



RESETTLEMENT POLICY FRAMEWORK
FOR THE
SUSTAINABLE FORESTS & LIVELIHOOD (SUFAL) PROJECT

BANGLADESH FOREST DEPARTMENT

JULY 2018

DHAKA, BANGLADESH

Table of Contents

Table of Contents.....	iii
Acronyms v	
Executive Summary.....	vi
1. Background and scope	1
2. Project Description	1
3. Target beneficiaries.....	6
4. Objectives of the Resettlement Policy Framework (RPF).....	7
5. Project interventions and potential resettlement impacts.....	7
6. Legal and policy framework	9
6.1 National Legal and Regulatory Framework.....	9
6.2 Constitutional Provisions.....	9
6.3 The Acquisition and Requisition of Immovable Property Act 2017	9
6.4 Transfer of Property Act, 1882.....	10
6.5 The Forest Act 1927	10
6.6 The Forest Policy 2016	11
6.7 Social Forestry Rules 2004 (amended through 2011).....	11
6.8 The Wildlife (Conservation and Security) Act, Bangladesh 2012 (GoB 2012c).....	12
6.9 The Nursery and Plantation Guidelines 2012 (GoB 2012a).....	12
6.10 The Forestry Sector Master Plan (FSMP) 2017-2031 (draft 2016).....	12
6.11 The Protected Area Management Rules, 2017	12
6.12 The Forest Investment Plan 2017 (draft)	13
6.13 The World Bank Involuntary Resettlement Policy (OP 4.12)	13
6.14 The World Bank Policy on Indigenous Peoples (OP 4.10)	14
6.15 Dissimilarities between OP 4.12 and National Laws.....	14
6.16 Principles of Project Resettlement Policy	15
6.17 Project Principles and Process for Voluntary Acquisition of Land	16
6.18 Voluntary Land Donation	16
6.19 Negotiated Land Purchase	16
6.20 Other Considerations	16
7. Eligibility and Entitlements.....	17
7.1 Eligibility	18
7.2 Cut-Off Date	18
7.3 Entitlements	18
7.4 Structures.....	19
7.5 Trees.....	19
7.6 Resettlement and Relocation Process.....	19
7.7 Income Restoration.....	20
8. Implementation Arrangements for the Resettlement Policy Framework	21
8.1 Preparation and Implementation of Resettlement Action Plan (RAP)	21
8.2 Entitlement Matrix.....	22
9. Impact Assessment: Process and Mitigation Measures.....	23
9.1 Community Engagement.....	23
9.2 Stakeholder Participation.....	24
9.3 Women, Children, Persons with Disabilities and Other Excluded Groups' Needs.....	24
9.4 Small Ethnic Community Development	25

9.5	Initial Social Screening.....	25
9.6	Census Survey.....	25
9.7	Socioeconomic Study	26
10.	Monitoring and Evaluation.....	26
11.	Consultation and Participation.....	27
12.	Grievance Redress Mechanism (GRM).....	27
13.	Budget and Financing	29
	Annex 1: Social Impact Screening Checklist.....	31

Acronyms

AIGA	: Alternative Income Generating Activities
AOP	: Annual Operation Plan
BCFT	: Bangladesh Conservation Transition Fund
BDT	: Bangladesh Taka
BFD	: Bangladesh Forest Department
CDD	: Community Driven Demand
CFM	: Collaborative Forest Management
CFMC	: Collaborative Forest Management Committee
CHT	: Chittagong Hill Tracts
DC	: Deputy Commissioner
ESMF	: Environmental and Social Management Framework
FGD	: Focus Group Discussion
FMIS	: Forest Management Information System
FPICon	: Free, Prior and Informed Consultation
GAP	: Gender Action Plan
GoB	: Government of Bangladesh
GRM	: Grievance Redress Mechanism
GRS	: Grievance Redress Service
IoL	: Inventory of Losses
M&E	: Monitoring and Evaluation
MoL	: Ministry of Land
MPR	: Monthly Progress Report
NFI	: National Forest Inventory
NTFP	: Non-timber Forest Products
OP/BP	: Operational Policy/ Bank Procedure
PA	: Protected Area
PAP	: Project Affected Person
PAVC	: Property Assessment and Valuation Committee
PD	: Project Director
PF	: Process Framework
PMU	: Project Management Unit
R&R	: Rehabilitation and Resettlement
RAP	: Resettlement Action Plan
RIM	: Resource and Information Management
RPF	: Resettlement Policy Framework
SEC	: Small Ethnic Community
SECDF	: Small Ethnic Community Development Framework
SECDP	: Small Ethnic Community Development Plan
SIA	: Social Impact Assessment
UNO	: Upazila Nirbahi Officer
UP	: Union Parishad

Executive Summary

Background and Scope: The Bangladesh Forest Department (BFD), under the Ministry of Environment and Forests (MoEF), is preparing the SUFAL project with the objective of improving collaborative forest management and increase access to alternative income generation activities for forest-dependent people in selected afforestation and reforestation sites in different ecosystems. 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 on alternative livelihood development to improve their livelihoods.

Although the SUFAL project is not expected to necessitate any land acquisitions and resettlement, this Resettlement Policy Framework (RPF), nevertheless, has been prepared to address any involuntary resettlement impacts of the proposed SUFAL project in compliance with the national regulatory as well as WB policy requirements OP/BP 4.12. Similarly, a separate Process Framework (PF) has also been prepared in anticipation of possibility that during the project’s implementation, access to land and forest-based natural resources by some forest-based communities and households could be restricted, with adverse impacts on their livelihoods. Finally, a Small Ethnic Community Development Framework (SECDF) is also prepared in compliance with World Bank’s OP/BP 4.10 on Indigenous Peoples.

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).

Project 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 communities. The forest resource base is immensely significant to the livelihoods of forest dependent communities, which are quite varied and influenced by socio-economic and physical environment of different ecosystems of Bangladesh.

Objectives of the Resettlement Policy Framework (RPF): The RPF will serve as the guideline for BFD to plan, implement and monitor appropriate measure related to any land acquisition and involuntary resettlement that may arise in the course of implementation of the SUFAL project.

