

Ministry of Fisheries and Livestock, Bangladesh

Department of Fisheries (DoF)



Bangladesh Sustainable Coastal and Marine Fisheries Project (BSCMFP)

## SMALL ETHNIC COMMUNITY DEVELOPMENT FRAMEWORK (SECDF)



February 2018

---

Department of Fisheries (DoF), Dhaka, Bangladesh

Social Development Foundation (SDF), Dhaka, Bangladesh



## SMALL ETHNIC COMMUNITY DEVELOPMENT FRAMEWORK

### Table of Contents

<b>Executive Summary .....</b>	<b>ix</b>
<b>1. INTRODUCTION .....</b>	<b>1</b>
1.1. Background and Scope .....	1
1.2. Project Description and Components .....	1
1.3. Small Ethnic Community Development Framework .....	3
1.4. Approval and Public Disclosure .....	3
<b>2. SMALL ETHNIC COMMUNITIES IN PROJECT AREA .....</b>	<b>5</b>
2.1. Small Ethnic Communities in National Context.....	5
2.2. Small Ethnic Communities in the Project Area.....	7
<b>3. LEGAL FRAMEWORK AND REGULATIONS .....</b>	<b>9</b>
3.1. Constitutional Rights of Small Ethnic Communities .....	9
3.2. Legal and Regulatory Framework.....	9
3.3. Other Relevant Laws and Policies .....	9
3.4. World Bank Policy on Indigenous Peoples .....	10
<b>4. SMALL ETHNIC COMMUNITY DEVELOPMENT FRAMEWORK.....</b>	<b>13</b>
4.1. Rationale.....	13
4.2. Scope and Objectives of SECDF .....	13
4.3. Project SEC Development Policy .....	14
4.4. Small Ethnic Communities Development Plan .....	14
4.5. Contents of SECDP.....	15
4.6. Socioeconomic Characteristics & Concerns .....	15
4.7. Impact Mitigation & Development Measures.....	16
<b>5. PUBLIC CONSULTATION AND PARTICIPATION.....</b>	<b>19</b>
5.1. Stakeholders of the Project .....	19
5.2. Consultation and Participation Process .....	19
5.3. Consultation Outcomes on the SEC Stakes .....	19
5.4. SEC Participation and Consultation Plan .....	20
5.5. Free, Prior, and Informed Consultation.....	21
<b>6. IMPLEMENTATION ARRANGEMENT .....</b>	<b>23</b>
6.1. Institutional Arrangement.....	23
6.2. Grievance Redress Mechanism .....	25
6.3. Monitoring and Evaluation.....	27
6.4. Participation in Livelihood Transformation Program .....	27
6.5. Schedule .....	27
6.6. Budget .....	27

## List of Tables

Table 2.1: Small Ethnic Population in the Project Area. ....	7
Table 6.1: Roles and Responsibilities of PMU .....	24
Table 6.2: The Grievance Redress Mechanism. ....	25

## List of Annexes

Annex 1: Detailed Description of Project and Components .....	29
Annex-2: Technical Guidelines for Consultation and Preparation of SECDF.....	40
Annex 3: Preliminary Screening of Small Ethnic Communities .....	45

## List of Acronyms

AI	: Alternative Income
AIGA	: Alternative Income Generating Activities
AIS	: Automatic Identification System
BDT	: Bangladesh Taka
BFDC	: Bangladesh Fisheries Development Corporation
BFRI	: Bangladesh Fisheries Research Institute
BWDB	: Bangladesh Water Development Board
CAP	: Community Action Plan
CBO	: Community Based Organization
CDD	: Community Driven Development
CG	: Credit Group
CHT	: Chittagong Hill Tracts
CISF	: Community Infrastructure and Support Fund
CISW	: Community Infrastructure Support Window
COM	: Community Operational Manual
DDR	: Disaster Risk Reduction
DFO	: District Fisheries Officer
DG	: Director General
DLI	: Disbursement-Linked Indicators
DMC	: District Management Committee
DOA	: Department of Archaeology
DOE	: Department of Environment
DoF	: Department of Fisheries
DOL	: Department of Labor
DPP	: Development Project Proforma
DSC	: Design Supervision Consultant
E&S	: Environmental and Social
EA	: Executing Agency
EEZ	: Exclusive Economic Zone
EFM	: Ecosystem-based Fisheries Management
ESMF	: Environmental and Social Management Framework
EWS	: Early Warning System
FAO	: Food and Agriculture Organization
FCG	: Fisher Credit Group
FCMC	: Fisheries Co-Management Committees
FGD	: Focus Group Discussion
FPIC	: Free, Prior and Informed Consultation
FVG	: Fisher Village Group
GoB	: Government of Bangladesh
GRM	: Grievance Redress Mechanism
GRS	: Grievance Redress Service
HACCP	: Hazard Analysis and Critical Control Point
HDC	: Hill District Council
ID	: Identity

IDA	: International Development Association
IDF	: Institution Development Fund
IDW	: Institution Development Window
IGA	: Income Generating Activity
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
MMD	: Marine Mercantile Department
MoF	: Ministry of Finance
MoFL	: Ministry of Fisheries and Livestock
MOU	: Memorandum of Understanding
MPR	: Monthly Progress Report
NATP	: National Agricultural Technology Program
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
PDO	: Project Development Objective
PMU	: Project Management Unit
POM	: Project Operational Manual
PRSP	: Poverty Reduction Strategy Paper
PSC	: Program Steering Committee
RAP	: Resettlement Action Plan
RDF	: Revolving Development Fund
RPF	: Resettlement Policy Framework
SA	: Social Assessment
BSCMFP	: Bangladesh Sustainable Coastal and Marine Fisheries Project
SDF	: Social Development Foundation
SE	: Small Ethnic
SEC	: Small Ethnic Community
SECDF	: Small Ethnic Community Development Framework
SECDP	: Small Ethnic Community Enhancement Plan
SIA	: Social Impact Assessment
SME	: Small and Medium-sized Enterprise
SMP	: Social Management Plan
SOP	: Series of Projects
SPF	: Specific Pathogen Free

SSDS	: Senior Social Development Specialist
TIG	: Technical Implementation Group
ToT	: Training of Trainers
U/P	: Union Parishad
ULB	: Urban Local Bodies
UN	: United Nations
UNDP	: United Nations Development Programme
UNESCO	: United Nations Educational Scientific and Cultural Organization
UNO	: Upazila Nirbahi Officer
UPPC	: Upazila Project Coordination Committee
USD	: United States Dollar
VDC	: Village Development Committee
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) under the guidance of the Ministry of Fisheries and Livestock (MoFL) in two phases which aims to increase coastal and marine fisheries' contribution to the economy, reduce poverty, and ensure environmental sustainability through enhanced management of coastal and marine fisheries and aquaculture. It also aims to create opportunities for the fishing communities' in accessing to alternative livelihood means. The phase I BSCMFP will be implemented in 5 (five) years with a preliminary budget envelope of around USD 256 million and cover 75 upazilas of 16 coastal districts. Along with the DoF the Social Development Foundation (SDF) under the Ministry of Finance (MoF) will be the co-implementer of the Component-3, where the Small Ethnic Community Development Framework (SECDF) is a part, through a Community Driven Demand (CDD) approach. Investment Project Financing (IPF), using a mixture of standard investment and Disbursement-Linked Indicators (DLIs) will be used to support project implementation. 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 and poor and extremely poor vulnerable 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 complex socio-economic and physical environment of the coastal area. There is a considerably low presence of small ethnic communities (SECs) in the coastal areas covered under the project.

**SECs in the project Area:** There are about 45 SECs officially recognized as tribes, minor races ethnic sects and communities commonly known as tribal peoples in Bangladesh with distinct culture, tradition, profession, and language -- covering about two percent of the total population ([www. Banlaembassy.com](http://www.Banlaembassy.com)). The number is, however, debated by many based on different definitions. In any estimate, tribal peoples constitute no more than between 1-2% of the total population of Bangladesh. In the project areas (16 coastal districts with a total population of 33.77 million) there are 77,102 SEC members dispersed among the mainstream population or in small pockets in the coastal region. There are 14 distinct tribal sects namely Chakma, Tripura, Barmon, Marma, Rakhine, Garo, Monda, Dalu, Pahari, Sawntal, Khumi, Khyang, Malpahari and Tanchangya, and many other undefined tribes. Chakmas are present in 14 of the 16 project districts and presence of Tripura groups is seen in 7 districts and the Barmans are in 6 of them. Most of them reside in Chittagong and Cox’s Bazar, while some in Patuakhali. These SECs have similar characteristics as referred to in the World Bank Operational Policy on Small ethnic community Peoples (OP 4.10).

**Small Ethnic Community Development Framework (SECDF):** The World Bank’s Operational Policy 4.10 on SEC Peoples is triggered for this Project. In compliance with the OP 4.10 and prior to project appraisal, a Small Ethnic Community Development Framework (SECDF) has been developed to ensure that SECs would be sufficiently and meaningfully consulted leading to their free, prior and informed consultation (FPIC) to project

interventions, that they would have equal opportunity to share the project benefits, and that any potential negative impacts are avoided, minimized and the residual impacts are properly mitigated. The SECDF will form a basis for project implementation and monitoring and evaluation of how the project deals with the SEC issues. At project implementation stage, Small Ethnic Community Development Plan (SECDP) will be developed, based on this SECDF, once the sites for project interventions are identified with all relevant information and the beneficiaries are selected from the fishers and fisheries-dependent poor and vulnerable households and results of social screening confirmed presence of SECs among the targeted beneficiaries.

