RESETTLEMENT PROCESS FRAMEWORK

FOR THE

SUSTAINABLE FORESTS & LIVELIHOODS PROJECT (SUFAL)

BANGLADESH FOREST DEPARTMENT (BFD)

JULY 2018

DHAKA, BANGLADESH

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Acronyms

AIGA   : Alternative Income Generating Activities
BDT   : Bangladesh Taka
BFD   : Bangladesh Forest Department
BP   : Bank Procedure
CDD   : Community Driven Demand
CHT   : Chittagong Hill Tracts
DC   : Deputy Commissioner
DRR   : Disaster Risk Reduction
ESMF   : Environmental and Social Management Framework
FGD   : Focus Group Discussion
GAP   : Gender Action Plan
GIS   : Geographic Information System
GoB   : Government of Bangladesh
GRM   : Grievance Redress Mechanism
GRS   : Grievance Redress Service
HH   : Household
IoL   : Inventory of Losses
M&E   : Monitoring and Evaluation
NGO   : Non-government Organization
OP/BP   : Operational Policy/ Bank Procedure
PAP   : Project Affected Person
PD   : Project Director
PF   : Process Framework
PMU   : Project Management Unit
R&D   : Research and Development
R&R   : Rehabilitation and Resettlement
RAP   : Resettlement Action Plan
PF   : Resettlement Policy Framework
SDS   : Social Development Safeguards
SEC   : Small Ethnic Community
SECDP   : Small Ethnic Community Development Plan
SIA   : Social Impact Assessment
ToT   : Training of Trainers
UP   : Union Parishad
UNO   : Upazila Nirbahi Officer
WB   : World Bank]

Executive Summary

Background and scope: The Bangladesh Forest Department (BFD), under the Ministry of Environment and Forests (MoEF), is preparing the SUFAL project. The project is designed to improve collaborative forest management and increase access to alternative income generation activities for forest-dependent people in selected afforestation and reforestation sites in different ecosystems; hills, plain and coastal regions.

A vast majority of forest dependent community are known to use lands and forest resources under customary/traditional rights that are not recognized in the country's land administration system (only 3% have legal title). They don't have legal title of the land they use and consequently, they usually ineligible for any assistance in cases they are adversely affected. Although, neither land acquisition nor physical displacement of forest-dependent people is being considered under the SUFAL project; however, it may impact on the livelihoods and income of those living in or near protected areas with their access to resources most probably being reduced. Considering such a scenario, this Resettlement Process Framework (PF) is prepared in compliance with the World Bank safeguard policy 4.12 on Involuntary Resettlement, following an initial consultation and social assessment to address the involuntary resettlement impacts of the proposed SUFAL project. BFD will undertake social screening of all site-specific activities to identify potential social safeguard issues, and adopt and implement impact mitigation measures.

Implementation duration: The SUFAL project duration is five (5) years, from the point of effectiveness (likely in early 2019) to closing (late 2023 or early 2024).

Pr**o**ject **cost:** The project will be implemented for an estimated US$175.00 million from the World Bank with a GoB contribution of US$20 million.

Project administrative area: Project will cover 169 Upazilas (sub-districts) under 28 districts in three different ecosystems: plains, hills and coastal.

Population coverage: The project will cover around 50.79 million population which consisted in 1.12 million households, and covers one-third of total population in Bangladesh (estimated based of World Food Program/ World Bank/ Bangladesh Bureau of Statistics, 2014).

Project Description: The project includes 4 distinct components with the associated activities provided below:

Component 1: Institutional Development, Information Systems and Training
Sub-Component 1.1: Strengthening Organizational Capacity
Sub-Component 1.2 Applied Research
Sub-Component 1.3 Training
Sub-Component 1.4: Strengthening Monitoring, Information Management Systems and Forest Inventory
Sub-Component 1.5: Communications & Outreach
Component 2: Strengthening Collaborative Forest and Protected Area Management
Sub-Component 2.1: Institutionalizing Collaborative Forest Management (CFM)

Sub-Component 2.2: Restoration of Degraded Forests, Plantations, Coastal Green Belt and Field Infrastructure
Sub-Component 2.3: Improving Protected Areas and Wildlife Management
Component 3: Increasing Access to Alternative Income Generating Activities (AIGAs), Forest Extension Services & Trees Outside Forests (TOF)
Sub-Component 3.1 Community Mobilization and Organization
Sub-Component 3.2 Community Livelihood Grants for AIGAs
Sub-Component 3.3 Extension Services for Trees Outside Forests
Component 4: Project Management, Monitoring and Learning
Sub-Component 4.1 Project Management
Sub-Component 4.2 Monitoring

Target beneficiaries: The SUFAL project target groups of beneficiaries are the poor and extremely poor households of forests dependent community.

Project interventions and potential resettlement impacts: The social risks and impacts foreseen at this stage are based on preliminary ideas and as well as feedback received from community level consultations and field observations. Component-specific social impacts including involuntary resettlement and livelihoods impacts have been summarized below:

Component activities	Potential Impacts
Component 1: Strengthening Institutional Development, Information Systems and Training	
Sub-Component 1.1 Strengthening Organizational Capacity	This component will be helpful for involuntary resettlement screening, gender based disaggregated data collection, appropriate beneficiary, selection, skills development, alternative income generation, decision-making, knowledge management, assessment and management. Adequate staff resources will be ensured with BFD for social safeguards management in project cycle.
Sub-Component 1.2 Applied Research and Training	
Sub Component 1.3 Training	
Sub-component 1.4 Strengthening Monitoring, Information Management Systems and Forest Inventory	
Sub-component 1.5: Communication and outreach	
Component 2 : Collaborative Forests and Protected Areas Management	
Sub-component 2.1Institutionalizing Collaborative Forest Management (CFM)	No land acquisition is foreseen but construction of small scale infrastructure on BFD land may induce restricted access to the formal and informal users of existing land.
Sub-Component 2.2 Restoration of Degraded Forests, Plantations & Coastal Green Belt and Field Infrastructure	There may also be issues of inclusion of small ethnic community, gender, public health risks and labor influx associated with the activities. No involuntary displacement and resettlement issues are expected,
Sub-Component 2.3 Improving Protected Areas and Wildlife Management	

	but component 2.3 could require communities to accept restrictions of access to natural resources in and around forests, in exchange for project benefits.
Component 3: Alternative Income Generating Activities (AIGAs)	
Sub-Component 3.1 Community Mobilization and organization	Alternative livelihoods improvement program – no involuntary resettlement issues are expected. Small infrastructure construction may be involved on existing available land upon confirmation of negative social attributes. The program will follow all-inclusive selection and placement approach.
Sub-Component 3.2 Community Livelihood Grants for AIGAs	
Sub-Component 3.3 Extension Services for Trees Outside Forests	
Component 4: Project Management and Monitoring	
Sub-Component 4.1 Project Management	This component will be conducive for involuntary resettlement screening, transparency and accountability, measuring the result of performance against the target, assessment and management. Adequate staff resources will be ensured with BFD for social safeguards management in project cycle.
Sub-Component 4.2 Project Monitoring	

