are eligible for resettlement assistance and compensation for the loss of no land assets and
- Disclose all social safeguard documents.

3.4 Gap analysis of OP 4.12 and National Laws

There are some gaps between existing land acquisition law of the country and WB Operation Policy on Involuntary Resettlement (OP 4.12) in terms of identification of affected persons and compensation packages. Gaps between GoB LA law (new Act 21 of 2017) and WB OP 4.12 and suggested mitigation measures are given in Table 3.1 below.

Table 3.1: Gaps between GoB LA laws and World Bank OP 4.12.

Sl. No	Gaps between WBG OP 4.12 and GoB Act 21 of 2017	Gap-filling measures/ actions to be taken in this Project
1	Avoidance and minimization of project impacts.	The project designs should aim to minimize impacts and adjusted tracks and station design further to reduce impacts.
2	Existing GoB laws recognize title owners only; informal settlers are not covered.	All affected persons irrespective of titles will need to be identified for compensation and assistance.
3	Existing laws and methods of assessments do not ensure full replacement costs.	Provisions will be adopted for additional top up payments to ensure replacement costs at current market price. Transaction cost will be built upon on current market price and no depreciation, tax or deductions will be applied.
4	Consultation with affected community not legally required.	Extensive consultations were carried out during the preparatory phase; similar consultations will continue during project implementation.
5	The affected land owners can object to the acquisition in the beginning but once hearing is done and settled, there is no scope of further complaint during the acquisition process.	There will be a provision of grievance redress mechanism (GRM) in the project to hear grievances and resolve them amicably to the satisfaction of the aggrieved persons.
5	No relocation assistance or support under the land acquisition law (Act 21 of 2017).	Affected households and businesses will be assisted for their relocation, financially and institutionally, from the project.
6	No support or program for income and livelihood restoration.	The project benefits will include income and livelihood restoration.
7	No provision for reconstruction of common property resources.	The project will reconstruct all religious, cultural and community structures, if affected by the project.

3.5 Principles of Project Resettlement Policy

The broad principles of the Resettlement Policy Framework (RPF) are as below:

- The adverse impacts on persons affected by the project would be avoided to the extent possible.
- Where the adverse impacts are unavoidable, the project-affected persons (PAPs) will be assisted in improving or regaining their standard of living. Vulnerable groups will be identified and assisted to improve their standard of living.
- All information related to resettlement preparation and implementation will be disclosed to all concerned, and community participation will be ensured in planning and implementation.
- The persons affected by the project who does not own land or other properties but have economic interest or lose their livelihoods will be assisted.

- Before taking possession of the lands and properties, resettlement and rehabilitation (R&R) assistance will be made to those who are eligible to receive the entitlements.
- Probable entitlement assistance framework of different categories of project-affected people has been assessed and is given in the entitlement section. Anyone moving into the project area after the cut-off date will not be entitled to assistance.
- Appropriate grievance redress mechanism (GRM) will be established at project level to ensure speedy resolution of disputes.
- All activities related to resettlement planning, implementation, and monitoring would ensure involvement of women. Efforts will also be made to ensure that vulnerable groups are included.
- All consultations with project affected parties shall be documented. Consultations will continue during the implementation of resettlement and rehabilitation works.
- As required, a Resettlement Action Plan (RAP) will be prepared including a fully itemized budget and an implementation schedule.

3.6 Project Principles and Process for Voluntary Acquisition of Land

The project will least seek and avoid involuntary acquisition of private land and in critical circumstances of small-scale local infrastructure constructions, voluntary acquisition approach will be pursued following the Transfer of Property Act 1882 (para 3.3.5 above) in compliance with the World Bank principles as follows:

1. The infrastructure must not be site specific.
2. The impacts must be minor, that is, involve no more than 10 percent of the area of any holding and require no physical relocation of people.
3. The land required to meet technical project criteria must be identified by the affected community, not by the executing agency (nonetheless, technical authorities can help ensure that the land is appropriate for project purposes and that the project will produce no health or environmental safety hazards).
4. The land in question must be in the absolute ownership of the donor free of squatters, encroachers, or other claims or encumbrances.
5. Verification (for example, notarized or witnessed statements) of the voluntary nature of land donations must be obtained from each person donating land.
6. If any loss of income or physical displacement is envisaged, verification of voluntary acceptance of community-devised mitigatory measures must be obtained from those expected to be adversely affected.
7. If community services are to be provided under the project, land title must be vested in the community, or appropriate guarantees of public access to services must be given by the private titleholder.
8. Grievance mechanisms must be available.

3.6.1 Voluntary Land Donation

In case project comes up with the requirement of private land for small infrastructure, project will approach Union Parishad (UP) or the Urban Local Bodies (ULB - Municipalities and City Corporations). UP Chairman/ Ward Councilor, in turn will interact with the land owners and facilitate voluntary donation of land required for the project. This use of voluntary donation option will be limited to small parcels of land. Under no circumstances, the titleholder will be subjected to any pressure, directly or indirectly, to part with the land. The consultation process and the agreement will be thoroughly documented by the project. These actions are expected to minimize adverse impacts on the local population and help in project benefits reaching all sections of community.

Table 3.2: Process of voluntary donation of land.

Level	Process	Output	Responsibility
DoF, UP, ULB at Village Level	<p>Based on the land survey, lands will be identified and the list of titleholders will be prepared. This will be done by DoF field office with the help of Union Parishad and partner organization. UP motivates the title holders for voluntary land donation required for the project. The UP will help in this process and will document the willingness to donate land by the titleholders and encroachers in the presence of the UP Chairman/ Ward Councilor in the form of a Willingness Letter.</p> <p>The list of such persons will be displayed at the UP-ULB Office.</p> <p>UP or ULB and Co-implementer jointly verify the land and after completion of verification, UP or ULB and Donor both will communicate this decision to AC Land Office/ DC office. The Donor with the assistance of Surveyor from local registration office gets the land surveyed and demarcated in the presence of adjoining land owners. Disputes and claims, if any will be resolved then and there. After verification, UP calls a meeting where all the information about the land is shared and discussed and if approved in the meeting, then UP will proceed further to donation of the land.</p>	Willingness Letters	Chairman, UP/ Mayor, ULB, DoF and Titleholder
Upazila Level	<p>Revenue Official, in presence of UNO or his/ her designated representative, surveys the land and demarcates the extent of area required. The survey will identify if the land is public, private or encroachment. Based on the survey, maps are prepared. The entire process will be carried out along with UP and relevant land administration body. The maps will be signed by Chairman, UP and concerned Revenue Officer.</p>	Survey map signed by relevant persons indicating the extent of land required.	UNO, Revenue Surveyor, Chairman, UP
District Level	Formalize relinquishment of land rights where concerned local people voluntarily donate their private land for the	Effect Changes in Land	District Collector, UNO

Level	Process	Output	Responsibility
	project for public purpose. This land is then registered in the name of DoF. Later the Land Dept. updates their records, through mutation, once the DoF applies for mutation. From then on land belongs to DoF.	Revenue Records	
	The entire process of consultation and agreement will be thoroughly documented.	Documentation	District Office of Co-implementer

3.6.2 Rules for Transparency in Donation

To make this process transparent, the following rules are prescribed:

- The Title holder should not belong to the Poor/ Poorest of the poor/ vulnerable sections.
- The Title holder should be holding more than the minimum prescribed land, i.e., 1 hectare of wet land and 2 hectares of dry land after donation.
- The impacts must be minor. The voluntary donation should not be more than 10 percent of the area of that land holding of the Titleholder in that category of land (dry, wet or commercial/ residential). This should not require any physical relocation of the Titleholder.
- Project should ensure that the land is appropriate for the purposes and that the project will not invite any adverse social impacts by procuring this land.
- The land in question must be free of squatters, encroachers, or other claims or encumbrances.
- Verification of the voluntary nature of land donations must be obtained from each of the persons donating land. This should be in the form of notarized witnessed statements.
- In case of any loss of income or physical displacement is envisaged, verification of voluntary acceptance of community-devised mitigation measures must be obtained from those expected to be adversely affected.
- The Title holder donating land should be provided access on priority basis, subject to eligibility, to the Government housing/ poverty reduction/ livelihoods/ etc. programs operating in the area.
- The Title holder donating land should made to understand that they will have equal access to the infrastructure built on the donated land like any other community member and those they cannot claim for any priority treatment.
- The whole consultation process will be documented and recorded.
- Grievance mechanisms must be available.

3.6.3 Negotiated Land Purchase

In case land is not available through voluntary donation, land will be purchased by the project on willing-buyer willing-seller basis. The land price offered will be at replacement value. The physical possession of the land will be taken only after price offered is fully paid and mutation done. The land to be purchased must be free of all encroachment and other encumbrances.

3.7 Other Considerations

Mitigating adverse effect: Before taking possession of any water body, pond, estuary, structures, land, and similar resource base and before start of activities, Project Affected Persons (PAPs) will be given R&R

assistance. The project will ensure that the standard of living of all affected persons is restored to the level enjoyed before the commencement of the project, and, if possible, improved.