Project interventions and potential resettlement impacts: No land acquisition is expected; hence these interventions will not result in adverse social impacts. Nevertheless, as a precautionary measure, this resettlement policy framework (RPF) has been prepared for implementation level guidance in assessment of impacts, preparation of resettlement action plan and implementation of the same. However, potential resettlement and livelihood impacts under each of the component activities are anticipated to be minimum which is summarized in the table below:

Component activities	Potential Impacts
<i>Component 1: Strengthening Institutional Development, Information Systems and Training</i>	
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	
<i>Component 2 : Collaborative Forests and Protected Areas Management</i>	
Sub-component 2.1 Institutionalizing Collaborative Forest Management (CFM)	No land acquisition is foreseen but construction of small scale infrastructure on BFD land may induce

Sub-Component 2.2 Restoration of Degraded Forests, Plantations & Coastal Green Belt and Field Infrastructure	restricted access to the formal and informal users of existing land.
Sub-Component 2.3 Improving Protected Areas and Wildlife Management	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.
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	

Legal and Policy Framework: Bangladesh has a number of constitutional and legal provisions on land acquisition. The most important of these are:

National Legal and Regulatory Framework: Land acquisition in Bangladesh is currently governed by the Acquisition and Requisition of Immovable Property Act, 2017 (Act 21 of 2017). Currently, the project will not cover the region of Chittagong Hill Tracts but in case it is extended in future, a number of separate laws will need to be taken into account. This includes the Chittagong Hill-Tracts (Land Acquisition) Regulation 1958, CHT Regional Council Act 1998, Hill District Council Acts 2001 for each of the three Hill Districts of Bandarban, Rangamati and Khagrachari and as well as the CHT Land Dispute Resolution Commission Act (amendment) 2014.

The other key laws relevant to SUFAL project are: (1) Transfer of Property Act, 1882; (2) The Forest Act 1927; (3) The Forest Policy 2016; (4) Social Forestry Rules 2004 (amended through 2011); (5) The Wildlife (Conservation and Security) Act, Bangladesh 2012 (GoB 2012c); (6) The Nursery and Plantation Guidelines 2012 (GoB 2012a); (7) The Forestry Sector Master Plan (FSMP) 2017-2031 (draft 2016); (8) The Protected Area Management Rules, 2017; and (9) The Forest Investment Plan 2017 (draft).

Constitutional Provisions: Article 40 of the constitution states categorically that every citizen has the right to practice any lawful occupation which implies that anything impeding such right (a) should not be done or (b) there should be supplementary measures to make recovery of the losses incurred by the citizen. Resettlement and rehabilitation of adversely affected people due to land acquisition very clearly falls within this requirement for supplementary measures. However, as per Article 42, sub-clause 2, no law

with provision of compensation for acquisition of land can be challenged in a court as the State can acquire land under the concept of 'eminent domain'.

The World Bank Involuntary Resettlement Policy (OP 4.12): The World Bank's policy on involuntary resettlement takes the position that if development induced displacements are left unattended, they often give rise to severe economic, social, and environmental risks. This policy includes safeguards to address and mitigate these impoverishments risks to people affected by Bank-supported projects.

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

- The adverse impacts on persons affected by the project would be avoided to the extent possible.
- Where the adverse impacts are unavoidable, the project-affected persons (PAPs) will be assisted in improving or regaining their standard of living. Vulnerable groups will be identified and assisted to improve their standard of living.
- All information related to resettlement preparation and implementation will be disclosed to all concerned, and community participation will be ensured in planning and implementation.
- The persons affected by the project who does not own land or other properties but have economic interest or lose their livelihoods will receive resettlement assistance.
- Before taking possession of the lands and properties, resettlement and rehabilitation (R&R) assistance will be made to those who are eligible to receive the entitlements.
- Probable entitlement assistance framework of different categories of project-affected people has been assessed and is given in the entitlement section. Anyone moving into the project area after the cut-off date will not be entitled to assistance.
- Appropriate grievance redress mechanism (GRM) will be established at project level to ensure speedy resolution of disputes.
- All activities related to resettlement planning, implementation, and monitoring would ensure involvement of women. Efforts will also be made to ensure that vulnerable groups are included.
- All consultations with project affected parties shall be documented. Consultations will continue during the implementation of resettlement and rehabilitation works.
- As required, a Resettlement Action Plan (RAP) will be prepared including a fully itemized budget and an implementation schedule.

Principles and Process for Voluntary Acquisition of Land: The project will seek to avoid involuntary acquisition of private land. In the case of small-scale infrastructure construction (or any other circumstance that would lead people to experience physical and/or economic displacement on account of land taking), a voluntary acquisition approach will, in the first instance, be pursued following the Transfer of Property Act 1882 (para 3.3.5 above) in compliance with the World Bank principles as follows:

- The infrastructure must be site specific.
- The impacts must be minor, that is, involve no more than 10 percent of the area of any holding and require no physical relocation of people.
- The land required to meet technical project criteria must be identified by the affected community, not by the executing agency (nonetheless, technical authorities can help ensure that the land is appropriate for project purposes and that the project will produce no health or environmental safety hazards).

- The land in question must be in the absolute ownership of the donor, free of squatters, encroachers, or other claims or encumbrances.
- Verification (for example, notarized or witnessed statements) of the voluntary nature of land donations must be obtained from each person donating land.
- If any loss of income or physical displacement is envisaged, verification of voluntary acceptance of community-devised mitigation measures must be obtained from those expected to be adversely affected.
- If community services are to be provided under the project, land title must be vested in the community, or appropriate guarantees of public access to services must be given by the private titleholder.
- Grievance redress mechanisms must be available.

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

The project will determine a cut-off date at the time of social impact assessment (SIA) survey and applicable at the beginning of a census of PAPs. Any person moving into the affected land after this cut-off date will not be eligible for compensation, relocation and livelihood restoration, and rehabilitation entitlements.

Entitlements: Compensation at full replacement cost, as per OP 4.12, will be the basic standard for the project. The entitlements will be in accordance with the government regulations. The Entitlement Matrix in the RPF details the entitlements to be received by the PAPs.

Resettlement Action Plan (RAP): During the implementation phase of the project, site-specific Resettlement Action Plans will be prepared that will detail the overall amount of compensation, number of the PAPs, procedure for paying compensation and/or restoring lost assets, consultation mechanisms with the PAPs and stakeholders, a GRM and arrangements for monitoring RAP implementation.