Resettlement Process Framework (PF): OP 4.12, the World Bank policy on Involuntary Resettlement, has a set of lesser known provisions relating to impacts deriving from "restriction of access" to natural resources in legally designated protected areas. These provisions are relevant in the case of SUFAL given that, overall, the project is not expected to necessitate any land acquisitions and resettlement, although there is the possibility that during the project's implementation, access to land and forest-based natural resources by some forest dependent communities and households could be restricted, with adverse effects on their livelihoods. This Process Framework (PF) is, thus, prepared (following OP 4.12) for the purpose of establishing a due process to avoid, minimize and mitigate the negative impacts from the project's interventions to guide the project to ensure effective participation of the affected communities and relevant stakeholders in the project.

The specific provisions for the tribal peoples and vulnerable communities are elaborated separately in the project's Small Ethnic Community Development Framework (SECDF). In this regard, the SECDF will be taken as complementary to the provisions of this PF.

Key Considerations for the PF:
Mitigating adverse effect: SUFAL team will take appropriate measures to mitigate any adverse impacts due from the activities of the project. In all such cases, the Project Affected Persons (PAPs) will be given appropriate assistance for restoration of livelihood through AIGAS.

Entitlements to affected people without legal rights to land: The PAPs will be carefully screened to ensure that appropriate assistance is provided to those without legal rights to land. This will include, in particular, ethnic minority communities, whose claim to land might be customary and/or historical, women, or other marginalized or otherwise vulnerable groups.

Social Networks: The required development of an action or management plan will consider existing social networks such as families, clans, religious groups, social and cultural associations (formal or informal), cooperative labor arrangements, etc.

Eligibility and Entitlements

Eligibility: People who are economically affected due to permanent or temporary loss of access to natural resources in and around legally designated forest lands because of the project will be eligible for benefits and assistance under this PF. Such eligible PAPs will include the following:

i.   Formal or informal users of existing available land or public land and/or recognized legally or socially;
ii.   Lessees (leaseholders) of public land, whether long-term or short-term;
iii. Tenants with or without formal legal registration according to national law;
iv.   Cultivators of plants and tree seedlings, irrespective of legal status of property in relation to land;
v.   Vulnerable persons, including households headed by women, elderly and/or disabled persons, the households in local context with per capita incomes at or below the poverty line.
vi.   Mobile vendors and others who may be drawing livelihoods from the area.

Income Restoration:

Access to means of livelihood: BFD will ensure that the forest dependent communities have access to the forest-based resources on which they depend for their livelihoods. In cases their access is restricted, BFD will undertake to restore their livelihood options by appropriate measures including AIGAs.

Vulnerable PAPs: Vulnerable PAPs, including ethnic minorities, are entitled to livelihood restoration/ improvement support in the form of cash, job-placement, and additional financial support in the form of grants for investments in business or re-employment related equipment and buildings.

Mitigation Measures and Process: The SUFAL project will use livelihoods transformation through Alternative Income Generating Activities (AIGAs) and capacity building to help poor forest dependent households break out of the poverty cycle and transform their better livelihoods. The overall process of ensuring the PAPs benefit from project activities that restrict their access to forest resources will include the following:

a. Consultation and Participation:

The SUFAL project activities will adopt an all-inclusive participatory approach that promotes consultation and participation of the forest dependent communities and other stakeholders in project process. Community engagement will be continued in the project implementation stages using two-way processes involving communication, consultation, collaboration and empowerment mechanisms. All consultation proceedings will be appropriately documented and feedback considered in the implementation process.

b. Community Engagement

The project will ensure the engagement of targeted communities through continued consultations for planning and full community management of implementation and monitoring of project activities. Consultations will be held at regular intervals with target communities.

c. Stakeholder Participation

The project will recognize the forest dependent communities as the primary stakeholders of the project. It project will address the legitimate concerns of community members and provide opportunities and avenues for consultation and their participation, and will allowed to be part of the decision-making process.

d. Women, Children, Persons with Disabilities and Other Excluded Groups' Needs

The project will actively promote advancement of gender equity, transforming traditional gender roles and progressive changes in power relationships between women and men. Alongside, it will give priority focus on the poor and the excluded groups to benefit from the project.

e. Small Ethnic Community Development

The small ethnic communities will be sufficiently and meaningfully consulted allowing their free, prior and informed consultation (FPICon) to project interventions. They will have equal opportunity to access the benefits and any potential negative impacts to those communities will be avoided, minimized and the residual impacts are properly mitigated. The project's Small Ethnic Community Development Framework (SECDF) will provide the necessary guidelines in this regard.

f. Initial Social Screening

During the identification and preliminary stages of any activity preparation, BFD will employ the screening checklists designed for the project. In cases where the preliminary assessment indicates that there is the potential for involuntary land taking and resettlement, appropriate preparation will be done for further surveys, studies and consultations with key stakeholders.

Implementation Arrangements of Process Framework: The SUFAL project will implement co-management approach and collaborative forest management. BFD, though its PMU, will be responsible for the implementation of this Process Framework. The Project Director will be the responsible officer in this regard, and s/he will be assisted by the Gender Expert and Social Safeguards Expert in the PMU, besides the NGOs contracted under the Component 3 (AIGAs).