Replacement cost: Market surveys are required to establish fair rates for assets lost by PAPs, so that they may replace those at current prices in accordance with the government regulations and for other potential yearly harvests, crops etc. lost by share-croppers or lease-holders.

Entitlements to affected people without legal rights to land: The PAPs will be carefully screened to ensure that R&R assistance is provided only to vulnerable families who are screened out.

Measures to avoid illegal occupation in the resource base for project activities: The preparation of a rehabilitation plan will require that an early cut-off date, preferably at the time of the baseline survey, is established. DoF will ensure that the information on cut-off date and eligibility are provided to the people with the clear understanding that anyone illegally occupying the land after the cut-off date will not be entitled to any compensation and, or assistance. DoF or the co-implementing agencies will also take appropriate measure to ensure that all lands that is identified for project activities (for example market structure development, hatchery establishment or processing facility extension etc.) remains clear of squatters. Experience shows that the most effective means of preventing reoccupation of cleared land is to include local communities in the prevention and reporting of such occupations.

Relocation of displaced PAPs: Affected households will be provided with viable options for relocation to choose from that may include, among others: self-relocation; special package for transfer to the place of origin; and relocation to a suitable resettlement site on other public lands in the vicinity. Where attempts to find suitable relocation, sites are not successful or the locations of identified sites are not acceptable to the PAPs, other options will be considered in consultation with the WB.

Social Networks: Planning will consider existing social networks such as families, clans, religious groups, cooperative labor arrangements and the like. The goal of any intervention will be to minimize disruption of existing social networks.

Entitlements: Compensation amounts will be based on the principle of replacement value. The exact value of compensation and replacement cost may be different for each activity and will be based on an economic and social survey of the area of the activity and of affected persons in accordance with the government regulations.

4. ELIGIBILITY AND ENTITLEMENTS

In absence of involuntary acquisition of land using the eminent domain law of the country, no compensation and assistance what so ever applies to affected parties due to resume of existing available land and any public land from private uses. However, under the provision of involuntary resettlement requirements of the World Bank, and the harmonized resettlement policy framework, any involuntary displacement of peoples causing physical relocation and impact on income and livelihoods will be helped with R&R assistance for relocation and livelihood restoration. However, the displaced persons will be recognized for R&R assistance entitlements under certain eligibility criteria discussed hereunder.

4.1 Eligibility

People who occupy or derive livelihoods from a piece of land prior to the cut-off date and who will be physically and/ or economically displaced due to permanent or temporary loss of access to land, and loss of structures and/ or livelihood, whether full or partial, because of the project will be eligible for R&R assistance entitlements under this RPF. Such eligible PAPs include the following:

- i. Formal or informal users of existing available land or public land and/ or recognized legally or socially;
- ii. Lessees (leaseholders) of public land, whether long-term or short-term;
- iii. Tenants with or without formal legal registration according to national law;
- iv. Informal users of land to be acquired for project activities causing temporary/ permanent displacement partially/ fully;
- v. Business owners, whether registered under national law or informal;
- vi. Employees of private or public businesses or enterprises, whether registered under national law or informal;
- vii. Cultivators of plants and tree seedlings, irrespective of legal status of property relation to land;
- viii. Vulnerable persons, including households headed by women, elderly and/ or disabled persons, the households in local context with per capita incomes at or below the poverty line.
- ix. Mobile vendors and others who may be drawing livelihoods from the area.

4.2 Cut-Off Date

Eligibility for entitlements under this RPF is limited by a cut-off date, determined at the time of social impact assessment (SIA) survey and applicable at the beginning of a census of PAPs. The date of census of affected persons is usually considered as the cut-off-date for World Bank projects. Any person moving into the land located within the specific location of the sub-project after this cut-off date will not be eligible for compensation, relocation and livelihood restoration and rehabilitation entitlements. DoF will establish the cut-off date which will be disclosed to the PAPs through consultative meetings, focus group discussions (FGD) and field surveys, and formalized through documentation and disclosure of reports.

4.3 Entitlements

Full replacement cost as compensation is the basic principle guiding the allocation of entitlements, i.e. the sub-projects will replace in-kind or cash what is lost in terms of structures, livelihood, community facilities and services, with special provisions for the improvement of livelihoods of vulnerable displaced persons, sharing of project benefits and unanticipated impacts. The entitlements will be in accordance with the government regulations.

The entitlement matrix for each site RAP will be specific to the types of impacts, losses and eligible persons in the activity, while the provisions made in this RPF include a wider range of possible cases, which may rise under the project activities. Each individual PAP will be eligible for a combination of entitlements specific to his/ her loss and property relations to the lost assets, income and livelihood means.

4.3.1 Structures

For the partial loss of structure/ percent of the total of a residential, commercial, public and community structure or its alteration (taking into account functional/ economic viability of remaining or un-affected part of the structure), the owners, including the informal land users, will receive cash compensation for the lost parts of a structure at replacement cost and for the repair of the remaining structure at the market rate for materials, labor, transport and other incidental costs, without deduction of depreciation for the age of the structure. They have the right to salvage all usable materials from the lost structures without any deduction in payment of compensation for salvaged items.

Lessees and rental tenants receive a cash refund at the rate of the rental fee proportionate to the size of the lost part of the structure and the duration of the remaining lease period.

For the full loss of a residential, agricultural, commercial, public and community structure/ percent of the total structure (considering functional/ economic viability of remaining structure), the owners, including informal users will receive cash compensation at replacement cost, including all transaction costs (such as applicable fees and taxes), without deduction of depreciation for age. The owners have the right to salvage all usable materials from the lost structures.

If minor structures, such as fences, sheds or latrines, need to be moved, their owners or the lessees and tenants, depending on the arrangements between owners and tenants, may either receive cash compensation for the structure at the current market rate for the cost of labor, materials, transport and other incidental costs, as required, without deduction of depreciation for age.

For stalls and kiosks of vendors either alternative sites comparable in business potential to the lost location will be provided together help for shifting. The vendors may choose to receive cash compensation towards self-relocation as well to a self-identified site for their stalls at the current market rate for the cost of labor, materials, transport and other incidental costs, as required, without deduction of depreciation for age.

4.3.2 Trees

Owners of affected trees and tree seedlings will receive cash compensation and the executing agency will re-plant the trees with a ratio of 1:3. The compensation will be made at the replacement cost of the trees. Fruit-bearing trees; if the tree is at or near fruit-bearing stage, the estimated current market price of the fruit produce for 3 seasons will be paid. The owners will be allowed to fell trees and take the timber, free of cost.

4.4 Resettlement and Relocation

Relocation assistance: Where applicable, PAPs will be provided logistical support for the identification and purchase or rental of replacement plots and/or structures, or the construction of new structures as well as with all related administrative tasks. Physically displaced persons will self-relocate at individual sites and establish structures of their own choice.

Transport allowance: All affected households to be relocated due to loss of access to land for residences, business premises or agricultural land, are entitled to receive a cash allowance to cover the cost of transport of people and their movable property (furniture, household items, personal effects, machinery, tools etc.) and of setting up at the new premises at the current market rate for labor, vehicle hire, fuel and incidental costs. A lump sum amount of compensation (covering all items mentioned) will be provided to the affected persons.

4.5 Income Restoration

Maintenance of access to means of livelihood: DoF will ensure that the business premises and residences of persons in the project area remain accessible, by either avoiding the obstruction of such access or by including special provisions for access in the technical design of sub-project facilities. The relevant sub-project RAP will elaborate on specific anticipated impacts and outline measures to ensure access.

Businesses: For the temporary loss of business income due to relocation and/ or Resettlement or construction activities by the project, the owner of a business will receive cash compensation equal to the lost income during the period of business interruption up to 3 months in accordance with the government regulations. The loss of income will be determined through census of affected persons and inventory of losses.

For permanent loss of business due to relocation without the possibility of establishing an alternative business or re-establishing the lost business at a new location, the owner will be compensated with (i) cash compensation equal to the lost income for 3 months assessed through census in accordance with the government regulations. DoF will determine the business restoration allowance with the help of PAVC. DoF/ Co-implementer will assist the displaced businesses identifying alternative business sites or job placements.

Employment: Loss of employment due to relocation or construction activities among all laid-off employees of affected businesses will be compensated through cash compensation equal to the lost wages during the period of employment interruption up to 3 months, based census and inventory of losses survey in accordance with the government regulations. An arrangement of payment disbursement between employer and laid-off employees would need to be documented, verified and made part of the RAP.

Public services and facilities: Public services and facilities interrupted and/ or relocated due to relocation will be fully restored and re-established at their original location or a relocation site. All compensation, relocation, restoration and rehabilitation provisions of this RPF are applicable to public services and facilities. These include but are not limited to schools, health centers, parks, community centers, local government administration, water supply, shrine and graveyards. However, for shrine and graveyard, the consent of the religious persons, local persons as well and local administration will be sought to mitigate the impact. Impacts on religious sites will be avoided as much as possible.

