

# Small Ethnic Communities Planning Framework (SECPF)

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**Sustainable Energy Development and  
Empowering Communities in Chattogram Hill  
Tracks Project**

**CURRENCY EQUIVALENTS**  
(As of 17 August 2025)

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**NOTES**

The fiscal year (FY) of the Government of Bangladesh and the Ministry of the Chittagong Hill Tracts ends on 30 June. “FY” before a calendar year denotes the year in which the fiscal year ends, e.g., FY2025 ends on 30 June 2025.

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## ABBREVIATIONS

ADB	- Asian Development Bank
ADC	- Additional Deputy Commissioner
AH	- Affected household
AP	- Affected Person
ARIPA	- Acquisition and Requisition of Immovable Property Act, 2017
CHT	- Chattogram Hill Tracts
CHTDB	- Chattogram Hill Tracts Development Board
CHTRC	- Chattogram Hill Tracts Regional Council
DC	- Deputy Commissioner
DMC	- Detailed Measurement Survey
DPD	- Deputy Project Director
DSCMC	- Design, Supervision Contract Management Consultant
EA	- Executing Agency
FYP	- Five Year Plan
GOB	- Government of Bangladesh
GRC	- Grievance Redress Committee
GRM	- Grievance Redress Mechanism
HDC	- Hill District Council
HIES	- Household Income Expenditure Survey of Bangladesh (2016)
M&E	- Monitoring and Evaluation
MoCHTA	- Ministry of Chittagong Hill Tract Affairs
O&M	- Operation And Maintenance
PAM	- Project Administration Manual
PD	- Project Director
PISC	- Project Implementation Support Consultant
PMU	- Project Management Unit
PPTA	- Project Preparatory Technical Assistance
PVM	- Participatory Village Mapping
RSECP	- Resettlement and Small Ethnic Community Plan
SEC	- Small Ethnic Communities
SECPF	- Small Ethnic Communities Planning Framework
SPS	- Safeguard Policy Statement 2009
VAR	- Village Access Road

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## GLOSSARY

**Administrative System in CHT** - Unlike other parts of Bangladesh, CHT has a dual administrative system under which, the general administrative government organs (e.g. Office of the Deputy Commissioner or DC, under which, there are Upazila Parishad/Thana, Union Parishad, in rural areas and Pourashava, in urban areas) work side-by-side with the traditional administrative structure, which is headed by the Chief (Raja) and the Headman and Karbari working under the Chief.

**Bengali** - People living mainly in the plain-land districts whose mother tongue is Bengali.

**Bohmong Circle** - The Bohmong Circle is one of three hereditary chiefdoms (or "circles") in the Chittagong Hill Tracts of modern-day Bangladesh. The jurisdiction of the Bohmong Circle encompasses parts of Bandarban District. The chiefdom's members are of Marma descent and are known as ragraisa.

**Chakma Circle** - Chakma circle, also known as the Chakma Raj, is one of three hereditary chiefdoms (or "circles") in the Chittagong Hill Tracts of modern-day Bangladesh. The Chakma Circle encompasses parts of Rangamati Hill District and Dighinala and Rajasthali Upazilas in neighboring Khagrachari District and Bandarban District respectively. The chiefdom's members are of Chakma descent.

**Circle** - The British divided the whole region of CHT into three demarcated areas naming as circle, being Chakma Circle, the Bohmong Circle, and the Mong Circle

**Circle Chief** - The leader of a circle is known as circle chief who was previously known as "Raja".

**Decimal** - 100 Decimal = 1 Acre. Bangladeshi agrometrology unit of measurement, a traditional measuring unit.

**Eksona Bandobasti** - The system of leasing a particular plot of land to a certain individual, household or community organization for one year by the respective Headman of the Mouza.

**Headman** - Person appointed in charge of mouza with the power of revenue collection and local trial.

**Jhum** - Shifting (swidden, slash and burn) cultivation is the dominant farming system in the lower and upper hills of Chattogram Hill Tracts.

**Khas Land** - In Bangladesh, Claimed as Government Land but in CHT is SEC Common Land.

**Karbari** - The head of a neighborhood or village whose main responsibility is to participate in social functions and to ensure rule of law in the society. Circle chief appoints the karbaris.

**Katcha houses** - house with mud or bamboo floor, bamboo walls and roof of tin or leaves

**Mauza** - A Mouza Revenue Village is the lowest unit of land administration in Bangladesh. Mouza consists of more than two villages headed by Headman. Alternative spelling is Mauja.

**Mong Circle** - Mong Circle is one of three hereditary chiefdoms (or "circles") in the Chittagong Hill Tracts of modern-day Bangladesh. The jurisdiction of the Mong Circle encompasses parts of Khagrachari District. The chiefdom's members are of Marma descent and are known as phalansa.

**Para** - A neighborhood or locality, usually characterized by a strong sense of community.

**PCJSS** - The Parbatya Chattagram Jana Samhati Samiti (PCJSS) [Bengali: পার্বত্য চট্টগ্রাম জনসংহতি সমিতি, English: United People's Party of the Chittagong Hill Tracts) is a political party formed to represent the people and small ethnic communities of the Chattogram Hill Tracts in Bangladesh.

**Pourashava** – Urban government of smaller town, to be distinguished from City Corporation.

**Pucca houses** - houses with concrete floors and brick walls

**Semi-pucca houses** – houses with brick foundations, concrete or bamboo/wooden floors, possibly lower brick walls and wooden/bamboo upper walls and tin or leave roofs

**Small Ethnic Communities** – Groups or population identified as Indigenous Peoples within the context of ADB's Safeguard Policy Statement will be referred to in this Project as tribes, minor races, ethnic sects, and communities, and collectively in this report referred to as Small Ethnic Communities (SEC) per 15 amendment article 23A of the constitution of Bangladesh.

**Union Parishad** - Union Parishad is one of the lowest administrative units in Bangladesh, part of a four-tier local government, namely Gram (Village) Parishad, Union Parishad, upazilla (Subdistrict) Parishad and Zila (District) Parishad.

**Upazilla** - Subdistrict, part of a four-tier local government structure

**Vulnerable Households** - The vulnerable households include vulnerable groups, especially those below the poverty line, the landless, the elderly, women and children, and Indigenous Peoples, and those without legal title to land,

## I. PROJECT DESCRIPTION

### A. Background

1. The Government of Bangladesh (GoB), through the Bangladesh Power Development Board (BPDB), has initiated the implementation of the project titled "Extension of Power Distribution System Network in Three Hilly Districts", covering Rangamati, Bandarban, and Khagrachhari districts in the Chattogram Hill Tracts (CHT) region. This project aims to expand and modernize the power distribution infrastructure to enhance electricity access in remote and underserved hill communities, including those in ethnically diverse and geographically challenging terrains. The project is expected to play a significant role in promoting social inclusion, improving quality of life, and contributing to economic development in the CHT region.

2. To facilitate the project's physical components including the construction of new substations, grid extensions, river crossing towers and switching stations land acquisition is necessary at multiple sites. Sub-station locations are such as Barkal, Thanchi, Tabalchhari, Rajasthali, Boroichhari, and others. While many of the project sites are on government-owned land under BPDB's jurisdiction, a small portion of private land is also required. Importantly, some of this land falls within areas traditionally occupied and used by Indigenous Peoples, where land tenure is often based on customary ownership and traditional use rather than formal legal titles.

### B. Project Objectives

3. The project will increase access to electricity and enhance energy based livelihood opportunities for the hilly population including SECs, and reduce system losses in ageing and inefficient distribution system in the Chattogram hill tracts, one of the most remote and relatively underdeveloped regions of Bangladesh through

- (i) Improving access to electricity in CHT by strengthening of BPDB's power distribution network with 6 x 33/11 kV new distribution substations comprising SF6 free switchgears and transformers with 80 MVA capacity, and extension of BPDB's distribution network with construction of 5,032 km of low-loss, climate resilient, bird sensitive and environment friendly distribution lines in 26 upazilas in Rangamati, Bandarbans and Khagrachori to provide electricity access to about 88,586 new households with 40% SECs;
- (ii) Reducing distribution loss by modernizing and upgrading of BPDB's old and aging lines in CHT with upgradation and capacity addition of 4 existing 33/11 kV distribution substations, 1 existing switching station, and 1 existing zonal repair workshop with an additional 40 MVA of capacity.;
- (iii) Improving BPDB's institutional capacity in distribution service delivery, troubleshooting and disaster recovery in CHT with digital technology, online tracking system, modernized technologies and smart rollout processes; and
- (iv) Fostering income generation through small scale business development by promoting energy-based livelihood activities for marginalized and grassroots households including 40% SECs living below the average poverty level of the country, and demonstration of renewable energy-based applications.

## C. Project Impact, Outcome and Outputs

4. The intended impact of the project is uninterrupted and reliable power supply for rural areas of Bangladesh achieved by 2041. The outcome is the quality, reliability, and resilience of the electrical power supply improved in the Chattogram Hill Tracts.

5. The project envisaged in the Project Concept Note (PCN) comprises the following four outputs:

**Output 1: Power distribution networks expanded, and resilience strengthened in 26 remote and difficult to access upazillas of Rangamati, Bandarban, and Khagrachari.** This output will support the development of new resilient and gender-responsive power distribution systems through:

- (i) Construction of 6 new 33/11 kilovolts (kV) distribution substations, adding 80 megavolt-amperes (MVA) of capacity (2025 baseline: 285\_MVA);
- (ii) Construction of new 5,032 kilometers (km) of 33 kV, 11 kV, and below distribution lines using low-loss conductors and climate-resilient features. (2025 baseline for distribution line: 7,893 km);
- (iii) Training of 91 BPDB staff (with participation of 90% of the relevant women staff) who will report increased knowledge on planning, designing, operation, and maintenance (O&M) of SF<sub>6</sub>-free switchgear, transformers, low-loss conductors, underground distribution systems, advanced technologies, and disaster-resilient options, and renewable energy systems. (2025 baseline: 0); and
- (iv) Establishment of 30 gravity-based pipeline drinking water distribution schemes powered by solar photovoltaic (PV), managed by para development committees (with at least 30% women membership), with enhanced capacity on O&M; and provision of at least 20 public or private community facilities serving tribes, minor races, ethnic sects and communities, including schools, hospitals, temples, and community clinics with solar power backup systems and batteries. This output is included in the TA Project funded by JFPR. (2025 baseline: 0).

**Output 2: Existing electricity distribution infrastructure in Rangamati, Bandarban, and Khagrachari augmented and upgraded with disaster-resilient features.** This output will support the augmentation and modernization of existing power distribution systems through:

- (i) Upgrading of 4 existing 33/11 kV distribution substations, 1 existing switching station, and 1 existing zonal repair workshop with an additional 40 MVA of capacity. (2025 Baseline: 285\_MVA).
- (ii) Upgrading and modernization of 1,874 km of distribution lines using low-loss conductor materials. (2025 Baseline: 0).

**Output 3: Institutional and disaster response capacity strengthened with modernized customer service delivery and troubleshooting system.** This output will strengthen BPDB's institutional capacity and disaster response capabilities through:

- (i) Establishment of 3 customer complaint centers and 3 day-care centers, equipped with digital technology and online monitoring systems. This output is included in the TA Project funded by JFPR (2025 Baseline: 0).

- (ii) Training of 34 BPDB staff or relevant complaint center staff (with at least 50% women and 50% from tribes, minor races, ethnic sects and communities across BPDB's 17 Service and Delivery Offices and Electricity Sales Units in the CHT, with reported increased knowledge on customer complaint management using digital and online technologies. This output is included in the TA Project funded by JFPR. (2025 Baseline: 0).
- (iii) Strengthening of BPDB's safeguards management capacity, including adequate resources for environment, health and safety, gender, and social staff, with a dedicated focal person for safeguards and gender nominated. This output is included in the TA Project funded by JFPR. (2025 Baseline: 0).
- (iv) Training of 50 BPDB staff to strengthen capacity on distribution O&M, including standard operating procedures for oil management and health and safety. This output is included in the TA Project funded by JFPR. (2025 Baseline: 0).
- (v) Awareness raising for at least 300 higher secondary or university students in the CHT (50% female students) on career opportunities in the energy sector and disaster resilient energy systems. This output is included in the TA Project funded by JFPR (2025 Baseline: 0).

**Output 4: Energy-based livelihood opportunities supported and promoted.** This output will foster inclusive, energy-based livelihoods in the CHT through. These outputs are included in the TA Project funded by JFPR.:

- (i) Identification and development of 10 business models for promoting energy-based livelihood opportunities responsive to the cultures of tribes, minor races, ethnic sects and communities' cultures, and incorporating gender-responsive elements, identified and developed for promoting energy-based livelihood opportunities in CHT, benefitting at least 1,000 electricity users, including 40% women and 50% from these groups. (2025 Baseline: 0);
- (ii) Training of 1,000 electricity users (including 40% women and 50% from tribes, minor races, ethnic sects and communities) with reported increased knowledge on energy-based livelihood opportunities such as small and medium-sized enterprises, agrobusiness, cottage industries, and eco-tourism. (2025 Baseline: 0);
- (iii) Support to 200 selected entrepreneurs (including 80% women and 65% from tribes, minor races, ethnic sects and communities) with business incubation assistance, leading to the establishment of their own energy-based enterprises. (2025 Baseline: 0); and
- (iv) Support for 10 numbers of women-led businesses through energy efficiency, product improvement, or quality assurance interventions, with at least 30% reporting increased revenue or expanded operations within 12 months. (2025 baseline: 0)

#### **D. Description of the Project Area**

6. The proposed project Extension of Power Distribution System Network in Three Hilly Districts is situated within the southeastern region of Bangladesh, encompassing the districts of Rangamati, Khagrachhari, and Bandarban, collectively known as the Chattogram Hill Tracts (CHT). These districts are characterized by rugged terrains, hilly topography, forested

landscapes, and ethnically diverse populations. The region is geographically distinct from the rest of the country and presents a range of development challenges owing to its remoteness, limited infrastructure, and historical socio-political complexities.

7. The project spans multiple upazilas, with substations, distribution lines, and associated facilities proposed in various locations including Barkal, Boroichhari, Rajasthali, Thanchi, and Tintohori, as well as in more accessible areas such as Nazirhat and Bandarban Sadar. Among these, Barkal and Thanchi are considered especially remote and predominantly inhabited by TMRSEC communities, where access to public services such as electricity, education, and healthcare remains limited. These areas are marked by limited road connectivity, dependency on traditional agriculture (including shifting cultivation or jhum), and minimal integration into the national grid.

8. The hill districts have enormous socio-economic potential, particularly in agriculture, tourism, and border trade. However, the lack of electricity in many parts of the region severely hampers this potential. The area also plays a critical role in national security due to its proximity to international borders. Ensuring electricity access to these areas is not only a matter of development equity but also a strategic necessity for border stability. The administrative information of all the project sites and distribution lines is given in the tables below. Project Location Map is given in

10. Figure I-1.

**Table I-1: Construction of 6 Nos new 33/11 KV substations (3 at Rangamati, 1 at Bandarban, 2 at Khagrachari)**

District	Type	Upazila Name	Location / Name of the Substation	GPS Location
Bandarban	New Substation	Thanchi Upazila	Thanchi	21.80632°N 92.43459 °E
Rangamati	New Substation	Rajasthali Upazila	Rajasthali	22.367661°N 92.253580°E
	New Substation	Kaptai Upazila	(Shilchari) Boroichhari	22.503222°N 92.162878 °E
	New Substation	Barkal Upazila	Barkal	22.724230°N 92.378118°E
Khagrachari	New Substation	Matiranga Upazila	Tabalchhari	23.2304843°N 91.810224°E
	New Substation	Manikchari Upazila	Tintahari	22.3676452°N 92.2537566°E

**Table I-2: Upgradation of existing 33/11 KV substations and 1 Regional Workshop (1 at Chattogram, 1 at Rangamati, 1 at Bandarban, 3 at Khagrachari)**

District	Type	Location / Name of the Substation	Upazila Name	GPS Location
Chattogram	Upgradation	Regional Workshop, Chattogram	Chattogram City Corporation	22.343767°N 91.803025°E
Bandarban	Upgradation	Kachinghata	Bandarban Sadar Upazila	22.190021°N 92.2272428°E
Rangamati	Upgradation/ Renewal	Marissa	Baghaichari Upazila	23.1639007°N 92.1903632°E
Khagrachari	Switching Station	Nazirhat	Fatikchhari Upazila	22.6304892°N 91.7897637°E
	Upgradation	Jaliapara	Guimara Upazila	22.95371°N 91.86636°E
		Dighinala	Dighinala Upazila	23.245748°N 92.066878°E

**Table I-3: Location Details of New indicative 33 & 11 kV Distribution Lines**

SL	Name	Volt age	Zilla	Upazilla Name	Starting GPS	Middle point GPS	Ending GPS	Length (km)
1	Vedvedi Substaion to Borkol Substaion (33 KV)	33 KV	Rangamati	Rangamati Sadar, Borkol	22.65855, 92.15363	22.71194, 92.26065	22.72404, 92.37837	45
2	Matiranga Substaion to Tobalchhari Substaion (33 KV)	33 KV	Khagrachari	Matiranga	23.04587, 91.8751	23.12494, 91.83575	23.23048, 91.81022	35