Identifying Impacts and Mitigation Measures: Each intervention will be scrutinized as to its type, location, scale, and sensitivity and the magnitude of its potential adverse impacts. The extent of assessment required to identify and mitigate the impacts largely depends upon the complexities of activities.

Project-Specific Mitigation Measures: The SUFAL project will use livelihoods transformation through Alternative Income Generating Activities (AIGAs) involving asset transfer and skill development supports for both men and women. This approach should complement the compensation and asset restoration packages offered to displaced households.

Community Engagement and Stakeholder Participation: 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. As part of DPP preparation, Focus Group Discussions (FGDs), regional workshops and like meetings were conducted in the three major ecosystem types: plain, hill and costal districts. BFD officers, Range Officer, Beat Officers, local government representatives, small ethnic communities, forest dependent attended these meetings and the feedback have been incorporated into the SUFAL project design.

In the course of project implementation, consultations will be held at regular intervals with affected people. The project recognizes the forest dependent communities are key stakeholders of the project and in order to provide a sense of ownership and ensure sustainability, the community members would be a part of the decision-making process.

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 will be key to the success of the project. Therefore, BFD will ensure women's and excluded groups' involvement in decision-making in the various project activities.

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'll have equal opportunity to access the benefits and any potential negative impacts to those communities will be avoided or minimized, with the residual impacts properly managed.

Monitoring and Evaluation: The BFD is primarily responsible for monitoring to ensure conformity with the applicable requirements. They will measure the results of performance and will take corrective measures against the targets. BFD will also hire third-party monitors to evaluate the project activities.

Annual Operation Plan (AOP), aligned with above project components, will be prepared and carried out through the compliance reports that will form a part of Monthly Progress Reports (MPR) and regular visits by the PMU/ partners.

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 related to project interventions. Through discussion and consensus, the GRM will try to resolve the issues/conflicts amicably, fairly and efficiently. BFD will set up a project-specific Grievance Redress Committees which will include representatives of the beneficiary/affected communities, at least the local level, besides other relevant stakeholders including representatives of BFD itself.

Budget and Financing: The cost of implementation of this RPF will be covered by the general budget of SUFAL. The BFD will initiate funding from the relevant departments of the Government of Bangladesh, as needed, and ensure that these funds are used for the disbursement of compensation payments and/or the provision of other assistance. The project will determine the annual inflation rates to be applied to all cash entitlements.

RESETTLEMENT POLICY FRAMEWORK (RPF)

Sustainable Forests and Livelihoods (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 peoples 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.

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 on alternative livelihood development to improve their livelihoods. BFD/partners will undertake social screening of all site-specific activities to identify potential social safeguard issues, and adopt and implement impact mitigation measures.

Although the SUFAL project is not expected to necessitate any land acquisitions and resettlement, this Resettlement Policy Framework (RPF), nevertheless, has been prepared to address any involuntary resettlement impacts of the proposed SUFAL project in compliance with the national regulatory as well as WB policy requirements OP/BP 4.12. For example, the project currently involves construction of some infrastructures for BFD (such as office buildings) which, although they will be constructed on BFD's own land, could result in some temporary or permanent displacement. The RPF has been prepared based on an initial consultation and social assessment of the project.

While this RPF outlines the overall stipulations as regards project's involuntary resettlement, the specific provisions for the tribal peoples and vulnerable communities are elaborated separately in the project's Small Ethnic Community Development Framework (SECDF). These provisions and requirements of the SECDF will be applicable in the case of the small ethnic communities as project affected persons from involuntary resettlement. In this regard, the SECDF will be taken as complementary to the provisions of this RPF.

Similarly, there is possibility that during the project's implementation, access to land and forest-based natural resources by some forest-based communities and households could find restrictions affecting their livelihoods. Therefore, along with this Resettlement Policy Framework, a separate Process Framework (PF) has also been prepared following the World Bank policy OP 4.12 on Involuntary Resettlement. The PF will also guide the project to ensure effective participation of the affected communities and relevant stakeholders in the project.

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).

Project 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
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

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 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

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.

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.

implementation of PA management plans for 10 PAs⁴. Management plans will be implemented with co-management committees (CMCs). The members of Village Conservation Forum, the lowest tier 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 species⁵; (iii) enhancing capacity for 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 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 repayment 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

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

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

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.

dependent communities. Forests resource is immensely significant to the livelihoods of the forest dependent communities, which are quite varied and influenced by socio-economic and physical environment of different ecosystems of Bangladesh.

4. Objectives of the Resettlement Policy Framework (RPF)

This RPF overall will serve as the guideline for BFD to oversee and monitor the social safeguards compliance on resettlement of the project components coming under their implementation responsibility. The specific objectives will be the following:

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

5. 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. There will be no land acquisition, hence these interventions will not result in adverse social impacts including loss or diminished means of livelihoods, as a result of displacement. 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 although none of these suggest that any land acquisition would be required under the project. Nevertheless, as a precautionary measure, this resettlement policy framework (RPF) has been prepared for implementation level guidance in assessment of impacts, preparation of resettlement action plan and implementation of the same.

Following basic categories of involuntary resettlement impacts may take place under this project, though acquisition of resources, structures, land and large-scale loss of livelihood are highly unlikely as there will be no new land acquisition and no loss of public infrastructure. Potential resettlement and livelihood impacts under each of the component activities have been anticipated to be minimum. Component specific social impacts including involuntary resettlement and livelihoods impacts have been summarized in the table 2.

Table 2 : Potential Resettlement and Livelihood Impacts of the Project

Component activities	Potential Impacts
<i>Component 1: Strengthening Institutional Development, Information Systems and Training</i>	
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,
Sub-Component 1.2 Applied Research and Training	

Sub Component 1.3 Training	decision-making, knowledge management, assessment and management. Adequate staff resources will be ensured with BFD for social safeguards management in project cycle.
Sub-component 1.4 Strengthening Monitoring, Information Management Systems and Forest Inventory	
Sub-component 1.5: Communication and outreach	
<i>Component 2 : Collaborative Forests and Protected Areas Management</i>	
Sub-component 2.1 Institutionalizing 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	
<i>Component 3: Alternative Income Generating Activities (AIGAs)</i>	
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	
<i>Component 4: Project Management and Monitoring</i>	
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	

To minimize impacts, the SUFAL project will promote Community Based Forest Management (CFM) by involving the communities and the stakeholders in forest management. PAPs whose livelihood are based on the forest resources will also be provided new income opportunities that are non-land-based and guarantee incomes through alternative income generation activities (AIGAs). The project will also support the communities with small infrastructure development works in an effort to mitigate the potential negative impacts.