Vulnerable PAPs: All vulnerable PAPs are entitled to livelihood restoration/ improvement support in the form of cash, job-placement, and additional financial support in the form of grants for investments in business or re-employment related equipment and buildings, as well as organizational and logistical support to establish the PAP in an alternative income generation activity.

Women: To ensure a clear understanding and due consideration of specific relocation and/ or resettlement impacts on displaced women and to safeguard their livelihoods, specific provisions for women will be adopted for the resettlement process, including (i) enumeration of all women and, if applicable, of their status as heads of household or otherwise vulnerable persons; (ii) collection of gender disaggregated socio-economic data; (iii) consultation of women in joint or separate meetings; (iv) due consideration of grievances lodged by women; and (iv) provision of compensation and/ or new titles to women if they are titled or recognized owners of lost assets, and provisions of restoration and rehabilitation measures to women, if households are female headed or women’s livelihood is directly concerned. The RAP for relevant sub-projects will detail the scope of impacts on women and where required gender action plans will be prepared, implemented and monitored within or outside RAPs.

4.6 Entitlement Matrix

Compensation and entitlements to the displaced persons will be commensurate to the resettlement policy framework proposed for this project. Based on good practice examples and the potential impacts to be associated with the project activities, the following matrices define the specific entitlements for different types of losses, entitled persons (EP), and the institutional responsibility to implement them.

Table 4.1: Compensation and Entitlement Matrices

Loss and impacts	Entitled Persons	Entitlements	Application Guidelines and responsibilities
Residential and commercial structures	Displaced leaseholder	Compensation for structures at replacement cost;	DoF will determine the replacement cost of structures with the help of property assessment and valuation committee (PAVC) in accordance with existing government regulations;
	Informal land users	Transfer and reconstruction allowance. Assistance for finding alternative sites.	PAVC will also guide inventory of loss of structures for quantity and type by construction materials. DoF will determine and pay compensation for structures. Transfer allowance per household/ shop. Transfer allowance and relocation assistance will be applicable for full loss of structures of a household or shop/ business without any scope to continue in remaining structure.
	Tenants of residences and	Alternative housing allowance	Alternative housing allowance will be determined by PAVC. Shifting allowance for household or shop.

Loss and impacts	Entitled Persons	Entitlements	Application Guidelines and responsibilities
	businesses premises	Shifting allowance	
2. Business, income and employment	Displaced business operators Wage employee	Business restoration allowance. Assistance for finding alternative business sites. Employment in reconstructed enterprise or in project civil works.	DoF will determine the business restoration allowance with the help of PAVC; DoF/ Co-implementer will assist the displaced businesses identifying alternative business sites or job placements.
Vulnerability	Poor women and other vulnerable households	Additional financial assistance equivalent to 3 months' subsistence cost for the incumbent household. Employment opportunities project civil works.	Vulnerability will be determined following the data on income, gender and disability of the household heads; DoF/ Co-implementer will facilitate priority of the vulnerable household members for employment in civil works and in job placements.
Construction related impact	Anybody impacted by civil works contractor's activity	Compensation as per RPF	The affected persons will approach Upazila level GRC notifying the impacts in writing with copy to the contractor; GRC will facilitate and assist the affected persons; Contractor will pay the compensation determined by PAVC.

5. PREPARATION AND IMPLEMENTATION OF RESETTLEMENT PLAN

5.1 Definition of Key Terms

Several key terms have been used in RPF that will be instrumental in framing the social management approach of the project and preparation of Resettlement Action Plan (RAP). Definition of such terms is as under:

Project Affected Persons (PAP) includes any fishers, households, group of fisher folks, a firm or private or public institution, who because the execution of the project, or any of its sub-components or part, would have their:

- Standard of living adversely affected;
- Access, right, title, or interest in any water bodies (including marine and coastal water bodies, open access areas, aquaculture, capture or inland water bodies), land or any other moveable or fixed assets acquired or possessed, in full or in part, permanently or temporarily adversely affected;
- Business, occupation, places of work or residence or habitat adversely affected, with or without displacement provided such occupation is legal under applicable Bangladesh law.

PAP means persons or affected household and consists of all members of a household residing under one roof and/ or operating as a single economic unit, who are adversely affected by a project or any of its components.

Household (HH) is a group of persons who commonly live together and would take their meals from a common kitchen.

Replacement Cost means and includes an amount needed to replace an asset at current value including depreciation and overhead expenses of the transaction, including stamp duty and registration charges, as follows:

- Aquaculture pond, estuaries, or agricultural land based on its productive potential; Residential land based on market value;
- Loss of houses and other related structures based on current market prices of building materials and labor, without depreciation and deductions for salvaged building materials, plus transaction costs (such as administrative charges, registration and titling costs), etc., if any.

Professional Transition Assistance (PTA) means if any fisher abandons/loses fishing as an occupation for a certain period and switches to an alternative livelihood means due to project intervention and endeavors for better livelihoods, the fisher will be prioritized to have a PTA as: inclusion in social safety net coverage (as being offered to jatka catchers during jatka harvesting ban period) or one time grant (OTG) or flexible credit (in the form of revolving development fund) as the case may demand. Different micro-financing and professional assistance mechanisms will be offered as an aid bundle to the PAPs under the PTA schemes referred to in the Livelihood Transformation Program (LTP) with the ESMF for skill development training, networking facilitation, business guidance and continuous technical supports, which are:

- i. *Social safety net coverage or one-time grant* - If any fisher loses fishing as an occupation for a certain period due to project intervention activities the fisher will be prioritized to be included in social

safety net coverage (like jatka catchers) or one-time monetary grant (OTG) help for coping with the situation.

- ii. *Revolving Development Fund (RDF)* - meaning a microcredit fund to be offered to the PAPs for startup ventures, which will continue with the business cycle upon regular repayment of the loan.
- iii. *Institution Development Fund (IDF)* – provision of adequate fund will be kept for capacity building of the fisher’s community (PAPs). Such fund could be utilized to conduct training on fisheries management, climate change and environment. Other utilization would include, skill training to the fisher’s community, youth skill development and temporary office set up at village/cluster level.
- iv. *Community Infrastructure and Support Fund (CISF)* – a fund category that would be arranged for PAPs, which the PAP communities could use for infrastructural development at village/ cluster level such as, installation of tube well and sanitation facilities, repairing or improving road connectivity at village/cluster level, and establishing drinking water facility and others.
- v. *Nutrition Support Fund (NSF)* - another funding category meant for nutrition awareness building, improved kitchen gardens, and other nutritional and hygiene practices.

Cut-off date is the date prior to which the occupation or use of the project area makes residents/ users of the project area eligible to be categorized as affected persons. In many projects, the cut-off date coincides with the commencement of the census of affected persons within the project area boundaries. Persons not covered in the census will not be eligible for compensation and other entitlements. For PAPs with legal titles the cut-off date would be the date of issue of legal notice under the Land acquisition act. For those without titles, the cut-off-date will be the date of commencement of census.

Vulnerable groups mean distinct groups of people who might suffer disproportionately or face the risk of being marginalized from the effects of the project and include: (i) female headed households with dependents, (ii) disabled household heads, (iii) households falling under the generally accepted indicator for poverty, (iv) elderly households with no means of support and landlessness, and (v) indigenous people or ethnic minorities.

Severely Affected household means households that will be affected by any one of the two criteria:

- i) significant loss of income (> 50%); and
- (ii) loss of accesses to fishing or other common property resource extraction for those whose livelihoods depends on these.

5.2 Resettlement Impacts of the Project

The project impacts will be ascertained based on the final engineering designs and delineated boundary of the physical interventions. Though no land acquisition is envisaged under the project, however, it is anticipated that some people may experience varying levels of economic displacement owing to project execution. Some small-scale and temporary land acquisition cannot be ruled out but those will be done through voluntary donation or willing-buyer and willing-sellers approach. The Project aims not to dislocate or dismantle any existing structures, unless required for rehabilitation, as far as possible.

No permanent structure will be removed, unless required for envisioned rehabilitation, during civil works. Impacts are foreseen mainly on formal or informal users of existing available land. Each intervention will be scrutinized as to its type, location, scale, and sensitivity and the magnitude of its potential adverse impacts.

The extent of assessment required to identify and mitigate the impacts largely depends upon the complexities of activities.