Objectives of the Small Ethnic Community Development Framework (SECDF) are the following:

- Screen all activities to determine presence of SECs and, if so, ensure their direct participation in selection, design and implementation of the activities including any civil works;
- Select sites and interventions and determine their scopes to avoid or minimize, to the extent feasible, adverse impacts;
- Adopt socially and culturally appropriate measures to mitigate the unavoidable adverse impacts; and
- Wherever feasible, adopt special measures – in addition to those for impact mitigation – to reinforce and promote any available opportunities for socio-economic development of the affected SE communities.

**Legal Framework.** The Constitution of Bangladesh all citizens are equal before law and are entitled to equal protection of law. Nevertheless, there are some specific laws that refer to small ethnic communities specially focusing the tribal peoples in the Chittagong Hill Tract (CHT) area, such as, East Bengal State Acquisition and Tenancy Act, 1950, CHT Regulation of 1900, the Hill District Council Acts of 1989 and the CHT Regional Council Act of 1998. Above all, the government of Bangladesh has a special affairs division under the Prime Minister’s Secretariat, which looks after the development of small ethnic communities outside CHT. The Special Affairs Division provides fund for small ethnic communities for their development including stipends for students. The operating principles of the project would consider all these laws and regulations in view of the development of the SECs.

**Preparation of Small Ethnic Community Development Plan (SECDP).** Since the SECs are amongst the poorest in the Project districts, they will receive priority support in BSCMFP. Fishing is the main source of SEC livelihoods, while agriculture and agriculture labor constitute other major means of living. The project will pay particular attention in preparing a culturally appropriate development and livelihood promotion plan, with the involvement of the SECs and based on full consideration of the options preferred by them. The project will create opportunity for active involvement of the SECs at each stage of its operation. The involvement of the SECs in planning, implementation and monitoring of the programs meant for their own development would be the cornerstone of SECDF strategy of the project.

Small Ethnic Community Development Plan (SECDP) will be prepared where project intervention will cover communities including the small ethnic groups. The SECDP will consider the ethnic and demographic characteristics of the project affected population; prevailing intuitions, such as, family, religion, language and education; and other small ethnic community variables and social stigmas. This Plan will accommodate the

local traditional leadership (as headman, karbari), gender issues, and civil and NGOs in the implementation process of the project activities. The SECDF will be prepared for each village where the small ethnic minority population constitutes more than 5% of the village population. SECDFs will primarily aim at mitigating adverse impacts, and reinforcing and promoting any existing development opportunities in those SEC villages and the project areas.

The overall SECDF will encompass the following aspects:

- Baseline data and impacts, including analysis of cultural characteristics; social structure and economic activities; land tenure; customary and other rights to the use of natural resources; relationship with the local mainstream peoples; and other factors that have been suggested by SECs during consultations and are to be addressed in the SECDF and project design.
- Strategy for disclosure and consultation, indicating timing of disclosure and consultation, and the participants, such as affected SE communities, SEC organizations, and individuals and entities who could provide useful feedback and inputs.
- Mitigation measures and activities, which will generally follow SEC preferences and priorities, including those agreed between the SE communities/SEC organizations and DoF/SDF.
- Institutional capacity, considering DoF/SDF's staff experience, consulting services, and SEC and civil society organizations in designing and implementing SECDFs.
- SECDF implementation schedule, taking into consideration minimizing disruption to the livelihood and other activities of SECs.
- Monitoring and evaluation, with participation of SEC representatives and organizations, as well as other civil society organizations that may have been operating in these areas.
- Financing the SECDF. Budgets and sources of funds needed to implement the mitigation measures and development activities agreed between the SECs and DoF/SDF.
- The Project would also implement a social assistance program for increasing social and economic opportunities for SEC. Such assistance programs will focus on:
  - Increased access to information (A2I) and knowledge about health and nutrition, including women's health, immunization services, personal hygiene, water and sanitation issues; literacy and leadership program; and human and legal rights, including child rights;
  - Motivation towards increased participation, 'voice' and empowerment in working with local government bodies for local level planning, decision making and monitoring, thereby decreasing social exclusion and improving local governance; and
  - Increased economic opportunities for skill development and access to income creating assets.

Several activities will be financed by this project under this program, such as, advocacy initiatives, occupational or skills training, support for pregnant women and risk pooling pilot initiatives, legal aid support, and grants for the graduated trainees and worst affected natural hazard victims. Finally, to ensure effective services in the SEC areas, project will ensure convergence and synergy with important line departments like

health, education, child welfare and nutrition, agriculture, horticulture, fisheries. Project will facilitate linkages with other poverty reduction programs, such as micro-finance; vulnerable groups development, legal literacy and human rights programs.

## **1. INTRODUCTION**

### **1.1. Background and Scope**

Fisheries are vital for Bangladesh's food supply and 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 facing ever-increasing challenges and constraints for sustainable fisheries development, due to lack of updated fish-stock data, infrastructure in collection, processing and marketing of fish catch, inadequate presence of control on marine fish catch and food safety regulation on marketing chain, insecure investment environment and poor management. 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 fisheries 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 Bangladesh Sustainable Coastal and Marine Fisheries Project (BSCMFP), with an aim to increase economic contribution of coastal and marine fisheries for sustainability and poverty reduction.

This document is called the Small Ethnic Community Development Framework (SECDF) for BSCMFP, called the Project. It is developed on the basis of outcomes from the initial Social assessment (SA) as a standalone document. The SECDF is part of the overall safeguards management instrument namely the Environmental and Social Management Framework (ESMF) for the Project. This framework will be applied to all activities under the Project which also involve SECs qualifying for special consideration under the World Bank's operational policy and bank procedure on small ethnic community peoples (OP/BP 4.10).

The Project comprises of four components as specified in Section I of this document. The Project will be executed by the Department of Fisheries (DoF) under the Ministry of Fisheries and Livestock (MoFL), that has established a Project Management Unit (PMU) to manage the implementation. A key component for fisheries co-management and livelihood transformation enabling controlled fishing ensuring free replenishment of coastal and marine fisheries resources and improvement in production management. The Social Development Foundation (SDF) under the Ministry of Finance (MoF) will be assisting DoF through executing the component three of the Project. This SECDF will also be followed by Social Development Foundation (SDF) in the Component 3 implementation.

### **1.2. Project Description and Components**

The Project is a two-phased proposed investment by the (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) under the guidance of the Ministry of Fisheries and Livestock (MoFL) in two phases which aims to increase coastal and marine fisheries' contribution to the economy, reduce poverty, and ensure environmental sustainability through enhanced management of coastal and marine fisheries and aquaculture. It also aims to create opportunities for the fishing communities'

in accessing to alternative livelihood means. The Phase I of BSCMFP will have a preliminary budget envelope of around USD 256 million. Investment Project Financing (IPF), using a mixture of standard investment and Disbursement-Linked Indicators (DLIs) will be followed to support project implementation. Phase II will be considered and its budget envelopes defined based on successful implementation of the reform project put in place under Phase I. The duration of the proposed Phase I will be five (5) years. Project will cover 75 upazilas (sub-districts) covering 16 coastal districts.

#### **1.2.1. Project Development Objectives**

The Program goal is to increase coastal belt fisheries' contribution to the economy, poverty reduction, and environmental sustainability. The Project Development Objective (PDO) of Phase I is to improvement management of targeted coastal belt capture and culture fisheries and fishing communities' s access to alternative livelihoods activities.

#### **1.2.2. Project Approach**

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 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 SOP 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.

#### **1.2.3. Project Components**

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 project 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. **Details of the project components have been discussed in *Annex-1*.**

### **1.3. Small Ethnic Community Development Framework (SECDF)**

The World Bank's Operational Policy 4.10 on Small ethnic community Peoples is triggered for this Project. The SECs present in the project areas resemble the small ethnic community people's characteristics as captured in the Bank OP 4.10. In compliance with the OP 4.10 and prior to project appraisal, a Small Ethnic Community Development Framework (SECDF) has been developed to ensure that SECs would be sufficiently and meaningfully consulted leading to their free, prior and informed consultation (FPIC) to project interventions, that they would have equal opportunity to share the project benefits, and that any potential negative impacts are avoided, minimized and the residual impacts are properly mitigated. The SECDF will form a basis for project implementation and monitoring and evaluation (M&E) of how the project deals with SEC issues. At project implementation stage, Small Ethnic Community Development Plan (SECDP) will be developed, based on this SECDF, once the sites for project interventions are identified with all relevant information and the beneficiaries are selected from the fishers and fisheries-dependent poor and vulnerable households and results of social screening confirmed the presence of small ethnic communities among the targeted beneficiaries.

### **1.4. Approval and Public Disclosure**

The draft SECDF will be reviewed and approved by the GoB through the DoF under the MoFL and concurred by the Social Development Foundation (SDF). The draft SECDF will be shared with the World Bank for formal review and clearance before final disclosure in the websites of DoF and of SDF. A summary of the SECDF will be translated into local Bangla language and posted with the main SECDF document. The final draft of SECDF will be uploaded into the World Bank's website before appraisal.