6. Legal and policy framework

Bangladesh also has a number of constitutional and legal provisions on land acquisition. The project's potential resettlement impacts will be managed under the legal and regulatory framework of the country and the World Bank operational policy on involuntary resettlement (OP 4.12). The most important of these are:

6.1 National Legal and Regulatory Framework

Infrastructure development projects using lands in Bangladesh is designed and implemented under the legislative and regulatory framework to compensate the affected persons due to land acquisition using the power of eminent domain. Land acquisition as of September 2017 used to be governed by the Acquisition and Requisition of Immovable Property Ordinance, 1982 (Ordinance II of 1982). The ordinance has now been replaced with the new act, "The Acquisition and Requisition of Immovable Property Act, 2017 (Act 21 of 2017). Currently, the project will not cover the region of Chittagong Hill Tracts but in case it is extended in future, a number of separate laws will need to be taken into account. In addition to the Act 21 of 2017, acquisition of any land or forest area in Chittagong Hill Tracts (CHT) districts is regulated under the Chittagong Hill-Tracts (Land Acquisition) Regulation 1958. Alongside, the relevant stipulations of the CHT Regional Council Act 1998, Hill District Council Acts 2001 for each of the three Hill Districts of Bandarban, Rangamati and Khagrachari and as well as the CHT Land Dispute Resolution Commission Act (amendment) 2014 will have major bearing if the project extends to the CHT region.

There is no national policy in Bangladesh governing social effects of infrastructure development projects on the project area communities. However, the Constitution of Bangladesh provides some rights to the affected persons, communities and groups those are not upheld in the Ordinance II of 1982 which is the instrument followed for land acquisition.

6.2 Constitutional Provisions

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

6.3 The Acquisition and Requisition of Immovable Property Act 2017

The principal legal instrument governing land acquisition in Bangladesh is the Acquisition and Requisition of Immovable Property Ordinance, 1982 (Ordinance II of 1982 with amendments up to 1994), which has been recently replaced by the new law (Act 21 of 2017). According to the Act, whenever it appears to the Government of Bangladesh that any property in any locality is needed or is likely to be needed for any

public purpose or in the public interest, the Government can acquire the land provided except property used for religious worship, graveyard and cremation ground. The Act also requires that compensation be paid for (i) land and assets permanently acquired (including standing crops, trees, houses); and (ii) any other damages caused by such acquisition. The Deputy Commissioner (DC) determines (a) market value of acquired assets on the date of notice of acquisition (based on the registered value of similar property bought and/ or sold in the area over the preceding 12 months), and (b) 200% premium on the assessed value for land and 100% for non-land assets on the land due to compulsory acquisition. There are also provisions for payment of crop compensation to tenant cultivators.

The law specifies methods for calculation of market value of property based on recorded prices obtained from relevant Government departments such as Registrar (land), Public Works Department (structures), Department of Forest (trees), Department of Agriculture (crops) and Department of Fisheries (fish stock). Given that people usually devalue land during title transfer to minimize tax payment, the stipulation of 200% premium in 2017 act is a measure to compensate for actual market price.

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

6.4 Transfer of Property Act, 1882

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

6.5 The Forest Act 1927

It defines national forest lands and frames its governance structure and empowers the forest officers for effective forest management. The act is considered the basis of current legislations for governing forests in the country and emphasizes on the protection of reserved forests. It features are;

- a. All rights over forestlands have been settled at the time of the reservation and prohibits the grant of any new rights of any kind to individuals or communities;
- b. Any activity within the forest reserves is prohibited, unless permitted by the Forest Department;

- c. Violations may result in court cases; and
- d. Empowers the Forest Department to regulate the use of water-courses within Reserved Forests.

The act further provisioned to prohibit, restrict or require a permit for land clearing, use of pesticides, harvest on steep slopes, or other forest management activities on private land that may pose a threat to property, renewable natural resources or the productivity of land. The act has guidance on “Shifting cultivation”, and not explicitly recognized the usufruct rights of small ethnic groups over forest lands. The amended (Forest Act 1927) in 1989 extended authority of BFD over "any [Government-owned] land suitable for afforestation.

6.6 The Forest Policy 2016

The National Forest Policy 2016 explicitly addressed the emergence of environmental and socio-economic changes in the context of climate change and the extensive loss of forest cover in the country. The policy aimed to manage all existing forest, wildlife and other forestry resources, adhering to the principles of sustainable management and climate resilience; enrich degraded forest areas and enhance land areas under forest/tree cover; to produce a wide array of goods and ecosystem services for the benefit of Bangladesh’s current and future generations, through its 16 policy objectives. It also affirmed to arrest deforestation, and degradation of forest resources, enrich and extend areas under tree cover, through appropriate programs and projects, to ensure that at least 20% of the country comes under tree cover by 2035, with at least a canopy density of 50%. The policy committed to ensure the Paris climate accord through INDC regarding land use, land change and forestry to guide the future forestry action in the country; enhancement of forestry carbon stocks and generation of benefits through mechanisms such as CDM and REDD+ in future forestry programs; it also affirmed to materialize a climate financing mechanism that will help the country to take advantage of new and emerging climate change funds such as REDD+, FCPF, GCF, and other available sources and also, include innovative ways to fund climate change actions domestically through accessing Bangladesh Climate Change Resilience Fund and support from other governmental allocations and other local sources.