5.3 Initial Social Screening

During the identification and preliminary stages of any activity preparation, DoF will employ the screening check-lists designed for the project. A preliminary assessment to identify the types, degree and scale of potential social impacts of the activity will be undertaken via the check-list attached in Annex 1 (social impact screening checklist). In cases where the preliminary assessment indicates that the potential adverse impact of the proposed project will be significant, appropriate preparation will be done for further surveys and consultation with key stakeholders. The detail is as follows:

- Social impacts will be screened at the beginning of the identification.
- The impacts that may occur will be recorded in the screening form, which will be used for the subsequent design process for avoiding or minimizing impacts.
- The impact category of each activity will be determined based on the number of persons experiencing major impacts and nature of these impacts.
- Where resettlement or impact on livelihoods is expected to take place, a RAP or an Abbreviated RAP (ARAP) will be prepared in line with the RPF.
- The activity with significant resettlement impacts, activity involving physical relocation and or affect livelihoods of 20 households or more, a full RAP will be prepared.
- An abbreviated RAP will be prepared in case less than 20 households experience the impacts of project, and
- No RAP/ ARAP will be prepared in case where an activity will not involve physical relocation or impact on livelihoods, but compensation for partial loss of assets, their mitigation will be addressed through Social Management Plan (SMP) for the activity.

5.4 Social Impact Assessment (SIA)

When the sites for specific activities are identified and substantive social effects are estimated by social screening, a social impact assessment (SIA) will be undertaken including census of affected persons and inventory of losses. The SIA will utilize a well-planned and all-inclusive communication and consultative process and include a baseline survey covering the prevailing status of income, employment, education, age, skills and other socio-economic aspects along with cultural and community aspects in the areas. Results from SIA process will be fed into the individual Resettlement Action Plans (RAP) created for each location and will be incorporated, along with consultation feedback from those identified in the PAP census and all other relevant stakeholders, in the development of mitigation measures, especially livelihood strategies. A structured questionnaire will be developed by DoF for census and inventory of losses.

Following basic categories of impacts or issues may take place under this project, though acquisition of resources, structures, land and large-scale loss of livelihood are highly unlikely as there will be no new land acquisition and no loss of public infrastructure:

- a) Loss of access to land by formal and informal users;

- b) Loss of physical structures and trees on land resumed for project works;
- c) Loss of business income due to displacement;
- d) Loss of wage income due to relocation of businesses;
- e) Loss of network; and vulnerability to local power elites
- f) Loss of public infrastructure.

The census will identify the Project Affected Families who are likely to lose their immovable assets, commercial establishment, access to productive assets, employment or are alienated wholly or substantially from the main source of their trade occupation or vocation. The census will also assess the vulnerability of the affected families including landlessness, poverty, social status, gender, disability and ethnic identity.

DoF on completion of the assessment will disseminate the results among the affected community. Based on the assessment, DoF will prepare RAP that will again be disseminated among the affected individuals/ community for their broader consent. The feedback received from the affected groups will be incorporated to the extent possible before finalization of the RAP.

The RAP is based on up-to-date and reliable information about (a) the proposed activities and its impacts on the displaced persons and other adversely affected groups, and (b) the legal issues involved in resettlement. Structure and basic elements of RAP is provided in Annex-3.

5.5 RAP Implementation

5.5.1 Condition for award of civil works contract

Once a final RAP/ ARAP has been prepared, approved by World Bank and disclosed for each sub-project, award of civil works contracts for each sub-project can take place. This will include preparation of final resettlement impacts, final census of PAPs, final inventory survey of affected assets and final compensation rates which meet the requirement of full replacement costs.

5.5.2 Condition for commencement of civil works

The full implementation of each RAP/ ARAP for a sub-project with relocation and/ or resettlement impacts, as confirmed by M&E Consultant and approved by World Bank will be a condition for commencement of civil works and the provision of a notice to proceed to contractors. The completion status must clearly include (i) disbursement of compensation to PAPs at full replacement costs for project components; (ii) other entitlements listed in the resettlement action plan that have been provided; and (iii) a comprehensive income and livelihood restoration and rehabilitation program, supported by an adequate budget. Once the RAP has been implemented, PAPs will vacate the area for civil works to begin.

5.6 Gender Mainstreaming in Resettlement Process

Women hold informal economic roles in project areas particularly in the fisheries sector. However, with less voice, visibility and skills, women are more vulnerable to project impact, which negatively affects their livelihoods. Planning and implementation of Social Development/ Safeguards will pay attention to ensure that women are adequately included in resettlement process and are given special attention in delivery of fair and timely compensation and support to the women. DoF will ensure the following requirements in preparation and implementation of RAP:

- i. Inclusion of women in the impact enumerators;
- ii. Conduct gender-disaggregated PAP's census and impacts assessments to pin-point how many women are likely to be affected by the Project and establish their pre-Project conditions;
- iii. Inclusion of women as major participants in the consultation processes;
- iv. Emphasize the effect of Resettlement impacts on women in monitoring and evaluation of RAP;
- v. Joint payment of resettlement allowances and relocation assistance;
- vi. Use of participation/ consultation strategies that encourage the involvement of women, ethnic minorities and poor households in resettlement planning and implementation;
- vii. Gender responsive grievance redress mechanism (GRM);
- viii. Give women and poor access to project related employment opportunities;
- ix. When possible, include women government officials in the coordinating committees to facilitate RAP preparation and implementation;

6. Consultation, Participation and Information Disclosure

6.1 Consultation and Participation Strategy

DoF-PMU will implement a comprehensive consultation, participation and information disclosure strategy to ensure the PAPs are meaningfully consulted in relocation and/ or resettlement process; their views and concerns are fully considered and appropriate steps taken to resolve them. The consultations will involve the PAPs and other relevant stakeholders including community leaders, host communities, civil society organizations including NGOs, local government institutions, project staff and consultants.

The RAP will provide a stakeholder analysis of all persons who are directly or indirectly involved in the project, including PAPs, project and related government staff, and host communities, and determine the need for consultation, participation and information. The consultation is an ongoing process, starting from initial social screening at the identification stage, social impact assessment in the design stage and implementation of the RAPs before start of civil works. Consultation will also be resorted to in the M&E process of RAP implementation.

Formal consultation meetings will be held with all PAPs, and will also include participation from project social staff and consultants, DoF division level officials as well as representatives of civil society/ non-government organizations and other stakeholders. The draft RAPs, based on the results of consultations and impact surveys in the field, will be disclosed. The PAPs will be informed about their rights and obligations, the institutional arrangements, the procedures which need to be followed, and the GRM. Under the GRM at sites levels will be formed. The structure of GRC will be detailed in RAP. Two-tiered structures (Grievance Redress Committees, one at each site level while other at PMU), will be formed.

During RAP preparation, the official eligibility cut-off date for the compensation and assistance will be announced at every meeting with PAPs. Every revision and update of the draft RAP requires a new disclosure and consultation meeting with PAPs. Any critical issue and complaint will be raised, discussed and resolved, if possible, at these meetings.

Separate meetings with women and vulnerable PAPs will be held so their voices are not constrained by those of men and powerful sections of the PAP communities. In addition, individual meetings and focus group discussions (FGDs) will be held formally and informally, as and when the opportunity or need arises during field activities, such as census and inventory of loss (IoL).

The consultation meetings will be recorded and documented comprehensively, including signed attendance lists, photographs and minutes of the key issues addressed and agreements reached, observations made in the field, and outstanding issues in need of being addressed. The consultations will be documented in the RAPs with consultation records appended. This information will be updated for each RAP update and will also be continued in the resettlement monitoring reports of the M&E consultants.

The PMU's social staff and consultants will prepare a resettlement information booklet for all PAPs in local Bangla language with concise information on all key aspects of the resettlement process. The booklet will be updated with every RAP update. In addition, the cut-off date and other information on relevant issues will be disclosed/ publicized to PAPs and other stakeholders in the project area through leaflets and brochures (in

Bangla) made available at project and relevant government offices. All information dissemination will be made in English and Bangla. For illiterate PAPs oral and/ or pictorial means of communication will be used.

After reaching agreement on the RAPs in the formal consultation meetings, the draft and final RAPs endorsed by the government will be disclosed on the World Bank website. All detailed specific information for displaced persons and their households will be kept anonymous in publicly disclosed documents by omitting their names. However, PMU will maintain a computerized database of project-specific resettlement impacts and lists of all the PAPs with inventory of losses by types. This computerized database will be updated and maintained in a retrievable system and made available to the independent RAP monitoring agency and World Bank, as and when required, to enable internal/ external monitoring to ensure transparency of information.

During internal monitoring of RAP, the PMU's social staff and consultants will carry out individual and focus group meetings with the PAPs to record the process and impact of RAP implementation for each activity. For larger activities, the M&E consultants will also carry out individual and focus group meetings as well as quantitative surveys.

6.2 Consultation for Preparation of RPF/ ESMF

As part of ESMF preparation, 12 FGD sessions were organized in the 07 (seven) coastal districts involving project beneficiaries viz: fishers/ fish farmers, fish traders, DoF field level officer/ staffs, local Union Parishad representatives to orient the activities of the project. Both male and female stakeholders were consulted through these meetings. Additionally, teachers, businessmen, village leaders, and local government members, farmers, and fishers were consulted individually. Female heads of the households were also interviewed.