## 2. SMALL ETHNIC COMMUNITIES IN PROJECT AREA

### 2.1. Small Ethnic Communities in National Context

Bangladesh is religiously, ethnically, and linguistically homogeneous. Its population of nearly 163 million (estimated 2016) comprised of roughly 90 percent Muslim, with about 7% Hindus and others mainly following Buddhism and Christianity. Close to 99 percent people speak Bangla. The overwhelming numbers of people are ethnic Bengalis although they are a mixed group containing Aryan, Dravidian, Mongoloid and other racial traits. However, across its territory, many minority groups inhabit most of whom continue to keep their distinct ethnic traits, social institutions and organizations, and cultural traditions. Despite the subjugation of religion, components of primitiveness are emphatically shown in their ceremonies, customs and regular life. The tribal families are matriarchal. The women's society is more persevering than the men and they are the primary beneficial power. Many of them could be taken as 'small ethnic community peoples' as defined in various UN human rights instruments and policies, including the World Bank's safeguards policy OP 4.10 on small ethnic community peoples.

There are about 45 smaller groups of SECs with distinct culture, tradition, profession and language in Bangladesh covering about two percent of the total population living in different pockets of the hilly zones and some plain lands of the country ([www. Banlaembassy.com](http://www.Banlaembassy.com).). According to the Bangladesh Adivasi Forum [Bangladesh Indigenous People's Forum], there are 45 ethnic groups with approximately 2.5 million living side by side with the Bengali majority people. However, according to the government statistics the total number of Adivasi is 12,05,978 which is only 1.03 percent of the total population. Hence, enough doubts remain about the true number of Adivasis population in the country. The Government of Bangladesh has generally preferred to use the term 'tribal/tribe' (Upajati in Bangla) or most recently, 'small ethnic groups' or 'ethnic minorities' rather than officially recognizing the presence of 'indigenous ethnic community peoples' within the national territory. This is despite the growing presence and importance given to the subject in recent public debates.

The Small Ethnic Groups Cultural Institution Act, 2010 uses the term "khudronrigoshthhi" (small ethnic groups) to refer to the small ethnic community peoples. However, in the definitions section, when explaining the meaning of the term "khudronrigoshthhi", it uses the term "adibashi", the Bengali equivalent of small ethnic community or aboriginal. A 2011 amendment to the Constitution refers to the small ethnic community peoples of Bangladesh as "tribes", "minor races" and "ethnic sects and communities". According to the Bangladesh Adivasi Forum, an apex advocacy and networking organization of the ethnic minorities, there are 3 million tribal peoples residing in Bangladesh territory largely concentrated in the Chittagong Hill Tract (CHT) districts (Rangamati, Khagrachari and Bandarban) in Chittagong Division. In any estimate, tribal peoples constitute no more than between 1-2% of the total population of Bangladesh.

The total number of small ethnic community groups is also a matter of much disagreement. The 1991 census mentions 29 groups. The recently adopted Small Ethnic Minority Cultural Institution Act (April 2010) mentions 27 different groups which is at present under revision and proposes 50 different groups. The Bangladesh Adivasi Forum includes as many as 45 small ethnic community groups as per one of their publications

(Solidarity, 2003). A proposed draft law, called Bangladesh Small ethnic community Peoples' Rights Act, by Bangladesh Parliamentary Caucus on Small ethnic community Peoples – a group of parliamentarians who advocate for the rights of the country's ethnic minority/small ethnic community peoples – enlists as many as 59 distinct ethnic minority groups. Yet a further study (2015) commissioned by UNDP for mapping different 'small ethnic community peoples' communities' could not draw a 'definitive conclusion' on the exact number. The reason stems partly from a vibrant movement of ethnic minority communities in recent years – particularly since the signing of the CHT Accord in December 1997 - with more marginalized groups increasingly becoming aware and assertive of their identity.

Notwithstanding the confusion about the exact number of the ethnic minority groups in Bangladesh, the project, for the purpose of its interventions, will adopt the World Bank's criteria for the identification of the small ethnic community peoples (i.e. ethnic minorities) which are as follows;

- self-identification as members of a distinct small ethnic community cultural group and recognition of this identity by others;
- collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories;
- customary cultural, economic, social, or political institutions that are separate from those of the dominant society and culture; and
- a distinct language, often different from official language of the country/ region.

Although the ethnic minorities are scattered all over Bangladesh, they are overwhelmingly concentrated in several geographical pockets; namely North-West (Rajshahi & Dinajpur), North-East (Sylhet), Central region (Dhaka and Mymensingh), South (Barishal & Patuakhali), with the most significant concentration in the south-eastern corner – the Chittagong Hill Tracts.

Different ethnic groups of Bangladesh and their colorful lifestyles have significantly enriched the overall culture in Bangladesh. Ethnic minorities, tribal peoples and other local people in the order of preference in the project strategy have been emphasized for development of all components. Most of them living in the plain areas make up about 0.6% of the project area population, lower than the national figure of over 1.1%.

For centuries, Bangladesh has been the dwelling place of different ethnic groups. In fact, 35 smaller groups of small ethnic community people covering about more than one percent of the total population have been living in different pockets of the hilly zones and some areas of the plainland districts of the country. Their historical background, cultural practices, economic activities, social structure, religious beliefs and festivals make them distinctive. The beauty of the hilly zones as well as the plain areas has been enhanced by the colorful culture and traditional practices of different ethnic groups, like the Mandi and Hajong in the northern part, the Manipuri, Garo and Khasiain the northeast, the Chakma, Tripura, Marma, Rakhain, Mru, Tanchyanga, Murong in the Eastern and South-Eastern parts and the Santal and Rajbangshi in the western part of the country.

Almost all tribal languages have rich folk literature, consisting of poems, songs, fairy tales and legends relating to their past nomadic life. There are plenty of narratives, similar to the Maymensingha Geetika (a collection

of folk ballads from the region of Mymensingh, Bangladesh) in Mogh, Chakma, Khasia and Garo languages. The folk tales of the tribal languages have similarities with those in Bangla. The ballads in some of the languages of the Himalayan foothills are similar to those in Bangla folk literature. Their linguistic aspects are similar to those of early form of Bangla. The rhymes in Bangla and the tribal languages are similar in subject, rhythm and vocabulary. However, tribal peoples in the plain districts can access public amenities equally with the mainstream communities.

The Project will generate substantial direct short and longer-term benefits for the ethnic, poor, including disadvantaged men and women. The locations of the Project's physical components - roads, markets, rural waterways and ghats –have been selected to create efficient rural transportation and socio-economic networks and to improve rural-urban connectivity.

## 2.2. Small Ethnic Communities in the Project Area

Project covers 16 coastal districts with a total population of 33.77 million with a male to female ratio is 1.0 : 0.99. Of this total population in the project area, a total of 77,102 are from SECs dispersed among the mainstream population or in small pockets in the coastal region. There are 14 distinct tribal sects namely Chakma, Tripura, Barmon, Marma, Rakhine, garo, Monda, Dalu, Pahari, Sawntal, Khumi, Khyang, Malpahari and Tanchangya, any many other undefined tribes in the project area. Chakmas are present in 14 of the 16 project districts and presence of Tripura groups is seen in 7 districts and the Barman are in 6 of them. Mostly of them reside in Chittagong and Cox's Bazaar, while some in Patuakhali (Table 2.1).

**Table 2.1: Small Ethnic Population in the Project Area.**

Sl. No.	District	Ethnic groups	Total tribal population	Male	Female
1	Cox's Bazaar	Rakhine, Tanchangya, Chakma & others	14,551	7,045	7,506
2	Jessore	Tribura, Barmon, Chakma & others	17,432	8,779	8,653
3	Khulna	Monda, Chakma, Barmon & others	2,054	1,022	1,032
4	Narail	Barmon & others	943	465	478
5	Satkhira	Monda, Barmon, Sawntal & others	2,615	1,278	1,337
6	Bagerhat	Barmon, Khyang, Chakma & others	3,327	1,677	1,650
7	Barguna	Rakhine, Chakma, Marma, & others	1,143	565	578
8	Barisal	Chakma, Garo, Tribura & others	76	45	31
9	Bhola	Chakma, Khumi, garo & others	57	28	29
10	Chittagong	Tripura, Chakma, Marma & others	32,165	16,329	15,836
11	Feni	Chakma, Barmon, Tripura & others	639	351	288
12	Jhalokati	Chakma, Pahari, Marma & others	57	28	29
13	Lakshmipur	Chakma, Tripura & others	244	131	113
14	Noakhali	Chakma, Tripura & others	347	201	146
15	Patuakhali	Rakhine, Chakma, Tripura & others	1,399	707	692
16	Pirojpur	Malpahari, Chakma, Dalu & others	53	26	27
	<b>Total =</b>		<b>77,102</b>	<b>38,677</b>	<b>38,425</b>

Source: BBS Population and Housing Census 2011.

The SECs are amongst the poorest in the Project districts and hence will receive priority support in BSCMFP. Most of the SECs are rural while some are urban. A very few families have been able to make a good progress

in terms of social and economic status with higher education and diverse employment. Other than fishing, agriculture and agriculture labor constitute the mainstay of livelihoods for majority of SECs living in the target intervention areas.

One of the prerequisites of a successful development plan for the SECs is the preparation of a culturally appropriate development plan, with the involvement of the SECs and based on full consideration of the options preferred by them. The project will create opportunity for active involvement of the SECs at each stage of its operation. The involvement of the SECs in planning, implementation and monitoring of the programs meant for their own development would be the cornerstone of SECDF strategy of the project.