6.7 Social Forestry Rules 2004 (amended through 2011)

The Rules played a vital role in the expansion of forest cover in degraded forests benefiting thousands of poor people. The Rules defined the process of beneficiaries’ selection, roles and responsibilities of different stakeholders, management, capacity building and distribution of earnings from social afforestation. According to the rules, the beneficiaries shall be selected from amongst the local communities and shall preferably be from the amongst the followings persons, namely: (a) landless persons; (b) owners or occupants of less than 50 decimals of land; (c) destitute women; (d) unprivileged community; (e) poor ethnic minority; (f) poor forest villages; and (g) insolvent freedom fighters or insolvent successor of freedom fighters. The rules provided the rotation period for different plantation and benefit sharing. In general, the communities responsible for maintenance of plantation will receive around 45% of timber value of the forest. Despite a success and high potentiality, social forestry still suffers from various institutional deficiencies like legitimate usufruct rights, peoples' participation from policy to implementation, skilled manpower, and clear budgetary arrangements (Muhammed et al. 2005).

6.8 The Wildlife (Conservation and Security) Act, Bangladesh 2012 (GoB 2012c)

This recently amended act empowered the government to declare any area as sanctuary, community conservation area, safari park, eco- park, botanical garden, wildlife reproduction center, landscape zone, buffer zone, core zone in relation to wildlife and plant preservation, protection and their natural growth. This act paved the process for the Protected Area Management Rules 2017 which facilitated collaborative management of PAs including wildlife sanctuaries and national parks of the country.

6.9 The Nursery and Plantation Guidelines 2012 (GoB 2012a)

The Nursery and Plantation Guidelines 2012 (GoB 2012a) addresses the risks associated with the site clearance of plantation, species selection, use of fertilizer/pesticides/herbicides in the plantation program, minor construction related disturbance and community level livelihood options. Related negative impacts are expected to be largely on-site and easily mitigated with proper planning and sound environmental practices. It has been agreed that no pesticides or herbicides will be used during plantation. Besides these, the general practice of burning, while preparing the plantation sites will not be done while raising plantations.

6.10 The Forestry Sector Master Plan (FSMP) 2017-2031 (draft 2016)

The FSMP specifically endorsed REDD+ initiatives in Bangladesh to enhance forest carbon stocks and generation of benefits out of it. The FSM Plan also affirmed its commitment on social and environmental safeguards to be addressed and respected throughout the sectoral development programs while national preparedness in REDD+ program. This plan further emphasized on preventing change in land use to any non-forestry activities without approval of Hon'ble Prime Minister, in case of other national priority and consequent transfer of forest lands, an equal area will be handed over to the Forest Department, with the required funds for compensatory afforestation. Regarding the traditional rights of small ethnic groups, the plan mentioned that various ethnic-communities, living in and around state forest areas, will be prioritized on recognition with due respect to their forest-related cultural values and religious beliefs. And also affirmed that conservation initiatives related to forest, wildlife and biodiversity taken up by indigenous communities will be encouraged.

6.11 The Protected Area Management Rules, 2017

The Rules, formulated under the Wildlife (Conservation and Safety) Act 2012, elaborated community engagement in PA management in a multi-stakeholder platform, guided the process of sharing "co-benefits" to grass-root co-management organizations from Government revenue. This rules further elaborated the structure of co-management and its functionality, and responsibilities of stakeholders. It also ensured engagement of forest dependent communities in general bodies and executive committees, including forest users and IPs. However, the Rules termed small ethnic groups as tribal minorities, alike other Government documents. One of the important feature of this Rules is creation of a central fund at BFD headquarter whereby finance from international sources are provisioned to facilitate co-management of protected areas in the country, along with government financing.

6.12 The Forest Investment Plan 2017 (draft)

The FIP 2017 was prepared in appreciation of the REDD+ mechanism as a means for i. sustainable forest management and recommended for improving the implementation of existing laws and policies, ii. Coordination between BFD and other government agencies, forest dependent communities, local government representatives, NGOs, CSOs, is needed to improve co-management of forests iii. Sustainable forest management through restoration of degraded and other marginal areas, and iv. Commitment to conserve forests as major strategies of the sector.

Finally, a recent (01 December, 2016) Gazette from MoEF declared ban on felling from reserved and natural forests till 31 December, 2022 (GoB 2018). This milestone commitment of the Government paves another affirmation aligned to REDD+ initiative for safeguards of natural forests and biodiversity.

6.13 The World Bank Involuntary Resettlement Policy (OP 4.12)

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

The involuntary resettlement safeguards cover physical displacement (relocation, loss of residential land, or loss of shelter) and economic displacement (loss of land, assets, access to assets, income sources, or means of livelihoods) because of (i) involuntary acquisition of land, or (ii) involuntary restrictions on land use or on access to natural resources in legally designated parks and protected areas. The latter type of impact is addressed in the Resettlement Process Framework prepared separately for the SUFAL project.

The overall objectives of the Policy are given below:

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

The key Principles of World Bank Involuntary Resettlement Policy are:

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

6.14 The World Bank Policy on Indigenous Peoples (OP 4.10)

The World Bank policy on Indigenous Peoples OP 4.10 is triggered for the project as the project coverage areas will include various small ethnic communities as they are called in Bangladesh. In this regard, the project will make particular attention to the issues related to customary land tenure of the small ethnic communities and as well as to their cultural traditions and livelihoods. Consultations based on the principles of ‘free, prior and informed consultations’ will be key for ensuring the effective participation of the small ethnic communities. Although, it is generally assumed that most members of the small ethnic communities understand the national language Bangla, special attention will be paid to this issues, concretely meaning that all consultations and communications with the small ethnic community stakeholders will be carried out in a language they understand.

The Small Ethnic Community Development Framework (SECDF) of the project details the requisite steps and provisions in this regard and it should be taken for the relevant guidelines as regard the OP 4.10.

6.15 Dissimilarities between OP 4.12 and National Laws

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

Table 3: Gaps between GoB LA laws and World Bank OP 4.12.