SL	Name	Voltage	Zilla	Upazilla Name	Starting GPS	Middle point GPS	Ending GPS	Length (km)
3	Khagrachari Grid Substation to Jaliyapara Substation (33 KV)	33 KV	Khagrachari	Panchari	22.95371, 91.86636	23.06447, 91.90629	23.0797, 91.97441	35
4	Panchari Substation to Tabalchhari Substation (33 KV)	33 KV	Khagrachari	Panchari	23.23048, 91.81022	23.27577, 91.85842	23.23048, 91.81022	25
5	Alikadam Substation to Thanchi Substation (33 KV)	33 KV	Bandarban	Alikadam, Thanchi	21.64593, 92.31092	21.72122, 92.39545	21.80632, 92.43459	40
6	Bangalhaliya Substation to Rajasthali Substation (33 KV)	33 KV	Bandarban, Rangamati	Rajasthali	22.36545, 92.14163	22.35888, 92.18767	22.3676452, 92.2537566	25
7	Bolipara Substation to Thanchi Substation (33 KV)	33 KV	Bandarban	Thanchi	21.87809, 92.39593	21.82972, 92.39656	21.80632, 92.43459	20
8	Bandarban Grid to BPDB Distribution Office (33 KV)	33 KV	Bandarban	Bandarban Sadar	22.23012, 92.18594	22.20551, 92.21589	22.19055, 92.21775	5
9	Bandarban Grid to Kechingghata Substation (33 KV)	33 KV	Bandarban	Bandarban Sadar	22.23012, 92.18594	22.20222, 92.21786	22.19002, 92.22724	7
10	Bandarban Grid to Rowangchhari Distribution Line (33 KV)	33 KV	Bandarban	Bandarban Sadar	22.23012, 92.18594	22.20551, 92.21589	22.19055, 92.21775	7
11	Bolipara-Thanchi Main Line To Kanajiu Para (11 KV)	11 KV	Bandarban	Thanchi	21.82634, 92.40129	21.83146, 92.41262	21.8392, 92.41748	4
12	Thanchi to Baklai para (11 KV)	11 KV	Bandarban	Thanchi	21.80632, 92.43459	21.83375, 92.48353	21.85639, 92.51991	22
13	Thanchi-Baklai Para Line to Boarding Para (11 KV)	11 KV	Bandarban	Thanchi	21.82694, 92.48152	21.81824, 92.48574	21.81298, 92.48902	3
14	Tabalchhari to Amtali (11 KV)	11 KV	Khagrachari	Matiranga	23.25321, 91.81463	23.20877, 91.81422	23.17294, 91.82412	15
15	Tabalchhari-Amtali Mainline to Barnal (11 KV)	11 KV	Khagrachari	Matiranga	23.17621, 91.82138	23.19582, 91.83813	23.2183, 91.8528	10
16	Dudhukchhari to Ghilatola BGB Camp (11 KV)	11 KV	Khagrachari	Panchari	23.3874, 91.88406	23.40915, 91.90144	23.43566, 91.9073	9
17	Rajasthali Substation to Faruabazar	11 KV	Rangamati	Rajasthali	22.36764, 92.25375	22.35401, 92.31878	22.38333, 92.40708	33
18	Y Junction Substation to	11 KV	Bandarban	Bandarban Sadar	22.09732, 92.24964	22.05737, 92.24207	21.99323, 92.23732	25

SL	Name	Voltage	Zilla	Upazilla Name	Starting GPS	Middle point GPS	Ending GPS	Length (km)
	Tongkaboti Substaion (11 KV)							
19	Y Junction Substaion to Empupara Substaion (11 KV)	11 KV	Bandarban	Bandarban Sadar	22.09732, 92.24964	22.03621, 92.28275	21.97894, 92.29923	22
20	Empupara Substaion to Bolipara Substaion (33 KV)	11 KV	Bandarban	Bandarban Sadar	21.97894, 92.29923	21.89218, 92.33584	21.87809, 92.39593	25

**Table I-4: List of Indecative lines of Renovation/Upgradation of existing 1874 k.m. distribution line of 33KV, 11KV, I /0.4KV, 0.4KV and 0.23KV**

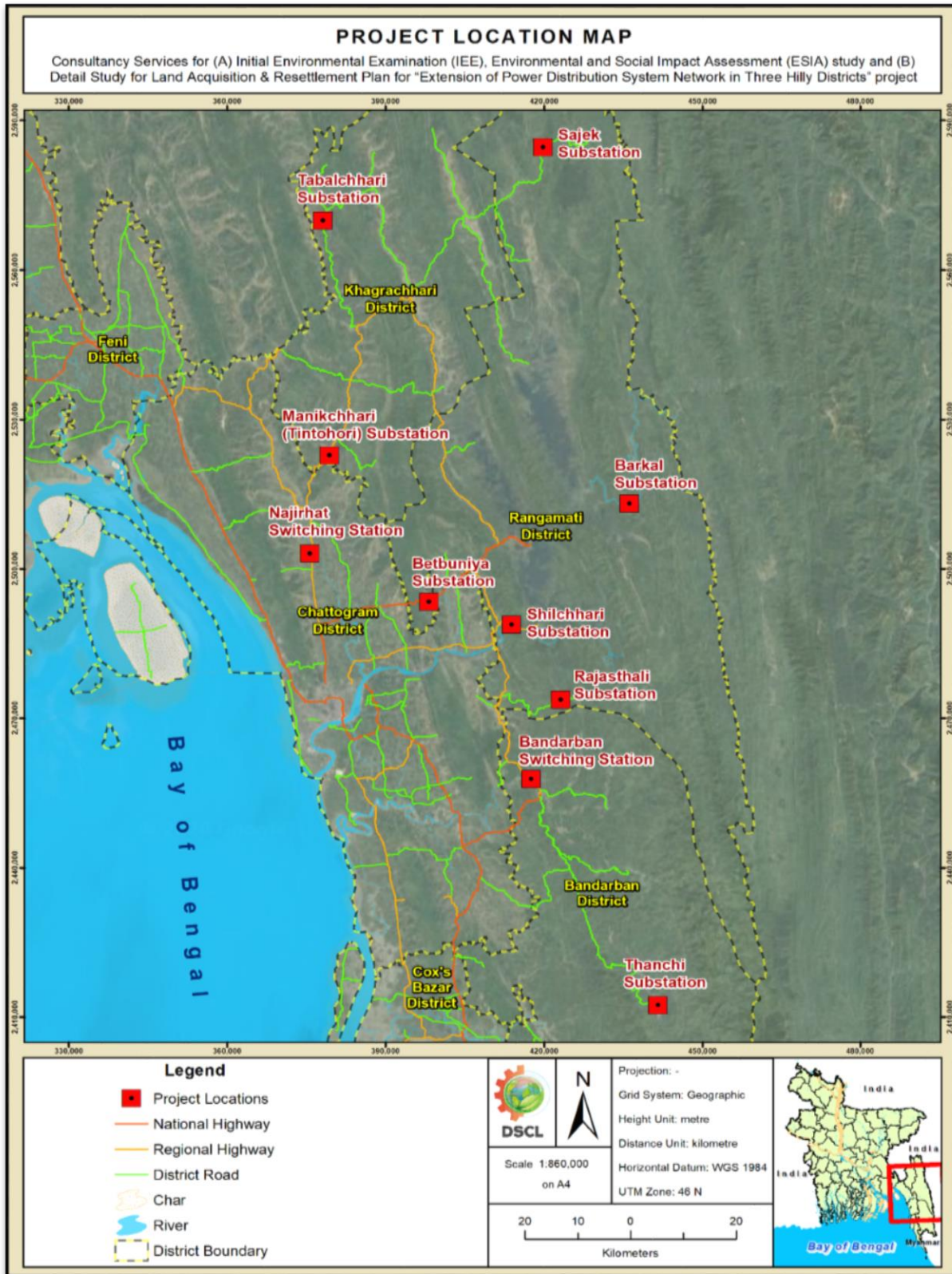
Name	Length	Zilla Name	Upazilla Name
Hathazari Substaion to Kawkhali Substaion (33 KV)	40	Chattogram, Rangamati	Hathazari, Raozan, Kawkhali
Hathazari Substaion to Nazirhat Substaion (33 KV)	15	Chattogram	Hathazari, Fakirhat
Nazirhat Substaion to Manikchari Substaion (33 KV)	30	Chattogram, Khagrachari	Fatikchari, Manikchari
Nazirhat Substaion to Ramgar Substaion (33 KV)	60	Chattogram, Khagrachari	Fatikchari, Manikchari, Ramgar
Khagrachari Grid Substaion to Panchari Substaion (33 KV)	35	Khagrachari	Khagrachari Sadar, Panchari
Bandarban Substaion to Bangalhaliya Substaion (33 KV)	25	Bandarban	Bandarban Sadar, Rajasthali
Shukkurchari to Kaukhali (33 KV)	45	Rangamati	Rangamati Sadar, Kawkhali
Panchari Substaion to Taindong (11 KV)	32	Khagrachari	Panchari, Matiranga
Panchari Substaion to Logang (11 KV)	15	Khagrachari	Panchari

**Table I-5: Upgradation of Existing indecative 33 & 11 KV Distribution Lines**

SL	Name	Voltage	Starting GPS	Middle point GPS	Ending GPS	Length (km)
1	Hathazari Substaion to Kawkhali Substaion (33 KV)	33 KV	22.50047, 91.80913	22.53908, 91.95044	22.54405, 92.01004	40
2	Hathazari Substaion to Nazirhat Substaion (33 KV)	33 KV	22.50047, 91.80913	22.56398, 91.79703	22.63048, 91.78976	15
3	Nazirhat Substaion to Manikchari Substaion (33 KV)	33 KV	22.63048, 91.78976	22.75566, 91.78534	22.8523, 91.8458	30
4	Nazirhat Substaion to Ramgar Substaion (33 KV)	33 KV	22.63048, 91.78976	22.79824, 91.71853	22.99754, 91.73701	60
5	Khagrachari Grid Substaion to Panchari Substaion (33 KV)	33 KV	23.0797, 91.97441	23.21041, 91.91588	23.23048, 91.81022	35
6	Bandarban Substaion to Bangalhaliya Substaion (33 KV)	33 KV	22.23012, 92.18594	22.29278, 92.15943	22.36545, 92.14163	25
7	Borkol to Juraichari	33KV	-	-	-	12

<b>SL</b>	<b>Name</b>	<b>Voltage</b>	<b>Starting GPS</b>	<b>Middle point GPS</b>	<b>Ending GPS</b>	<b>Length (km)</b>
8	Panchari to Taindong (11 KV)	11 KV	23.31761, 91.89395	23.26423, 91.8319	23.31605, 91.7982	32
9	Panchari to Logang (11 KV)	11 KV	23.31761, 91.89395	23.38436, 91.88644	23.38679, 91.86557	15

Figure I-1: Project Location Map



## II. OBJECTIVES AND POLICY FRAMEWORK

### A. Objectives and Principles of the SECPF

11. The project is aimed to expand BPDB's power distribution network in 26 upazilas in Rangamati, Bandarban and Khagrachori with 40% accessed by members from small ethnic community. In general, the SECPF provides guidance on the safeguards assessment and planning for small ethnic communities including legal framework, institutional arrangements, and other processes to be followed for identified components, subprojects and interventions during project implementation. The SECPF combines the relevant legal framework and procedures for dealing with SEC in Bangladesh and related safeguards stipulated in the ADB's Safeguards Policy Statement (SPS), 2009 to ensure compliance with the standards found in both policies. The SECPF is prepared based on the guidelines provided in ADB SPS 2009 Safeguard Requirements 3: Indigenous Peoples.

12. The national laws of Bangladesh include policies that recognize the rights of indigenous peoples to pursue their own economic, social, and cultural development. The ADB IP safeguards are intended to "ensure projects are designed and implemented in a way that fosters full respect for indigenous peoples' identity, dignity, human rights, livelihood systems, and cultural uniqueness as they define them." The SECPF incorporates principles from both Bangladesh national laws and the ADB SPS 2009.

**Table:II-1 Division wise Ethnic Population by Sex in Bangladesh**

Division	Number			Percentage		
	Total	Male	Female	Total	Male	Female
1	2	3	4	5	6	7
National	1,650,478	824,933	825,545	100.00	49.98	50.02
Barishal	4,190	2,196	1,994	0.25	52.41	47.59
Chattogram	991,013	496,788	494,225	60.04	50.13	49.87
Dhaka	82,324	41,999	40,325	4.99	51.02	48.98
Khulna	38,992	19,646	19,346	2.36	50.38	49.62
Mymensingh	61,561	30,101	31,460	3.73	48.90	51.10
Rajshahi	244,627	121,144	123,483	14.82	49.52	50.48
Rangpur	91,079	45,091	45,988	5.52	49.51	50.49
Sylhet	136,692	67,968	68,724	8.28	49.72	50.28

Source: Population and Housing Census 2022, BBS

**Table: II-2 Ethnic Population in three Hill Districts in Bangladesh**

Division	Total		Male		Female	
	Number	Percent	Number	Percent	Number	Percent
1	2	3	4	5	6	7
Bandarban	197,983	100.00	99,197	50.10	98,786	49.90
Khagrachhari	349,390	100.00	172,669	49.42	176,721	50.58
Rangamati	372,875	100.00	187,977	50.41	184,898	49.59

Source: Population and Housing Census 2022, BBS

## **B. ADB's Safeguard Policy Statement 2009**

13. ADB's safeguard policy statement 2009 consists of three operational policies on the environment, involuntary resettlement (IR) and Indigenous Peoples (IP) safeguards. These are accompanied by Operations Manual sections of which one is on IP safeguards. The ADB safeguard policies involve a structured process of impact assessment, planning, and mitigation to address the adverse effects of projects throughout the project cycle. The safeguard policies require that (i) impacts are identified and assessed early in the project cycle; (ii) plans to avoid, minimize, mitigate, or compensate for the potential adverse impacts are developed and implemented; and (iii) affected people are informed and consulted during project preparation and implementation. The policies apply to all ADB-financed projects and to all project components.

14. A basic principle of the ADB safeguard policies is that implementation of the provisions of the policies is the responsibility of the borrower/client. Borrowers/clients are required to undertake social and environmental assessments, carry out consultations with affected people and communities, prepare and implement safeguard plans, monitor the implementation of these plans, and prepare and submit monitoring reports. ADB's role is to explain policy requirements to borrowers/clients, help borrowers/clients meet those requirements during project processing and implementation through capacity-building programs, ensure due diligence and review and provide monitoring and supervision. ADB staff, through their due diligence, review, and supervision, will ensure that borrowers/clients comply with these requirements during project preparation and implementation. ADB's Safeguard Requirements 3 is concerned with Indigenous Peoples.<sup>15</sup>

15. The Objects of the ADB IP Safeguard Policy is to design and implement projects in a way that fosters full respect for Indigenous Peoples' identity, dignity, human rights, livelihood systems, and cultural uniqueness as defined by the Indigenous Peoples themselves so that they (i) receive culturally appropriate social and economic benefits, (ii) do not suffer adverse impacts because of projects, and (iii) can participate actively in projects that affect them. The Indigenous Peoples safeguards are triggered if a project directly or indirectly affects the dignity, human rights, livelihood systems, or culture of Indigenous Peoples or affects the territories or natural or cultural resources that Indigenous Peoples own, use, occupy, or claim as an ancestral domain or asset.

16. Internationally, Indigenous People are referred or defined under various terms. ADB SPS 2009 use the term Indigenous Peoples as a generic sense to refer to a distinct, vulnerable, social and cultural group possessing the following characteristics in varying degrees: (i) self-identification as members of a distinct indigenous cultural group and recognition of this identity by others; (ii) collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories; (iii) customary cultural, economic, social, or political institutions that are separate from those of the dominant society and culture; and (iv) a distinct language, often different from the official language of the country or region. In considering these characteristics, national legislation, customary law, and any international conventions to which the country is a party will be considered. A group that has lost collective attachment to geographically distinct habitats or ancestral territories in the project area because of forced severance remains eligible for coverage under this policy.

17. ADB's IP Safeguard Policy has nine Policy Principles:

- (i) Screen early on to determine (a) whether Indigenous Peoples are present in, or have collective attachment to, the project area; and (b) whether project impacts on Indigenous Peoples are likely.

- (ii) Undertake a culturally appropriate and gender-sensitive social impact assessment or use similar methods to assess potential project impacts, both positive and adverse, on Indigenous Peoples. Give full consideration to options the affected Indigenous Peoples prefer in relation to the provision of project benefits and the design of mitigation measures. Identify social and economic benefits for affected Indigenous Peoples that are culturally appropriate and gender and intergenerationally inclusive and develop measures to avoid, minimize, and/or mitigate adverse impacts on Indigenous Peoples.
- (iii) Undertake meaningful consultations with affected Indigenous Peoples communities and concerned Indigenous Peoples organizations to solicit their participation (a) in designing, implementing, and monitoring measures to avoid adverse impacts or, when avoidance is not possible, to minimize, mitigate, or compensate for such effects; and (b) in tailoring project benefits for affected Indigenous Peoples communities in a culturally appropriate manner. To enhance Indigenous Peoples' active participation, projects affecting them will provide for culturally appropriate and gender inclusive capacity development. Establish a culturally appropriate and gender inclusive grievance mechanism to receive and facilitate resolution of the Indigenous Peoples' concerns.
- (iv) Ascertain the consent of affected Indigenous Peoples communities to the following project activities: (a) commercial development of the cultural resources and knowledge of Indigenous Peoples; (b) physical displacement from traditional or customary lands; and (c) commercial development of natural resources within customary lands under use that would impact the livelihoods or the cultural, ceremonial, or spiritual uses that define the identity and community of Indigenous Peoples. For the purposes of policy application, the consent of affected Indigenous Peoples communities refers to a collective expression by the affected Indigenous Peoples communities, through individuals and/or their recognized representatives, of broad community support for such project activities. Broad community support may exist even if some individuals or groups object to the project activities.
- (v) Avoid, to the maximum extent possible, any restricted access to and physical displacement from protected areas and natural resources. Where avoidance is not possible, ensure that the affected Indigenous Peoples communities participate in the design, implementation, and monitoring and evaluation of management arrangements for such areas and natural resources and that their benefits are equitably shared.
- (vi) Prepare an Indigenous Peoples plan (IPP) that is based on the social impact assessment with the assistance of qualified and experienced experts and that draw on indigenous knowledge and participation by the affected Indigenous Peoples communities. The IPP includes a framework for continued consultation with the affected Indigenous Peoples communities during project implementation; specifies measures to ensure that Indigenous Peoples receive culturally appropriate benefits; identifies measures to avoid, minimize, mitigate, or compensate for any adverse project impacts; and includes culturally appropriate grievance procedures, monitoring and evaluation arrangements, and a budget and time-bound actions for implementing

the planned measures.