SECs residing in the 16 coastal districts are likely to be the beneficiaries of the project according to its approach and interventions for livelihood improvement and transformation. Key weaknesses and vulnerability of the SECs as listed in the findings of a WB funded project, namely, Social Investment Program Project (SIPP) are:

*Backwardness and Impoverishment:*

- Lack of awareness among SECs women and men on income generating activities
- High incidence of landlessness, especially in plain areas
- Depletion of natural forest and common property resources
- Lack of awareness on processing and marketing of agriculture and horticulture produce.
- Lack of market linkages for handicrafts made by SECs
- Lack of employment to educated youth.
- Lack of assistance to differently abled persons

*Insecurity and Vulnerability:*

- Food insecurity during lean seasons
- Vulnerability to natural disasters and social shocks.

*Lack of Awareness:*

- Lack of awareness on SECs culture to the field level functionaries
- Lack of Gender sensitization among field level functionaries and Small Ethnic and Minority Communities.

*Other Issues*

- Involvement of traditional SECs councils in development
- Language skills only in ethnic minorities' dialects are a hindrance for access to education.
- High incidence of dropouts especially among girls.
- Lack of awareness on health, hygiene and sanitation.
- Lack of access to common property resources.

### **3. LEGAL FRAMEWORK AND REGULATIONS**

#### **3.1. Constitutional Rights of Small Ethnic Communities**

In Article 27 of the Constitution of the Peoples Republic of Bangladesh states that all citizens are equal before law and are entitled to equal protection of law. The national Constitution also outlaws discrimination on grounds of race, religion and place of birth (Article 28) and provides scope for affirmative action (positive discrimination) in favor of the backward section of citizens (Articles 28, 29). Consequent upon these provisions, a small percentage of public sector jobs and seats in several government educational institutions are reserved for SEC peoples.

#### **3.2. Legal and Regulatory Framework**

In addition, there are some specific laws that refer to SECs specially focusing the tribal peoples in the Chittagong Hill Tract (CHT) area. In the plains, the only one of such laws is section 97 of the East Bengal State Acquisition and Tenancy Act, 1950 which forbids the transfer of lands owned by aboriginals to non-aboriginal persons without the express consent of the Government's District Officer. The CHT in contrast has a far larger body of laws that refers directly to small ethnic community peoples. Some of these laws recognize small ethnic community peoples' customs regarding the ownership and use of lands and other natural resources. The most important of such laws is the CHT Regulation of 1900. Other laws include the Hill District Council Acts of 1989 and the CHT Regional Council Act of 1998. The last-mentioned laws were passed after the signing of the peace accord of 1997, which ended more than twenty years of armed conflict and provided a framework for the recognition and strengthening of the CHT self-government system.

The Government of Bangladesh has a Special Affairs Division under the Prime Minister's Secretariat, which looks after the development of small ethnic community population outside CHT. The Special Affairs Division provide fund for SEC populations for their development including stipends for students.

#### **3.3. Other Relevant Laws and Policies**

A positive step is that government has recognized the vulnerable situation of SEC peoples in the PRSP (Poverty Reduction Strategy Paper) document. SEC peoples were invited to participate in the consultations organized by the government. Consultations have pointed out the need for giving special attention to the problems and development needs of the SEC people. To improve the condition of SEC people, suggestions have been made to restructure the Ministry of Chittagong Hill Tracts Affairs by expanding its scope to include other plain-land SEC people, undertake measures to preserve the language of the SEC people, to take up a special program for poverty reduction among the SEC people, to incorporate their culture in the national curriculum of education, and to formulate a policy for the development of SEC people and implement laws. The PRSP suggests that it is necessary to provide education to SEC people with a curriculum that allows learning in their own language at the primary level.

Under the provision of the Constitution, Bangladesh Government has enacted different Acts, Ordinances and Policies to protect and promote the diversity of the wide range of cultural expressions viz, Antiquities Act, 1968, Bangla Academy Ordinance 1978, National Archive Ordinance 1983, Bangladesh National Museum

Ordinance 1983, Nazrul Institute Ordinance 1984, Bangladesh Shilpakala Academy Act 1989, Bangladesh Folk Art and Crafts Foundation Act 1998, Copyright Act 2000, Bangladesh National Cultural Policy 2006, Small Ethnic Groups Cultural Organization Act 2010 etc. It is noteworthy that for the last 40 years Bangladesh Government has been working for many of the principles, depicted in the UNESCO Convention 2005.

### **3.4. World Bank Policy on Indigenous Peoples**

The World Bank policy on indigenous peoples requires that the development process fully respects the dignity, human rights, economies, and cultures of indigenous peoples. The Bank provides project financing only where free, prior, and informed consultation results in broad community support to the project by the affected indigenous peoples. Such Bank-financed projects include measures to (a) avoid potentially adverse effects on the indigenous communities; or (b) when avoidance is not feasible, minimize, mitigate, or compensate for such effects. Bank-financed projects are also designed to ensure that the indigenous peoples receive social and economic benefits that are culturally appropriate and gender and inter-generationally inclusive.

The term “Indigenous Peoples” is used in a generic sense to refer to a distinct, vulnerable, social and cultural group possessing the following characteristics in varying degrees:

- self-identification as members of a distinct SEC cultural group and recognition of this identity by others;
- collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories;
- customary cultural, economic, social, or political institutions that are separate from those of the dominant society and culture; and
- a small ethnic community language, often different from official language of the country/ region.

Small ethnic communities in Bangladesh qualifies the characteristics of indigenous peoples referred to the OP 4.10 of the World Bank. As a prerequisite for Project approval, OP 4.10 requires the borrower to conduct free, prior and informed consultations with potentially affected SEC peoples and to establish a pattern of broad community support for the Project and its objectives. It is important to note that the OP 4.10 refers to social groups and communities, and not to individuals. The primary objectives of OP 4.10 are:

- To ensure that such groups are afforded meaningful opportunities to participate in planning project activities that affects them;
- To ensure that opportunities to provide such groups with culturally appropriate benefits are considered; and
- To ensure that any project impacts that adversely affect them are avoided or otherwise minimized and mitigated.

Bangladesh recognizes the right of SECs to cultural expressions, education, training, health, environment, land, agriculture, water resources, infrastructure, tourism and industry. They are generally treated equally as the mainstream citizens. However, there is some gaps as captured in the social assessment presented in the ESMF. The SECDF, therefore, will be prepared based on the World Bank’s OP4.10 by taking into consideration

relevant Bangladesh policies and regulations. Clear mechanism for free, prior and informed consultation to seek broad support of the Project from the SECs will be used in the entire cycle of the Project. During implementation, a Grievance Redress Mechanism (GRM) will be established so that every SEC members can bring his/her voice, complaint or any un-satisfaction about the project.





## 4. SMALL ETHNIC COMMUNITY DEVELOPMENT FRAMEWORK

### 4.1. Rationale

Small ethnic communities are covering about two percent of the total population in Bangladesh those are living in different pockets of the hilly zones and some areas of the plain lands of the country. Their historical background, economic activities, social structure, religious beliefs and festivals make them distinctive which refer to in the World Bank OP 4.10. The terms "small ethnic community people," "small ethnic community ethnic minorities", and "tribal groups" are used to describe social groups that share similar characteristics, namely a social and cultural identity that is distinct from dominant groups in society. The Government of Bangladesh has generally preferred to use the term 'tribal/tribe' (*Upajati* in Bangla) or most recently, 'small ethnic groups' or 'ethnic minorities' rather than officially recognizing the presence of 'small ethnic community peoples' within the national territory. This document has therefore use the term "Small Ethnic Community (SEC)". Characteristically both the terms small ethnic community and tribal hold same nature as SEC. In line with the World Bank OP 4.10 on indigenous peoples, the SECs in Bangladesh largely qualify the four criteria to distinguish small ethnic community people.

Since the nature and scale of impacts will remain unknown until the sites for project activities are identified and the beneficiaries selected and screened, DoF, as also applicable for SDF, has decided to formally adopt guidelines to address small ethnic issues and concerns, and identify and promote development opportunities for the affected SECs.

### 4.2. Scope and Objectives of SECDF

Applicability of the Bank's OP 4.10 on indigenous peoples will depend on the presence of SECs in the project's impact zones in 16 coastal districts, where they might be affected in a manner that could impact their culture and way of life, including present livelihood activities. The proposed Small Ethnic Community Development Framework (SECDF) outlines principles, policies, guidelines and the procedure to identify impact issues and potential risks and, if required, formulate and execute Small Ethnic Community Development Plan (SECDP), whenever project activities affect small ethnic communities present in the project districts.

The primary objective is to ensure that the road improvement and other works funded by the Bank do not adversely affect SECs and that they receive culturally compatible social and economic benefits. This will require DoF to work with the following strategic objectives:

- Screen all activities to determine presence of SECs and, if so, ensure their direct participation in selection, design and implementation of the activities including any civil works;
- Select sites and interventions and determine their scopes to avoid or minimize, to the extent feasible, adverse impacts;
- Adopt socially and culturally appropriate measures to mitigate the unavoidable adverse impacts; and
- Wherever feasible, adopt special measures – in addition to those for impact mitigation – to reinforce and promote any available opportunities for socio-economic development of the affected SE communities.