Sl. No	Gaps between WBG OP 4.12 and GoB Act 21 of 2017	Gap-filling measures/ actions to be taken in this Project
1	Avoidance and minimization of project impacts.	The project designs should aim to minimize impacts and adjusted tracks and station design further to reduce impacts.
2	Existing GoB laws recognize title owners only; informal settlers are not covered.	All affected persons irrespective of titles will need to be identified for compensation and assistance.
3	Existing laws and methods of assessments do not ensure full replacement costs.	Provisions will be adopted for additional top up payments to ensure replacement costs at current market price. Transaction cost will be

		built upon on current market price and no depreciation, tax or deductions will be applied.
4	Consultation with affected community not legally required.	Extensive consultations were carried out during the preparatory phase; similar consultations will continue during project implementation.
5	The affected land owners can object to the acquisition in the beginning but once hearing is done and settled, there is no scope of further complaint during the acquisition process.	There will be a provision of grievance redress mechanism (GRM) in the project to hear grievances and resolve them amicably to the satisfaction of the aggrieved persons.
5	No relocation assistance or support under the land acquisition law (Act 21 of 2017).	Affected households and businesses will be assisted for their relocation, financially and institutionally, from the project.
6	No support or program for income and livelihood restoration.	The project benefits will include income and livelihood restoration.
7	No provision for reconstruction of common property resources.	The project will reconstruct all religious, cultural and community structures, if affected by the project.

6.16 Principles of Project Resettlement Policy

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

- The adverse impacts on persons affected by the project would be avoided to the extent possible.
- Where the adverse impacts are unavoidable, the project-affected persons (PAPs) will be assisted in improving or regaining their standard of living. Vulnerable groups will be identified and assisted to improve their standard of living.
- All information related to resettlement preparation and implementation will be disclosed to all concerned, and community participation will be ensured in planning and implementation.
- The persons affected by the project who does not own land or other properties but have economic interest or lose their livelihoods will be assisted.
- Before taking possession of the lands and properties, resettlement and rehabilitation (R&R) assistance will be made to those who are eligible to receive the entitlements.
- Probable entitlement assistance framework of different categories of project-affected people has been assessed and is given in the entitlement section. Anyone moving into the project area after the cut-off date will not be entitled to assistance.
- Appropriate grievance redress mechanism (GRM) will be established at project level to ensure speedy resolution of disputes.
- All activities related to resettlement planning, implementation, and monitoring would ensure involvement of women. Efforts will also be made to ensure that vulnerable groups are included.
- All consultations with project affected parties shall be documented. Consultations will continue during the implementation of resettlement and rehabilitation works.
- As required, a Resettlement Action Plan (RAP) will be prepared including a fully itemized budget and an implementation schedule.

6.17 Project Principles and Process for Voluntary Acquisition of Land

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

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

6.18 Voluntary Land Donation

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

6.19 Negotiated Land Purchase

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

6.20 Other Considerations

Mitigating adverse effect: Before taking possession of any water body, pond, estuary, structures, land,

and similar resource base and before start of activities, Project Affected Persons (PAPs) will be given Rehabilitation and Resettlement (R&R) assistance. The project will ensure that the standard of living of all affected persons is restored to the level enjoyed before the commencement of the project, and, if possible, improved.

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

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

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

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

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

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

7. Eligibility and Entitlements

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

7.1 Eligibility

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

1. Formal or informal users of existing available land or public land and/ or recognized legally or socially;
2. Lessees (leaseholders) of public land, whether long-term or short-term;
3. Tenants with or without formal legal registration according to national law;
4. Informal users of land to be acquired for project activities causing temporary/ permanent displacement partially/ fully;
5. Business owners, whether registered under national law or informal;
6. Employees of private or public businesses or enterprises, whether registered under national law or informal;
7. Cultivators of plants and tree seedlings, irrespective of legal status of property relation to land;
8. 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.
9. Mobile vendors and others who may be drawing livelihoods from the area.

7.2 Cut-Off Date

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

7.3 Entitlements

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

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

7.4 Structures

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

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

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

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

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

7.5 Trees

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

7.6 Resettlement and Relocation Process

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

Transport allowance: All affected households to be relocated due to loss of access to land for residences,

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

7.7 Income Restoration

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

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

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

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

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

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

Women: To ensure a clear understanding and due consideration of specific relocation and/ or

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

8. Implementation Arrangements for the Resettlement Policy Framework

The SUFAL project will implement co-management approach and collaborative forest management. The participatory co-management approach will aim to develop equitable benefits from project activities and avoid the extent possible, restriction of access to natural resources that will adversely affect forest dependent people. The participatory approach will be developed in more detail during inception of implementation. It will include measures to ensure a reliable site-specific planning methodology where decisions are based on relevant 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.

The relevant SUFAL staff or partner will establish a multi-stakeholder forum to enable joint design, planning, implementation prioritization and working between local stakeholders connected to the SUFAL management.

8.1 Preparation and Implementation of Resettlement Action Plan (RAP)

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

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

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

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

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

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

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

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

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

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

8.2 Entitlement Matrix

Involuntary acquisition of private land is unlikely to take place in the project as mentioned above but in case such a case likely, it will be avoided to the extent possible by exploring all possible alternatives. For such cases of involuntary displacement, site-specific Resettlement Action Plan (RAP) will be prepared. The following entitlement matrix (Table 4.) will be followed for the RAPs.

Table 4: Compensation and Entitlement Matrix

Loss and impacts	Entitled Persons	Entitlements	Application Guidelines and responsibilities
1. Residential and commercial structures	1. Displaced leaseholder 2. Informal land users (squatters & encroachers)	1. Compensation for structures at replacement cost; 2. Transfer and reconstruction allowance. 3. Assistance for finding alternative sites.	<ul style="list-style-type: none"> • BFD will determine the replacement cost of structures with the help of property assessment and valuation committee (PAVC); • PAVC will also guide inventory of loss of structures for quantity and type by construction materials. • BFD will determine and pay compensation for structures • Transfer allowance per household /per shop. • Transfer allowance and relocation

Loss and impacts	Entitled Persons	Entitlements	Application Guidelines and responsibilities
			assistance will be applicable for full loss of structures of a household or shop/business without any scope for continue in remaining structure.
	3. Tenants of residences and businesses premises	Alternative housing allowance Shifting allowance	<ul style="list-style-type: none"> Alternative housing allowance will be determined by PAVC. Shifting allowance will be determined by PAVC.
2. Business, income and employment	1. Displaced business operators 2. Wage employee	1. Business restoration allowance. 2. Assistance for finding alternative business sites. 3. Employment in reconstructed enterprise or in project civil works.	<ul style="list-style-type: none"> BFD will determine the business restoration allowance with the help of PAVC; BFD and partners will assist the displaced businesses identifying alternative business sites or job placements.
Vulnerability	Poor women and other vulnerable households	1. Additional financial assistance equivalent to 3 months' subsistence cost for the incumbent household. 2. Employment opportunities project civil works.	<ul style="list-style-type: none"> Vulnerability will be determined following the data on income, gender and disability of the household heads; BFD and partners will facilitate priority of the vulnerable household members for employment in civil works and in job placements.
4. Construction related impact	Anybody impacted by civil works contractor's activity	Compensation as per RPF	<ul style="list-style-type: none"> The affected persons will approach NCC notifying the impacts in writing with copy to the contractor; GRC will facilitate and assist the affected persons; Contractor will pay the compensation determined by PAVC.