- (vii) Disclose a draft IPP, including documentation of the consultation process and the results of the social impact assessment in a timely manner, before project appraisal, in an accessible place and in a form and language(s) understandable to affected Indigenous Peoples communities and other stakeholders. The final IPP and its updates will also be disclosed to the affected Indigenous Peoples communities and other stakeholders.
- (viii) Prepare an action plan for legal recognition of customary rights to lands and territories or ancestral domains when the project involves (a) activities that are contingent on establishing legally recognized rights to lands and territories that Indigenous Peoples have traditionally owned or customarily used or occupied, or (b) involuntary acquisition of such lands.
- (ix) Monitor implementation of the IPP using qualified and experienced experts; adopt a participatory monitoring approach, wherever possible; and assess whether the IPP's objective and desired outcome have been achieved, taking into account the baseline conditions and the results of IPP monitoring. Disclose monitoring reports.

### **C. Bangladesh's Legal Framework related Small Ethnic Communities**

18. **The Constitution of Bangladesh.** The constitution guarantees equal rights and equality before law of its citizens (Article 27). It does not use the term "indigenous peoples" but instead identifies "tribes, minor races, ethnic sects and communities" (Article 23A), and obliges the State to protect and develop their unique local culture and traditions. On citizenship, however, the Constitution identifies all the people of Bangladesh as "Bangalees" (Article 6.2). Nevertheless, the Constitution also identifies particularly disadvantaged sections of the population – those referred to as "backward sections" – for special provisions that include protection from all forms of exploitation (Article 14); outlawing of discrimination on grounds of religion, race, caste, sex or place of birth (Article 28); and equality of opportunity in public employment, while enabling the State to make special provisions to ensure adequate representation of these sections of the population (Article 29). These provisions protect those affirmative acts of the state that might otherwise amount to discrimination.

19. **Laws applied to SEC in the plains.** Several laws relevant to the tribes, minor races, ethnic sects, and communities geographically define their scope of application (i.e., they are applicable to the plains or the CHT).<sup>16</sup> In the case of the plains, the first law is applicable to the plains only, while the others now apply to all SECs in the country:

- (i) East Bengal State Acquisition and Tenancy Act, 1950 (Act XXVIII of 1950). This restricts the transfer of land of "aboriginal castes and tribes" to non-aboriginals.
- (ii) Other laws that have implications for SEC in the plains include the Drugs and Alcoholic Substances Control Act, 1990 (Act XX of 1990); the Forest Act of 1927 (Act XVI of 1927); and the Social Forestry Rules of 2004. To be specific:
- (iii) Narcotics and Alcoholic Substances Control Act-1990. Section 11 of this Act prohibits consumption of alcohol without permission but allows SEC to consume traditionally produced alcohol.
- (iv) The Forest Act-2019 (amendment of Forest Act 1927). Section 10 refers to treatment of claims relating to practice of shifting cultivation. It cites that the practice of shifting

cultivation shall in all cases be deemed a privilege to control, restrict and abolish by the (Government), and details how the determination of how this privilege is circumscribed. Furthermore, there is a provision in section 93 that “The traditional and customary rights of the ethnic minorities can be reserved under this law”.

- (v) The Social Forestry Rules-2004. There is a provision in section 26 of this law of forming a national consultation forum which will include an SEC representative. Section 20 of the rules include a provision for local people to participate in social forestry and claim a profit up to 15%, but this doesn't refer to SEC specifically.

20. **Vested Property (Return) Act, 2011.** This Act enables the return of land and property seized from both the Hindu minority and tribes, minor races, ethnic sects, and communities over the last four decades.

21. The Project may encroach on individual or common land of tribes, minor races, ethnic sects, and communities. The principal legal instrument governing land acquisition in Bangladesh is the “Acquisition and Requisition of Immovable Property Act of 2017” (ARIPA 2017). As discussed in the Resettlement Framework (RF) of the Project ARIPA 2017 does not pertain to the CHT. In 2018 the President issued the “Chittagong Hill Tracts (Land Acquisition) (Amendment) Ordinance”. This ordinance recognizes the customary land rights of tribes, minor races, ethnic sects, and communities. And the compensation rates have been now made equivalent to registered land, which is 200% premium on top of recorded rates to be provided as compensation as Cash Compensation by Law (CCL).

22. Therefore, under the project's SECPF, recognizable claims to land are those having (i) customary ownership or (ii) possess any other legal document to establish ownership.

23. In addition to its domestic laws, Bangladesh is also signatory to most of the major international human rights instruments which are either directly or indirectly relevant to the rights of the tribal/ indigenous peoples. Furthermore, Bangladesh is signatory to the ILO Convention 107 on Tribal Populations although it is yet to ratify the other important ILO convention on tribal peoples, Convention No. 169 of 1989. It is also one of the select few countries to abstain from voting on the UN Declaration on the Rights of the Indigenous Peoples (UNDRIP) in 2007.

24. The Government of Bangladesh has embarked on its 8<sup>th</sup> Five-Year Plan (8FYP) for the period of FY2021 – FY2025 with the theme of “Promoting Prosperity and Fostering Inclusiveness”. Several intentions have been included for the development of the country's ethnic minorities and the CHT.

25. The 8FYP highlights the vulnerable situation of tribes, minor races, ethnic sects, and communities by referring to the more than 1.6 million people of ethnic communities who live in Bangladesh according to the Population Census 2011.<sup>19</sup> According to the analysis of the 8FYP, the ethnic communities in Bangladesh are deprived of economic, social, cultural, and political rights. The 8FYP presents the major problems faced by all ethnic minorities and the inadequacy of policies to protect the ethnic people.<sup>20</sup>

26. The 8FYP specifically aims to reduce poverty in lagging regions, and in this regard mentions that the CHT is “one of the most disadvantaged and vulnerable regions in the country in terms of almost all major development indicators” and that it “exhibits a large concentration of poor people, with two of the three districts in the CHT [Bandarban and Khagrachari] showing poverty in the 53-63 percentage range, which is more than twice the national average.” In

response to this the 8FYP proposes interventions for lagging regions, including: spending on: infrastructure needs, irrigation, agriculture extension, growth of non-farm rural enterprises, support for marketing services, greater access to lab or training programs, strengthening partnerships with NGOs and CBOs in delivering relevant local services, and conducting in-depth district-level poverty assessments. the Plan's chapter on social inclusion also includes the following measures to be promoted for the CHT specifically: empowerment of ethnic communities, income generating activities, marketing infrastructure, strengthening vocational and social skills, promoting sustainable development, mitigating climate related challenges, and strengthening the implementation capacity of local institutions, such has the CHTRC and HDCs.

**Table II- 3. Bangladesh and SEC related International Treaties and Conventions**

SL	Name of the Treaties/Conventions	Year of Adoption by UN	Year of Ratification by Bangladesh
1.	International Convention on the Elimination of All Forms of Racial Discrimination	1965	1979
2.	International Covenant on Civil and Political Rights	1966	2000
3.	International Covenant on Economic, Social and Cultural Rights	1966	1998
4.	Convention on the Elimination of All Forms of Discrimination against Women	1979	1984
5.	Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment	1984	1998
6.	Convention on the Rights of the Child	1989	1990
7.	Convention on Biological Diversity	1993	1994
8.	ILO Conventions No. 107 on Indigenous & Tribal Populations	1957	1972
9.	Convention on the Rights of Persons with Disabilities	2007	2008
10.	United Nations Declaration on the Rights of Indigenous Peoples	2007	Abstention
11.	ILO Conventions No. 169 on Indigenous & Tribal Populations	1989	Yet to ratify

#### **D. Harmonization with ADB's Policy**

27. As per ADB SPS 2009, 'consent of Affected Indigenous Peoples Communities' is defined as for the purpose of policy application, this refers to a collective expression by the affected Indigenous Peoples communities, through individuals and/or their recognized representatives, of broad community support for the project activities. Such broad community support may exist even if some individuals or groups object to the project activities.

28. The SEC related ADB policies are more specific and detailed than those in Bangladesh law. The Project will adhere to the more specific ADB safeguards. Primarily, ADB SPS (2009) includes (i) culturally appropriate measures, (ii) the requirement to ensure consent or broad

community support from SEC, and (iii) community consultation, preparation, disclosure, implementation, and monitoring of the SECPs. All three will be applied in this Project.

29. In any of the project's subprojects where land acquisition and/ or resettlement of SEC becomes unavoidable, the Project's RF, and SECPFs will be applied. In case of any subproject to have impact on customary land, assets, access and impact on SEC culture or livelihood, a SECP is to be prepared to address culturally appropriate additional needs that may not be adequately addressed through a SECPF. The guiding principle is that the need for land acquisition and resettlement will be avoided as much as possible (see RF for details). Where this is unavoidable, mitigation measures will be ensured. In all cases, but particularly in the case of tribes, minor races, ethnic sects and communities, the mitigation measures will be culturally sensitive to the affected community. Under the RF as well as under this SECPF recognizable claims to land are those having (i) customary ownership or (ii) possess any other legal document to establish ownership.

## **E. The CHT Institutional Framework**

30. Historically, CHT had largely been a self-governed independent territory until its annexation to the then province of Bengal in 1860 by the British. The Chittagong Hill Tracts Regulation of 1900, enacted by the British, declared the CHT as an 'excluded area' prohibiting settlement of and purchase of land by, persons of non-indigenous origin in the SEC territory.<sup>22</sup> In the constitutional amendment of Pakistan in 1962, the CHT was re-designated as 'tribal area' and the SEC could no longer exercise substantive autonomy as in earlier decades. Even after numerous amendments of the CHT Regulation of 1900, this law forms the basis of legal and administrative systems of the region.

31. The rights of the SEC of the CHT underwent gradual changes by successive governments under the rules of Britain, India, Pakistan, and sovereign Bangladesh after its independence in 1971. Since the mid-50s, the SEC of the CHT have been displaced from their ancestral lands, firstly due to the Kaptai Hydroelectric Project (inundating 22,000 hectares of cultivable land and displacing more than 100,000 SEC, mainly Chakma), and later due to transmigration of settlers from the plains. It led to an armed uprising for autonomy and the rights of SEC which had seen a two-decade long armed conflict which ended by signing of the CHT Accord in 1997 between then Bangladesh ruling government party and the SEC' political party PCJSS. The Accord formally recognized CHT as a 'tribal-inhabited area' and re-established partial autonomous self-government system.

32. The CHT is governed under dual legal and administrative system. While the region is comprised of three formal administrative boundaries, i.e. the districts (followed by smaller tiers of units of *upazillas*, unions and villages), it is also divided into three tiered traditional administrative boundaries termed 'Circle' headed by the Circle Chiefs (traditionally known as Raja/King). Circles are comprised of a few *mouzas* (smaller administrative unit headed by a Headman) each of which are comprised of *paras* (smallest administrative unit at village level) headed by a karbari. In this arrangement, "administrative authority in the region is shared by the central government through its district and sub-district officers, the traditional institutions of the chiefs, headmen and karbaris, and elected councils at the district and regional levels. All these institutions are supervised by the Ministry of Chittagong Hill Tracts Affairs.

33. The formal, national institutional governance arrangements for CHT are like those elsewhere in Bangladesh where the institutional set up for development intervention consists of bodies of elected people's representatives at three levels: (i) union councils; (ii) upazilla councils;

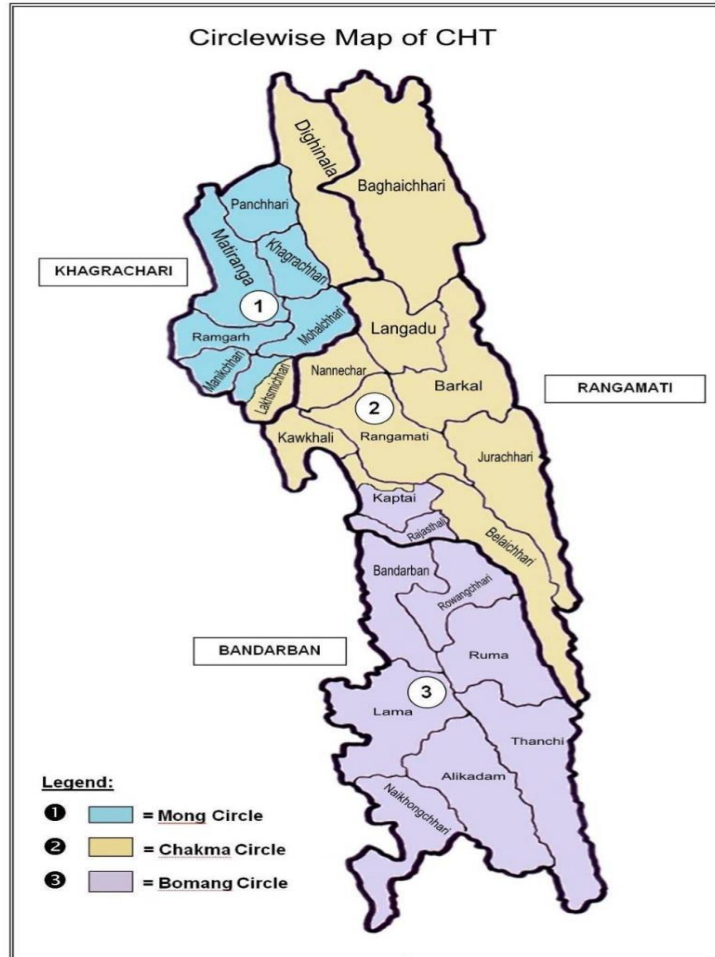
and (iii) national parliament. Implementing line agencies exist at each level. Away from the CHT, agencies are coordinated at the upazilla level by the upazilla Executive Officer (UNO), at District level by the Deputy Commissioner (DC) and at national level by Cabinet. The upazilla is the lowest level in the administrative structure while the Union Council is the lowest tier in the local Government system. Upazilla and District Councils existed until 1991 when they were discontinued. Elected upazilla councils were reintroduced in 2009 but there is still no elected body at the district level.

34. In CHT there are three districts, 26 upazillas, 122 Unions, 379 Mouzas and 4,811 *para* or villages. The area of each of these units is up to four times greater than those in the rest of the country. The population of these units, however, is 3 to 6 times smaller than that of equivalent units in rest of Bangladesh. Mouzas is the exception as they are up to 15 times larger and have more inhabitants than an average mouza on the plains.<sup>23</sup>

#### **a) Customary Institutions**

35. The three 'circles' are the Chakma Circle, the Bohmong Circle, and the Mong Circle. The chiefs, headmen and karbaries receive a small monthly honorarium from the government. In addition, the chiefs and headmen are entitled to retain a fixed percentage of the taxes on land, prior to submitting the Government's share of the tax in the national treasury. Apart from this, they receive no support for their office management from the Government.

36. The Chiefs and the Headmen perform very useful functions and are held in very high esteem by members of the ethnic communities. The Circle Chief system works for the protection of the minorities and there are three Circle Chiefs (roughly coincident with each of the CHT districts). The Bohmang Circle includes areas from Rangamati District; Chakma Circle has areas in Khagrachari District under its rule; and Mong Circle is wholly within Khagrachari District. Figure 1 show the three Circles territory.



**Figure II-1. Chakma, Mong and Bohmong Circles of the CHT**

37. **Para Development Committee (PDC)** have been established by the UNDP-CHTF Project in the 2000s to bridge the gap between the lowest level of administration, the Union, and the actual habitations of people, paras, which in the CHT are mostly small villages with populations from a few households to several hundreds, but mostly will be particularly useful to support Project activities. The previous CHTRDP- projects used the PDCs to anchor its community infrastructure interventions.

38. **Village Common Forests (VCF)** is based on the CHT Regulation, 1900, which mandated Mouza headmen to manage Mauza Reserves as one of the categories of untitled customary lands. The headman for example was empowered to prohibit the removal of forest produce other than for domestic use. VCFs have become increasingly recognized, and UNDP with USAID support has been investing in further capacity development over the last few years.

39. Another most important category of community-managed forests is the mouza forest commons or village common forests (VCFs). Traditionally, every village had a parcel of land (some as big as several thousands of hectares) earmarked for domestic uses (and never commercial) of its produce, such as timber, fruits, and bamboos. These are mostly small (average 50-300 acres), consisting of naturally grown or regenerated vegetation. Once every village used to have 'common forest', but they are rapidly vanishing. They are traditionally managed, protected and utilized by village communities under the leadership of the mouza Headmen and village

karbaries (traditional elders). Under the laws specific to the CHT, the Headmen is responsible for USF maintenance and nurturance. The VCF are technically part of the USFs, but should be considered a separate category.

## **b) CHT Specific Institutions**

40. Similar to national level agencies and local councils (upazilla and unions) and upazilla level agencies that exist elsewhere, there exists a CHT specific hierarchy of institutions. These are:

- (i) Ministry of CHT Affairs (MoCHTA)
- (ii) CHT Regional Council (CHTRC)
- (iii) CHT Development Board (CHTDB)
- (iv) Hill District Councils (HDCs)

### **(i) Ministry of Chittagong Hill Tracts Affairs (MoCHTA)**

41. After the signing of the CHT Accord (also known as the “Peace Accord”) in December 1997, the Government established MoCHTA in mid-1998. The creation of MoCHTA was seen as evidence of the realization by the Government of the special importance and needs for accelerating the socio-economic development of the inhabitants of the CHT region in general and the SEC in particular. This was a positive and progressive step taken by the Government, which reflected appreciation of the hopes and aspirations of the indigenous people of the region.

42. MoCHTA is the apex institution concerning national level decision making for the CHT. It coordinates the functions of CHTRC, CHTDB, and the three HDCs and has a broad mandate covering legal, administrative, developmental, and financial matters pertaining to the region. Upon receipt of funds from the Ministry of Finance, it allocates them to several of the CHT institutions except the district level offices of the line ministries (which go directly from the line ministry concerned). MoCHTA allocates the annual development program (ADP) funds for CHTRC, CHTDB and the three HDCs. These funds are dispersed in response to the funding requests from these institutions. MoCHTA vets all CHT project proposals of other ministries and other Government agencies before they are approved by the Ministries of Planning and Finance. MoCHTA is Dhaka based and has no separate physical presence in CHT. The present arrangements (2022) are that the Prime Minister is the cabinet minister and the Member of Parliament (MP) from Bandarban is the Minister of State.