Preparation and Implementation of Action Plans: The NGOs, assisting BFD in the implementation of the project will undertake the preparation of the relevant Action Plans which will specify the concrete measures that will assist the PAPs. The Plans can take the form of natural resource management plans prepared under the project. In the case of the Protected Areas, this can be incorporated in the respective Protected Area Management Plan.

Grievance Redress Mechanism (GRM): BFD will establish a grievance redress mechanism (GRM) for all project activities related to land acquisition and involuntary resettlement to address complaints and grievances on the project's interventions. As part of GRM, BFD will set up a project-project specific Grievance Redress Committee(s) which will include representatives of the beneficiary/affected communities, besides other relevant stakeholders. Decisions agreed at any level of GRC hearings will be binding on BFD and its partners' organizations involved in the implementation of the project.

Monitoring and Evaluation: The BFD is responsible for monitoring of the project activities. As part of this, BFD will measure the results of performance of any and all resettlement actions, and take corrective measures against the targets. BFD also hire a third party monitor to evaluate the project activities. Other tools such as, Annual Operating Plans (AOP), Monthly Progress Reports (MPR) and regular visits by the PMU/ partners will also be utilized as part of the project Monitoring and Evaluation (M&E) system.

Budget and Financing: The cost of implementation of this Process Framework will be covered by the general budget of the SUFAL project.

1. Background and scope

The Bangladesh Forest Department (BFD), under the Ministry of Environment and Forests (MoEF), is preparing the SUFAL project. The project is being designed to improve collaborative forest management and increase access to alternative income generation activities for forest-dependent people in selected afforestation and reforestation sites in different ecosystems; hills, plain and coastal regions. This will be implemented over a period of five years with financial support of the World Bank.

A vast majority of forest dependent community are known to use lands and forest resources under customary/traditional rights that are not recognized in the country's land administration system (only 3% have legal title). The lands that they use without legal titles are considered public and make them ineligible for any assistance in cases they are adversely affected. Neither land acquisition nor physical displacement of forest-dependent people is being considered under the SUFAL project; however, it may impact on the livelihoods and income of those living in or near protected areas. Their access to resources will most probably be reduced. In that case, World Bank safeguard policy 4.12 on Involuntary Resettlement requires a Resettlement Process Framework (PF) to address the social safeguard issues. Consequently, BFD has adopted this framework to addresses impacts and outline mitigations of SUFAL project interventions. The report identifies the Project Affected Peoples (PAPs) and assesses about the specific needs and interests with the aim of restoring their livelihoods. Those people who have only traditional rights to the forest and protected area resources may be given capacity building and income-generating alternatives. The indigenous peoples, who depend on forest resources will be allowed free access as much as possible, including special rights of the SUFAL project benefits.

The project will facilitate mobilization of poor forest-dependent households into groups, engage them in afforestation and reforestation activities, and provide them with appropriate training, technical and financial support, social forestry support, alternative livelihood development improving their livelihoods. BFD will undertake social screening of all site-specific activities to identify potential social safeguard issues, and adopt and implement impact mitigation measures. This PF has been prepared following an initial consultation and social assessment to address the involuntary resettlement impacts of the proposed SUFAL project, in compliance with the national regulatory as well as WB policy requirements as enshrined in OP/BP 4.12.

2. Project Description

With a population of 160 million, Bangladesh is one of the most densely populated countries in the world most of whom live rural areas. Located in the world's largest delta, with an average elevation on of 203 meters from sea level it is also one of the most exposed to the impacts of global warming and climate change. The country's continued economic growth and poverty reduction critically depends on its environmental sustainability and natural resource management.

Forests for Bangladesh are essential to its environment and natural resources management, in particular for its large rural population who depend for their livelihood on its resources in the form of small timber, medicinal plants, fuel-wood, fodder and food supplements. This demands on forest-based resources is only likely to grow further in the coming years as Bangladesh economically grows. The project is conceived to respond to this critical issue and will support the Government of Bangladesh in creation of further forest coverage, management of natural resources and environmental sustainability.

Implementation duration: The SUFAL project duration is five (5) years, from the point of effectiveness (likely in early 2019) to closing (late 2023 or early 2024).

Pr**o**ject **cost:** The project will be implemented for an estimated US$175.00 million from the World Bank with a GoB contribution of US$20 million.

Project administrative area: Project will cover 169 Upazilas (sub-districts) under 28 districts in three different ecosystems: plains, hills and coastal.

Population coverage: The project will cover around 50.79 million population which consisted in 1.12 million households, and covers one-third of total population in Bangladesh (estimated based of World Food Program/ World Bank/ Bangladesh Bureau of Statistics, 2014.

Table 1: Components of SUFAL Project

Component 1: Institutional Development, Information Systems and Training
Sub-Component 1.1: Strengthening Organizational Capacity
Sub-Component 1.2 Applied Research
Sub-Component 1.3 Training
Sub-Component 1.4: Strengthening Monitoring, Information Management Systems and Forest Inventory
Sub-Component 1.5: Communications & Outreach
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Sub-Component 4.1 Project Management
Sub-Component 4.2 Monitoring

Component 1. Strengthening Institutional Development, Information Systems and Training

Sub-Component 1.1 Strengthening Organizational Capacity: (i) A review of BFD's capacity and roles will focus on the long-term needs of BFD including, IT, GIS and other systems and business processes and staffing and will initially concentrate on incremental change and bolstering existing capacity, with possible functional reorganization being addressed subsequently. (ii) Support for the adoption of the new draft Forest Policy, the draft Forest Master Plan and, a review of key regulations (timber transit and social forestry) and development of options for innovative long-term forest financing will provide. (iii) project area field offices and training centers will be renovated and climate -proofed and serve as cyclone shelters in coastal districts.

Sub-component 1.2 Applied Research: The Bangladesh Forest Research Institute (BFRI) will undertake this task through a Memorandum of Understanding (MoU) with BFD. Applied research will focus on sourcing of high quality and climate resilient planting material for plantations through (i) seed collection systems and seed orchards; and (ii) improved nursery techniques. An Innovation Window will fund proposals related to climate change and forests and biodiversity conservation and increasing efficiency of wood and non-wood processing, wildlife management or other topics that support the objective of SUFAL, from individuals, companies, educational institutions, NGOs, etc. A BFD committee will review and shortlist proposals according to agreed criteria.