FGDs were held in the greater Khulna-Satkhira-Bagerhat in the South-west and Chittagong-Cox's Bazaar in the south-east coastal area to get views/ ideas on the prevailing aquaculture practices from the community and aquaculturists/ fishers' associations/ cooperatives/ clusters, importance of aquaculture, and fisheries:

1. 09 August, 2017 in the Conference room of the District Fisheries Officer, Bagerhat.
2. 10 August, 2017 in the Conference room of the Fakirhat Upazila Parishad, Bagerhat.
3. 18 August, 2017 at Atshatobigha Primary School premise of Kalibari, Debhata, Satkhira.
4. 14 September 2017 in the Hurka Union Parishad Conference Room, Rampal, Bagerhat.
5. 15 September 2017 in the Charbanda (Under Sonadana Union), Paikgacha, Khulna
6. 23 November, 2017 at Shabab Chowdhury's Hat, Subarna Char, Noakhali.
7. 23 November 2017 at Hotel Seagull, Cox's Bazar
8. 24 November, 2017 in the Meeting Room of Marine Fisheries Surveillance Check Post, Patenga, Chittagong
9. 24 November, 2017 in South Kattolli Jele Para, Pahartali, Chittagong
10. 24 November, 2017 at Marine Fisheries Surveillance Check Post at Patenga, Chittagong
11. 24 November, 2017 in BFDC Landing Center, Cox's Bazar Sadar, Cox's Bazar
12. 24 November 2017 in the Office of Shrimp Hatchery Association of Bangladesh (SHAB), Cox's Bazar

Irrespective of their age, sex, occupation or economic condition, all stakeholders strongly supported the program. Community is optimistic about the project benefits and suggested to consider participation of community members in implementation and long-term post-project monitoring.

Major recommendations of the FGDs are related to river and canal excavation requirements, resilient fishing practices, capacity building of the fishing communities, infrastructure requirements, livelihood transformation, and disaster risk reduction. Since land acquisition and involuntary resettlement otherwise are not envisaged, the consultation process in the implementation stage will focus on these issues where relevant at specific project intervention sites.

The FGD-wise details is attached as Annex 2.

6.3 Information Disclosure

The mechanism of information dissemination should be simple and be accessible to all. Two of the important means that have been followed until now include briefing material and organization of community consultation sessions. The briefing material (all to be prepared in local language) can be in the form of (a) brochures (including project information, details of entitlements including compensation and assistance to be given to the PAPs; grievance mechanism) that can be kept in the offices of local self-government (Union Council Office) and project office; (b) posters to be displayed at prominent locations and (c) leaflets that can be distributed in the project areas. Consultation meetings should also be organized at regular intervals by the project to acquaint the PAPs of the following:

- i. Timeline and progress of the project;
- ii. Information on compensation and entitlements;
- iii. Information on land acquisition and market valuations of property;
- iv. Time line for acquisition/ voluntary donation/ direct purchase approaches.

Also, opinion and consensus of the community needs to be sought for common and cultural property relocation. Information disclosure procedures are mandated to provide citizen centric information as well as all documentation necessary for addressing any queries. A computer based information management systems shall be employed to disseminate information pertaining to the project. Disclosure of information will enhance governance and accountability specifically with respect to strengthening of monitoring indicators to help the World Bank monitor compliance with the agreements and assess impact on outcomes.

This Information Disclosure Policy is intended to ensure that information concerning the project activities will be made available to the public in the absence of a compelling reason for confidentiality. Information shall be provided in a timely and regular manner to all stakeholders, affected parties, and the public. Access by the public to information and documentation held or generated by the project will facilitate the transparency, accountability, and legitimacy as well as operations overseen by it.

7. Implementation Arrangements

7.1 Institutional Arrangement

The implementation of the social management plans (SMP, GAP, LTP, RAP, SECDP and others) is the responsibility of Project Management Unit (PMU) of the DoF. Since DoF doesn't have in-house capacity, project will hire the services of a Gender and Social Development Specialist-GSDS) to support DoF in implementation of the social management plans. DoF however, will designate one official as departmental focal person on social development and safeguards (SDS) to coordinate with field offices of DoF, the communities, consultants and the WB. The role and responsibility of the SDS Focal Person and the GSDS individual consultation will be as under:

Table 7.1: Roles and Responsibilities of PMU

Levels	Roles and Responsibilities
Social Development and Safeguards Focal Person ⁶	<ul style="list-style-type: none"> Review and institutionally internalize the project ESMF, RPF and SECDF; Identify scope and areas of application of the ESMF, RPF and SECDF in project process; Identify and document responsibility of the project management unit, the Project Director, him/herself and the GSDS individual consultant as well as the field level DoF officials and staff on the ESMF, RPF and SECDF implementation; Contribute in design and conduct of training for the project staff; Represent the DoF in various forums with regards to implementation of the ESMF, RPF and SECDF; Contribute in translation of the ESMF, RPF and SECDF and disclosure of the same across the project area using appropriate communication method; Participate in the project level meetings Report progress, highlighting social issues not addressed, to provide for mid-course correction, Assist in establishing GRM and its operation helping the communities and any affected persons; Coordinate and oversight work of the GSDS individual consultant in the project process.
Gender and Social Development Specialist (GSDS)	<ul style="list-style-type: none"> Review relevant legal and policy framework and social development and safeguards planning frameworks; Review, update and coordinate with project schedules for subproject selection, design and implementation of civil works and other tasks, vis-a-vis the process tasks required for land taking, and preparation and implementation of social management plans. Review design and conduct subproject level social screening, social impact assessment and preparation of social management plans. Coordinate and facilitate all activities contained in ESMF, RPF and SECDF and any social management plans with the help of the Consultant.

⁶ A detail ToR for appointing a Gender and Social Development Specialist is shown in Annex-3

Levels	Roles and Responsibilities
	<ul style="list-style-type: none"> • Coordinate and facilitate surveys for social impacts assessment and market price assessment for preparation of RAP and SECDP and their implementation; • Assist in the process of supervision and monitoring of implementation of ESMF, RPF and SECDP and the subsequent social management plans; • Ensure that all information related to land taking, acquisition and resettlement are generated and collected from the field and secondary sources and are analyzed, collated and instruct consultant to prepare the subproject based social management plans. • Routinely monitor progress in land acquisition and RAP implementation activities and keep Project Director informed monthly, and assist with the preparation of formal status reports for World Bank missions. • Facilitate with the help of the Project Director and his SDS Focal Person, the land acquisition activities by liaising, as and when necessary, with the Deputy Commissioners and Ministry of Land. • Help affected persons and communities in the grievance resolution process involving the project GRM; • Collect data, consult the communities and targeted beneficiaries and prepare monthly progress reports and participate in monthly review meetings; • Participate in the training program for capacity building; and • Carry out other responsibilities as required from time to time.

7.2 Grievance Redress Mechanism

The DoF will establish a three-tier grievance redress mechanism (GRM) under the project to receive, hear and resolve grievances associated with the project implementation including social and environmental considerations. The Gender and Social Development Specialist (GSDS) in the PMU will be the contact person at DoF. In case the issue is not resolved, the aggrieved person has the option to adopt judicial procedure. In cases where vulnerable persons are unable to access the legal system, the GoB will provide legal support to the vulnerable person(s). As well as, the PMU will assist the vulnerable person(s) in getting this support from the GoB. The PMU will also ensure that there is no cost imposed (such as for travel and accommodation) on the aggrieved person if the person belongs to the vulnerable groups. The verdict of the judiciary will be final. The project specific GRM is summarized in the table below:

Table 7.2: The Grievance Redress Mechanism

Tiers of GRM	Nodal Person for Contact	Facilitation by Project	Time frame to redress
First Tier: Upazila Project Coordination Committee (UPCC)	Once the UPCC is created, it will be the first level of contact in specific grievance related to the management of the project or any other issue related to land; access and adverse impacts on the PAPs or community.	The UPCC will maintain a Community Information Board to record the grievance, contacting and facilitating the aggrieved person to redress.	15 days

Tiers of GRM	Nodal Person for Contact	Facilitation by Project	Time frame to redress
Second Tier: District Management Committee (DMC)	The grievance will be forwarded to the DMC.	Only after exhausting the first tier. Website advertisement, public notices in print media. The aggrieved person can attend the hearing in person. The District Fisheries Officer will be responsible to ensure that there is no cost imposed (such as for travel, etc.) on the aggrieved person if the person belongs to the vulnerable groups, the project will assist the PAPs with travel and accommodation costs, if needed.	30 days
Third Tier: Department of Fisheries (DoF)/ Ministry of Fisheries and Livestock (MoFL) – E&S Safeguards Coordinator of the Project Management Unit (PMU).	The grievance will be forwarded to the Gender and Social Development Specialist at the PMU.	Only after exhausting the first and second tier. Website advertisement, public notices in print media. The aggrieved person can attend the hearing in person. The District Fisheries Officer will be responsible to ensure that there is no cost imposed (such as for travel, etc.) on the aggrieved person if the person belongs to the vulnerable groups, the project will assist the PAPs with travel and accommodation costs, if needed.	60 days
OR the Judiciary			

Communities and individuals who believe that they are adversely affected by Sub-project interventions may submit complaints to existing project-level GRM or the WB Grievance Redress Service (GRS). Project affected communities and individuals may also submit their complaint to the World Bank's independent Inspection Panel which determines whether harm occurred, or could occur, because of non-compliance with WB safeguards policies and procedures. For information on how to submit complaints to the WB's corporate GRS, please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the WB Inspection Panel, please visit www.inspectionpanel.org. Any disclosure instrument on GRM will provide addresses of the GRS and the Inspection Panel.