### **(ii) Chittagong Hill Tracts Regional Council**

43. The CHTRC is the apex regional institution in the CHT. Ultimately, CHTRC is to be indirectly elected by an electoral college consisting of the members of the three HDCs, both indigenous and Bengali. There has, however, been no election to the council since its inception in 1998. Pending elections, CHTRC is composed of an interim council with Government nominees. CHTRC was established by the Government through an Act of Parliament passed in May 1998 (Act no. 12 of 1998). The Act responded to the Government view at the time that:

- a) CHT were inhabited by underdeveloped “tribal” people;
- b) special arrangements were essential for development of the underdeveloped region;
- c) it was necessary to speed up political, social, cultural, educational, and economic development and to uphold the socio-political rights of all CHT people including the “tribal” inhabitants;

- d) an Agreement was entered into between the National Committee on CHT Affairs and the PCJSS on 2 December 1997; and
- e) it was desirable and essential to establish, as part of implementation of the Agreement, a regional council for the purpose of coordination of the activities of the three HDCs and for performing other related activities.

44. The most important CHTRC functions are of a supervisory nature, involving oversight authority over the HDCs, general administration and law and order (this would theoretically include the Deputy Commissioners and Upazilla Nirbahi Officers (UNOs)), development, NGO activities, local government councils, including (urban) municipalities, tribal traditions and practices, and heavy industries, among others.<sup>18</sup> However, despite the legal provisions, the CHTRC has not been able to exercise its supervisory authority over the Deputy Commissioner, UNOs and upazilla, union and municipal councils. Similarly, MoCHTA has not exercised direct authority over these institutions despite inclusion of the matter in the Rules of Business of the Ministry.

45. CHTRC is expected to: (i) be consulted by the Government on legislation affecting CHT; (ii) advise the Government to remove, through legislation, inconsistencies between the HDC Acts of 1989 and the CHT Regulation 1900 and other laws and regulations; and (iii) advise the Government to amend any law that hinders the CHT development or is otherwise harmful to the interests of the tribal peoples. CHTRC's main source of funds is grants from the Government (through MoCHTA). Although CHTRC is also entitled to a share of the income of the three HDCs, this arrangement is yet to take place. Unlike the HDCs and CHTDB, CHTRC does not directly implement development or other projects, hence, the bulk of its budget is composed of funds for the salaries of its members and staff, travel costs, maintenance of its office, vehicles, and other logistical matters.

46. Since its establishment, the composition of CHTRC has remained unchanged – the same individuals continue to assume their responsibilities, and this includes the chairman. Only the chairmen of the three HDCs who are ex officio members have been changed.

### **(iii) Chittagong Hill Tracts Development Board (CHTDB)**

47. The CHTDB predates the Peace Accord. It was established as an autonomous body in 1976 with the mandate of undertaking region wide development programs and projects. As per the Peace Accord and the CHTRC Act, the CHTDB was assumed to be under the control of the CHTRC as an organ for socio-economic development of the region. This, however, is still to occur and the Board functions under the direct jurisdiction of MoCHTA. Of the CHT specific institutions within the CHT itself, CHTDB is the largest institution in terms of budget and manpower.

48. The chairman and other senior officials of CHTDB, including its vice chairman, are appointed by the Government. While previous chairpersons were either from the military, MPs, or civil servants, the current chairman is a common citizen with the rank of Secretary. This is in line with the CHT Accord of 1997, which states that preference will be given to an IP for appointment as chairman. The CHTDB Ordinance of 1976, provides for a consultative committee that includes the three circle chiefs and representatives of union council chairmen and mauza headmen, and other public representatives. The representatives of the chairmen, headmen and others, apart from the chiefs (whose involvement is ex-officio), are nominated by the chairman of the CHTDB. The consultative committee meets every few months to vet project proposals, which are generally submitted through the Deputy Commissioners.

49. Many CHTDB projects, with a correspondingly large percentage of funds, involve physical infrastructure, including roads, buildings and dams. A far smaller number of projects (also with a smaller budget) are concerned with horticulture (orange and coffee plantations) and rubber plantations, water supply and sanitation, renewable energy and a yet smaller number with commensurately smaller budgets are involved in human development and technical training including supported by development partners.

50. CHTDB has no direct role in natural resource management. However, it runs a few projects on rubber cultivation, horticulture, and agro-forestry. It is expected to be the implementing agency of a Food and Agriculture Organization (FAO) project to be financed by the Adaptation Fund with the Ministry of Environment, Forest and Climate Change.

#### **(iv) Hill District Councils (HDC)**

51. The Chittagong Hill District Councils (HDC), previously known as Hill District Local Government Councils, were established by the Acts of Bangladesh Parliament in 1989 for the three Hill Districts (Act. No. 19 for Rangamati, Act No. 20 for Khagrachari and Act No. 21 for Bandarban). Creation of such institutions recognized the fact that these districts are a special area inhabited by different under-developed ethnic groups and it was considered desirable and necessary to make legal provisions for establishing the Councils for political, social, cultural, educational, and economic development of all citizens of the region including the indigenous population. The three HDCs are the most important administration and development related public institutions in the CHT. Each is headed by a chairman, who by law, must be from a SEC.

52. When the first councils took office in 1989 after elections, they consisted of one chairman each (a SEC) and thirty-three other members (two-thirds from SECs and one-third Bengali), including three women (two from SECs and one Bengali). In the future, when elections are held again for these councils, the same composition will be retained. However, no elections have been held since 1989, and instead interim councils were appointed by the Government. The interim councils are each composed of an SEC chairman, three SEC members and one Bengali member.

53. The Acts provide that the chairmen and the members of the 3 HDCs shall be elected by direct votes of the people with the chairmen being elected from the SECs. The chairmen have the rank, status, and the privileges of a Deputy Minister of the Government. However, no elections have been held since 1990, due to the unsettled issue of permanent voter list tied to 'permanent resident status' of the Bengali inhabitants. Meanwhile, an interim council continues to function with a chairman and four members, all nominated by the Government.

54. Considering the Agreement between the National Committee on CHT signed on December 2, 1997, some amendments were made to the three Acts in 1998 to implement several terms of the Agreement. The amended Acts made provision for three seats for women in each of the three Hill District Councils with one of these three seats reserved for non-IP. The tenure of the Hill District Councils was increased from three years to five years with the amendment. There have been no further amendments to the act in recent years.

55. The Act lists 33 functions of the HDCs. Those relevant to the Project are:

56. Supervision, maintenance and improvement of law and order of the district through the police, and in the settlement of disputes related to social, cultural, and ethnic affairs according to tribal customs and practices

(i) coordination of development activities of the local authorities of the district; review of

- implementation of their development projects and audit their accounts providing them with assistance, co-operation, and encouragement
- (ii) education (mainly primary education and adult education)
  - (iii) public health
  - (iv) agriculture and forestry
  - (v) livestock development
  - (vi) fisheries
  - (vii) cooperatives
  - (viii) construction, maintenance and development of roads, culverts and bridges which are not the responsibility of the government or any local authorities
  - (ix) management of ferries not maintained by Government or any local authority
  - (x) implementation of development plans entrusted to the HDCs by the Government
  - (xi) drainage, water supply, construction of pucca roads and other essential public welfare activities
  - (xii) preparation of designs for development of the local area
  - (xiii) land and land management
  - (xiv) protection and development of the environment; and
  - (xv) *jhum* cultivation (shifting cultivation).

57. There is a provision in the Act which states that the Government, with consent of the HDC, may transfer any institution or work of the HDC to its management and control, and transfer any institution or work of the Government to the HDC. Many of these responsibilities have been transferred already and the transfer of others is in progress. The HDCs have disciplinary authority over the staff of the “transferred departments” dealing with the subjects mentioned above and can also appoint class III and class IV employees of the same departments. The salaries of the staff of these departments are generally paid through the HDCs. However, funds for any special projects undertaken by these departments are generally channeled directly by the mother line ministries to the department concerned. The council, chaired by their respective chairmen, coordinates the activities of these departments through monthly coordination meetings in the district headquarters.

58. The HDCs are to have direct authority over land administration officials. Moreover, the HDC Acts also vest the councils with the special authority whereby no lands may be settled, leased out, transferred, or compulsorily acquired without the prior consent of the councils. In practice, however, except in the case of transfer of land titles, the HDCs are seen to have no role in land administration. The only notable exception is the Rangamati HDC, which has also exercised its authority about the protection of village common forests or mauza reserves and the rights of the concerned village community.

59. The HDC Act provides that the Circle Chiefs (Rajas) can attend HDC meetings (Chakma Chief in Rangamati and Khagrachari, Bomong Chief in Bandarban and Rangamati, and Mong Chief in Khagrachari) and express their opinions on any item in the agenda if they wish or are invited to do so. The Act provides that the HDCs can constitute committees or sub-committees, if deemed necessary, to assist the HDCs in their functions and fix the number of members of the committees, their terms of reference and procedures of business. Rangamati HDC has formed five sub-committees to assist in selection of development projects, supervision, coordination, and assistance of different transferred subjects / departments. The other HDCs, i.e. Khagrachari and Bandarban, have also formed similar sub-committees.

60. As a temporary arrangement, an interim Council with the Chairman and other appointed members is currently running the affairs of each HDC. This arrangement will continue until the general election of the Council is held and the elected Council assumes its duties. A monthly coordination meeting of the HDC is held with the five members of the Council (including the Chairman). The meeting is also attended by the representatives of the transferred Departments/agencies. Representatives of other non-transferred agencies/departments may also attend these meetings upon invitation.

61. For coordination, planning and implementation, most of the district line agencies have already been placed under the control of the HDCs. This means that the structure is more decentralized than in other districts where the vertical link between district line agencies and their Ministries is often more important than the horizontal links within the district. However, the Deputy Commissioners and the police administration remain under central government control.<sup>26</sup>

62. The 2011 Project Preparation Technical Assistance Final report for the preparation of the CHTRDP-II<sup>27</sup> already presented an overview of the main functions of CHTRC and the HDCs together with an assessment of their major strengths and weaknesses. This is reproduced in the Table 6. A decade later this analysis is still largely correct.

63. The 8FYP, without going in detail, also underscores the need to strengthen the implementation capacity of local institutions by increasing manpower and facilities with reference to MoCHTA, CHTRC, HDCs and the CHTDB.<sup>28</sup> It also recognizes the need to develop a Perspective Plan for the CHT. The project could directly and indirectly support both capacity development and the Perspective Plan, while ADB in its interaction with Government could raise the matter of adequate resourcing of the CHTRC and HDCs.

64. Lastly, several developments affecting the CHT and its population, may undermine the precarious stability. As noted, the CHT specific institutions are still not fully empowered and several key aspects of the 1997 Peace Accord are yet to be implemented, most notably the stipulation related to land issues. The past decade has also witnessed an increasing fragmentation of the political landscape. Finally, the Rohingya refugee crisis and current conflict and realignments in Myanmar may have implications for the stability and security of the CHT. These developments may affect the project and the risk of a deteriorating security environment has therefore been included as a risk in the project's risk assessment and risk mitigation matrix.

### III. IDENTIFICATION OF AFFECTED SMALL ETHNIC COMMUNITIES

#### A. Criteria for Identifying SEC

65. ADB SPS (2009) defines 'Indigenous People' (IPs) as 'a distinct, vulnerable, social and cultural group possessing the following characteristics in varying degrees:

- (i) Self-identification as members of a distinct indigenous cultural group and recognition of this identity by others.
- (ii) Collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories.
- (iii) Customary cultural, economic, social, or political institutions that are separate from those of the dominant society and culture.
- (iv) A distinct language, often different from the official language of the country or region.

66. Accepted or preferred terms and definitions vary country by country, by academic discipline, and even by the usage of groups concerned. ADB SPS (2009) takes into consideration national legislation, customary law, and any international conventions to which the country is a party to in defining the IPs.

67. In Bangladesh, the term Indigenous People as referred in SPS 2009 is often referred to as Adivasi, Small Ethnic Groups, Ethnic Communities, Hill People (Paharis) and Forest People. To recognize both ADB and GoB preferred terminology, groups or population identified as IPs within the context of ADB SPS (2009) will be referred to in this Project as tribes, minor races, ethnic sects and communities, and collectively referred to as Small Ethnic Communities (SEC) per 15 amendment article 23A of the constitution of Bangladesh. Groups that have lost collective attachment to geographically distinct habitats or ancestral territories in the project area because of forced severance remains eligible for coverage in accordance with the ADB SPS, 2009.

#### B. SEC Land

68. Marmas are found in all districts of the CHT, but the majority live in the Mong and Bohmong Circles (see Figure 1). The majority of Chakmas live in the Chakma Circle, roughly corresponding to Rangamati District. Tripuras have mostly settled in the northern region of the Mong circle (Khagrachhari District) but have scattered settlements in the Chakma and Bohmong Circles. The three large SEC have access to valley or plough land, where paddy is cultivated, practicing a mix of jhum, valley bottom arable land (paddy, vegetables), and horticulture (fruit) systems. However, Bengali settlers have slowly taken over substantial stretches of valley land. In view of increased population pressure and inward migration, there has been a spontaneous shift to perennial fruits and commercial crops like pineapple and ginger, not all practices in a sustainable manner. IPs are thus mostly familiar with varying agricultural practices. Some of the smaller IP groups live in the more remote upland areas and have long solely relied on jhum cultivation for their subsistence.

69. Communal land is allocated to individual households and each household (HH) has customary use. A HH is considered to be landless if it owns less than 5 decimals of customary or title land. Thus they own their homestead but have no or very limited agriculture land. The village head plays a role in land management, but households regard land as theirs under customary title. Lands may be transferred to others as long as the karbari and headman agree. Sale of customary land also occurs. Land was never shared on an egalitarian basis, as most of the CHT

IP communities are somewhat stratified: for example not all households own arable land that can be ploughed and irrigated. Also, with population growth land is becoming scarcer leading to further inequalities also within IP communities.

### **C. Potential Positive and Negative Impacts on SEC**

#### **a) Potential Positive Impacts on SEC**

70. As already described in previous sections, the project has positive impacts on the livelihood and lifestyle largely in following manners:

71. BPDB's power distribution network in 26 municipalities in Rangamati, Bandarban and Khagrachori expanded by:

- (i) 1a. 6 x 33/11 kV new distribution substations at aggregate 80 MVA capacity with SF6 free switchgear and transformers constructed at the Barkal, Rajasthali, Kaptai upazila of the Rangamati Hill District; Matiranga and Manikchari upazila of the Khagrachori Hill District; and Thanchi upazila of the Bandarban Hill District. 100% of the new substations constructed with gender equality and social inclusion (GESI) sensitive features (2024 baseline: 0) (OP 1.3.1)
- (ii) 1b. 5032 km of 33 kV, 11 kV, 6.35kV, 11/0.4 kV, 6.35/0.23kV, 0.4 kV and 0.23 kV distribution line constructed with low loss conductors, and bird sensitive and climate resilient features, and about 88,586 households living in remote hilly districts of CHT including at least 35,000 from small ethnic community connected with electrical grid; (2024 baseline for distribution line: 0; 2024 baseline for grid-connected HH: 191,72 with 40% accessed by members from small ethnic community) (OP 1.3.1; OP 1.3.3; OP 3.2.5)
- (iii) 1c. At least 91 relevant BPDB staffs, 90% of the women included, trained on planning, designing, operation and maintenance of SF6 free switchgears, transformers, low-loss conductors, underground distribution systems, advance technology and climate resilient options, and renewable energy systems. (2024 baseline: 0) (OP 3.1.2, OP 3.2.2; OP 6.1.1)
- (iv) 1d. At least 30 gravity-based pipeline drinking water distribution schemes powered by solar PV, managed by the para development committees (30% women membership), with enhanced capacity on O&M of the water distribution scheme. This output is included in the TA Project funded by JFPR (2024 baseline: 0) (OP 3.1.3, OP 3.1.4; OP 1.3.1)
- (v) 1e. At least 20 public or private community infrastructure for small ethnic communities including schools, hospitals, temples and community clinics provided with solar power backup systems with batteries. This output is included in the TA Project funded by JFPR. (2024 baseline: 0) (OP 3.1.3, OP 3.1.4; OP 1.3.1)

#### **Energy based livelihood opportunities supported and promoted in CHT**

- (vi) 4a. at least 10 GESI responsive business models identified and developed for promoting energy-based livelihood opportunities in CHT, benefitting at least 1000 Beneficiaries of electricity including 40% women. This output is included in the TA

- Project funded by JFPR. (2024 baseline: 0) (OP 1.2.2).
- (vii) 4b. 1000 Beneficiaries of electricity including 40% women, trained on energy-based livelihoods opportunities including on SMEs, agro-business, cottage industries, eco-tourism, etc. This output is included in the TA Project funded by JFPR. (2024 baseline: 0) (OP 1.1.1; OP 1.2.1; OP 1.2.2; OP 2.1.1).
  - (viii) 4c. 200 selected entrepreneurs including 80% women and 65% SECs supported with business incubation assistance and seed money. This output is included in the TA Project funded by JFPR. (2024 baseline: 0) (OP 1.1.1; OP 1.2.1; OP 1.2.2; OP 2.1.1).

**b) Impact on Land Acquisition and SEC People**

72. During selection of the Substation sites, multiple option assessments have been conducted to avoid customary land. The three land plots currently selected for substations are privately owned. Out of 03 landowners, one of them is Tribal People. In addition, the RCT landowners are also from SEC People communities.