9. Impact Assessment: Process and Mitigation Measures

The SUFAL project will use livelihoods transformation through a holistic support package including 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 AIGA delivery approach will enable the gender equitable distribution of resources to enhance coping capabilities for both men and women. Ultimately, this approach should complement the compensation and asset restoration packages offered to displaced households.

9.1 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:

- Census survey of affected households;
- Socio-economic study that provides the baseline of the households;
- Identification of land for small-scale infrastructure;
- Implementation of the IEC/ Communication plan for awareness creation about project activities;
- Identifying livelihood support programs; and
- To keep the momentum of engagement, activity specific consultations and a quarterly overall consultation will be held with all community groups.

9.2 Stakeholder Participation

BFD recognizes that forest dependent communities are key stakeholders of the project. Hence, the Department will ensure that these stakeholders are consulted on issues and that they have a chance to 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.

9.3 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 voice of women, girls and excluded groups are important during all stages and cycles of project implementation. The setting and tracking of indicators includes alternative livelihoods, AIGAs supports, afforestation and reforestation, capacity building, the design of gender-responsive infrastructure, the participatory planning of projects and financial plans etc. Economic, political, social and physical empowerment of women and excluded groups will also be stimulated by the alternative income generating activities and value chain development such as supporting women as entrepreneurs who sell alternative livelihood products.

The SUFAL project implementing partners 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.

The project's awareness raising will address the needs of the different demographic groups (men, women, adolescent girls, adolescent boys, children and ethnic people), and also aim at influencing gender roles to promote equity. The group/committee formation and beneficiary selection will follow participatory approaches and open consultation with the forest dependent community so that each of groups have the equal rights, access to, and control over resources.

For gender related communication the materials might be used flipcharts, leaflet, posters, newsletter, local drama, and folk song, organizing cultural events, short video clips, meant as guidelines or conversation points. Awareness-raising issues will also address the importance of disability-inclusive as well as gender friendly facilities at all stages (detailed in the Gender Equity Guidelines).

9.4 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 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).

9.5 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.

9.6 Census Survey

Wherever economic and/or physical displacement stemming from land taking under the project is

anticipated, and it cannot be addressed via voluntary means (e.g. land donation or negotiated purchase), a brief census survey will be undertaken to identify project beneficiaries, particularly distinguishing among the poor, vulnerable people and other relevant stakeholders, and to generate a preliminary inventory of losses.

9.7 Socioeconomic Study

The implementing agency will undertake a socioeconomic study (based on PRA techniques, as appropriate) to obtain further information on the persons and their families likely to be affected by economic and/or physical displacement stemming from land taking under the project. The study will utilize a well-planned and all-inclusive communication and consultation strategy and develop a baseline covering the prevailing status of income, employment, education, age, skills and other socio-economic aspects along with cultural and community aspects in the areas. This assessment will feed into the individual RAPs created for each location. The study shall collect and manage this information for the following categories of PAPs:

- i. Members of families who are residing, practicing any trade, occupation or vocation in the project affected area;
- ii. Project Affected Families who are likely to lose their immovable assets, commercial establishment, agricultural land, employment or are alienated wholly or substantially from the main source of their trade occupation or vocation;
- iii. Families belonging to indigenous peoples categories;
- iv. Families headed by a female;
- v. Families that are landless (not having homestead land, agriculture land or ether homestead or agriculture land) and are below poverty line, but residing in the affected area; and
- vi. Those losing access to private property or common property resources.

10. 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. Various areas will be monitored, as detailed in the Table 5.

Table 5: Monitoring components of SUFAL project

Component	What was the target and how much of it was achieved
Institutional development, Information Systems and Training	Sub-component 1.1. Improving organizational effectiveness Sub-component 1.2. Research coordination Sub-component 1.3. Training Sub-component 1.4. Equipment and physical infrastructure Sub-component 1.5. Forestry information system and ICT support
Collaborative Forest and Protected Area Management	Sub-component 2.1. Improving policy and institutional framework and implementation of collaborative forest management Sub-component 2.2. Management and restoration of forests, including establishment of coastal forests

	Sub-component 2.3. Integrated Protected Area management plans, including co-management, ecotourism and biodiversity conservation
Alternative Income Generating Activities (AIGAs)	Sub-component 3.1. Community mobilization Sub-component 3.2. Alternative Income Generating Activities (AIGAs) Sub-component 3.3. Extension Services for Trees Outside Forests
Project Management, Monitoring and Learning	It will support the establishment of the Project Management Unit (PMU) in BFD. The PMU will support financial management, collaborative management, data management and IT service, forestry, accounting, social and environmental safeguards, communications and procurements.

Annual Operating Plans (AOP) should be aligned with above project components and monitoring design also needs 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.

11. Consultation and Participation

SUFAL project activities have adopted an all-inclusive participatory approach that promotes citizen engagement in project process. As part of DPP preparation, nine Focus Group Discussions (FGDs) sessions, four regional workshops, a number of meetings were conducted in the three major ecosystem types: plain, hill and costal districts. BFD officers, Range Officer, Beat Officers, local government representatives, small ethnic communities, forest dependent 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.

12. 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.