7.3 Determining Compensation for Affected Persons

DoF will conduct joint on-site verification of affected physical properties on land resumed for project's infrastructure constructions. As per WB OP 4.12 on involuntary resettlement, the authorized and unauthorized occupants of public land/ DoF land will be entitled for compensation and assistance as per RPF determined in

site specific RAPs. These affected persons and their physical and economic losses will be assessed and replacement cost of affected physical assets and income will be determined, in accordance with existing government regulations, by a PAVC established for each division of the DoF covered under the project. The PAVC will be a 5-member committee at division/ Region level. The members of PAVC will be nominated by the DoF Division offices and approved by the PD, PMU of BSCMFP for DoF.

Membership of PAVC will be represented by the Division/ Region Office of DoF, concerned DC office, elected representative, women, and affected persons. The Gender and Social Development Specialist (individual consultant) with the PMU will be the member-secretary of the PAVC.

The PAVC will verify and cross check the inventory of physical losses as well as loss of income and livelihoods and certify for compensation. PAVC will assess quantity and category of affected physical property (structure, tree, business, common properties, etc.) on DoF/ public lands. Replacement cost of the affected physical property will also be determined by the PAVC based on current market price. The PAVC will design and conduct a property valuation survey through survey method and public consultation and consult secondary data as well to recommend Replacement cost of structures and market price of trees and crops as well as amount of loss of income at current market price.

7.4 Monitoring and Evaluation

The DoF is primarily responsible for monitoring to ensure conformity to the requirements of the ESMF, RPF and SECDF. The monitoring will cover all stages of planning and implementation. The monitoring will be carried out through the compliance reports that will form a part of Monthly Progress Reports (MPR) and regular visits by the Safeguard Specialist of the PMU. During implementation, meetings will be organized by DoF inviting all actors for providing information on the progress of the project work. Tables below present the Mitigation, Monitoring, Responsibility and Timeline for Social Impacts.

Table 7.3: Social Monitoring Indicators.

Sl. No	Impact /Issues	Monitoring Measures	Responsible Agency
Social Indicators			
1	Land taking	Regular internal monitoring by DoF and periodic evaluation	DoF/ SDF
2	Taking of house/ structure	Regular internal monitoring by DoF and periodic evaluation	DoF / SDF
3	Loss of livelihood or source of livelihood	Regular internal monitoring by DoF; midterm and end term evaluation	Evaluation consultants
4	Loss of access to private and / or common property	Regular internal monitoring by DoF; midterm and end term evaluation	Evaluation consultants
5	Displacement of Non-Title holders	Regular internal monitoring by DoF; midterm and end term evaluation	Evaluation consultants
6	Gender Action Plan	Regular internal monitoring by the social safeguard coordinator of PMU; Mid-term and end-term evaluation.	Evaluation consultants

The list of above mentioned impact performance indicators will be used to monitor project objectives as depicted in table below along with the milestones. The socio-economic survey conducted will provide the

benchmarks for comparison. The table below gives the assessment methodology and the expected outputs for the various stages of implementation process.

Table 7.4: Monitoring Project Implementation Process, Input and Output.

Progress	Assessment Methodology	Expected Output
Implementation Process		
Involuntary land taking	Structured Schedule, informal and formal discussion	Timely notices to the affected families
Dissemination of information on project and social issues	Check the registers with the DoF for queries	Adequate knowledge on project and its various components
Consultations conducted under the project with PAPs and others	Check the minutes of meetings registers with the PAPs. Taking photographs of meeting. Verify copies on agreements made on issues raised and discussed.	Awareness and information on the project and participation in the project.
Consultations on Resettlement & Rehabilitation (R&R) Policy and Distribution of R&R Policy of the project	Check the registers with the PAPs. Taking photographs of consultation. Verify copies on agreements made on issues raised and discussed.	Awareness on R&R Benefits
Information on modes of valuation of assets, payment schedules and disbursement modes	Check the registers with the PAPs. Structured Schedule, informal and formal discussion, taking photographs of discussion.	Awareness on methods of valuation, satisfaction with the payment schedules, disbursement modes
Needs assessment and training programs for income generation	Structured Schedule, informal and formal discussion, taking photographs of discussion.	Awareness and satisfaction with the training programs for income restoration
Services of the Co-implementer	Structured Schedule, informal and formal discussion, taking photographs of discussion.	Proper knowledge, guidance and assistance in rehabilitation and resettlement
Functioning of the Grievance redressal mechanism	Check the records of the NGO and DoF for the complaints registered	Appropriate and timely action on the grievances of the affected people
Consultations for the identification of the Community Development Works	Check the minutes of meetings registers with the PAPs. Verify copies on agreements made on issues raised and discussed, taking photographs of discussion	Participation in decision making process and satisfaction with the identified areas of development
Financial progress		
Amount disbursed for land taking, structure, etc.	Structured Schedule, informal and formal discussion, taking photographs of discussion.	PAPs purchased land equivalent or more than land loss of same quality

Progress	Assessment Methodology	Expected Output
Amount disbursed R&R assistance.	Structured Schedule, informal and formal discussion, taking photographs of discussion.	New house constructed, new land purchased, new productive assets purchased, created some income source to offset the loss of income
Amount disbursed for extension of development programmes, training and capacity building.	Structured Schedule, informal and formal discussion, taking photographs of discussion.	Alternative income restoration programs initiated and lost income restored.
Fees paid for implementation of RAP and consultants for M&E activities	Structured Schedule, informal and formal discussion, taking photographs of discussion.	Timely implementation
Amount disbursed for training of implementation staff of PMU	Formal Discussion with concerned officials, taking photographs of discussion.	Better implementation and coordination
Physical progress		
Total land taken	Structured Schedule	Progress of land acquisition
Number of PAFs affected	Structured Schedule	Progress of resettlement
Number of PAFs R&R Assistance	Structured Schedule	Progress on Economic Rehabilitation
Social well being		
Women time disposition and decision-making power for women groups trained for alternative livelihood	Participatory Appraisal	Women Empowerment
Increase in literacy level due to project intervention; drinking water, schools, health facilities, and other community infrastructures if relocated and enhanced by the project	Structured Schedule	Social well and improved social status.
Increased annual Household income and expenditure due to project intervention	Structured Schedule	Improved income Economic Status

7.5 Capacity Building and Training

To complement the existing capacities and fulfill any gaps on social safeguards management, this project-specific framework will be adopted. It has been identified it would be necessary to put in place certain amount of capacity to implement and monitor social safeguards as defined in this ESMF, RPF and SECDF within the DoF. If necessary, the DoF would conduct a capacity needs assessment and decide to provide training on ESMF, RPF and SECDF requirements and conducting, managing and monitoring safeguards during year one of the project implementation.

7.6 Budget for RPF Implementation

The DoF will arrange the funds (reflected in their DPP) from the GoB and ensure to use these funds for the disbursement of compensation payment and other assistances. The Project will determine the annual inflation rates to be applied to all cash entitlements. The PMU will assist them in identifying additional loss of assets

during construction and proposing entitlements for such PAPs. The budget revisions will be approved by PMU with the concurrence of the World Bank.

The Project will also ensure that funds for entitlements under the RAP are fully provided to PAPs prior to commencement of civil work. Compensation and resettlement funds will be provided to the PAPs directly by the DoF with the assistance of the respective social staff at PMU and the division level DoF officials.