73. Table 3-1 presents the total land acquisition required for the proposed substations. The required land for each substation ranges from 1.00 acre for Thanchi to 1.0734 acres for Tintohori (Manikchari). Overall, the project will acquire approximately 3.1334 acres (313.34 decimals) of land, providing a clear estimate of the area needed for the construction of all three substations. The total amount of private land required for the project is provided below:

**Table III-1: Total Amount of Land Acquisition Required for the Proposed Sub-Stations**

SL	Substaion Name	Total Land Acquisition (Decimal)	Total Land Acquisition (acre)
1	Thanchi	100	1.00
3	Tabalchhari	106	1.06
4	Tintohori (Manikchari)	107.34	1.0734
<b>Total</b>		<b>313.34</b>	<b>3.1334</b>

Source: IoL Survey, 2025

**c) Ownership of Affected Households, Commercial & Common Property Structures**

74. Census Survey identifies a total of 05 displaced households across the project sites, all of whom are legal titleholders affected primarily by loss of land only. These households are spread across three substation locations where land acquisition is necessary for project implementation. The RSECP reveals that there are no tenant households or informal settlers (non-titleholders) residing or conducting livelihoods on the affected lands, indicating that the affected population is relatively stable and well-defined in terms of legal land ownership.

75. All 05 displaced households are experiencing land, 1 structure, crops and trees to be affected, meaning the impact is limited to the acquisition of land parcels, with no requirement for physical relocation of houses or businesses. These impacts do not involve displacement from homes or disruption of residential structures, commercial establishments, or any tenant arrangements.

76. Furthermore, the RSECP confirms that there are no affected Common Property Resources (CPRs) such as mosques, madrasas, schools, or community centers within the land acquisition footprint. This is an important aspect of the project's social safeguard, as the

preservation of communal and religious institutions plays a significant role in maintaining the social fabric and cohesion of rural and Tribal communities, particularly in the culturally sensitive areas of the Chattogram Hill Tracts.

77. The absence of non-titleholders, tenants, and CPRs among the affected entities reflects a well-targeted site selection process by BPDB, which prioritized the use of existing government land and lands without heavy encumbrances or complex ownership patterns. As a result, the resettlement impact is confined to a small number of titled households, all of whom will be compensated according to the provisions of the Acquisition and Requisition of Immovable Property Act (ARIPA), 2017, as well as the safeguard requirements of the Asian Development Bank (ADB). This allows for a transparent and efficient compensation process while minimizing social disruption.

**Table III-2: Summary of the Impact Affected Households/Entities**

SI	Affected Households/Entities	Number
1	Title holder	05
2	Non-titleholder	0
3	CPR (Mosque, Madrasa, School & College)	0
<b>Total</b>		<b>05</b>

Source: IoL Survey, 2025

78. For each of the six proposed substation and switching station locations Tabalchhari, Barkal, Boroichhari, Rajasthali, Tintohori, and Thanchi the only form of impact is the acquisition of land from titled holders.

79. No residences, businesses, community structures, or livelihood-generating assets (such as shops or irrigation facilities) are being impacted, which significantly simplifies the compensation process and reduces the risk of long-term adverse effects on affected people.

80. Each of the five (05) titled households/entities will be compensated in accordance with the Acquisition and Requisition of Immovable Property Act (ARIPA), 2017, as well as ADB's Safeguard Policy Statement (SPS), 2009, which collectively ensure the application of replacement cost principles, timely disbursement of compensation, and adequate consultation and grievance redress mechanisms.

**Table III-3: Number of Affected Households by Ownership**

SN	Name of the proposed substation	Land Ownership Status	Types of losses	Titled Entities
1	Tabalchhari	Private	Crop & Land Loss	01
2	Tintohori	Private	Structure & Land Loss	01
3	Thanchi	Private	Tree & Land Loss	01
4	RCT-01	Private	Land only (Temporary)	01
5	RCT-02	Private	Land only (Temporary)	01

Source: IoL Survey, 2025

#### **d) Impact on SEC Households**

81. Chittagong Hill tracts are a diverse region in terms of ethnicity. In addition to Bengali communities, 11 various tribes, minor races, ethnic sects and communities are inhabitant in the project area. The project will not have any negative impacts on the Tribal communities in terms

of customary land, assets, cultural dignity or human rights. Based on the social survey and consultations carried out in the project-affected areas, it has been identified that one Tribal household will be directly impacted by private land acquisition. This household located in Thanchi in Bandarban District.

82. The project will impact, 05 Tribal persons for substation land acquisition. The land is privately owned and registered. No customary land or assets will be affected by the project. CHT has dual land tenure systems in terms of registered and customary ownership, and land is not only an economic asset but also a central part of their identity and heritage. As such, the RSECP incorporates safeguard measures that are aligned with both the Acquisition and Requisition of Immovable Property Act (ARIPA), 2017, Chittagong Hill Tracts (Land Acquisition) (Amendment) Ordinance, 2019 and the Asian Development Bank’s Safeguard Policy Statement (2009) on Indigenous Peoples. These include tailored compensation packages, additional livelihood restoration assistance if needed, and continued engagement to ensure that the affected Tribal households are fully informed, consulted, and able to participate in decision-making processes.

**Table 3-4: Affected Tribal Households’ information**

<b>Name of the Substation</b>	<b>No. of Tribal owner(s)</b>	<b>Total members of their households</b>
Thanchi	01	05
<b>Total</b>	<b>01</b>	<b>05</b>

**Source:** *IoL Survey, 2025*

#### **IV. SOCIAL IMPACT ASSESSMENT AND SECP FOR SUBPROJECTS AND/OR COMPONENTS**

83. In line with the ADB SPS (2009) the development of an SECPF requires the assessment of potential negative and positive project impacts on SEC and their way of life including impacts on their familial and community structures, livelihood systems, and etc. This assessment needs to be done before (sub) project implementation.

##### **A. Conduct of Social Assessment**

84. A social assessment overseen by Project Management Unit (PMU) is required. It involves the assessment of the legal and institutional framework that defines SEC involvement within the project context. The assessment shall generate the necessary baseline information on demographic, social, cultural, and political characteristics of the affected SEC as well as the land and territories that they have traditionally owned or customarily used or occupied, and the natural resources on which they depend. Potential negative and positive impacts of the project shall be identified, and recommended measures necessary to avoid negative impacts, or agreed mitigation measures in case unavoidable, mutually developed with SEC groups through meaningful consultation.

85. The social assessment and SECP preparation will also take into consideration the following aspects of the project affected SEC ties to land, forests, water, wildlife, and other natural resources:

- (i) SEC customary/traditional ties to ancestral domains and natural resources, including land, forest, water, and others, and measures to protect such ties.
- (ii) Broad community support to subprojects and interventions to be implemented in ancestral domains or areas with SEC.
- (iii) Full disclosure to SEC on their customary rights and scope and nature of Commercial development of cultural natural resources, if any.
- (iv) Mitigation and/or compensation measures for negative impacts.
- (v) Situation and concerns of women and youth in SEC.

86. The methodologies discussed below will be used in generating a list of affected persons and their socioeconomic information as well as potential positive and negative impacts in accordance with ADB SPS (2009).

## **V. CONSULTATION, PARTICIPATION, AND DISCLOSURE**

### **A. Introduction**

87. Meaningful consultations were conducted as per the ADB SPS 2009 guideline. Consultation meetings were done with various stakeholders including women in affected communities during the social assessment with affected persons, host communities, and concerned nongovernment organizations. Information shared with all APs of their entitlements and resettlement options – where relevant. Special attention paid to vulnerable groups, especially those below the poverty line, the landless, the elderly, women and children, and SECs and smaller SECs, and those without legal title to land.

### **B. Objectives of Stakeholder Consultation Meeting (SCM)**

88. The project is aimed to expand BPDB's power distribution network in 26 municipalities in Rangamati, Bandarban and Khagrachori with 40% accessed by members from small ethnic community. During consultation, it was tried to include SEC people within the project affected people. To assess stakeholders' needs, expectations, perceptions, and choices, and to ensure their rights and voices a two-fold consultation process was carried out during the survey. In this regard, SCMs has been conducted firstly with both the primary and secondary stakeholders and later, affected persons within the occupation and gender-based groups has been consulted.

89. The consultations have been conducted to ensure that adequate and timely information is made available to the people and communities of the project area and sufficient opportunities are provided to them to voice their opinions and participate in influencing the upcoming project decisions and processes. The main objectives of the public consultation meetings are to ensure timely, effective, and multi-directional communications between the project and the relevant stakeholders and communities. So that people can get the benefits of the projects and the project get their cooperation to ensure successful implementation of the project.

90. The FGD has been conducted to ensure that adequate and timely information is made available to the affected people and communities. Sufficient opportunities should be provided to them to express their opinions and participation in influencing the upcoming project decisions and processes. The main objective of the FGDs is to ensure timely, effective, and multi-directional communications between the project and the affected people and communities. Therefore, that people can get the benefits of the project.

91. The broad objectives of the consultation, participation and information disclosure has been as follows:

- (i) To actively promote the project and its proposed interventions and programs for implementation.
- (ii) To raise public awareness about the proposed project, particularly among potentially affected and benefited individuals, households, and communities, and to inform the public about project activities.
- (iii) To learn about the opinions and preferences of those who would be harmed and benefited by the proposed project.
- (iv) To establish an understanding for identification of overall developmental goals and benefits of the project.
- (v) To identify and evaluate both positive and negative project consequences.

- (vi) To collect & share their experience of problems / constraints of the project.
- (vii) Understand the views of the people affected, with reference to acquisition of land or loss of property, business, livelihood etc. and compensation issues.
- (viii) Understand views of people on resettlement options, if any.
- (ix) Identify and assess major economic and social characteristics of the project area to enable effective planning and implementation.
- (x) Issues related to impacts on PAPs & community property and their relocation.
- (xi) To explain to the community about importance of their role in supporting/facilitating and participation during project implementation includes implementation of SECPF and other safeguards issues of the project.
- (xii) To develop a thorough coordination between all the stakeholders for the successful implementation of the project.
- (xiii) To know people's ideas for mitigation / minimization of negative impacts & enhancements of positive impacts with expected changes during implementation & operation stage of the project.
- (xiv) To assess over all support to implement the project.

### **C. Consultation and Participation Framework and Methodology**

92. The approach for discussion, consultation and participation has been structured in such a way that it would offer a platform to all the stakeholders where they may discuss, share, and debate their opinions. The GoB acts and policies has been followed in designing and performing the consultation and participation process. The process has been initiated through conducting necessary Focus Group Discussions (FGDs) and Key Informant Interviews (KIIs) in the project area. These have been preceded by meetings with Implementing Agency, local government representatives at the Union/Upazila levels. The process will continue at the individual level also through various surveys undertaken in this Project.

93. To attain desired objectives of consultations, the following methodologies has been adopted during carrying out of public consultations for this project:

- (i) **Consultation through Key Informant Interviews (KIIs):** Key Informant Interviews (KIIs) were conducted as part of the consultation process to gather insights from individuals with in-depth knowledge and experience related to the project area. These interviews included discussions with local leaders, shop owners, transport operators, and municipal officials, who provided valuable input on the potential social and economic impacts of the project.
- (ii) **Consultation through Focus Group Discussions (FGDs):** Numbers of small group consultation meetings with local affected peoples, affected landowners, community leaders, public representatives, particularly the indigenous peoples of the project AOI have been conducted.

94. During the stakeholder's consultation meetings, people has been briefed about the project benefits, roles and responsibilities of the project authority, local government institutions and other stakeholders. Mitigation measures of potential adverse impacts including compensation at replacement cost, resettlement benefits, income and livelihood restoration, grants to vulnerable

people and employment opportunity of the eligible PAPs in project civil works has been also discussed in the meetings.

95. In the present study, all the stakeholders have been primarily categorized into two categories that has been identified as:

- (i) Primary Stakeholders are people, groups, institutions that either have a direct influence on the project or are directly impacted (positively or adversely) by the project and its activities; and
- (ii) Secondary stakeholders are those that have a bearing on the project and its activities by the virtue of their being closely linked or associated with the primary stakeholders and due to the influence, they have on the primary stakeholder groups.
- (iii) Apart from categorization, the stakeholders have also been classified in accordance with the level of influence they have over the project as well as their priority to the project proponent in terms of importance.
- (iv) The influence and priority have both been primarily rates as:

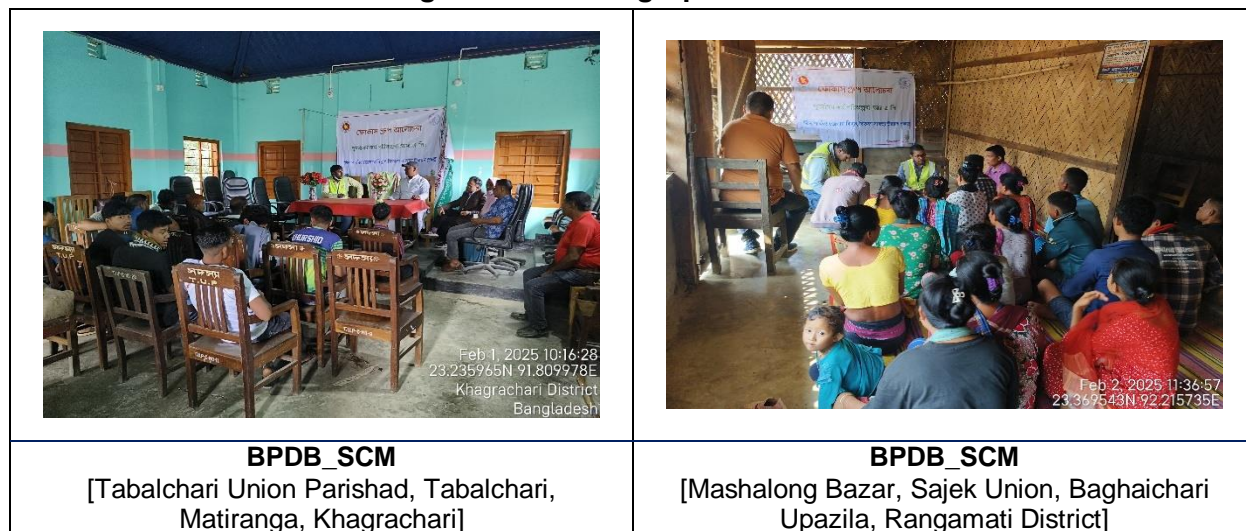
**Table V-1: Particulars of the SCM**

SL. No.	Date	Location of meetings	Type of Participants	Tribal People		Non-Tribal People		Total Participants
				Men	Women	Men	Women	
1	27-Jan-25	Guiyatal Bazar, Betbunia Union, Kawkhali Upazila, Rangamati District	Chairman, Member, Service Holder, Consultant, Farmer, Business	0	0	16	0	16
2	28-Jan-25	Mondakini, Nazirhat, Hathazari, Chattogram	Service Holder, Consultant, Farmer, Business, Student	0	0	14	0	14
3	28-Jan-25	Shapchari Bazar, Wagga Union, Kaptai Upazila, Rangamati District	Service Holder, Engineer, Farmer, Business	14	0	2	0	16
4	30-Jan-25	Barkal Union, Barkal Upazila, Rangamati District	Service Holder, Labor, Business, Student, Civil Engineer, Jr. Environmental Specialist	5	0	10	0	15
5	31-Jan-25	Beside Nazirhat Railway Station, East Mondakini, 1 No. Forhadabad Union, Hathazari Upazila, Chattogram District	Enterprenuer, Business, Shopkeeper, Worker	0	0	14	0	14

SL. No.	Date	Location of meetings	Type of Participants	Tribal People		Non-Tribal People		Total Participants
				Men	Women	Men	Women	
6	1-Feb-25	Tabalchari Union Parishad, Matiranga Upazila, Khagrachari District	Farmer, Labor Business, Service Holder, Student	2	0	14	1	17
7	1-Feb-25	Aamchhara para, Rajasthali, Rangamati	Member, Social Service, Farmer, Worker, Business, Consultant	0	0	17	0	17
8	2-Feb-25	Mashalong Bazar, Sajek Union, Baghaichari Upazila, Rangamati District	Labor, Business, Student, Housewife	8	3	2	0	13
9	20-Apr-25	Tintahari Union, Manikchari Upazila, Khagrachari District	Farmer, Business, Engineer	3	0	11	0	14
10	10-Jul-25	PDB Collony, Wapda, Munsurabad, Dabalmoring, Chattogram	Teacher, Student, Job, Consultant, Driver	0	0	13	0	13
11	13-Jul-25	Digholibag, 8 No. Ward, Sapchhari, Rangamati, Rangamati	Business, Farmer, Driver, Housewife, Student, Consultant	1	2	6	2	11
12	14-Jul-25	Vedvedi, 6 No. Ward, Rangamati Sadar, Rangamati	Business, Film Director, Housewife, Student, Consultant	7	2	3	0	12
13	14-Jul-25	Bottola Bazar, 6 No. Ward, Vedvedi, Kotoali, Rangamati	Job, Business, Student, Consultant	5	2	5	0	12
14	17-Jul-25	2 no. Bolkhali, Dighinala, Dighinala, Khagrachhari	Housewife, Farmer, Consultant	2	8	1	0	11
15	17-Jul-25	Lama Square, Dighinala, Khagrachhari	Business, Shopkeeper, Consultant	1	0	10	0	11

SL. No.	Date	Location of meetings	Type of Participants	Tribal People		Non-Tribal People		Total Participants
				Men	Women	Men	Women	
16	18-Jul-25	Kanongopara, Panchhari Sadar, Panchhari, Khagrachhari	Student, Farmer, Housewife, Consultant	3	3	6	0	12

**Figure V-1: Photographs of SCM**



**Table V-2: Summary of the findings from SCM**

Name of the Proposed Substation	Major issues raised by the participants	Response by consultants
Guiyatal Bazar, Betbunia Union, Kawkhali Upazila, Rangamati District	Will it improve access to electricity for households? The region faces frequent power shortages, especially during peak demand times. Will this project address these issues and provide a more stable power supply?	Yes, the extension of the power distribution network will significantly benefit the local community, especially in remote and hilly areas. By improving the power infrastructure, we are ensuring a more reliable and consistent electricity supply, which is essential for the daily lives of the people. Yes, this project is designed to enhance the capacity of the existing power distribution system. By upgrading and extending the network, we aim to reduce power outages and improve the overall stability of the power supply. The project will help meet growing demand, especially during peak times, and ensure a more resilient and efficient distribution system. This will lead to a more consistent supply of electricity, which is crucial for both domestic and commercial activities in the region.