### **4.3. Project's SEC Development Policy**

In accordance with the Bank's requirements, the project proposes the following principles, guidelines and procedure to prepare Small Ethnic Community Development Plan (SECDP), where project activities and interventions are found to affect the SECs in positive or negative directions. To avoid or minimize adverse impacts and, at the same time, ensure culturally appropriate benefits, DoF as well as SDF (co-implementor) will apply the following basic principles in selection, design and implementation of the subprojects.

- Ensure that SECs in general and their organizations are fully included in the project process including identification and selection of beneficiaries.
- Carefully screen the sub-programs, together with SECs, for a preliminary understanding of the nature and magnitude of potential adverse impacts, and explore alternatives to avoid or minimize them.
- Where alternatives are infeasible and adverse impacts are unavoidable, immediately assess the key impact issues, together with SECs and others knowledgeable of tribal culture and concerns.
- Undertake the necessary tasks to identify the impact details and the most appropriate mitigation measures, through intensive consultations with the affected tribal communities, tribal organizations, civil society organization like NGOs and CBOs, professionals, and the like.
- Do not undertake a subproject/activity where the tribal communities remain unconvinced to offer broad support for the project.

### **4.4. Small Ethnic Communities Development Plan**

Small Ethnic Community Development Plan (SECDP) will be prepared where project activities will affect this distinct community either positively or negatively. DoF and SDF will consider the following for preparation of the SECDP:

- The ethnic and demographic characteristics of the affected population;
- The prevailing intuitions as family, religion, language and education and other SEC variables and social stigma;
- This Plan will accommodate the local traditional leadership (as headman, karbari), gender issues, and civil and NGOs in their implementation plan;
- The land ownership pattern and availability of required land for taking up agriculture related livelihoods interventions;
- The positive and negative impacts on the prevailing institutions; both formal and informal; and
- To ensure adequate and appropriate consultation and communication, and their participation and approval of their implementation of project inputs and mitigation plan.

In view of the above considerations and in accordance with the Bank's requirements, the project proposes the following principles, guidelines and procedure to prepare SECDP, where project activities are found to affect SECs. To avoid or minimize adverse impacts and, at the same time, ensure culturally appropriate benefits, DoF/SDF will apply the following basic principles in selection, design and implementation of the project activities and programs.

- Ensure that SECs in general and their organizations are fully included in the selection of sites for project interventions as well as their beneficiaries, and design and implementation of the activities.
- Carefully screen the project activities proposed on site, together with SECs, for a preliminary understanding of the nature and magnitude of potential adverse impacts, and explore alternatives to avoid or minimize them.
- Where alternatives are infeasible and adverse impacts are unavoidable, immediately assess the key impact issues, together with SECs and others knowledgeable of SEC culture and concerns.
- Undertake the necessary tasks to identify the impact details and the most appropriate mitigation measures, through intensive consultations with the affected SECs, SEC organizations, civil society organization like NGOs and CBOs, professionals, and the like.
- Not undertake a project activity on a site, where the SECs remain unconvinced to offer broad support for the project.

The SECDP will be prepared for each village where the small ethnic minority population constitutes more than 5% of the village population. The objectives of the SECDP are:

- To evolve a development process which fosters full respect for dignity, human rights and cultural integrity of SECs;
- To ensure that they do not suffer adverse effects during the development process; and
- To take up economic benefit programs which are culturally and socially compatible.

#### **4.5. Contents of SECDP**

SECDPs will primarily aim at mitigating adverse impacts, and reinforcing and promoting any existing development opportunities in the project areas, with emphasis on the SECs who would be directly affected. The elements and contents of the SECDP are provided in the Annex-2.

#### **4.6. Socioeconomic Characteristics & Concerns**

Baseline data and identification of social concerns will primarily focus on the cultural and socioeconomic characteristics of SECs and the potential vulnerability that might be caused by the proposed subproject activities. Data on the following socioeconomic characteristics are expected to indicate the nature and scale of adverse impacts and provide the essential inputs for SECDP.

##### ***4.6.1. Social & Cultural Characteristics***

- Relationships with areas where they live -- relating to religious/cultural affinity with the ancestral lands, existence and use of livelihood opportunities etc.
- Use of any SEC languages for social interactions and their use in reading materials and for instruction in formal/informal educational institutions in SEC localities.
- Food habits/items that may differ from non- SEC peoples and the extent to which they are naturally available for free or can only be grown in the SEC territories, and which are considered important sources of protein and other health needs of SECs.

- Interactions and relationships with other SEC groups in the same and other areas.
- Presence of customary social and political organizations – characteristics indicating internal organization and cohesion of the communities, and their interaction with those of the non- SEC population in these areas.
- Presence of SEC organizations, like community based organizations (CBOs)/NGOs, working with SEC development issues, and their relationships with mainstream organizations engaged in community development activities.
- Other cultural aspects likely to be affected or made vulnerable by the proposed project.

#### **4.6.2. Settlement Pattern**

- Physical organization of homesteads – indicating organizational patterns with the existing community facilities, such as schools, places of worship, cremation/burial grounds and others, water supply and sanitation, etc.
- The extent to which the SEC settlements/neighborhoods are spatially separated from those of the non- SEC peoples, indicating interactions and mutual tolerance of each other.
- Present distance between the SEC settlements/neighborhoods and the selected subproject.

#### **4.6.3. Economic Characteristics**

- Prevailing land tenure -- indicating legal ownership and other arrangements that allow them to reside in and cultivate or otherwise use lands in their areas.
- Access to natural resources - prevailing conditions under which SECs are using natural resources like forests, water bodies, and others that are considered important sources of livelihood.
- Occupational structure - indicating the relative importance of the households' present economic activities, and the extent to which they might be affected or benefited because of the proposed subproject activities.
- Level of market participation -- engagement in activities that produce marketable goods and services, and how and to what extent market participation would be affected or enhanced by the project activities.

### **4.7. Impact Mitigation & Development Measures**

#### **4.7.1. Measures for Mitigation of Impacts**

To use private and public lands and avoid or minimize adverse impacts on SECs, DoF will apply the same guidelines proposed in the Project Resettlement Policy Framework (RPF). Eligibility and standards for compensation will also use those proposed in the RPF. In addition, particular attention will be paid to ensure that non-local workers do not intrude into the SEC localities, or resort to actions and behavior that could be considered as culturally insensitive and disrespectful by SECs.

Choice of appropriate and culturally compatible development measures will largely depend on preferences and priorities of the affected SECs. Such measures may include providing credits where SECs are found to

engage in the production of marketable goods, such as handicrafts, handlooms, small-scale horticulture; employment in construction and maintenance activities; basic water supply and sanitation facilities; and those, such as schools, that could be used by the communities as a whole. If credit programs are found appropriate, SDF may, in consultation with DoF, call upon civil society organizations like NGOs to organize and administer them.

#### **4.7.2. Community and Social Enhancement**

A baseline survey would be conducted to generate baseline data. There are villages exclusively inhabited by SEC and villages which have both SEC and non-SECs. Therefore, to address the needs of SEC in these different situations distinct strategies would be adopted. Likely processes are described below, and the actual implementation will be participatory and situation specific.

**Exclusive SE villages.** The project would consult SEC leaders, both men and women on the kind of groups that would be formed from among the SEC. Village Development Committee (VDC) will be formed that will include representatives from all SEC. It is likely that credit group (CG) would be formed separately for each SEC sub-group if required. Members of the CG shall belong to the same SEC group as they may have close relations with each other and they trust each other. They can be motivated to work together. All such CGs in a village would form into a VDC, since the different SECs traditionally extend mutual co-operation in times of need.

**Mixed Villages.** Mixed villages would be of two types — SEC majority villages and non-SEC majority villages. The institution building process will be different in each context. The project would address the concerns of the poor non-SEC in SEC villages. In a SEC majority village, the SEC CGs and the non-SEC CGs would perhaps be formed separately and federate at the VDC level. In a non-SEC majority village, the SECs typically live in a separate settlement within the village or at the outskirts of the village. CGs would be formed for SEC exclusively and the CGs of the non-SEC would be formed separately. Representatives from each CG will form an inclusive VDC.

#### **4.7.3. Community Infrastructure Works**

As with other vulnerable groups, project will facilitate formation of VDC and CGs, and assist them in developing a community action plan (CAP), the CAP will identify the resources available—natural and human, and the opportunities and risks in each of the existing livelihoods. This would be done through a participatory process and there would be several rounds of discussions. The focus naturally would be on the traditional livelihoods sources and infrastructure needs of the tribes such as skill development, access to seed capital and credit, land, livestock and forests. The community would identify the leakages and gaps and opportunities for consolidation and expansion in their present livelihoods. They would analyze the causes of leakages and gaps in their livelihoods and the alternative approaches that can be adopted for their development and select appropriate plans for intervention.

The SEC through their institutions would not only develop CAP, but would be responsible for implementation and monitoring of the plans thus prepared. In order to bridge their knowledge gap SEC youth would be trained as volunteers and provided necessary inputs in managing that sector interventions. The SEC

institutions would receive capacity building inputs from the project staff and functionaries for the evolution and management of projects. The capacity building inputs for the SEC would include visits (study) to successful interventions.

#### **4.7.4. Social Assistance**

Project would also implement a social assistance program for increasing social and economic opportunities for SEC and other vulnerable groups. The objectives of the social assistance program are to increase the capacity of SEC groups to participate in mainstream development activities through:

- Increased access to information and knowledge about health and nutrition, including women's health, immunization services, personal hygiene, water and sanitation issues; literacy and leadership program; and human and legal rights, including child rights;
- Motivation towards increased participation, 'voice' and empowerment in working with local government bodies for local level planning, decision making and monitoring, thereby decreasing social exclusion and improving local governance; and
- Increased economic opportunities for skill development and access to income creating assets.