Sub-component 1.3 Training: Training for BFD staff, and especially female staff, will be delivered on a number of topics to strengthen capacity in forest and wildlife management and will include training in emerging areas including, climate change, carbon measurement, eco-tourism, gender, collaboration with communities, etc. Other stakeholders e.g., tourism companies, NGOs, will also receive training in eco-tourism, collaborative management, forest and PA regulations, etc. A customized training program will be delivered by the NGOs under Components 2 and 3 for communities on collaborative management and AIGAs.

Sub Component 1.4 Strengthening monitoring, information management systems and forest inventory: A strategy for information management systems will be developed. The Resource Information Management System (RIMS)unit will be resourced to develop a digital site-specific management planning system using free and open source software. This approach will build on the Site-Specific Plans developed under Component 2 and will be piloted in 3 Management Planning Divisions and will help in the revision of the Forest Manual and format for management plans. The project will support updating of management plan requirements by piloting preparation of new management plans for both forests and PAs (protected areas). The current NFI will be updated and a team of trained staff will be dedicated to continue the process beyond the project. Precise estimates of TOF, which play an important role in the economy and carbon sequestration, are not normally the focus of NFI but the NFI unit will consolidate the necessary skills and tools to conduct the sophisticated analysis for this work.

Sub-component 1.5. Communication & Outreach: Under a communication and outreach plan formulated in the first year, the PMU will pursue an outreach program to motivate both the participating partners, especially women, about collaborative management, PA management, wildlife protection, etc. The experiences and lessons from the project will be shared with relevant officials, partners and decision-makers for effective project management and implementation. A separate program of outreach will be planned for each of the key interventions under the project: (i) collaborative forest management; (ii) protected areas and wildlife management; and, (iii) Trees Outside Forests (TOF);

Component 2: Strengthening Collaborative Forests and Protected Areas Management

Sub-component 2.1 Institutionalizing collaborative forest management (CFM): The aim of collaborative management is to give forest dependent communities1 a stake in the management and maintenance of forest cover and to foster local stewardship of forests. Key activities will be: (i) identifying policy and regulatory measures to strengthen collaboration with communities in different ecosystems; (ii) identifying

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[1] A forest dependent community would include forest dependent people (self-selected) residing in villages located within three kilometers from the boundary of the Forest Beat area and would include the nearest village in the case of mangroves.

the most forest dependent communities where CFM committees will be established; (iii) awareness raising, capacity development and training on the CFM approach for communities, especially women and BFD staff; (iv) strengthening CFM committees with own bank account, an operating fund and, (v) developing an institutional framework and rules for CFM during implementation. Special emphasis will be given to encourage women's participation as office-bearers in the CFMCs.

Community co-management in PAs will be under the Protected Area Management Rules 2017. In areas where social forestry programs are underway, the BFD will initiate CFM after the 3rd (third) rotation. A template to describe the roles and responsibilities of CFMCs will be developed during the first year of the project in consultation with communities. The CFMC will be the point of entry for the AIGAs under Component 3.

Sub-Component 2.2 Reforestation, Coastal Green Belt and Plantations: Protection, management and planting as appropriate in different forest ecosystems, covering about 76,000 hectares will be financed to enhance forest quality and increase the sustainable supply of fuelwood and non-timber products to communities. This will be achieved through:

- Assisted Natural Regeneration -protection and planting of up to 20% of site
- Enrichment plantations - with up to 60% planting
- Mixed plantation with indigenous and slow or fast-growing species, including NTFPs, medicinal
- Mangrove and other coastal afforestation

Availability of suitable forest land for these activities was assessed by BFD with support from the Center for Environment and Geographical Information Services (CEGIS), Bangladesh, using satellite images and field verification[2],[3]. Selection of areas for afforestation in the coastal districts is based on field verification using the study conducted by CEGIS for this purpose in 2016. Afforestation activities will be preceded by Site-Specific Planning(SSP) for each site based on actual site requirements. SSPs will generate a geo-spatial database which will help monitoring of treated sites, increase transparency and be an entry point for involvement of local communities in CFM.

Sub-Component 2.3 Improving Protected Areas (PAs) and Wildlife management: (i) development and implementation of PA management plans for 10 PAs[4]. Management plans will be implemented with co-management committees (CMCs). The members of Village Conservation Forum, the lowest tire of this organizational structure, would be eligible to be part of the livelihood support provided under Component 3. For motivation, networking and organizational development, the NGOs contracted under Component 3 will be responsible for organizing the CMCs and their training and capacity building for AIGAs. (ii) scaling up endangered species conservation programs for 13 endangered species[5]; (iii) enhancing capacity for

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[2] CEGIS, 2017. GIS based Forestland Availability Assessment for Plantation/ Restoration. (Dhaka: CEGIS)

[3] Government of Bangladesh (2017), National Land Representation System of Bangladesh, Forest Department, Ministry of Environment and Forests, Government of the People's Republic of Bangladesh.

[4] Baraiyadhala National Park, Shingra National Park, Nababgong National Park, Birgonj National Park, Pablakhali Wildlife Sanctuary, Hazarikhil Wildlife Sanctuary, Shangu Wildlife Sanctuary, Nagarbari-Mohangonj Dolphin Sanctuary, Shilanda-Magdemra Wildlife Sanctuary, Nazirgonj Wildlife Sanctuary, Altadighi waterbased SBCA, Swatch of No-ground MPA, Char-muguria Eco-park

[5] Tiger, Elephant, Dolphins, Shark and Rays, Migratory Birds, Vultures, SB Sandpiper, Russel's Viper, C-E Macaque, SW Crocodile, River Terrapin, P-Langur, Gharial Conservation Program

wildlife law enforcement (excluding support to active enforcement activities): The project will support developing necessary technical and human capacity for scaling up SMART patrolling in 10 PAs outside Sundarbans. Training, facilities, equipment including software and hardware, GPS navigators, binoculars, tools for data collection and analysis will be procured. Necessary awareness raising and outreach and training will be provided to the Co-Management Committee (CMC) members. (iv) restoration and protection of natural habitats in select wildlife corridors (3.8 thousand hectares) for wild elephants for the alleviation of human-wildlife conflict in and outside of the country's protected areas and, (v) knowledge and information sharing with regional neighbors to curb trade in wildlife products and enhance wildlife law enforcement in the region and cooperation on transboundary habitat maintenance.