Annex 1: Social Screening Format (Sample)

SOCIAL SCREENING FORMAT

General Information	1. Name of Village:					
	2. Name of Union:					
	3. Name of Upazila:					
	4. Name of District:					
	5. Name of Component & sub-component:					
	6. Location:					
	7. Type of work Please Tick mark (√):	New Construction		Reconstruction		
		Rehabilitation		Others (please specify)		
8. Objective of the proposed scheme and brief description:						
			Please Tick mark (√)			
9. Does the proposed scheme involve all types and classes of the people in the village			Yes	No	Not applicable	
B. Social Impact	1. Is there any chance of resettlement of people living in the land for the implementation of the scheme?			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2. Is there any chance of land acquisition from public for the implementation of the scheme?			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	3. Is there any chance of destruction of homestead land?			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	4. Is there any chance of resettlement of people living in the government land for the implementation of the scheme?			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	5. Is there any chance of destruction of religion and cultural place?			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	6. Is there any chance of loss of employment of the people of lower down the living standard for the implementation of the scheme?			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	7. Is there any chance of destruction of cultural tradition of people?			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Mitigation Measure			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

C. Livelihood Impact	1. Is there any chance of losing access to the usual fishing area due to implementation of the scheme?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2. Is there any chance of losing means of livelihood due to the implementation of the scheme?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	3. Is there any chance of losing private community-based fishing areas or similar facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	4. Is there any chance of losing existing social or financial safety network due to implementation of the scheme?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	5. Is there any chance of being vulnerable to or come under the wrath of local elite due to fishers' association with this scheme?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
D. Small Ethnic Communities (Tribal People)	1. Is the scheme located in an area where Tribal people or small ethnic communities (SECs) live?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	N.B. If yes, please answer the following questions			
	2. Are the tribal people involved in the planning and implementation of the scheme?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	3. Is there any chance of tribal people be affected?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	4. What are the feelings of tribal people to the schemes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Positive	<input type="checkbox"/>		
	Negative	<input type="checkbox"/>		
	Not any one	<input type="checkbox"/>		
If the answer of the question number 4 is negative, please briefly describe the reason and mitigation measure:				
Other Information (if any)				
Name & Signature of the Assessor:				
Date:				

Annex 2: Details of FGDs

SI	Date	Place	Total No. of Participants	Recommendation
1.	09 August 2017	Conference Room at the District Fisheries Office, Bagerhat	15	<ol style="list-style-type: none"> 1. SUFO, Rampal opined that capture fishers should be involved in aquaculture/ fish trades as a means of AIGAs in the project areas. He also gave importance for modernization/ improvement of the existing fish depots/ fish service centers of the area by the project finance. 2. Coastal capture fishers should be helped with Early warning system (EWS) installed fishing boats through the project funds. 3. SUFO, Morelgonj pointed out project implementation may not have any environmental implications but providing AIGAs may face some social problems. To solve this social challenge, only registered fishers having valid ID card should be selected for providing AIGAs – which needs to be articulated in the DPP.
2.	10 August 2017	Conference Room, Fakirhat Upazila Parishad, Bagerhat	21	<ol style="list-style-type: none"> 1. Local elected people's representative should be involved in the project implementation activities. 2. NOC should be taken from the concerned local elected people's representative prior to inclusion of any canal for excavation during project implementation in the project proposal. 3. During many previous excavation programs, the local administration must evict people from the area which creates social problems. Hence the benefits of canal excavation to be informed to the

SI	Date	Place	Total No. of Participants	Recommendation
				<p>beneficiaries through the local elected representatives before project implementation and the list of canals to be brought to the notice of the local administration for easing social problem.</p> <p>4. Only the fish depots/ fish service centers established on khas land should be prioritized in modernization/ improvement of the existing fish depots/ fish service centers of the area by the project finance.</p> <p>5. Vegetable farming on the ridges of the shrimp/ prawn farms should be prioritized in the project activities for enhancing farm income and fish farmer's livelihoods.</p> <p>6. Development of social forestry along the project roads side through cooperative / cluster formation of the fishers/ fish farmers of concerned area should an option of AIGAs (both socio-economically & environmentally sustainable).</p> <p>7. Hilsa fishers of Fakirhat are not covered by the present food safety scheme of the Govt. during hilsa fishing ban period. The project should give such help to the registered ID holder hilsa fishers during project implementation.</p> <p>8. Bhairab and Kaliganga rivers of Fakirhat including its tributaries and canals need to be excavated to ease water flow for aquaculture, navigation and reduce flooding in the area.</p>
3.	18 August, 2017	Atshatobigha Primary School	26	1. Nearby canals/ river mouths need to be excavated urgently

SI	Date	Place	Total No. of Participants	Recommendation
		premise of Kalibari, Debhata, Satkhira		<ol style="list-style-type: none"> 2. Shallow farms should be re-excavated on a priority basis 3. Insolvent shrimp/prawn farmer would get priority while selecting farms for re-excavation 4. Farms located at a greater distance from the nearby canal would get priority 5. For landless people bee farming, mud crab/ Eel farming in cages in the adjacent rivers and sewing options for womenfolk would be the best alternative income generating activities (AIGAs) in this area.
4.	14 September 2017	Conference Room, Hurka Union Parishad, Bagerhat	25	<ol style="list-style-type: none"> 1. Connecting canals needs to be re-excavated to ensure water exchange; 2. Ensure supply of required number of Specific Pathogen Free (SPF) shrimp Post Larvae (PL); 3. Depth of the gher/ pond needs to be increased. 4. Promotion of cluster farming and support to shrimp value chain will retain quality of their product ensuring better access to market with increased profit; 5. The farmers opined to re-excavate canals in areas where more shrimp farms are located; 6. The focus group suggested to re-excavate gher/ ponds owned by poor and vulnerable farmers; 7. The focus group shows interest to abstract water from the excavated canal by their own arrangement.
5.	15 September 2017	Charbanda, Sonadana,	31	<ol style="list-style-type: none"> 1. Connecting canals needs to be re-excavated to ensure water exchange;

SI	Date	Place	Total No. of Participants	Recommendation
		Paikgacha, Khulna		<ol style="list-style-type: none"> 2. Ensure supply of required number of Specific Pathogen Free (SPF) shrimp Post Larvae (PL); 3. Depth of the gher/pond needs to be increased. 4. The group desired to facilitate with common collection centre (depot) for the cluster to get rid of from the clutch of middleman. 5. Promotion of cluster farming and support to shrimp value chain will retain quality of their product ensuring better access to market with increased profit; 6. The farmers opined to re-excavate canals in areas where more shrimp farms are located; 7. The focus group suggested to re-excavate ghers/ ponds owned by poor and vulnerable farmers; 8. The focus group shows interest to abstract water from the excavated canal by their own arrangement.
6.	23 November 2017	Shabab Chowdhury's Hat, Subarna Char, Noakhali	16	<ol style="list-style-type: none"> 1. To arrange micro credit interest free; 2. To provide the net fiber among the group by forming 7-8 group members; 3. To provide the fishing boat/ vessel among the group by forming 7-8 group members; 4. To ensure 100% VGF card holders; 5. To provide the cattle (cow) among the fishers to create alternate income generating activities; and 6. To provide training on sewing among the interested fisher's wife along with sewing machine,
7.	23 November 2017	Hotel Seagull, Cox's Bazaar	18	<ol style="list-style-type: none"> 1. Shrimp/ prawn/ crab/ fish farms should be re-excavated on a priority

SI	Date	Place	Total No. of Participants	Recommendation
				<p>basis to ensure mortality reductions during peak growing season of March-April.</p> <p>2. Electricity, safety, repair/develop of sluice gates, improve water exchange facilities by re-excavating silted canals would be crucial, 80% of lease holder are not solvent for capital investment;</p> <p>3. Farms located at a greater distance from the nearby canal and insolvent/ vulnerable shrimp/ prawn/ crab/ fish farmers would get priority while selecting farms for re-excavation.</p>
8.	24 November 2017	Marine Fisheries Surveillance Check Post, Patenga, Chittagong	31	<p>1. The fishers also know the deleterious effect of using illegal gears and admitted using the legal gears;</p> <p>2. Currently the fishing boats do not comply with safety measures which they accept to comply with;</p> <p>3. The fishers also concern for post-harvest quality maintenance of their harvest;</p> <p>4. They also expect wide awareness campaign/ training to let them inform with relevant marine rules and regulations;</p> <p>5. Fishers admit that fishing boats engaged in fishing should have registration and fishing license.</p> <p>6. The fisherman also admit that fish stock is depleting due to over exploitation and number of fishing boats engaged in marine fishing needs to reduce.</p> <p>7. They propose that if they get education, vocational technical</p>

SI	Date	Place	Total No. of Participants	Recommendation
				<p>training for skill development on driving, motor mechanic, welding, poultry rearing, fish farming, goat farming, cow rearing, crab farming, net making etc., they may be able to change their livelihood transformation.</p> <p>8. Fishers also express to facilitate with schools in their fishing villages to educate their children. They asked for mass awareness campaign/ training on fishing regulation, post-harvest management of harvested fish, education, sanitation, community mobilization.</p> <p>9. They also expressed that if institutional access (government) be increased they will change this risky profession.</p> <p>10. They expressed concern about the piracy at sea and bad weather and recommend providing fishing boats with communication devices to communicate among themselves at sea and between land/ port to take measures against piracy and bad weather.</p>
9.	24 November 2017	South Kattoly Jelepara, Pahartali, Chittagong	54	<p>1. The fishers showed interest for the provision of supports in the project;</p> <p>2. They expressed hope to get involved with Model Fisher Village to change their livelihood through transformation process;</p> <p>3. Fishers admit imposing stringent restriction for use of illegal and detrimental gears;</p> <p>4. The fisher expects awareness training to practice for responsible fishing;</p>