Activities eligible for financing under this program will include five types:

- advocacy programs
- occupation/ skills training
- support for pregnant women and risk pooling pilot initiatives
- legal aid support
- grants for the graduated trainees and worst affected natural hazard victims.

#### **4.7.5. Linkages and Leverages**

To ensure effective services in the SEC areas, project will ensure convergence and synergy with important line departments like health, education, child welfare and nutrition, agriculture, horticulture, fisheries, and livestock. Project will facilitate linkages with other poverty reduction programs, such as micro-finance; vulnerable groups development, legal literacy and human rights programs.

## **5. PUBLIC CONSULTATION AND PARTICIPATION**

### **5.1. Stakeholders of the Project**

The fishers and the poor fisheries-dependent households along the coastal areas are the primary beneficiary while the fish traders, processors, and formal and informal investors have key stake with the proposed interventions under the project. Fishers associations, boat owners' associations, fish exporters association, processors associations and hatcheries associations are also important players in the value chain. Informed participation of the fisher communities and other stakeholders in the value chain and management process is crucially important for effective design and successful implementation of the project. Engagement of the public-sector agencies like BFDC, BFRI and MFA, DoL, FD, DoE, DoA, BWDB, MMO, Bangladesh Navy, and the Bangladesh Coast Guard is also important for sustainable coastal and marine fisheries development.

Among the registered fishers, SEC in the coastal areas have interests and some of them are also registered with the DoF. Ministry of Livestock and Fisheries (MoFL), DoF, Fish traders, money lenders and investors, local government bodies, NGOs, CSOs, and research institutes are the secondary stakeholders.

Use of land for small infrastructure construction and policy interventions in the coastal and marine fisheries production may induce economic displacement of people, affecting the poor and very poor fishers and fisheries-dependent households including the small ethnic communities.

### **5.2. Consultation and Participation Process**

Department of Fisheries (DoF), in the process of initial social assessment and preparation of social assessment and management framework, has carried out consultation with the community and other stakeholders. FGD sessions were organized in 07 (seven) of the coastal districts involving project beneficiaries including fishers/fish farmers, fish traders, local level DoF officials, local elected representatives and the small ethnic communities. Consultations were carried out during August, September and November of 2017. Irrespective of their age, sex, occupation or economic condition, all the stakeholders participating in the consultation process, 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.

### **5.3. Consultation Outcomes on the SEC Stakes**

The small ethnic communities have declining engagement in the coastal and marine fisheries sector. However, some of them are among the registered fishers with the DoF. In their opinion, they are willing to switch to any feasible livelihood activity facilitated under the project. However, their access to project resources should be equitable and proportionate to the impacts they experience as small and marginal community in the coastal area. Livelihood support should particularly focus on the involvement of SEC women including skill training, capital support, and linkages with market.

The SECs also have concern on their land rights issues and access to the fisheries resources as well as employment opportunities. They are more vulnerable to coastal disasters and requested early warning system (EWS) should be installed in their fishing boats through the project funds. They also sought insurance

coverage for fishing profession and easy access to institutional credits/loans to get rid of the exploitation by private money lenders.

#### **5.4. SEC Participation and Consultation Plan**

Participation of SECs in selection, designing and implementation of project activities will largely determine the extent to which the SECDF objectives will be achieved. Where adverse impacts on SECs are likely, DoF/SDF will undertake free, prior and informed consultations with the affected SECs and those who work with and/or are knowledgeable of SEC development issues and concerns. To facilitate effective participation, DoF/SDF will follow a time-table to consult the would-be affected SEC at different stages of the project cycle. The primary objectives are to examine whether there is broad community consensus in support of the project activities and sites and to seek community inputs/feedback to avoid or minimize the impacts associated with the chosen activities; identify the impact mitigation measures; and assess and adopt economic opportunities which DoF could promote to complement the measures required to mitigate the adverse impacts.

Consultations will be broadly divided into two parts. Prior to selection of a sub-project activity located in an area predominantly inhabited by SECs, DoF/SDF will consult the SEC about the need for, and the probable positive and negative impacts of, the project interventions for fisheries production and management development and other works. Prior to detailed assessment of the impacts at household and community levels, the main objectives of consultation at this stage would be to ascertain (i) how the SEC in general perceive of the need for undertaking the project activities in question and any inputs/feedback they might offer for better outcomes; (ii) whether or not the communities broadly support the works proposed under the project; and (iii) any conditions based on which the SEC may have provided broad support to the project, which are to be addressed in the SECDF and project design. To ensure free, prior and informed consultation, DoF/SDF will:

- Ensure widespread participation of SEC with adequate gender and generational representation; customary/traditional SEC organizations; community elders/leaders; and civil society organizations like NGOs and CBOs; and groups knowledgeable of SEC development issues and concerns.
- Provide them with all relevant information about the project, including that on potential adverse impacts, organize and conduct these consultations in a manner to ensure full coverage of SECs in the project areas and free expression of their views and preferences.
- Document and share with the Bank the details of all community consultation meetings, with SEC perceptions of the proposed works and the associated impacts, especially the adverse ones; any inputs/feedbacks offered by SECs; and the minutes stating the conditions that have been agreed during the consultations and provided the basis for broad-based community support for the project.

Once broad-based community consensus is established in favor of the project activities, DoF/SDF will assess the impact details at the household and community levels, with focus on the adverse impacts perceived by the SECs and the probable (and feasible) mitigation and community development measures. To ensure continuing informed participation and more focused discussions, DoF/SDF will provide SECs with the impact



details, both positive and adverse, of the proposed project activities. The disclosure of SECDP will be done in local language through face to face meetings and involving inter-generational representations. Times for disclosure and consultation will be set in line with the available time of the SECs. Other than those that are technical in nature, consultations will cover topics/areas as suggested below and those the SECs consider important. Beginning with those for broad-based support for the project activities, community consultations will continue throughout the preparation and implementation period, with increasing focus on the households which would be directly affected. Consultation timing, probable participants, methods, and expected outcomes are suggested in a matrix in Annex-2.

Project staff and implementing agencies working in the SEC areas would be oriented towards SEC culture and development issues to enable them to appreciate the importance of SEC culture while working with them.

### **5.5. Free, Prior, and Informed Consultation**

Participation is a process through which stakeholders' influence and share control over development initiatives and the decisions and resources which affect them. The decision to participate is the start of the whole participatory process in the project cycle. National Policy on the development of the SEC does not provide clear guideline for public consultation. However, the World Bank' OP/BP 4.10 provides a clear guidance and direction to project proponents in both the public and private sectors, on the need for public consultation and participation and underscore the importance of getting project influenced SEC informed about the project and, more importantly, getting their actual and active involvement in the planning and implementation.

DoF and SDF will follow a Free, Prior and Informed Consultation (FPIC) approach in engaging with the SEC in the project process. All communications will be in local language made in advance to enable the SEC to participate in the consultation process. Their views and voices expressed in the consultation process will be given due consideration to incorporate those in project design and implementation approaches.



## 6. IMPLEMENTATION ARRANGEMENT

### 6.1. Institutional Arrangement

Department of Fisheries (DoF) will be the lead executing agency for the project and will house the Project Management Unit (PMU) responsible for day-to-day implementation and M&E. A Technical Implementation Group (TIG), consisting 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 sub-district levels, and overseeing technical implementation quality. The overall goal of the TIG is to ensure technical quality, consistency in approaches, and knowledge exchange.

To retain and build on the DoF technical capacity, DoF's divisions will be tapped for technical knowledge on a regular basis. Led by a DoF-appointed Project Director (PD) and Deputy Project Director (DPD), the PMU's core operational staff will include a Project Manager; Financial Manager; an Accountant; 6 Technical Coordinators (TCs) with qualification and experience to support the implementation of components 1, 2 and 3; 2 procurement specialists; and 2 technical assistants. The PD will report to the DG of DoF.

MoFL will establish a Program Steering Committee (PSC), chaired by the Secretary and including representation from the Ministries of Finance, Planning, Agriculture, and Maritime to provide supervision and policy guidance and facilitate inter-ministerial collaboration on reform agenda. The PSC will oversee project implementation and will act upon project-related issues based on agreed terms of reference included in the Project Operations Manual (POM).

Project Components 1 and 2 will be implemented directly by DoF through the PMU. Component 3 will be implemented by DoF with the support of the Social Development Fund (SDF) as a co-implementing agency, with SDF undertaking that component's community-level activities under a Memorandum of Understanding (MOU) signed between the DoF and the SDF. The MOU will establish the SDF responsibilities for implementation of activities under subcomponents 3.1. and 3.2.