Component 3: Increasing Access to Alternative Income Generating Activities (AIGAs), Forest Extension Services & Trees Outside Forests (TOF)

Sub-Component 3.1 Community mobilization and organization for AIGAs: AIGAs and will be implemented in up to 600 villages in or close to forests, covering about 40,000 households. A Community Operations Manual (COM) will elaborate the rules and criteria for the implementation of AIGAs. NGOs will be contracted by BFD to mobilize, organize and provide training to communities to plan and implement the AIGAs and manage the AIGA fund. The CFMCs will open a bank account and start community savings and initiate village development activities and receive training for AIGAs. An important aspect will be organizing and targeting women and adolescent girls with tailored training and income generation activities. These activities will be organized in a way that is conducive to women's participation and compatible with their multiple responsibilities.

Sub-Component 3.2 Alternative Income Generation Activities (AIGAs): The COM will elaborate the protocols for implementation including: (i) awareness raising and community mobilization; (ii) criteria and process for selection of AIGAs recipients - priority will be given to members of CFMCs who are (a) the poorest in the village; (b) all women-headed households; (c) landless and those who lack year-round employment; or, (d) belong to ethnic minority communities; the NGO will ensure that all decisions are participatory, inclusive and, transparent and address the specific needs for women's economic empowerment. (iii) capacity building; (iv) assessing AIGA proposals; (v) rules for borrowing and re-payment to the AIGA fund; (vi) reporting and procurement; (vii) list of activities that may not be financed by the project; (viii) sustainability.

Funding of AIGAs: Funding will be channeled from the PMU directly to community accounts. Each community will have two accounts:(i) a collaborative forest management committee (CFMC) account for a village development fund of $5000 per village for carrying out activities that benefit the village as a whole; and, (ii) AIGA fund. The AIGA fund will be maintained as a revolving fund at the community level and will be available to community members as micro-credit. AIGAs that may be financed would be screened, among others, for enhancing climate resilience, reduction of forest degradation and support to the objectives of SUFAL. A list of activities that may not be financed by the project will be in the COM. Both on and off-forest income generating activities may be financed. The NGOs will help with the forward linkages to markets and banking and credit facilities where required with special emphasis on providing women with these linkages.

Sub-component 3.3 Extension services and Trees Outside Forests (TOF)[6]: The existing private sector network of nurseries and planting material distribution tends to use non-certified, low quality seed of unknown origin and germination rates, and generally raises poor quality seedlings using outdated methods. The TOF value chain comprises of. This sub-component will support the TOF value chain (nurseries, homesteads, sawmills) by: (i) establishing a national timber market intelligence system; (ii) technology transfer and training to nursery owners and farmers through Social Forestry Nursery and Training Centers (SFNTCs); (iii) training to improve efficiency of small scale sawmilling; and, (iv) a review and updating of policies to ease costs and difficulty for tree growers, sawmillers and exporters. Activities will include plantations on bare and other unused land available on the sides of roads, coastal embankments, railway tracks, and river and canal banks; outreach programs with Upazila Parishads to encourage planting of trees on public and private land in five Upazilas; seedling distribution to homestead farmers. Special focus will be given to ensure that extension and training is held in locations and at times that encourage participation of women farmers and entrepreneurs.

Component 4: Project Management, Monitoring and Reporting

Sub-Component 4.1 Project Management: This sub-component will finance the BFD's project management unit at the central level in the headquarters and in the 28 districts where field implementation will take place. Support will be provided for contracting key specialists such as in the areas of social and gender, financial management, procurement, knowledge management and community development. In addition, monitoring and evaluation including, baseline survey, mid-term and end of project evaluations, independent third-party monitoring, external and social audits will be financed under the sub-component.

Sub-component 4.2 Monitoring, Reporting and Evaluation: This component will finance all activities related to M&E and reporting of the project including surveys, social audits, third-party monitoring, geo-spatial monitoring and analysis of administrative records. The forest inventory and the new module on trees outside of forests, will be financed under component 1.

3. Target beneficiaries

The SUFAL project target groups of beneficiaries are the poor and extremely poor households of forests dependent community. Forests resource is immensely significant to the livelihoods of these forest dependent communities, which are quite varied and influenced by socio-economic and physical environment of different ecosystems of Bangladesh.

4. Project interventions and potential resettlement impacts

The project interventions involve both afforestation and reforestation, repair or upgrade of infrastructure works as well as certain alternative livelihoods interventions with the target communities. The social risks and impacts foreseen at this stage are based on preliminary ideas and as well as feedback received from

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[6] Trees Outside Forests (TOF) refers to trees that have been grown on land that is not classified as Reserved Forest or Protected Forest or any land with legal status of a forest. These trees are frequently grown on government or privately-owned land or some are grown as part of the Social Forestry program.

community level consultations and field observations although none of these suggest that any land acquisition would be required under the project. Adverse impacts on livelihoods have actually been anticipated to be minimum. Component-specific social impacts including involuntary resettlement and livelihoods impacts have been summarized in the table 2.