SI	Date	Place	Total No. of Participants	Recommendation
				<p>5. Currently the fishing boats do not comply with safety measures which they accept to comply with;</p> <p>6. The fishers also concern for post-harvest quality maintenance of their harvest;</p> <p>7. They also expect wide awareness campaign/ training to let them inform with relevant marine rules and regulations;</p> <p>8. Fishers admit that fishing boats engaged in fishing should have registration and fishing license.</p> <p>9. They expressed concern about fishers entering from adjoining areas viz. Bhola, Barisal and engage fishing with destructive gears.</p> <p>10. They need vocational training for skill development on driving, motor mechanic, welding, poultry rearing, fish farming, goat farming, cow rearing, crab farming, net making, ice making, painting, car servicing, press operating etc. to start livelihood transformation process.</p> <p>11. They need loan or grant to build fishing boat to go deep and distant waters for fishing.</p> <p>12. They want insurance coverage for fishers as safeguard under safety net coverage;</p> <p>13. They expressed that they are bound to do illegal fishing as they have taken loan from the dadondar, (middle man) they want loan facility to get rid from the dadondar (middle man)</p>
10.	24 November, 2017	BFDC Landing Center, Cox's	19	1. The landing center alongside Banskhali River partially washed

SI	Date	Place	Total No. of Participants	Recommendation
		Bazaar Sadar, Cox's Bazaar		<p>away and the remaining portion is left unused for which great difficulty is faced in landing fishes from the boats that needs renovation improving with sanitation and hygiene condition;</p> <ol style="list-style-type: none"> 2. Landing shade is risky that requires repairing and renovation for using safely; 3. Excessive time is usually required in lifting and landing fish that leads to wastage of fish; 4. Absence of neatness and cleanness and lack of ice plant; 5. Paucity of water supply arrangement; 6. Acute toilet problem; 7. Fish storage problem; 8. Problem in entering trawler from Nazirar Take; 9. Lack of Canteen; 10. Training for fishers is needed; 11. Constructions of new structures are needed.
11.	24 November 2017	Office of Shrimp Hatchery Association of Bangladesh (SHAB), Cox's Bazaar	18	<ol style="list-style-type: none"> 1. Develop protocol for importing SPF brood. 2. Support should be provided to establish more private shrimp hatcheries for production of SPF PL of Black Tiger Shrimp 3. Prepare plan to estimate total number of SPF PL production needed for the next five years.
12	24 November 2017	Office of the Marine Fisheries Survey Management Unit, DoF, Agrabad, Chittagong	15	<ol style="list-style-type: none"> 1. Procure high speed marine petrol vessel for the proper implementation of Marine Fisheries Ordinance 2. Establish marine fisheries surveillance check post along the strategic locations in coastal rivers/

SI	Date	Place	Total No. of Participants	Recommendation
				<p>estuaries for catch monitoring and check compliances;</p> <p>3. Procure another research and survey vessel to support RV Meen Shandhani in surveying acoustic survey;</p> <p>4. For the research and survey vessel, provision of recruitment of all categories of manpower must be incorporated and this manpower should have provision to transfer to revenue budget for sustainability;</p> <p>5. Provision of Masters and Doctoral Program for the officers engaged in Marine Fisheries Management</p>

Annex-3: Outline of Resettlement Action Plan

Resettlement Action Plan (RAP) prepared shall contain the following.

- *Description of the project*: General description of the project and identification of the project area.
- *Potential impacts*: Identification of (a) the project component or activities that give rise to resettlement; (b) the zone of impact of such component or activities; (c) the alternatives considered for avoiding or minimizing resettlement; and (d) the mechanisms established to minimize resettlement, to the extent possible, during project implementation.
- *Objectives*: The main objectives of the resettlement program.
- *Census and Socio-economic survey*: The findings of census and socio-economic studies conducted including the results of a census survey covering (i) current occupants of the affected area to establish a basis for the design of the resettlement program and to exclude subsequent inflows of people for eligibility for compensation and resettlement assistance; (ii) standard characteristics of displaced households, including a description of production systems, labor, and household organization; and baseline information on livelihoods (including, as relevant, production levels and income derived from both formal and informal economic activities) and standards of living (including health status) of the displaced population; (iii) the magnitude of the expected loss--total or partial--of assets, and the extent of displacement, physical or economic; (iv) information on vulnerable groups or persons for whom special provisions may have to be made; and (v) provisions to update information on the displaced people's livelihoods and standards of living at regular intervals so that the latest information is available at the time of their displacement; (vi) land tenure and transfer systems, including an inventory of common property natural resources from which people derive their livelihoods and sustenance, non-title-based usufruct systems (including fishing, grazing, or use of forest areas) governed by local recognized land allocation mechanisms, and any issues raised by different tenure systems in the project area; (vii) the patterns of social interaction in the affected communities, including social networks and social support systems, and how they will be affected by the project's (viii) public infrastructure and social services that will be affected; and (ix) social and cultural characteristics of displaced communities, including a description of formal and informal institutions (e.g., community organizations, ritual groups, non-governmental organizations (NGOs)) that may be relevant to the consultation strategy and to designing and implementing the resettlement activities.
- *Legal framework*: The findings of an analysis of the legal framework
- *Institutional framework*: The findings of an analysis of the institutional framework covering (a) the identification of agencies responsible for resettlement activities and NGOs that may have a role in project implementation; (b) an assessment of the institutional capacity of such agencies and NGOs; and (c) any step that is proposed to enhance the institutional capacity of agencies and NGOs responsible for resettlement implementation.
- *Eligibility*: Definition of displaced persons and criteria for determining their eligibility for compensation and other resettlement assistance, including relevant cut-off dates.
- *Valuation of and compensation for losses*: The methodology to be used in valuing losses to determine their replacement cost; and a description of the proposed types and levels of compensation under

- local law and such supplementary measures as are necessary to achieve replacement cost for lost assets.
- *Resettlement measures:* A description of the packages of compensation and other resettlement measures that will assist each category of eligible displaced persons to achieve the objectives of the policy. In addition to being technically and economically feasible, the resettlement packages should be compatible with the cultural preferences of the displaced persons, and prepared in consultation with them.
 - *Community participation:* Involvement of resettlers and host communities, (a) a description of the strategy for consultation with and participation of resettlers and hosts in the design and implementation of the resettlement activities; (b) a summary of the views expressed and how these views were taken into account in preparing the resettlement plan; (c) a review of the resettlement alternatives presented and the choices made by displaced persons regarding options available to them, including choices related to forms of compensation and resettlement assistance, to relocating as individuals families or as parts of pre-existing communities or kinship groups, to sustain existing patterns of group organization, and to retain access to cultural property (e.g. places of worship, pilgrimage centers, cemeteries); and (d) institutionalized arrangements by which displaced people can communicate their concerns to project authorities throughout planning and implementation, and measures to ensure that such vulnerable groups as indigenous people, ethnic minorities, the landless, and women are adequately represented.
 - *Grievance procedures:* Affordable and accessible procedures for third-party settlement of disputes arising from resettlement; such grievance mechanisms should consider the availability of judicial recourse, community and traditional dispute settlement mechanisms.
 - *Organizational responsibilities:* The organizational framework for implementing resettlement, including identification of agencies responsible for delivery of resettlement measures and provision of services; arrangements to ensure appropriate coordination between agencies and jurisdictions involved in implementation; and any measures (including technical assistance) needed to strengthen the implementing agencies' capacity to design and carry out resettlement activities; provisions for the transfer to local authorities or resettlers themselves of responsibility for managing facilities and services provided under the project and for transferring other such responsibilities from the resettlement implementing agencies, when appropriate.
 - *Implementation schedule:* An implementation schedule covering all resettlement activities from project preparation through implementation, including target dates for the achievement of expected benefits to resettlers and hosts and terminating the various forms of assistance. The schedule should indicate how the resettlement activities are linked to the implementation of the overall project.
 - *Costs and budget:* Tables showing itemized cost estimates for all resettlement activities, including allowances for inflation, population growth, and other contingencies; timetables for expenditures; sources of funds; and arrangements for timely flow of funds, and funding for resettlement, if any, in areas outside the jurisdiction of the implementing agencies.
 - *Monitoring and evaluation:* Arrangements for monitoring of resettlement activities by the implementing agency, supplemented by independent monitors as considered appropriate by the Bank, to ensure complete and objective information; performance monitoring indicators to measure inputs, outputs, and outcomes for resettlement activities; involvement of the displaced persons in the

monitoring process; evaluation of the impact of resettlement for a reasonable period after all resettlement and related development activities have been completed; using the results of resettlement monitoring to guide subsequent implementation.

In case affected persons are less than 20 households, an abridged RAP needs to be prepared. The content of Abbreviated Resettlement Action Plan (ARAP) is as under:

- (a) a census survey of displaced persons and valuation of assets;
- (b) description of compensation and another resettlement assistance to be provided;
- (c) consultations with displaced people about acceptable alternatives;
- (d) institutional responsibility for implementation and procedures for grievance redress;
- (e) arrangements for monitoring and implementation; and
- (f) a timetable and budget.