<p>Mondakini, Nazirhat, Hathazari, Chattogram</p>	<p>How will the extension of the power distribution network improve electricity access, especially for households in remote areas of Mondakini, Nazirhat, Hathazari, Chattogram?</p> <p>The region often faces power shortages, especially during peak times. Will the proposed extension of the power distribution network solve this issue and stabilize the power supply?</p>	<p>The extension of the power distribution network is a significant initiative that will ensure reliable and consistent electricity access for households in remote areas. This project will connect areas that have been facing power shortages or limited access to electricity, helping to bring more stability to daily life. With a more reliable power supply, homes will benefit from improved lighting, better access to communication tools, and overall enhanced living standards. Additionally, this will promote growth in local businesses, improve access to education, and support healthcare facilities in the region.</p> <p>Yes, this project is specifically designed to address current power shortages in the region. By extending and upgrading the power distribution system, we will increase the capacity of the network, which will help meet the growing demand for electricity. This will reduce the frequency and duration of power outages, especially during peak usage times. A stable and reliable electricity supply will benefit homes, businesses, and essential services in the region, contributing to overall community development.</p>
<p>Shilchari Bazar, Wagga Union, Kaptai Upazila, Rangamati District</p>	<p>In many rural parts of Kaptai Upazila, there are frequent power outages. Will this project help resolve these electricity supply problems in rural areas?</p> <p>Given that the project involves land acquisition and construction, will it harm the local environment, especially considering the natural beauty of Kaptai Upazila?</p> <p>How will this project contribute to the long-term development of the region, especially in terms of economic and social growth?</p>	<p>Yes, the project will significantly address the ongoing electricity supply problems in rural areas, including those in Shilchari Bazar and other rural parts of Kaptai Upazila. By expanding the power distribution system, we aim to reduce the frequency and duration of outages, especially in rural areas that have previously been underserved.</p> <p>We understand the community's concern regarding environmental protection, especially in areas like Kaptai Upazila, which is known for its natural beauty. As part of the planning process, we will conduct an IEE, ESIA to ensure that any potential risks to the local ecosystem are identified and mitigated.</p> <p>This project is not just about improving electricity access; it is a critical part of a broader effort to</p>

		foster sustainable development in the region. By extending the power distribution network, we are creating the foundation for long-term economic and social growth. Reliable electricity is key to supporting local businesses, improving access to education, enhancing healthcare services, and facilitating the development of small industries.
Barkal Union, Barkal Upazila, Rangamati District	<p>Will this project provide long-term benefits to our community, or is it a short-term initiative?</p> <p>Will the community have a say in how the project is implemented? How can we ensure that our concerns are addressed during the project?</p>	<p>This project is designed with long-term benefits in mind. By upgrading and extending the power distribution network, we are laying the foundation for sustainable growth in the region. Access to reliable electricity will support local businesses, improve education through better access to technology, and enhance healthcare services, leading to overall community development. The infrastructure improvements will have a lasting impact, ensuring that the community is prepared to meet future energy demands. The increased reliability of the power supply will foster greater economic stability and improve the quality of life for everyone in the community.</p> <p>Community involvement is crucial to the success of this project. We will ensure that local residents are actively engaged in the decision-making process throughout the project. Regular meetings will be held to update the community on progress, and their feedback will be carefully considered. We will also establish a grievance redress mechanism to ensure that any concerns or complaints are addressed promptly and effectively. The goal is to maintain a transparent and open dialogue with the community, ensuring that their concerns are heard and incorporated into the project's implementation.</p>
Beside Nazirhat Railway Station, East Mondakini, 1 No. Forhadabad Union, Hathazari Upazila, Chattogram District	<p>The area often experiences frequent power outages. How will this project help in reducing these outages and provide a stable power supply?</p> <p>The region often faces power shortages, especially during peak</p>	<p>This project is specifically aimed at strengthening the existing power infrastructure to ensure a more stable and reliable electricity supply. By extending the power distribution network, we will enhance the overall</p>

	<p>times. Will the proposed extension of the power distribution network solve this issue and stabilize the power supply?</p>	<p>capacity of the system, which will directly reduce the frequency and duration of power outages, especially during high-demand periods.</p> <p>Yes, this project is specifically designed to address current power shortages in the region. By extending and upgrading the power distribution system, we will increase the capacity of the network, which will help meet the growing demand for electricity. This will reduce the frequency and duration of power outages, especially during peak usage times. A stable and reliable electricity supply will benefit homes, businesses, and essential services in the region, contributing to overall community development.</p>
<p>Tabalchari Union Parishad, Matiranga Upazila, Khagrachari District</p>	<p>Participants expressed concerns about the fairness and sufficiency of compensation offered for land acquisition. There were worries that the compensation might not reflect the true value of the land or the impact on their livelihoods.</p> <p>Participants raised the issue of losing valuable agricultural land, which is critical for their subsistence.</p>	<p>The consultant team acknowledges the concerns regarding compensation and assures that a thorough valuation process will be carried out. We are committed to ensuring that the compensation reflects the full market value of the land and accounts for the broader impact on livelihoods. We will collaborate with local authorities and valuation experts to ensure that all compensations are fair, transparent, and aligned with both local and national standards.</p> <p>We recognize the importance of agricultural land for the community's sustenance and income. The consultants are committed to minimizing the acquisition of productive agricultural land wherever possible.</p>
<p>Aamchhara para, Rajasthali, Rangamati</p>	<p>Given that Aamchhara Para is a remote area, how will the construction of the power distribution network minimize disruption to our daily lives, especially for farming and local businesses?</p> <p>How will having a more reliable power supply from this project benefit the daily lives of people in Aamchhara Para and Rajasthali?</p>	<p>We understand that the construction phase could cause some temporary disruptions, particularly for farming and local businesses in Aamchhara Para. Our team is committed to minimizing these disruptions by implementing a well-planned construction schedule. We will work with local authorities to ensure that the construction activities are carried out during off-peak agricultural seasons, and temporary solutions will be provided to maintain access to key areas.</p>

		A reliable power supply is essential for improving the quality of life in Aamchhara Para and the surrounding areas. By extending the power distribution network, this project will bring uninterrupted electricity, which will have a wide range of benefits. For example, local businesses will be able to operate without the frequent interruptions that currently hinder productivity. Households will experience better lighting, reduced reliance on expensive and polluting alternatives like kerosene lamps, and improved access to modern communication tools like mobile phones and the internet.
Mashalong Bazar, Sajek Union, Baghaichari Upazila, Rangamati District	How will the project ensure that landowner is compensated fairly?	The compensation will be based on independent land valuation to ensure that landowner receive fair compensation for their property. We will also account for the loss of crops, and any other assets that may be impacted by the project.
Tintahari Union, Manikchari Upazila, Khagrachari District	How involved will the community be in the decision-making process regarding land acquisition? Will our opinions and concerns be considered? Tintahari Union frequently experiences power shortages, especially during peak times. Will the extension of the power network address this issue and improve the reliability of electricity?	Community involvement is essential to the success of this project. The consultancy team is committed to maintaining open and transparent communication with the community throughout the entire process. Yes, one of the primary objectives of this project is to improve the reliability and capacity of the power distribution system in Tintahari Union. By extending and upgrading the network, we will reduce the frequency of power outages, especially during peak demand periods. This will ensure that households and businesses have a more consistent and reliable power supply, allowing for better planning and development.
PDB Collony, Wapda, Munsurabad, Dabalmoring, Chattogram		
Digholibag, 8 No. Ward, Sapchhari, Rangamati, Rangamati	How can we be sure that the compensation for our land acquisition will be fair and reflect the true value of our land?	We recognize the significance of providing equitable recompense for the impacted populations. The compensation procedure will adhere to a clear and open framework. To determine the actual market worth of the land and property being purchased, a comprehensive land

		valuation procedure will be carried out by impartial valuation specialists.
Vedvedi, 6 No. Ward, Rangamati Sadar, Rangamati	<p>The area often experiences frequent power outages. How will this project help in reducing these outages and provide a stable power supply?</p> <p>The region often faces power shortages, especially during peak times. Will the proposed extension of the power distribution network solve this issue and stabilize the power supply?</p>	<p>Yes, the specific goal of this project is to fortify the current power infrastructure in order to guarantee a more steady and dependable supply of electricity. We will increase the system's total capacity by expanding the power distribution network, which will immediately lower the frequency and length of power outages, particularly during times of heavy demand.</p> <p>Yes, this project is specifically designed to address current power shortages in the region. By extending and upgrading the power distribution system, we will increase the capacity of the network, which will help meet the growing demand for electricity. This will reduce the frequency and duration of power outages, especially during peak usage times. A stable and reliable electricity supply will benefit homes, businesses, and essential services in the region, contributing to overall community development.</p>
Bottola Bazar, 6 No. Ward, Vedvedi, Kotoali, Rangamati	<p>The area often experiences frequent power outages. How will this project help in reducing these outages and provide a stable power supply?</p> <p>The region often faces power shortages, especially during peak times. Will the proposed extension of the power distribution network solve this issue and stabilize the power supply?</p>	<p>The consultants assured the community that the project is designed not only to improve electricity reliability but also to minimize any adverse impacts on households, land, and livelihoods during construction and network extension. They explained that by upgrading and extending the power distribution network, the frequency and duration of outages in Bottola Bazar and surrounding areas will be significantly reduced, ensuring a more stable electricity supply for both households and businesses.</p> <p>In cases where land acquisition or temporary access to private property is necessary for construction, compensation and resettlement measures will be implemented in accordance with established resettlement policies. This includes full replacement cost for any affected structures, fair market value for land, and livelihood restoration support for households experiencing disruption. Special attention will be provided to</p>

		<p>vulnerable groups, such as women-headed households, the elderly, and landless families, to ensure equitable treatment and continued access to essential services.</p> <p>The consultants emphasized that the project will adopt a participatory approach, keeping affected communities informed at every stage and involving local representatives in monitoring and grievance resolution. Temporary support, including financial assistance and relocation help where needed, will be provided to minimize disruption. Overall, the project aims to combine improved power reliability with a fair and transparent resettlement process, enhancing both living standards and economic opportunities for the local population.</p>
<p>2 no. Bolkhali, Dighinala, Dighinala, Khagrachhari</p>	<p>Participants expressed concerns about the potential displacement of families and loss of homesteads, which could disrupt daily life and social networks. They were also worried about losing productive agricultural land, which many households depend on for food security and income. Questions were raised regarding the fairness, transparency, and timeliness of compensation, and households considered vulnerable, such as women-headed families, the elderly, and landless individuals, were concerned about receiving sufficient support during resettlement.</p>	<p>The consultants acknowledged these concerns and emphasized that minimizing displacement is a priority. They explained that in unavoidable cases of land acquisition, compensation would be based on full market value for land, structures, crops, and trees. Additionally, comprehensive livelihood restoration measures would be implemented to ensure that affected households could maintain or improve their previous standards of living. This includes temporary financial support, employment opportunities, skill training programs, and targeted assistance for vulnerable groups. The process will be closely monitored by local authorities and community representatives, ensuring transparency and accountability at every stage. A Grievance Redress Mechanism (GRM) will also be established to address complaints and provide timely resolution, ensuring that no household is left disadvantaged. Regular community consultations will be held to keep residents informed and involved in decision-making, reinforcing confidence in the resettlement process.</p>

<p>Larma Square, Dighinala, Khagrachhari</p>	<p>Residents raised concerns about possible relocation of homes and community structures, stressing the importance of maintaining social ties and access to local services. They asked how the resettlement process would be managed, particularly the timing and sequencing of compensation and relocation. Questions were also raised about whether all affected persons, including tenants and non-titleholders, would be included in the resettlement plan and about potential disruptions to livelihoods during the transition.</p>	<p>The consultants assured residents that resettlement would be planned carefully to reduce disruption as much as possible. Compensation and relocation would follow a phased approach, ensuring that households receive adequate notice and support before displacement. Replacement housing will be built prior to relocation, including access to essential services such as water, sanitation, education, and healthcare. Special attention will be given to vulnerable households, including women-headed families, elderly persons, and persons with disabilities. Tenants, sharecroppers, and other non-titleholders will be included in compensation and livelihood restoration programs. The consultants highlighted that continuous dialogue with affected households and active participation of local authorities will ensure fairness, transparency, and proper sequencing of resettlement activities. Monitoring and reporting mechanisms will track progress, address grievances promptly, and adjust measures as needed to minimize negative impacts on livelihoods.</p>
<p>Kanongopara, Panchhari Sadar, Panchhari, Khagrachhari</p>	<p>Participants highlighted potential loss of common property resources, such as community forests and grazing lands, critical for livelihoods. They expressed concerns about economic hardship from partial or total land loss and requested assurance that they would be actively consulted in compensation and resettlement decisions.</p>	<p>The consultants confirmed that any loss of common property resources would be addressed through appropriate community-level compensation measures, such as replacement land, financial support, or alternative livelihood programs. A participatory approach will be used to involve the community in planning and decision-making, ensuring that all affected households have a voice in the process. The consultants explained that resettlement and compensation measures would be designed to prevent long-term economic hardship, including temporary employment opportunities and livelihood restoration support. Monitoring and evaluation procedures will ensure that mitigation measures are implemented effectively, and feedback from affected communities will guide adjustments as needed.</p>

		This approach aims to maintain the social and economic fabric of the community while facilitating the project's implementation.
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#### D. Venues and Nature of the Public Consultations

96. Consultations with public were done through Focus Group Discussions (FGDs) and Key Informant Interviews (KIIs) in both locations. FGDs were organized with various segments of the affected population, including indigenous people, women, elderly individuals, and economically disadvantaged groups. The discussions focused on understanding the community's views on the project impacts, their resettlement preferences, and any specific support they would need during the resettlement process. KIIs were conducted with key stakeholders, including local leaders, community representatives, and officials from relevant government departments. These interviews provided valuable perspectives on the broader implications of the substation projects and the practical aspects of implementing the resettlement plan.

##### a) Focus Group Discussions (FGDs)

97. A total of 44 Focus Group Discussions (FGDs) were held across various BPDB sites, bringing together diverse community groups including indigenous people, women, elderly individuals, youths and economically disadvantaged persons. These discussions were facilitated by experienced moderators who fostered an environment of open dialogue and ensured that all participants had the opportunity to share their perspectives. The FGDs covered topics such as the community's perception on the project, the anticipated impacts on their lives and livelihoods, as well as their preferences and concerns regarding the resettlement process. Summaries of the FGDs are provided below in Table V-3.

**Table V-3: Particulars of the FGDs**

SL. No.	Date	Location of meetings	Type of Participants	Tribal People		Non-Tribal People		Total Participants
				Men	Women	Men	Women	
1	27-Jan-25	Tabalchari Union Parishad, Tabalchari, Matiranga, Khagrachari	Service Holder, Farmer, Business	0	0	15	0	15
2	27-Jan-25	Betchari Bazar, Ghagra Union, Kawkhali Upazila, Rangamati District	Business, Consultant, Farmer	0	0	14	0	14
3	28-Jan-25	Shilchari Bazar, Wagga Union, Kaptai Upazila, Rangamati District	Businessman, Engineer, Shopkeeper	1	0	12	0	13

SL. No.	Date	Location of meetings	Type of Participants	Tribal People		Non-Tribal People		Total Participants
				Men	Women	Men	Women	
4	29-Jan-25	Rajasthali Bus Stand Bazar, Gaindya Union, Rajasthali Upazila, Rangamati District	Business, Service Holder, Engineer	0	0	13	0	13
5	29-Jan-25	Gaindya Union Parishad, Gaindya Union, Rajasthali Upazila, Rangamati District	Farmer, Business, Housewife	6	2	3	0	11
6	29-Jan-25	Betbunia Bazar, Kawkhali, Rangamati	Farmer, Worker, Business	0	0	11	0	11
7	30-Jan-25	Ghat Bazar, Barkal Union, Barkal Upazila, Rangamati District	Business, Service Holder, Worker, Engineer	6	0	6	0	12
8	30-Jan-25	Barkal Bazar, Barkal sadar, Rangamati	Business, Engineer, Teacher, Consultant Hosuewife	3	3	7	0	13
9	31-Jan-25	Beside Nazirhat 33/11 KV Substation, East Mondakini, 1 No. Forhadabad Union, Hathazari Upazila, Chattogram District	Student, Farmer Business, Engineer	0	0	13	0	13
10	31-Jan-25	Silchari, Kaptai, Rangamati	Farmer, Business, Service Holder, Student	1	0	11	0	12
11	1-Feb-25	West Cumilla-Tila, Tabalchari Union, Matiranga Upazila, Khagrachari District	Member, Farmer, Imam, Journalist	0	0	12	0	12
12	2-Feb-25	Masalong, Sajek, Baghaichhari, Rangamati	Farmer, Student, Business	8	0	3	0	11
13	2-Feb-25	Bridge Para, Sajek Union, Baghaichhari Upazila, Rangamati District	Farmer, Housewife, Business, Engineer	4	6	2	0	12

SL. No.	Date	Location of meetings	Type of Participants	Tribal People		Non-Tribal People		Total Participants
				Men	Women	Men	Women	
14	5-Feb-25	Near BADC Farm Gate, Rangamati District	Mason, Business Engineer	0	0	12	0	12
15	5-Feb-25	Pool para, Bandarban Sadar, Bandarban	Driver, Farmer, Business	1	0	12	0	13
16	5-Feb-25	Balaghata, Ghona Road, Bandarban District	Service Holder, Business, Mason	0	0	18	0	18
17	20-Apr-25	Borodolu Muslim Para, Tintahari Union, Manikchhari Upazila, Khagrachari District	Teacher, Farmer, Plumber, Service Holder, Consultant	0	0	11	0	11
18	20-Apr-25	Tintahari Bazar, Tintahari Union, Manikchhari Upazila, Khagrachari District	Business, Farmer, Service Holder	0	0	12	0	12
19	23-Apr-25	Tin Rastar Mor, 2 No. Ward, Thanchisadar Union, Thanchi Upazila, Bandarban District	Ex. Chairman, Vice Chairman, Farmer, Business	8	0	3	0	11
20	23-Apr-25	Wakpara, 2 No. Ward, Thanchisadar Union, Thanchi Upazila, Bandarban District	Business, Farmer	5	6	0	0	11
21	23-Apr-25	Amtoli Para, 2 No. Ward, Thanchisadar Union, Thanchi Upazila, Bandarban District	Farmer, Housewife, Business	4	2	3	1	10
22	18-Jul-25	6 No. Ward, Panchhari, Panchhari Sadar, Khagrachhari	Job, Business, Consultant	0	0	12	0	12
23	19-Jul-25	Guimara, Doctor tila, 6 No. Ward, Guimara Sadar, Khagrachhari	Farmer, Business, Consultant	0	0	11	0	11
24	19-Jul-25	1 No. Ward, Hafchhari, Guimara,	Business, Driver, Farmer, Consultant	0	0	11	0	11