Table 2 : Potential Resettlement and Livelihood Impacts of the Project

Component activities	Potential Impacts
Component 1: Strengthening Institutional Development, Information Systems and Training	
Sub-Component 1.1 Strengthening Organizational Capacity	This component will be helpful for involuntary resettlement screening, gender based disaggregated data collection, appropriate beneficiary, selection, skills development, alternative income generation, decision-making, knowledge management, assessment and management. Adequate staff resources will be ensured with BFD for social safeguards management in project cycle.
Sub-Component 1.2 Applied Research and Training	
Sub Component 1.3 Training	
Sub-component 1.4 Strengthening Monitoring, Information Management Systems and Forest Inventory	
Sub-component 1.5: Communication and outreach	
Component 2 : Collaborative Forests and Protected Areas Management	
Sub-component 2.1Institutionalizing Collaborative Forest Management (CFM)	No land acquisition is foreseen but construction of small scale infrastructure on BFD land may induce restricted access to the formal and informal users of existing land.
Sub-Component 2.2 Restoration of Degraded Forests, Plantations & Coastal Green Belt and Field Infrastructure	There may also be issues of inclusion of small ethnic community, gender, public health risks and labor influx associated with the activities. No involuntary displacement and resettlement issues are expected, but component 2.3 could require communities to accept restrictions of access to natural resources in and around forests, in exchange for project benefits.
Sub-Component 2.3 Improving Protected Areas and Wildlife Management	
Component 3: Alternative Income Generating Activities (AIGAs)	
Sub-Component 3.1 Community Mobilization and organization	Alternative livelihoods improvement program – no involuntary resettlement issues are expected. Small infrastructure construction may be involved on existing available land upon confirmation of negative social attributes. The program will follow all-inclusive selection and placement approach.
Sub-Component 3.2 Community Livelihood Grants for AIGAs	
Sub-Component 3.3 Extension Services for Trees Outside Forests	
Component 4: Project Management and Monitoring	
Sub-Component 4.1 Project Management	This component will be conducive for involuntary resettlement screening, transparency and accountability, measuring the result of performance against the target, assessment and management. Adequate staff resources will be ensured with BFD for
Sub-Component 4.2 Project Monitoring	

social safeguards management in project cycle.

While SUFAL is not seeking to reform existing laws to allow human activities in reserved forests, it will promote greater flexibility (in policy and in practice) in local-level uses of forest resources by those dependent on them. PAPs whose livelihood are entirely based on the forest will also be provided new income generation opportunities that are non-land-based and could therefore require diversification, which would in turn require training and support by BFD.

5.   Resettlement Process Framework (PF)

OP 4.12, the World Bank policy on Involuntary Resettlement, has a set of lesser known provisions relating to impacts deriving from "restriction of access" to natural resources in legally designated protected areas. These provisions are relevant in the case of SUFAL given that, overall, the project is not expected to necessitate any land acquisitions and resettlement. However, there is the possibility that during the project's implementation, access to land and forest-based natural resources by some forest dependent communities and households could be restricted, with adverse effects on their livelihoods. Similarly, the project also involves construction of some infrastructures for BFD (such as office buildings and complexes) which, although will be constructed on BFD's own land, could result with restricting access to the nearby communities. Therefore, a Process Framework (PF) has also been prepared (following OP 4.12) for the purpose of establishing a due process to avoid, minimize and mitigate the negative impacts from the project's interventions. It will also guide the project to ensure effective participation of the affected communities and relevant stakeholders in the project.

The specific provisions for the tribal peoples and vulnerable communities are elaborated separately in the project's Small Ethnic Community Development Framework (SECDF). In this regard, the SECDF will be taken as complementary to the provisions of this PF.

6.   Key Considerations for the PF

Mitigating adverse effect: SUFAL team will take appropriate measures to mitigate any adverse impacts due from the activities of the project. There most likely to arise from restrictions to accessing forest-based products (timber and non-timber) which could be vital to the livelihoods of the forest-dependent communities. In all such cases, the Project Affected Persons (PAPs) will be given appropriate assistance for restoration of livelihood through AIGAs. The project will assist affected persons with the improvement of their standards of living, or at least their restoration, in real terms, while also maintaining the sustainability of the ecosystem.

Entitlements to affected people without legal rights to land: The PAPs will be carefully screened to ensure that appropriate assistance is provided to those without legal rights to land. This will include, in particular, ethnic minority communities, whose claim to land might be customary and/or historical, women, or other marginalized or otherwise vulnerable groups.

Social Networks: The required development of an action or management plan will consider existing social

networks such as families, clans, religious groups, social and cultural associations (formal or informal), cooperative labor arrangements, etc. The objective of all interventions under the project be to avoid, and if this is not possible to minimize, disruption of existing social networks of the affected communities.

7. Eligibility and Entitlements

a. Eligibility

People who are economically affected due to permanent or temporary loss of access to natural resources in and around legally designated forest lands because of the project will be eligible for benefits and assistance under this PF. Such eligible PAPs will include the following:

vii. Formal or informal users of existing available land or public land and/or recognized legally or socially;
viii. Lessees (leaseholders) of public land, whether long-term or short-term;
ix. Tenants with or without formal legal registration according to national law;
x. Cultivators of plants and tree seedlings, irrespective of legal status of property in relation to land;
xi. Vulnerable persons, including households headed by women, elderly and/or disabled persons, the households in local context with per capita incomes at or below the poverty line.
xii. Mobile vendors and others who may be drawing livelihoods from the area.

b. Income Restoration

Access to means of livelihood: BFD will ensure that the forest dependent communities, as far as possible, have access to the forest-based resources on which they depend for their livelihoods. In cases their access is restricted, BFD will undertake to restore their livelihood options by appropriate measures including AIGAs.

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

8. Mitigation Measures and Process

The SUFAL project will use livelihoods transformation through a holistic support package including Alternative Income Generating Activities (AIGAs), financial resources, and investments in infrastructure, assets, and capacity building to help poor forest dependent households break out of the poverty cycle and transform their better livelihoods. The package will involve asset transfer and skill development supports. The AIGA delivery approach will enable the equitable distribution of resources to enhance coping capabilities for both men and women. Ultimately, this holistic transformation will contribute in reducing poverty among forest dependent communities, and thereby enable more sustainable forest management. The overall process of ensuring the PAPs benefit from project activities that restrict their access to forest resources will include the following:

a. Consultation and Participation

The SUFAL project activities will adopt an all-inclusive participatory approach that promotes consultation and participation of the forest dependent communities and other stakeholders in project process. As part of the project's preparation, 13 Focus Group Discussions (FGDs) sessions, 3 community level consultations, 5 regional consultations workshops and 2 national workshops meetings were conducted in the three major ecosystem types: plain, hill and coastal districts. BFD officers, Range Officer, Beat Officers, local government representatives, small ethnic communities, forest dependent communities were consulted through these meetings. Additionally, teachers, businessmen, village leaders, and local elites, farmers, and fishers were consulted.