The implementation of the SECDF and any SECDP along with other social management plans 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 Senior Social Development Specialist (SSDS) 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 SSDS individual consultation will be as under:

**Table 6.1: Roles and Responsibilities of PMU, BSCMF, DoF**

Levels	Roles and Responsibilities
Social Development and Safeguards Focal Person <sup>1</sup>	<ul style="list-style-type: none"> <li>• Review and institutionally internalize the project SECDF;</li> <li>• Identify scope and areas of application of the SECDF in project process;</li> <li>• Identify and document responsibility of the project management unit, the Project Director, him/herself and the SSDS individual consultant as well as the field level DoF officials and staff on the SECDF implementation;</li> <li>• Contribute in design and conduct of training for the project staff;</li> <li>• Represent the DoF in various forums with regards to implementation of the SECDF;</li> <li>• Contribute in translation of the SECDF and disclosure of the same across the project area using appropriate communication method;</li> <li>• Participate in the project level meetings</li> <li>• Report progress, highlighting social issues not addressed, to provide for mid-course correction,</li> <li>• Assist in establishing GRM and its operation helping the communities and any affected persons;</li> <li>• Coordinate and oversight work of the SSDS individual consultant in the project process.</li> </ul>
Senior Social Development Specialist	<ul style="list-style-type: none"> <li>• Review relevant legal and policy framework and social development and safeguards planning frameworks;</li> <li>• 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.</li> <li>• Review design and conduct subproject level social screening, social impact assessment and preparation of social management plans.</li> <li>• Coordinate and facilitate all activities contained in SECDF and any social management plans with the help of the Consultant.</li> <li>• Coordinate and facilitate surveys for social impacts assessment and market price assessment for preparation of RAP and SECDF and their implementation;</li> <li>• Assist in the process of supervision and monitoring of implementation of SMF and the subsequent social management plans;</li> <li>• 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 Design Supervision Consultant (DSC) to prepare the subproject based social management plans.</li> <li>• Routinely monitor progress in land acquisition and RAP implementation activities and keep Project Director informed on a monthly basis, and assist with the preparation of formal status reports for World Bank missions.</li> </ul>

<sup>1</sup> A detail ToR for appointing a Social Coordinator is shown in Annex-3

Levels	Roles and Responsibilities
	<ul style="list-style-type: none"> <li>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.</li> <li>Help affected persons and communities in the grievance resolution process involving the project GRM;</li> <li>Collect data, consult the communities and targeted beneficiaries and prepare monthly progress reports and participate in monthly review meetings;</li> <li>Participate in the training program for capacity building; and</li> <li>Carry out other responsibilities as required from time to time.</li> </ul>

## 6.2. Grievance Redress Mechanism

For addressing grievances, four tier grievance redress mechanism (GRM) will be established. The Social Coordinator 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 6.2: The Grievance Redress Mechanism.**

Tiers of GRM	Nodal Person for Contact	Facilitation by Project	Time frame
<b>First Tier:</b> 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
<b>Second Tier:</b> 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
<b>Third Tier:</b> 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 Social Coordinator 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
<b>Fourth Tier:</b> Independent Institutions such as Anti-Corruption Commission, Human Rights Commission etc.	Independent Institutions and the Judiciary will remain as an option for an aggrieved person and/or community in case that the other tiers have not been effective.	Only for vulnerable person (s) as per the grievance mechanism of the project. Only after exhausting both first, second and third.	As per established laws of Bangladesh
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, as a result 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.

### **6.3. Monitoring and Evaluation**

The DoF is primarily responsible for monitoring to ensure conformity to the requirements of the 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 Social Safeguard Coordinator of the PMU. During implementation, meetings will be organized by DoF and SDF inviting all actors for providing information on the progress of the project work.

Below list indicators for social monitoring of the SECDF implementation:

- (1) Presence of SEC in the influence areas of project interventions;
- (2) Number of SEC by gender and age affected;
- (3) Number of SEC participate in project beneficiary groups;
- (4) Loss of livelihoods by SEC due to the project interventions;
- (5) Number of SEC persons losing livelihoods;
- (6) Number of SEC fishers and fishery-dependent households covered in livelihood transformation program;
- (7) Changes in livelihoods and level of income at pre- and post-project situations;
- (8) Level of satisfaction expressed by the SEC on the project process, input, output and outcomes;
- (9) Participation of the SEC in project process using FPIC;

### **6.4. Participation in Livelihood Transformation Program**

The scope of livelihood transformation will be assessed under the component 3 and inclusion of the small ethnic communities will be prioritized in the community fisheries management and alternative livelihoods including business development and market linkages. The project will expand vocational training and employment placements as per existing and acquired skills. The community fisheries management and livelihood transformation activities will be implemented in a targeted set of villages, initially up to 450 clusters across the 16 project districts to ensure that recipients benefit from technical and facilitation support backed by sufficient resources and capacity building.

### **6.5. Schedule**

An SECDF shall be prepared as soon as the site-specific projects activities are selected and impact on SE community be identified and submitted to the Bank as part of the implementation plan. Prior to the commencement of the implementation, the SECDF shall be disclosed on DoF and SDF websites and the World Bank portal. A copy of SECDF with local language shall be placed in local project offices, Union Parishad offices, Upazila and District Administration offices where small ethnic community peoples can access to.

### **6.6. Budget**

Budget for implementing SECDF will be part of the Project budget. It uses to cover costs of project staff allowances and consultants to prepare compliance reports including supervising and monitoring reports, data

collection, and preparation of SECDP, etc. The SECDP will include information on detailed cost of mitigation measures and other community level enhancement measures and entitlements for small ethnic community peoples in the project areas; and administrative and monitoring costs. Sources of funding for the various activities and financing plans for SECDF will be indicated later when SECDP is developed. All funds for management of small ethnic community development will be financed from the GOB counterpart financing. DoF will keep resources allocation for social development and safeguards in the Development Project Proposal to be approved by the Government.



## Annex 1: Detailed Description of Project and Components

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) in two phases which aims to increase coastal and marine fisheries' contribution to the economy, reduce poverty, and ensure environmental sustainability through enhanced management of coastal and marine fisheries and aquaculture. It also aims to create opportunities for the fishing communities' in accessing to alternative livelihood means. The phase I BSCMFP will be implemented in 6 years with a preliminary budget envelope of around USD 256 million and cover 75 upazilas of 16 coastal districts. Along with the DoF the Social Development Foundation (SDF) under the Ministry of Finance (MoF) will be the co-implementer of the Component-3, where the Small Ethnic Community Development Framework (SECDF) is a part, through a Community Driven Demand (CDD) approach. Investment Project Financing (IPF), using a mixture of standard investment and Disbursement-Linked Indicators (DLIs) will be used to support project implementation. 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.

Phase I of the project will have four components focusing on: (i) activities necessary to enable sustainable fisheries sector investments and growth; (ii) improvements to infrastructure and production practices for coastal belt fisheries (capture and culture); (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 in to 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 new Bangladesh fisheries law (currently under legislative review) 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.<sup>2</sup> Furthermore, chill stores<sup>3</sup> will be constructed at different nodes to store iced fish at cool temperatures, as this increases the fish value and helps prevent cross-contamination.

---

<sup>2</sup>At the processing end of the export chain, the EU approved factories will have appropriate flake ice-making equipment and storage facilities.

<sup>3</sup> 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.

*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, 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 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 prerequisites 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 subcomponent 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) *P. 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 species<sup>4</sup> (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

---

<sup>4</sup>*P. monodon* (Bagda) – a commercial export product that can generate quality jobs and taxable revenues to support broader economic growth. ROI 200%.

*M. 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%.

*P. serrata* (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%.

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: Empowerment and Livelihoods Development.** 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 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 Livelihoods.** 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)<sup>5</sup>. 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

<sup>5</sup> 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 as a result 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.

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 Committee<sup>6</sup> 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).

*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

---

<sup>6</sup> 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.



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 jump-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 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 and including representation from key Ministries, to provide supervision, 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.

## **Annex-2: Technical Guidelines for Consultation and Preparation of SECDP**

The consultation framework is designed to help to ensure that indigenous peoples are well informed, consulted and mobilized to participate in the investments to be supported under the project. Their participation will not only make school management more sustainable but also provide benefits with more certainty, or protect them from any potential adverse impacts of investments to be financed by the project. The main features/process of the consultation framework include an environmental and social impact assessment to determine the degree and nature of impact supported by the project. A Small Ethnic Community Development Plan (SECDP) will be developed if small ethnic communities are found to be present in or have collective attachment to areas affected under the respective project intervention. Consultations with and participation of small ethnic communities, their leaders and local government officials will be an integral part of the overall SECDP, which should be prepared along with other required project reports.

### **SELECTION OF TARGET BENEFICIARIES**

Selection of the target beneficiaries at a community will be carried out during project screening using the below criteria:

- (a) Community that exhibit a strong commitment to the project concept and is willing to meet the project objectives and conditions; and
- (b) Community is poor and vulnerably dependent on fishing and fisheries-dependent occupations.

A free, prior, and informed consultation process involving small ethnic communities would provide a comprehensive baseline data on social, economic and technical aspects of each investment particularly for those areas that have been identified with ethnic groups during the project screening (preparation). This also includes participatory mapping to determine exact sites and communities, and location of small ethnic communities. The checklist for screening small ethnic communities with characteristics as provided in the Bank OP 4.10 will indicate whether or not the small ethnic communities exist in the project area and further identify potential social issues on small ethnic communities because of the investments. The DoF and SDF will undertake specific measures to consult with, and give opportunity to small ethnic communities to participate in decision making related to the investments, should they so desire.

All target communities that have small ethnic mix and are candidates for project support will be visited (at the time of first consultation with communities) by the PMU's team including social safeguard focal person and relevant local authorities, including personnel with appropriate social science training or experience. Prior to the visit, the PMU will send notice to the communities informing their leaders that they will be visited by the respective focal person and local authorities and that consultation will be conducted to seek support of the project intervention and to determine potential adverse impacts as well as possible support from the project in order to address the potential impact. The notice will request that the communities shall invite to the meeting representatives of fishers and other occupational groups, women association and community leaders. During the visit, the community leaders and other participants will present their views with regards to the proposed activities.