SL. No.	Date	Location of meetings	Type of Participants	Tribal People		Non-Tribal People		Total Participants
				Men	Women	Men	Women	
		Jaliapara, Khagrachhari						
25	20-Jul-25	1 No. Ward, Marissa Choumohoni, Baghaichhari, Rangamati	Driver, Business, Farmer, Consultant	0	0	12	0	12
26	20-Jul-25	Chijok, Chilchhari, 30 No. Char bottoli, Baghaichhari, Rangamati	Farmer, Student, Job, Consultant	5	3	2	0	10
27	3-Aug-25	Kaching Ghata, 6 No. Ward, Bandarban Pourashava, Bandarban	Business, Farmer, Driver, Job, Surveyor, Consultant	1	0	12	0	13
28	3-Aug-25	Kala Ghata, 3 No. Ward, Bandarban Pourashava, Bandarban	Business, Farmer, Surveyor, Consultant	0	0	12	0	12

**Figure V-1: Photographs of FGD**



98. Major discussions and responses from FGDs are described below in Table V-4.

**Table V-4: Summary of the findings from FGDs**

Name of the Proposed Substation	Major issues raised by the participants	Response by consultants
<p>Tabalchari Union Parishad, Tabalchari, Matiranga, Khagrachari</p>	<p>Participants expressed concerns about the fairness and sufficiency of compensation offered for land acquisition. There were worries that the compensation might not reflect the true value of the land or the impact on their livelihoods.</p> <p>Participants raised the issue of losing valuable agricultural land, which is critical for their subsistence.</p>	<p>The consultant team acknowledges the concerns regarding compensation and assures that a thorough valuation process will be carried out. We are committed to ensuring that the compensation reflects the full market value of the land and accounts for the broader impact on livelihoods. We will collaborate with local authorities and valuation experts to ensure that all compensations are fair, transparent, and aligned with both local and national standards.</p> <p>We recognize the importance of agricultural land for the community's sustenance and income. The consultants are committed to minimizing the acquisition of productive agricultural land wherever possible.</p>
<p>Betchari Bazar, Ghagra Union, Kawkhali Upazila, Rangamati District</p>	<p>Will there be any environmental impact? Will the project harm the local ecosystem? Will this project create job opportunities for the local population? How will local residents benefit economically from the project?</p>	<p>We understand the importance of preserving the natural environment, and as part of the project, IEE, ESIA will be conducted. The goal is to identify potential environmental risks and develop mitigation strategies to minimize any negative impacts. Our approach ensures that we minimize deforestation, soil</p>

		<p>erosion, and water pollution.</p> <p>Yes, the project will create numerous job opportunities for the local community. From the construction phase to the operation and maintenance of the extended power distribution network, local residents will be involved in various roles.</p>
<p>Shapchari Bazar, Wagga Union, Kaptai Upazila, Rangamati District</p>	<p>How will the extension of the power distribution network improve the living standards in Shapchari Bazar and surrounding areas? Will the project lead to improved quality of life for residents? How Will the Project Impact Local Businesses and Economic Development?</p>	<p>The extension of the power distribution network is designed to significantly enhance the quality of life in Shapchari Bazar and nearby areas. By providing reliable and consistent electricity, the project will improve access to essential services like healthcare, education, and communication. This will directly benefit households, businesses, and public institutions, creating a more stable environment for growth and development.</p> <p>The extension of the power distribution network will have a direct positive impact on local businesses in Shapchari Bazar. With reliable and continuous electricity, businesses can operate more efficiently and without interruptions, allowing them to expand and increase productivity.</p>
<p>Rajasthali Bus Stand Bazar, Gaiindya Union, Rajasthali Upazila, Rangamati District</p>	<p>Is this project part of a broader strategy for sustainable development? How will the extension of the power distribution network contribute to long-term growth in the region? Given the project involves land acquisition in a sensitive area, how will the project ensure that the environment is protected during construction?</p>	<p>This project is indeed part of a broader strategy for sustainable development in the region. By improving access to electricity, we are not only addressing current energy needs but also preparing the area for future growth. Reliable power is a key enabler of development, supporting local businesses, educational institutions, and healthcare services, which all contribute to long-term prosperity. Moreover, the project will be implemented with a focus on sustainability, ensuring that it has minimal environmental impact and aligns with the region's long-term development goals. This initiative is an essential step in securing a sustainable and prosperous future for Shapchari Bazar and the surrounding areas.</p> <p>Environmental sustainability is a</p>

		<p>top priority for us. We will implement mitigation measures to protect the environment, such as avoiding critical habitats, reducing deforestation, and ensuring proper waste management practices.</p>
<p>Gaindya Union, Rajasthali Rangamati District</p>	<p>How will the extension of the power distribution network help improve the economic growth of Gaindya Union? Many women in Gaindya Union are involved in home-based businesses. Will the extension of the power network provide opportunities to support their work and empower women in the community?</p>	<p>This project will be instrumental in fostering economic growth in Gaindya Union by ensuring a more reliable power supply. Yes, the extension of the power network will have a direct impact on women's empowerment in the area. Access to reliable electricity will enable women to expand and improve their home-based businesses, such as tailoring, food production, or small-scale crafts. Additionally, women will benefit from increased access to education, healthcare, and technology, which are all facilitated by stable power.</p>
<p>Betbunia Bazar, Kawkhali, Rangamati</p>	<p>Apart from electricity, will this project contribute to improving other local infrastructure, such as roads or communication networks? In Gaindya Union, social services such as schools and health clinics often face challenges due to unreliable power supply. Will this project help improve these services?</p>	<p>While the primary focus of this project is on power distribution, improving electricity access often results in positive ripple effects on other infrastructure sectors. For instance, as the power network extends, there may be opportunities for improved communication services and better access to the internet, which is essential for education, business, and healthcare. Yes, one of the key benefits of this project is that it will improve the power supply to essential public services like schools, health clinics, and community centers. Reliable electricity will enhance the functioning of these services, ensuring that schools can run efficiently with access to modern teaching tools, and health clinics can provide better care with consistent power for medical equipment.</p>
<p>Ghat Bazar, Barkal Union, Barkal Upazila, Rangamati District</p>	<p>How will extending the power distribution network to Ghat Bazar directly impact the quality of life for the local community? Will it improve living conditions?</p>	<p>The extension of the power distribution network is designed to improve the overall quality of life in Ghat Bazar. With consistent and reliable electricity, local residents will experience better lighting, enhanced access to information, and increased opportunities for</p>

		<p>educational and healthcare services. Reliable electricity is also crucial for small businesses, allowing them to operate more effectively and for longer hours. This project will bring about improvements in living standards, making the community more self-sufficient and connected to broader economic opportunities.</p>
<p>Barkal Bazar, Barkal sadar, Rangamati</p>	<p>The area often experiences frequent power outages. How will this project help in reducing these outages and provide a stable power supply? Our area is mainly dependent on agriculture and small-scale businesses. Will this power distribution project benefit these activities, and how?</p>	<p>This project is specifically aimed at strengthening the existing power infrastructure to ensure a more stable and reliable electricity supply. By extending the power distribution network, we will enhance the overall capacity of the system, which will directly reduce the frequency and duration of power outages, especially during high-demand periods.</p> <p>Yes, this power distribution expansion will have a positive impact on local economic activities. A stable electricity supply is essential for small businesses, including local shops, farms, and service providers. With reliable power, agricultural businesses will have better access to modern irrigation systems and equipment, leading to higher productivity.</p>
<p>Beside Nazirhat 33/11 KV Substation, East Mondakini, 1 No. Forhadabad Union, Hathazari Upazila, Chattogram District</p>	<p>How will the expansion of the power distribution network benefit local healthcare facilities in the region? Will hospitals and clinics have access to more reliable power? How can the community be actively involved in the decision-making process for the project? Will there be regular consultations and updates?</p>	<p>A reliable power supply is critical for healthcare facilities, and the extension of the power network will ensure that local clinics and hospitals in East Mondakini and Forhadabad Union have continuous access to electricity. This will support the operation of essential medical equipment, lighting, and refrigeration for medicines, improving the quality of healthcare services. Furthermore, with improved energy supply, local health centers will be better equipped to serve the growing population, leading to improved health outcomes and more efficient healthcare delivery in the region.</p> <p>Community involvement is a cornerstone of this project. We are committed to maintaining an open and transparent dialogue with the</p>

		local community throughout the duration of the project. Regular consultations will be held at key stages, allowing residents to provide feedback, ask questions, and express any concerns. We will ensure that the community is informed at every step, and that their voices are heard and addressed in a timely manner. Additionally, a grievance mechanism will be put in place to ensure that any issues that arise can be resolved quickly and effectively.
Silchari, Rangamati	Kaptai, How will extending the power distribution network impact the residents of Silchari, Kaptai, and Rangamati in terms of daily life and living standards?	The extension of the power distribution network will be a game-changer for local communities. By bringing a more stable and reliable electricity supply, residents will experience better access to lighting, communication, and essential services. This will improve living standards, making life easier and more comfortable. Additionally, with more consistent power, businesses can operate more efficiently, education will be more accessible with better facilities, and healthcare services can improve with more reliable equipment.
West Cumilla-Tila, Tabalchari Union, Matiranga Upazila, Khagrachari District	Participants raised the issue of losing valuable agricultural land, which is critical for their subsistence and income. They are concerned about the long-term effects on their ability to support their families. What kind of support will be provided to families affected by land acquisition, particularly those who may lose their land?	We recognize the importance of agricultural land for the community's sustenance and income. The consultant team is committed to minimizing the acquisition of productive agricultural land wherever possible. We understand that losing land can have a significant impact on families financially. To support families affected by land acquisition, we will ensure that fair compensation is provided based on the market value of the land and any assets or crops affected.
Masalong, Baghaichhari, Rangamati	Sajek, Will this project create job opportunities for the local population in Masalong, Sajek, and Baghaichhari, both during construction? Participants expressed concerns about the fairness and sufficiency of compensation offered for land	Yes, this project will generate numerous employment opportunities for local residents. During the construction phase, there will be a demand for labor in areas such as manual labor, machinery operation, and

	<p>acquisition. There were worries that the compensation might not reflect the true value of the land or the impact on their livelihoods.</p>	<p>transportation. The consultant team acknowledges the concerns regarding compensation and assures that a thorough valuation process will be carried out. We are committed to ensuring that the compensation reflects the full market value of the land and accounts for the broader impact on livelihoods. We will collaborate with local authorities and valuation experts to ensure that all compensations are fair, transparent, and aligned with both local and national standards.</p>
<p>Bridge Para, Sajek Union, Baghaichari Upazila, Rangamati District</p>	<p>Participants expressed concerns about the fairness and sufficiency of compensation offered for land acquisition. There were worries that the compensation might not reflect the true value of the land or the impact on their livelihoods. How can we join with the project after operation stage?</p>	<p>The consultant team acknowledges the concerns regarding compensation and assures that a thorough valuation process will be carried out. We are committed to ensuring that the compensation reflects the full market value of the land and accounts for the broader impact on livelihoods. We will collaborate with local authorities and valuation experts to ensure that all compensations are fair, transparent, and aligned with both local and national standards. When we will go for operation then we will require numerous technicians, local laborers, and various other types of local individuals.</p>
<p>Near BADC Farm Gate, Rangamati District</p>	<p>Since the land involved is government-owned, how will the land acquisition process be handled?</p>	<p>Since the land in question is government-owned, the land acquisition process will be more streamlined and straightforward. There will be no displacement or disruption of local residents as it is not private land being acquired. The government will ensure that any land required for the extension of the power distribution network is repurposed in line with national development goals.</p>
<p>Pool para, Bandarban Sadar, Bandarban</p>	<p>Will the extension of the power distribution network in Bandarban improve electricity access for communities in remote areas like Pool Para? What environmental impacts might this project have on Pool Para and its surrounding areas? How will you</p>	<p>Yes, this project is designed to extend the power distribution network to remote areas like Pool Para, which currently face challenges with electricity access. By expanding the network, we will ensure that more households can connect to a reliable and stable</p>

	<p>mitigate any potential harm to the environment during construction?</p>	<p>power supply. Environmental protection is a top priority for this project. IEE, ESIA will be conducted to identify any potential risks to the local ecosystem, including soil erosion, water contamination, and deforestation. We are committed to implementing mitigation strategies to reduce any environmental impacts. These measures might include using sustainable construction methods, minimizing deforestation, and restoring disturbed areas after construction.</p>
<p>Balaghata, Ghona Road, Bandarban District</p>	<p>How will extending the power distribution network help improve the region's preparedness for natural disasters or emergency situations? During certain seasons, power outages in Balaghata and Ghona Road are more frequent. Will this project help in reducing seasonal power outages?</p>	<p>The extension of the power distribution network will play a critical role in improving disaster preparedness and emergency response in Balaghata and Ghona Road. With a more reliable power supply, essential services such as emergency lighting, communication systems, and medical equipment will be able to function even during power outages. This ensures that the community can respond more effectively to emergencies and natural disasters. Moreover, the project will help improve infrastructure resilience, making it easier to maintain operations during challenging situations and enabling better coordination of emergency response activities. Yes, one of the primary objectives of the project is to reduce the frequency of seasonal power outages by improving the capacity and reliability of the power distribution system. By upgrading and extending the network, we aim to make the infrastructure more resilient to seasonal fluctuations in demand. This will help ensure a more stable and continuous power supply, particularly during peak usage periods, reducing the stress on the grid and minimizing the likelihood of outages. The project is designed to enhance the overall resilience of the power system, ensuring better performance during all seasons.</p>

<p>Borodolu Muslim Para, Tintahari Union, Manikchhari Upazila, Khagrachari District</p>	<p>How will the extension of the power distribution network in Borodolu Muslim Para impact local infrastructure? Will it lead to improvements in roads, water supply, or other services?</p>	<p>The extension of the power distribution network in Borodolu Muslim Para will have a positive impact on local infrastructure. Reliable electricity is essential for the development of other infrastructure such as roads, water supply, and communication networks. As part of the project, we anticipate that there will be improvements to the accessibility of the area, especially during the construction phase when temporary infrastructure improvements will be made to facilitate the movement of materials and machinery. Once the network is extended, the improved power supply will contribute to the development of additional services, ultimately benefiting the whole community.</p>
<p>Tintahari Bazar, Tintahari Union, Manikchhari Upazila, Khagrachari District</p>	<p>Many community members expressed concern about the impact of land acquisition on their livelihoods, especially regarding the loss of agricultural land that many depend on for their daily sustenance. The acquisition of land would affect their crops and their ability to support their families. Participants raised concerns about the challenges involved in resettling families whose lands are affected. Issues such as the availability of suitable land for resettlement, the relocation process, and the risk of disruption to their community and social ties were highlighted.</p>	<p>The consultant team recognizes the importance of agriculture in the livelihoods of local families. We assure the community that the land acquisition process will prioritize minimizing the loss of agricultural land wherever possible. In cases where land acquisition is unavoidable, fair and adequate compensation will be provided. The consultancy team fully understands the significance of social ties and community structures in the affected areas. We will work to ensure that resettlement plans are carefully designed, considering the availability of suitable land, access to essential services (such as education and healthcare), and the preservation of social networks.</p>
<p>Tin Rastar Mor, 2 No. Ward, Thanchi sadar Union, Thanchi Upazila, Bandarban District</p>	<p>How can we be sure that the compensation for our land acquisition will be fair and reflect the true value of our land?</p>	<p>We fully understand the importance of ensuring fair compensation for the affected Peoples. The compensation process will follow a transparent and well-defined framework. A thorough land valuation process will be conducted by independent valuation experts to assess the true market value of the land and</p>

<p>Wakpara, 2 No. Ward, Thanchi Sadar Union, Thanchi Upazila, Bandarban District</p>	<p>This is private land, and we are concerned about whether the compensation will truly reflect the market value of our property. How will the valuation process work? How will the community stay informed about the progress of the project? Will there be enough communication from the consultants throughout the process?</p>	<p>property being acquired.</p> <p>We understand the importance of ensuring that private landowners are fairly compensated for their land. An independent land valuation expert will assess the market value of the affected land based on current conditions, including the land's use, quality, and location. This assessment will ensure that compensation is both fair and transparent. Throughout the process, we will maintain open communication with the affected landowners, ensuring that they are fully informed of how the valuation and compensation process will be carried out. We are committed to offering a compensation package that reflects the true value of the private land.</p> <p>We understand the importance of clear and consistent communication throughout the project. Regular consultation meetings will be held with the community to keep everyone informed about the project's progress and any changes to the plan. We will also provide a contact point for residents to raise any concerns or queries they might have during the course of the project.</p>
<p>Amtoli Para, 2 No. Ward, Thanchi sadar Union, Thanchi Upazila, Bandarban District</p>	<p>Will the extension of the power network create any job opportunities for our people? Can local residents be involved in the construction or maintenance of the new infrastructure? Is this project a step toward sustainable development in our region? Will it improve the quality of life for future generations?</p>	<p>Yes, the extension of the power distribution network will create a number of job opportunities for local residents during both the construction and operational phases of the project. These opportunities will include positions in construction, installation, maintenance, and administration.</p> <p>Yes, the extension of the power distribution network is designed to be a catalyst for sustainable development in your community. By providing a reliable power supply, the project will improve access to education, healthcare, and economic opportunities. It will also foster the growth of local businesses and support the region's long-term economic development. We are committed to implementing the project in a</p>

		way that is environmentally and socially responsible, ensuring that future generations benefit from both the improved infrastructure and the preservation of your cultural and natural heritage.
6 No. Ward, Panchhari, Panchhari Sadar, Khagrachhari	Residents asked whether households experiencing partial land loss would still be eligible for compensation. Concerns were raised about tenants, sharecroppers, and landless workers being excluded, and questions were asked about how compensation for crops, trees, and structures would be calculated. Requests were made for clear documentation and monitoring to ensure fairness.	The consultants assured that households experiencing partial land loss would receive proportional compensation, including payments for crops, trees, and structures affected by the project. Tenants, sharecroppers, and landless families will also receive support, ensuring that all affected persons are covered. Compensation rates will be verified by independent valuation experts in coordination with local authorities. Detailed records will be maintained for each household, including property inventories and compensation agreements, to ensure transparency. Additionally, monitoring teams including community representatives will oversee implementation, promptly addressing any disputes. Support will also include temporary relocation assistance, livelihood restoration programs, and capacity-building initiatives to ensure that affected households can recover quickly and sustain their living standards. Regular updates and community meetings will be organized to keep residents informed of progress and address emerging concerns.
Guimara, Doctor tila, 6 No. Ward, Guimara Sadar, Khagrachhari	Participants emphasized concerns about the loss of income for small businesses, agricultural workers, and other livelihood sources due to land acquisition. They raised questions about how livelihood restoration would be ensured, whether skill development or employment programs would be provided, and the support for vulnerable groups including women, elderly, and disabled persons.	The consultants acknowledged the community's concerns regarding potential loss of income for small businesses, agricultural workers, and other households affected by land acquisition. They explained that a range of support measures would be provided to help households maintain their income and economic stability during and after project implementation. This includes temporary financial assistance, compensation at full market value for affected land, structures, and assets, and priority opportunities