Consultations as part of the implementation would be the direct interactions of the implementation agency with the target group beneficiaries, affected persons and the local communities as mentioned above including the ethnic communities. Community engagement will be continued in the project implementation stages using two-way processes involving communication, consultation, collaboration and empowerment mechanisms. All consultation proceedings will be appropriately documented and feedback considered in the implementation process.

b. Community Engagement

The project will ensure the engagement of targeted communities through continued consultations for planning and full community management of implementation and monitoring of project activities. Consultations will be held at regular intervals with target communities. In general, the following activities will provide the opportunity for consultations:

  i.   Socio-economic survey for preparing the baseline of the households;
  ii. Identification of land for small-scale infrastructure;
  iii. Implementation of the IEC/ Communication Plan for awareness creation about project activities; and
  iv. Identifying livelihood support programs.

To keep the momentum of engagement, activity specific consultations and a quarterly overall consultation will be held with all community groups.

c. Stakeholder Participation

The project recognizes that forest dependent communities are the primary stakeholders of the project. Hence, project will ensure that these stakeholders are consulted on relevant issues and they participate in all project activities including planning and implementation. The project will address the legitimate concerns of community members and provide opportunities and avenues for consultation and their participation. In order to provide a sense of ownership and ensure sustainability, the community members would be a part of the decision-making process.

d. Women, Children, Persons with Disabilities and Other Excluded Groups' Needs

Advancement of gender equity, transforming traditional gender roles and progressive changes in power relationships between women and men are essential to the success of any development initiative. Therefore, BFD will ensure that all gender groups will not be overburdened of SUFAL interventions. Women's and excluded group's involvement in decision-making should be a genuine and meaningful participation.

The poor, women, excluded groups remain in a disadvantaged position in different three ecosystem

forests area under SUFAL. The land ownership status, income opportunity, existing livelihood status, education, rate of poverty amongst the forests dependent communities are reportedly far behind the national rates. In fact, their development has always been lagging behind due to socio-political discrimination, geographically in disadvantaged position and paternalistic attitude of the state and powerful social actors. Therefore, BFD has given a special attention to creating an enabling environment for women, adolescent girls, children, elderly physically challenged people and excluded groups for their empowerment.

The SUFAL project team will appoint a gender specialist/social safeguards specialist who will provide regular training and orientation and overall guidance on gender and safeguard issues at the project and field level. Gender-sensitive communication materials, leaflet, guidelines will be developed with the support of all concern at PMU and field level which will be continued during the project phase. She/he will monitor/audit and influence the gender mainstreaming from field to policy level.

e. Small Ethnic Community Development

It is important to ensure that small ethnic communities are sufficiently and meaningfully consulted allowing their free, prior and informed consultation (FPICon) to project interventions; they have equal opportunity to access the benefits; and that any potential negative impacts to those communities are avoided, minimized and the residual impacts are properly mitigated.

The project has a separate Small Ethnic Community Development Framework (SECDF) and as per its prescriptions, site-specific Small Ethnic Community Development Plans (SECDPs) will be prepared for SUFAL, as needed. These SECDPs will consider the ethnic and demographic characteristics of the project affected population; prevailing intuitions, such as, family, religion, language and education; and cultural traditions of the small ethnic communities. The respective SECDP will accommodate the local traditional leadership, gender issues, civil society engagement and NGOs in the implementation process of the project activities.

The SUFAL project envisages restoration of degraded forest ecosystems and conserves biodiversity through sustainable forest management practices for enhancing carbon sequestration, ecosystem services, livelihoods opportunities, climate change resilience and improves Protected Area (PA) networks in selected forest landscapes of Bangladesh. The project will develop livelihoods of targeted people from the poorest, vulnerable, forest dependent communities through conservation-focused. Alternative Income Generating Activities (AIGAs) and market based value chain development. Potential interventions of the project are Afforestation/ Reforestation (A/R), Small-scale constructions and Market driven livelihood activities. Major project areas are hill forests, plain land Sal forests, Fresh water swamp forests and coastal lands including their community landscapes (detailed in the Small Ethnic Community Development Framework document).

f. Initial Social Screening

During the identification and preliminary stages of any activity preparation, BFD will employ the screening checklists designed for the project. A preliminary assessment to identify the types, degree and scale of potential social impacts of the activity will be undertaken via the checklist attached in Annex 1 (Social Impact Screening Checklist). In cases where the preliminary assessment indicates that there is the potential for involuntary land taking and resettlement, appropriate preparation will be done for further surveys, studies and consultations with key stakeholders.

9. Implementation Arrangements of Process Framework

The SUFAL project will implement co-management approach and collaborative forest management. The participatory co-management approach, to be elaborated during inception phase, will aim to develop equitable benefits from project activities and avoid to the extent possible, restriction of access to natural resources that will adversely affect forest dependent people. It will include measures to ensure a reliable methodology where decisions are based on sufficient information. It will also include open discussions and mutual understanding for proper triangulation and validation of information. The process will be taken to ensure the marginalized, poor, ethnic people, disable, elderly and venerable communities will be able to participate and raise their voice, concern and suggestions.

BFD, though its PMU, will be responsible for the implementation of this Process Framework. The Project Director will be the responsible officer in this regard, assisted by the project team including the Gender Expert and Social Safeguards Expert. The NGOs contracted under the Component 3 (AIGAs) will assist in community mobilization and consultations with the PAPs, forest-dependent communities and other relevant stakeholders.

10. Preparation and Implementation of Action Plans

Once site-specific screening identifies instances of restriction of access to forest resources by the communities depending on them, the NGOs assisting BFD in the implementation of certain components (including those related to PAs management and AIGAs implementation) will undertake the preparation of Action Plans. These Plans will specify the concrete measures that will assist the PAPs and the arrangements for their implementation. The Plans can take the form of natural resource management plans prepared under the project. In the case of the Protected Areas, this can be incorporated in the respective Protected Area Management Plan.

11. Grievance Redress Mechanism (GRM)

BFD will establish a grievance redress mechanism (GRM) for all project activities related to land acquisition and involuntary resettlement to address complaints and grievances on the project's interventions. Through discussion and consensus, the GRM will try to resolve the issues/conflicts amicably and quickly to ensure unhindered implementation process.