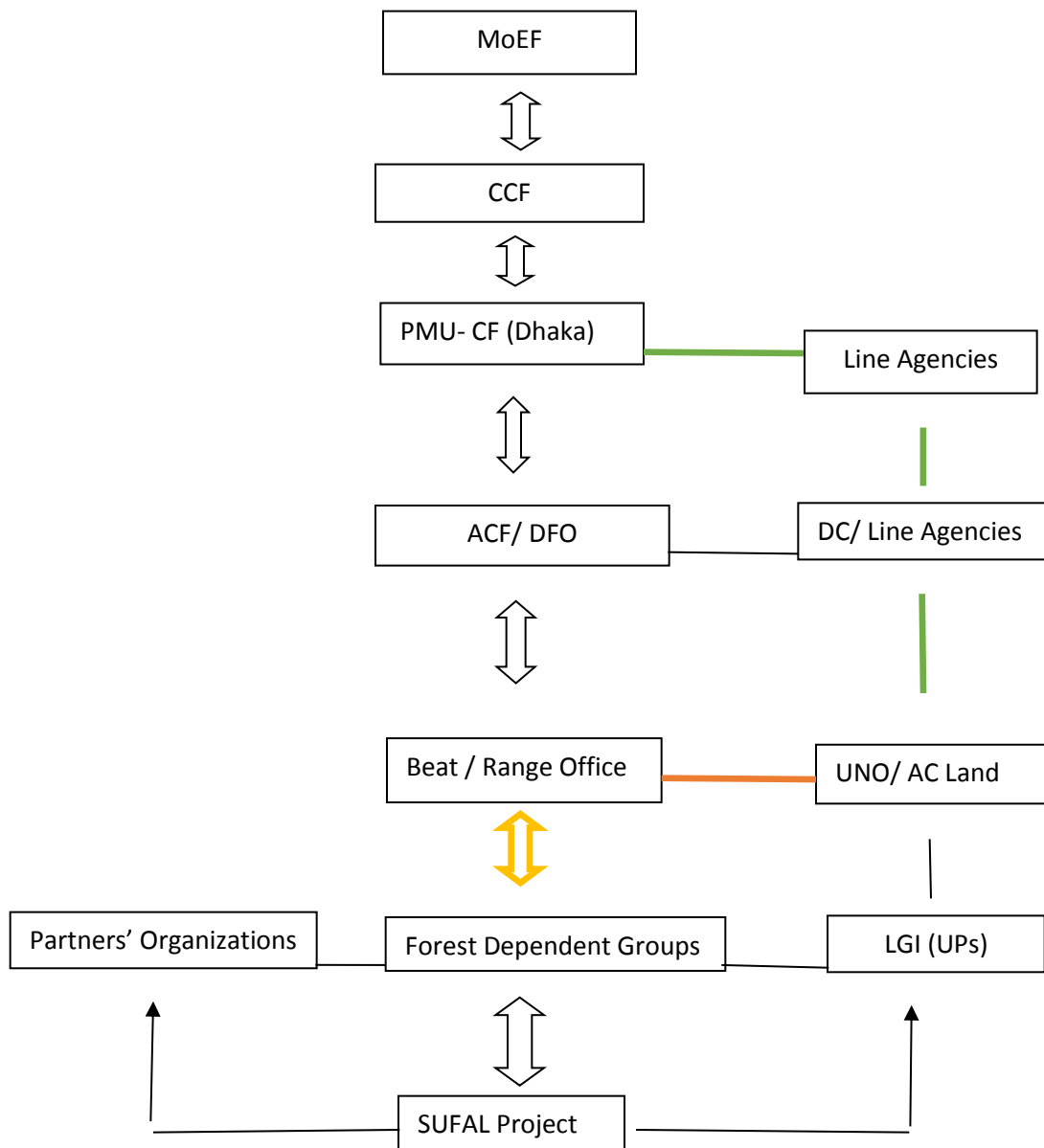
BFD, as part of GRM, will set up project-specific Grievance Redress Committee(s) which will include representatives of the beneficiary/affected communities, at least the local level, besides other relevant

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 diagram 8.1 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 will 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 vulnerable groups. 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**13. Budget and Financing**

The cost of implementation of this RPF 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 the use of these funds for the disbursement of compensation payments and/or the provision of other assistance. The project will determine the annual inflation rates to be applied to all cash entitlements.

Annex 1: Social Impact Screening Checklist

General Information	1. Name of village			
	2. Name of Union			
	3. Name of Upazila			
	4. Name of District			
	5. Name of the site-specific project			
	6. Location			
	7. Type of site	New Construction		Reconstruction
		Rehabilitation		Others(please specify)
	8. Objective of the SUFAL and brief description			
		Please Tick mark(v)		
	9. Does the SUFAL project involve all types and classes of the people in the village	Yes	No	Not applicable
Social and gender	1. Is there any chance of destruction of homestead land?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2. Is there any chance of resettlement of people living in the government land for the implementation of the scheme?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	3. Is there any chance of destruction of religion and cultural place?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	4. Is there any chance of loss of employment of the people of lower down the living standard for the implementation of the scheme?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	5. Is there any chance of destruction of cultural tradition of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	6. Is there changing the socio-economic status of forest-dependent communities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	7. Is there reducing gender gap (needs additional info)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	8. Is gender-disaggregated data being collected and maintained?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	9. Is there increasing social awareness?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	10. Is forest dependent community receiving access to AIGAs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	11. Mitigation Measures	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Livelihood	1. Is there any chance of losing access to the usual Forest area due to implementation of the scheme?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2. Is there any chance of losing means of livelihood due to the implementation of the scheme?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	3. Is there any chance of losing private community-based Forest or similar facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	4. Is there any chance of losing existing social or financial safety network due to implementation of the scheme?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	5. Is there any chance of being vulnerable to or come under the wrath of local elite due to Forest association with this scheme?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
D. Small Ethnic Communities (Tribal People)	1. Is the SUFAL located in an area where Tribal people or small ethnic communities live?			
	N.B. If yes, please answer the following question			
	2. Are the tribal people involved in the planning and implementation of the scheme?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	3. Is there any chance of tribal people be affected?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	4. What are the feeling of tribal people to the schemes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Positive	<input type="checkbox"/>		
	Negative	<input type="checkbox"/>		
	Not any one	<input type="checkbox"/>		
If the answer of the question number 4 is negative, please briefly describe the reason and mitigation measure:				
Other Information (if any)				
Signature of the Social Specialist				