The project will identify and utilize the existing community grievance mechanism to take into account specific cultural attributes as well as traditional-cultural mechanisms for raising and resolving issues— to ensure that the concerns of different ethnic groups are received and addressed during project preparation, implementation and beyond project completion. To achieve this, projects would (a) identify and determine culturally acceptable ways to address grievances from significantly different ethnic groups within affected communities, including different ethnic or cultural groups within the project-affected area; (b) understand cultural attributes, customs, and traditions that may influence or impede their ability to express their grievances, including differences in the roles and responsibilities of sub-groups (especially women) and cultural sensitivities and taboos; and (c) agree on the best way to access grievance mechanisms, taking into consideration the ways communities express and deal with grievances.

At this visit, the PMU's focal person or relevant official with social expertise will undertake a screening for indigenous peoples with the help of indigenous people leaders and local authorities. The screening will check for the following:

- a) Names of ethnic groups in the target/affected villages/community;
- b) Total number of ethnic groups in the affected villages/community;
- c) Percentage of ethnic people in affected villages/communities; and
- d) Number and percentage of ethnic households within a described zone of influence of the proposed investments.

Once target communities have been selected by the DoF through screening process and impact on small ethnic communities is potential a social impact assessment will be conducted using inventory of affected assets, impact on their occupations and income, baseline socioeconomic survey and consultation. Social and economic profile of beneficiary population or project-affected people will be collected. Free, prior and informed consultations will be carried out for each of the beneficiary/affected communities/villages and the respective communities, ascertaining their broad support and determining the potential impacts and possible support under the Project. The outcome of this process will be the basis to develop safeguard documents as part of the project implementation plan that includes:

- **Small Ethnic Community Development Plan (SECDP)** is to be developed under the Project. The outline of the SECDP is described below subsection of this document;
- **Resettlement Action Plan** is to be developed provided that land acquisition exists. Outline of RAP and guideline for preparation is described in the Resettlement Policy Framework (RPF); or
- **Due Diligent Report** is to be prepared if no land acquisition or impact on indigenous peoples.

If unexpected impacts (both on SECs or involuntary displacement) occur during project implementation (particularly during construction) and it is significant the SECDP and RAP will be updated. SECDP and RAP shall be implemented prior to construction commencement.

**Table 2A: Matrix of Project Phase Vs. Safeguard Documents Required**

<b>Project Phase</b>	<b>Preselection of target Community (Concept)</b>	<b>Selection of target Community (Screening)</b>	<b>Selected target Community with potential impact (Design and approval)</b>	<b>Construction and Livelihood Transformation (Implementation)</b>
Assessment	Social assessment	Safeguards Screening	Social assessment	Updating social assessment
Safeguards required	Preparation of ESMF, RPF and SECDF	List target communities Prepare DDR for community with no impact Documentation of consultative process	Prepare RAP, if involuntary resettlement involved Prepare SECDF	Update and implement the RAP and SECDF Monitor

## **SOCIAL ASSESSMENTS**

In addition to the social assessment that was carried out at the project preparation stage, a social assessment will be undertaken among the selected target communities that have potential resettlement and livelihood impacts. The SA will be conducted by qualified social development specialist knowledgeable about the culture of the concerned ethnic communities. At this stage, the social assessment will not only gather relevant information on demographic data; social, cultural and economic situation, but also project impacts covering social and economic aspects, either positive or negative. The breadth, depth, and type of analysis required for the social assessment are proportional to the nature and scale of the proposed interventions under the project and their potential effects on the small ethnic communities. Outcomes of the assessment will be used to prepare SECDF.

The social assessment includes the following elements, as needed:

- a. A review, on a scale appropriate to the project, of the legal and institutional framework applicable to small ethnic community.
- b. Gathering of baseline information on the demographic, social, cultural, and political characteristics of the affected Small ethnic community' communities, the land and territories that they have traditionally owned or customarily used or occupied, and the natural resources on which they depend.
- c. Taking the review and baseline information into account, the identification of key project stakeholders and the elaboration of a culturally appropriate process for consulting with the Small ethnic community at each stage of project preparation and implementation.
- d. An assessment, based on free, prior, and informed consultation, with the affected small ethnic communities, of the potential adverse and positive effects of the project. Critical to the determination of potential adverse impacts is an analysis of the relative vulnerability of, and risks to, the affected small ethnic communities given their distinct circumstances and close ties to land and natural

resources, as well as their lack of access to opportunities relative to other social groups in the communities, regions, or national societies in which they live.

- e. The identification and evaluation, based on free, prior, and informed consultation with the affected small ethnic communities, of measures necessary to avoid adverse effects, or if such measures are not feasible, the identification of measures to minimize, mitigate, or compensate for such effects, and to ensure that the Small ethnic community receive culturally appropriate benefits under the project.

Free, prior and informed consultations will be conducted through a series of meetings, including separate group meetings: ethnic village chiefs; ethnic men; and ethnic women, especially those who live in the zone of influence of the proposed work under the project. All consultation will be conducted in easily accessible locations. All will be carried out in relevant local languages. Discussions will focus on investments impacts, positive and negative; and recommendations for design of investments. A broader community support will be required to proceed with the project intervention on a particular site with presence of ethnic communities.

Updated social assessment will also be carried out periodically during project implementation as part of monitoring process in order to identify unexpected adverse impacts and to propose mitigation measures. If the impact is significant, SECDF will be updated based on outcome of updated social assessment. Likely, the free, prior and informed consultation process will be continued.

#### **SMALL ETHNIC COMMUNITY DEVELOPMENT PLAN (SECDF)**

On the basis of the social assessment and in consultation with the affected small ethnic community, the DoF and SDF will prepare a Small Ethnic Community Development Plan (SECDF) that sets out the measures through which the Project will ensure that (a) small ethnic community affected by the project receive culturally appropriate social and economic benefits; and (b) when potential adverse effects on small ethnic community are identified, those adverse effects are avoided, minimized, mitigated, or compensated for. The SECDF is prepared in a flexible and pragmatic manner and its level of detail varies depending on the specific project and the nature of effects to be addressed. DoF and SDF will integrate the SECD into the project design. When small ethnic community are the sole or the overwhelming majority of direct project beneficiaries, the elements of SECDF should be included in the overall project design, and a separate SECDF is not required. The Social Management Plan or and RAP will cover the SEC requirements.

The SECDF includes the following elements, as needed:

- a. A summary of the information about (i) legal and institutional framework applicable to small ethnic community and (2) baseline information on the demographic, social, cultural, and political characteristics of the affected small ethnic communities, the land and territories that they have traditionally owned or customarily used or occupied, and the natural resources on which they depend.
- b. A summary of the social assessment.
- c. A summary of results of the free, prior, and informed consultation with the affected small ethnic communities that was carried out during project preparation and that led to broad community support for the project.

- d. A framework for ensuring free, prior, and informed consultation with the affected small ethnic communities during project implementation.
- e. An action plan of measures to ensure that the Indigenous Peoples receive social and economic benefits that are culturally appropriate, including, if necessary, measures to enhance the capacity of the project implementing agencies.
- f. When potential adverse effects on small ethnic communities are identified, an appropriate action plan of measures to avoid, minimize, mitigate, or compensate for these adverse effects.
- g. The cost estimates and financing plan for the SECDF.
- h. Accessible procedures appropriate to the project to address grievances by the affected small ethnic communities arising from project implementation. When designing the grievance procedures, availability of judicial recourse and customary dispute settlement mechanisms among the small ethnic communities will be taken into account.
- i. Mechanisms and benchmarks appropriate to the project for monitoring, evaluating, and reporting on the implementation of the SECDF. The monitoring and evaluation mechanisms should include arrangements for the free, prior, and informed consultation with the affected Indigenous Peoples' communities.

The following basic information will be required for preparation of the SECDF:

- The basic census, socio-economic data and inventory of affected assets;
- Household ownership of economic and productive assets
- Annual income from primary and secondary employment opportunities including fishing and fisheries dependent occupations;
- Economic information of community (e.g. brief information on economic and natural resources, production and livelihood systems, tenure systems)
- Social information of community (e.g. description of kinship, value system, types of social organizations of formal and informal groups)
- Potential impact of proposed project activities on basic social services (e.g. water supply, health clinics and schools)
- Potential impact of project activities on the social and economic livelihood.



**Annex 3: Preliminary Screening of Small Ethnic Communities****Date:** \_\_\_\_\_

<b>When to do the screening?</b>	At the time of the first consultation with a community/village.				
<b>What information to be collected?</b>	Demographic data of small ethnic community people who live within the catchment of the project interventions.				
<b>How to collect the information?</b>	It can be obtained from ethnic leaders, village leaders (UP Chairman) and community chief.				
<b>Who will do the screening?</b>	Consultants or PMU staff				
<b>District:</b> _____ <b>Upazila:</b> _____ <b>Union:</b> _____ <b>Village:</b> _____ _____					
Name of village within catchment of project interventions	Name of ethnic group	Number of ethnic households	Total population of the village (nos.)	Number of ethnic population (name)	
				Male	Female

Signature: \_\_\_\_\_

Name (of the PMU Consultant): \_\_\_\_\_