BFD, as part of GRM, will set up a project-project specific Grievance Redress Committee(s) which will include representatives of the beneficiary/affected communities, at least the local level, besides other relevant stakeholders including representatives of BFD itself. The GRC will carry out all its transactions in a transparent manner with full disclosure of the relevant information to the stakeholders. Decisions agreed at any level of GRC hearings will be binding on BFD and its partners' organizations involved in the implementation of the project.
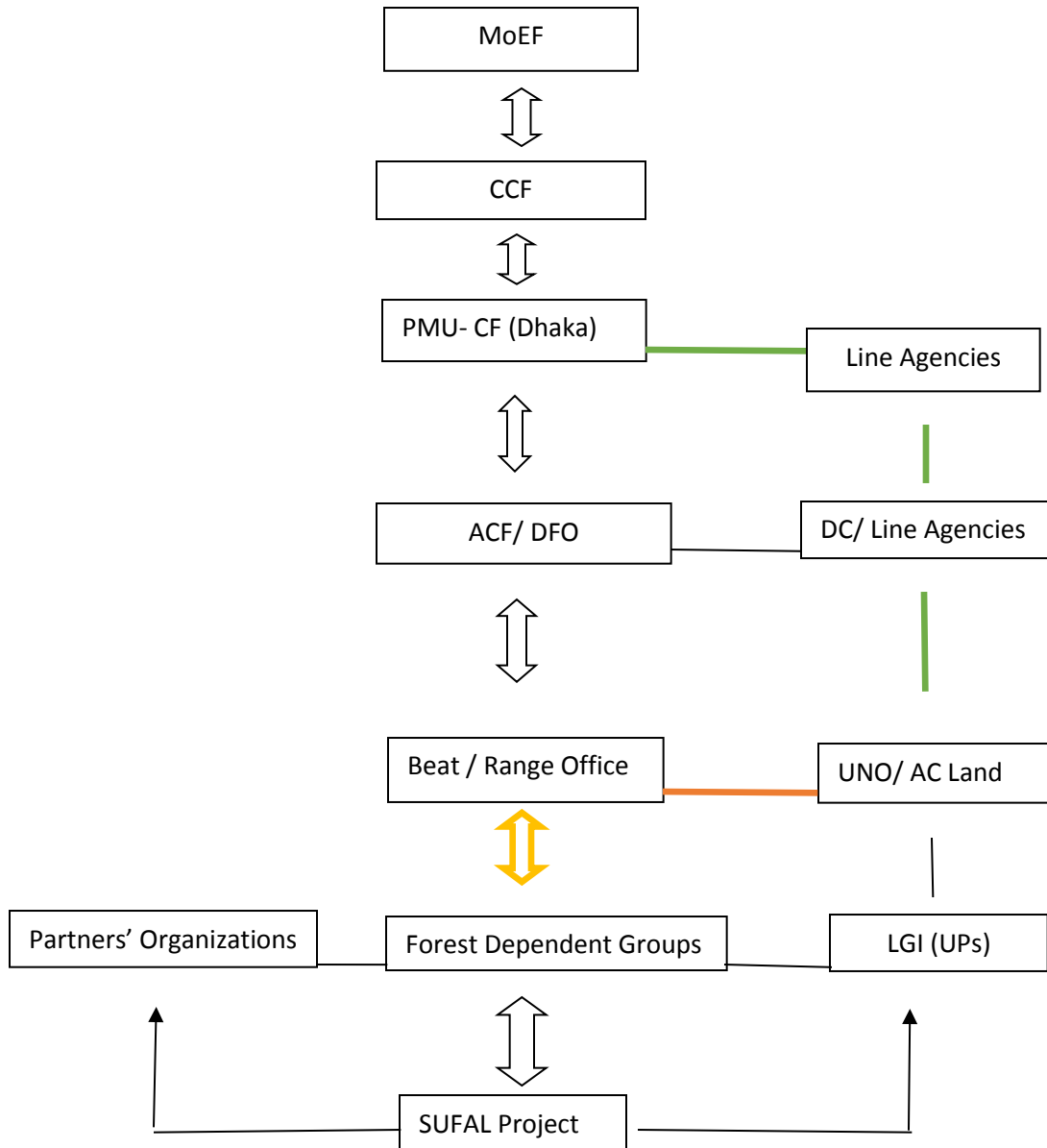
In addressing grievances, a bottom up approach will be adopted as shown in the diagram below.

Grievances will be discussed first at local level i.e. in group level to solve among the community themselves. If required, the issue will be referred to the upper tier GRCs at district/regional level and finally it may be addressed at central level in the PMU.

BFD will prepare the relevant process for smooth operation of the GRM. It'll develop a related Communication Policy which will be disclosed to the public and relevant stakeholders. The project management will set up a toll-free phone line whereby the aggrieved stakeholders will be able to register their grievances. Further, at the field level, it will also maintain a grievance register where by any cases of grievance brought by aggrieved persons will be received and duly registered. All cases of grievance will be resolved with a reasonable timeframe not exceeding one month. In this regard, BFD/SUFAL management will develop an appropriate monitoring mechanism so that all concern will know and understand the status of grievance redress progress at implementation level.

All along the grievance redress process, the aggrieved person(s) will have the option to seek redress in a court of law in Bangladesh. In this regard, BFD will facilitate the concerned persons from the SEC in getting free legal aid from the relevant department/agency of the government. 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 SEC or a vulnerable group. In case communities and individuals who believe that they are adversely affected by project interventions he/they may also submit their grievance to the WB Grievance Redress Service (GRS).

Grievance Redress Mechanism diagram

12. Monitoring and Evaluation

The BFD is primarily responsible for monitoring to ensure conformity to the requirements. They will measure the results of performance of any and all resettlement actions, and take corrective measures against the targets. BFD also hire a third party monitor to evaluate the project activities. Annual Operating Plans (AOP) should be aligned with above project components and monitoring design also need to be formulated based on all indicator and activities. 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 PMU/ partners. During implementation, meetings will be organized by BFD inviting all actors for providing information on the progress of the project activities. The monitoring indicators will be adopted under the Monitoring and Evaluation (M&E) system. The impact performance indicators will be used to monitor project objectives along with the milestones.

13. Budget and Financing

The cost of implementation of this Process Framework will be covered by the general budget of the SUFAL project. The BFD will initiate funding from the relevant departments of the Government of Bangladesh and ensure that these funds are applied toward the achievement of the PF's objectives.