		<p>for employment during the construction phase. Special attention will be given to vulnerable groups, including women-headed households, elderly individuals, and persons with disabilities, to ensure that they receive fair treatment and adequate support. The consultants emphasized that all assistance measures will be implemented transparently, in close coordination with local authorities and community representatives. Mechanisms will be in place for affected households to raise concerns, seek clarifications, and provide feedback, ensuring that support is timely, effective, and tailored to the specific needs of the community. These actions aim to minimize disruption, maintain economic stability, and safeguard the well-being of all affected persons.</p>
<p>1 No. Ward, Hafchhari, Guimara, Jaliapara, Khagrachhari</p>	<p>Residents raised concerns about the adequacy of compensation for homesteads and whether replacement housing would be provided. They were concerned about delays in relocation and maintaining access to basic services like water, sanitation, schools, and health facilities. Priority support for households with children, elderly, or disabled members was also requested.</p>	<p>The consultants assured that replacement housing will be provided for all displaced households, including access to water, sanitation, and other essential services. Compensation for homesteads will reflect full replacement cost, including structures, land improvements, and infrastructure access. Relocation will be phased and planned to prevent disruption, with priority given to households with children, elderly, or disabled members. Schools, healthcare facilities, and community centers will remain accessible, and temporary arrangements will be made if needed. The process will be overseen by a dedicated monitoring team including local authorities and community representatives, ensuring transparency, accountability, and timely implementation of resettlement measures. Grievances will be addressed through a formal mechanism to protect the rights and livelihoods of affected persons.</p>

<p>1 No. Ward, Marissa Choumohoni, Baghaichhari, Rangamati</p>	<p>Participants expressed concerns about the grievance redress process, transparency of the resettlement plan, timelines for compensation and relocation, and proper recognition of land rights to ensure fair treatment of all affected households.</p>	<p>The consultants highlighted the establishment of a comprehensive Grievance Redress Mechanism (GRM) to address all complaints promptly and transparently. Detailed information about compensation calculations, timelines, and relocation plans will be publicly disclosed. Local authorities, community representatives, and independent monitors will oversee implementation to ensure compliance with international best practices. All affected households will be provided with detailed documentation of their entitlements and assistance, and continuous engagement will ensure that concerns are addressed proactively. Training and awareness sessions will be conducted to help affected households understand their rights and the procedures to raise grievances.</p>
<p>Chijok, Chilchhari, 30 No. Char bottoli, Baghaichhari, Rangamati</p>	<p>Residents highlighted potential disruption of livelihoods due to delayed resettlement and asked whether households without formal land titles would be supported. Concerns were also raised about marginalization of minority and indigenous communities, and residents requested inclusion in consultation and decision-making processes.</p>	<p>The consultants assured that all households, including those without formal land titles, will be included in compensation and livelihood support programs. Special attention will be given to minority and indigenous communities to prevent marginalization. Continuous community consultations will guide resettlement decisions, and livelihood restoration, temporary assistance, and skill development will be provided to all affected households. The GRM will ensure that complaints and issues are addressed promptly. Monitoring and reporting mechanisms will ensure transparency and accountability, preventing delays and ensuring equitable treatment for all affected communities.</p>

<p>Kaching Ghata, 6 No. Ward, Bandarban Pourashava, Bandarban</p>	<p>Participants questioned how compensation values would be determined and verified, expressing concerns about fairness, potential underpayment, and delays in payments. Independent assessment of land and property values and assurances for timely relocation were requested.</p>	<p>The consultants explained that compensation will be based on independent market assessments validated by local authorities. Full replacement cost for land, structures, crops, and other assets will be included, and payments will be made before relocation to prevent financial hardship. Transparent procedures will ensure fairness, with documentation of compensation agreements for each household. A GRM will handle disputes or complaints, and continuous monitoring will ensure timely implementation. Households will receive guidance and updates throughout the process to ensure confidence in the resettlement measures. Engagement with community representatives will maintain transparency and provide opportunities for feedback and adjustments.</p>
<p>Kala Ghata, 3 No. Ward, Bandarban Pourashava, Bandarban</p>	<p>Residents raised issues regarding the timing and sequencing of resettlement relative to construction. They asked how access to schools, health services, and markets would be maintained during relocation. Priority support for vulnerable households and transparency in monitoring were emphasized.</p>	<p>The consultants emphasized that all resettlement activities will be completed before construction begins in affected areas. Temporary arrangements will be made to maintain access to schools, health services, and markets. Vulnerable households will be prioritized for relocation assistance and livelihood support. Monitoring committees with community participation will oversee the process to ensure transparency, accountability, and timely implementation. Detailed schedules will be communicated to households, and regular consultations will allow residents to raise concerns and provide input, ensuring that the resettlement process is smooth, fair, and minimally disruptive to daily life.</p>

**b) Key Informant Interviews (KIIs)**

99. Overall, 91 KIIs were carried out. The key informants included local leaders, community representatives, government officials and other stakeholders who possess in-depth knowledge about the local context and the potential impacts of the project. These interviews provided an opportunity to delve into specific issues such as land ownership patterns, socio-economic

conditions, and the institutional frameworks governing resettlement. The KIIs also explored the informants' views on the challenges and opportunities associated with the resettlement process, as well as their recommendations for ensuring a smooth and equitable transition for the affected populations. Photographs of KIIs conducted under this project are given **Annex- VII**.

## **E. Overall Outcomes of the Stakeholder Consultation**

### **a) Identified Beneficial Impacts:**

- (i) **Improved Access to Electricity:** Stakeholders highlighted that connection to the national grid would significantly enhance access to power for lighting, refrigeration, communication, and small businesses, thereby reducing reliance on kerosene and solar power.
- (ii) **Socio-Economic Upliftment:** The project is expected to contribute to economic development through increased opportunities for cottage industries, improved agricultural productivity (via irrigation), and small-scale enterprises.
- (iii) **Enhanced Education and Healthcare:** Electricity would allow schools and clinics to function more effectively, improving education outcomes and healthcare services, particularly in Indigenous areas where such services are currently limited.
- (iv) **Tourism Promotion:** In areas like Thanchi, stakeholders noted that electrification could boost tourism by enabling better facilities and accommodations for visitors, contributing to the local economy.
- (v) **Reduced Migration Pressure:** With better infrastructure and development prospects, fewer Indigenous youths may feel compelled to migrate to urban areas, allowing communities to preserve their cultural and social structures.

### **b) Potential Adverse Impacts:**

100. During stakeholder consultations, no significant concerns or objections were raised by Indigenous Peoples or other community members regarding potential adverse impacts. However, a few participants expressed general apprehension about temporary disturbances during construction, such as noise or dust. These concerns were minimal and non-specific, and stakeholders were reassured that all construction activities would follow environmental and social safeguards to mitigate any such temporary inconveniences. Overall, the community response remained overwhelmingly positive.

## **F. Disclosure of SECPF**

101. The SECPF will be duly disclosed as per ADB's SPS requirement.

## **G. Consultation & Participation during Project Implementation**

102. During the preparation of the SECPF, PAPs and their communities will be informed, closely consulted, and encouraged to participate in the meeting. Consultation is a continuous process and will also be carried out during implementation and monitoring. During the implementation phase, Physical Relocation Assistance Committees (PRACs) will be formed at Union or Upazila level to seek cooperation from various stakeholders in the decision-making and implementation of the SECPF. Through public consultations, the PAPs will be informed that they have a right to grievance redress from the BPDB. The PAPs can call upon the support of SECPF Improvement of the proposed Project. The GRCs will review grievances involving all resettlement benefits, relocation and other assistance. Union/Upazila based grievance redress committees

(GRCs) will be formed and the grievances will be redressed within a month from the date of lodging the complaints. The GRC as well as the Property Valuation Assessment Committee (PVAC) will be formed and activated to allow PAPs sufficient time to lodge complaints and safeguard their recognized interests.

## VI. INSTITUTIONAL AND IMPLEMENTATION ARRANGEMENTS

### A. Introduction

103. The successful implementation of the SECPF for the “Extension of Power Distribution System Network in Three Hilly Districts” project requires well-coordinated institutional arrangements, clear roles and responsibilities, and effective inter-agency collaboration. This chapter outlines the institutional framework, implementation strategy, and capacity-building measures essential for the smooth execution of all resettlement-related activities in compliance with national laws particularly the Acquisition and Requisition of Immovable Property Act (ARIPA), 2017 and the safeguard requirements of the Asian Development Bank (ADB).

104. Bangladesh Power Development Board (BPDB) has experience in implementing ADB funded projects previously. Bangladesh Power Development Board (BPDB), as the project executing agency, will have the primary responsibility for implementing the SECPF, ensuring that affected persons are compensated and supported in accordance with the entitlements defined in this plan. Various government entities, support consultants, and local stakeholders will also be involved at different stages to facilitate land acquisition, disbursement of compensation, grievance resolution, and monitoring of SECPF outcomes. This section describes the roles of all relevant institutions, the reporting and coordination mechanisms, and the timeline for SECPF implementation. It also includes strategies to enhance institutional capacity and ensure timely, efficient, and transparent delivery of resettlement benefits to the affected households and entities.

### B. Institutional Framework for SECPF Implementation

105. BPDB will serve as the Project Executing Agency (EA) and have the overall responsibility for SECPF implementation. Within BPDB, Project Management Unit (PMU) will be responsible for the day-to-day coordination and management of SECPF activities. The PMU will be supported by its project field offices and the Social Safeguard Focal Person, who will oversee the implementation of social safeguard and SEC people related activities and coordinate with other agencies involved therein.

106. Implementation of SECPF will follow cultural appropriateness, continue meaningful consultation with ethnic communities, ensure inclusive benefits are proportionately shared with all communities.

107. Grievance Redress Committees (GRCs) will be established in each project-site to resolve complaints related to project. These committees will include representatives from BPDB, affected communities, local government officials, and where applicable, indigenous leaders, ensuring culturally sensitive and inclusive decision-making.

108. The institutional framework is designed to ensure that SECPF implementation is participatory, transparent, and compliant with national and donor standards. It emphasizes inter-agency coordination, inclusive engagement of Tribal peoples, and field-level responsiveness to minimize adverse impacts and safeguard the rights and livelihoods of affected persons.

**Table VI-1: Composition of PMU at BPDB**

Position	Key Activities
<b>1. Project Director</b>	<ul style="list-style-type: none"> <li>• The PD is responsible for necessary policy, administrative and financial decisions and actions for the effective and timely</li> </ul>

<p><b>2. Deputy Project Director</b></p> <p><b>3. Executive Engineer</b></p> <p><b>4. Consultants</b></p> <p><b>5. Support Staff</b></p>	<p>implementation of the project as per the approved policy and implementation arrangements.</p> <ul style="list-style-type: none"> <li>• Support the field data gathering for the preparation of SECPF addendums and updates.</li> <li>• Conduct and document regular and meaningful consultations with affected persons.</li> <li>• Conduct internal monitoring of SECPF implementation activities and prepare monthly progress reports.</li> <li>• Form and convene a GRC for establishing and operationalizing Grievance Redress Mechanism (GRM), and</li> </ul>
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**a) Role of Design & Supervision and Contract Management Consultant (DSCMC)**

109. The Design & Supervision and Contract Management Consultant (DSCMC) plays a pivotal role in supporting the successful implementation of the SECPF for the project. As an integral technical partner to the Project Management Unit (PMU) and the executing agency, Bangladesh Power Development Board (BPDB), the DSCMC provides expert guidance and independent oversight across all stages of project execution particularly on safeguard compliance, engineering design, and construction supervision.

110. In terms of resettlement implementation, the DSCMC is mandated to provide technical and advisory support to the PMU in ensuring that all SECPF activities are carried out in accordance with national legal provisions (notably, the Acquisition and Requisition of Immovable Property Act, 2017) as well as the Asian Development Bank’s (ADB) Safeguard Policy Statement (SPS), 2009. The consultant is responsible for reviewing and validating SECPF-related documentation such as the updated socio-economic survey results, census data, land acquisition plans, and detailed entitlements for project-affected persons (PAPs). The DSCMC helps ensure the accuracy of these data sets and advises on necessary adjustments based on field realities or design changes.

111. A core responsibility of the DSCMC is to oversee and verify the implementation of safeguard measures on the ground. This includes regular monitoring of land acquisition processes, compensation disbursement, and assistance to affected households particularly vulnerable groups such as indigenous communities and private landowners and adherence to the project’s approved grievance redress mechanisms. The consultant supports the PMU in organizing public consultations, stakeholder meetings, and disclosure of project information in formats and languages understandable to local communities.

112. In addition to technical assistance, the DSCMC provides capacity-building support to the PMU and local implementing agencies. This may include training on ADB’s safeguard requirements, gender-inclusive resettlement planning, handling customary land issues in indigenous areas, and managing grievance redress mechanisms effectively. The consultant also ensures that all activities are well documented and recorded through progress reports, photo documentation, field logs, and community feedback.

113. Furthermore, the DSCMC plays an important liaison role between the PMU, external monitoring agencies, and ADB. It assists in preparing quarterly and annual safeguard monitoring reports, assessing the effectiveness of SECPF implementation, and recommending corrective actions where gaps or challenges are identified. In cases of project design modifications or

realignments, the DSCMC evaluates the need for SECPF updating or addenda, ensuring continued compliance with safeguard requirements.

114. In the context of the three hilly districts where terrain, accessibility, and cultural sensitivity are crucial factors. The DSCMC ensures that engineering designs minimize social impacts, avoid unnecessary displacement, and maintain cultural appropriateness in ethnic minority areas. Through its continuous advisory, technical, and supervisory functions, the DSCMC ensures that both the physical infrastructure and the associated resettlement processes are delivered in a socially responsible, transparent, and sustainable manner.

**(i) Role of Grievance Redress Committee (GRC)**

115. A Grievance Redress Committee (GRC) will be formed for resolving the grievances involving resettlement benefits, relocation and other disputes. The aggrieved persons shall be able to file their grievances without any fear and intimidation. The field team of the project shall assist the EPs in drafting the grievances. The judgment made by GRC will be communicated to the concerned EP in writing. If dissatisfied, he may request for further review of the judgment of GRC. If the EP does not get the remedy, he/she may appeal to the PD for final decision. The GRC procedures and operational rules have been publicized widely through community meetings and pamphlets in the state language (Bangla) so that the APs are aware of their rights and obligations, and procedure of grievance redress mechanism. All the documents of GRC shall be reserved by the PMU project site team for record.

116. The detailed compositions of local level GRC and project level GRC are given in the Chapter 08. The major functions of the GRC will be, but not limited to:

- (i) Further determination of losses that were identified incorrectly earlier,
- (ii) Rectify compensation/assistance not determined as per Entitlement Matrix (EM),
- (iii) Mediate in redressing disputes on ownership of affected properties and assets,
- (iv) Facilitate to minimize delay in disbursement of compensation/assistance,
- (v) Assist in proper distribution of compensation/assistance in case of joint ownership through distribution following the legal documents, records, etc., and Valuation of affected assets.

## VII. GRIEVANCE REDRESS MECHANISM

### A. Introduction

117. Grievances are issues, concerns, problems, or claims (perceived or actual) that individuals or community groups want to address and be resolved by the Project. The grievance mechanism is a locally based, project-specific extra-legal way to deal with and resolve complaints and grievances faster and thus enhance project performance standards in terms of social and resettlement management. The Grievance Redress Mechanism (GRM) will be established to facilitate the affected people and their communities to voice grievances, complaints and concerns linked to the project for ensuring accountability towards the affected persons through redressing their grievances, complaints and concerns. This mechanism (GRM) will be readily accessible to all project affected persons. Preferably grievance cases will be resolved by local level GRC.

118. An effective Grievance Redress Mechanism (GRM) is a critical component of the Resettlement Plan (SECPF) for the "Extension of Power Distribution System Network in Three Hilly Districts" project. This mechanism ensures that concerns, complaints, or disputes arising from land acquisition, compensation, resettlement, or any other project-related impacts are addressed in a timely, transparent, and fair manner. Given the socio-cultural sensitivities of the Chittagong Hill Tracts (CHT), where indigenous populations reside and where customary practices often govern land and community relations, the GRM is designed to be accessible, inclusive, and respectful of local contexts.

119. The primary objectives of the GRM are to promote accountability, reduce conflict, and enhance project outcomes by providing a structured platform through which affected persons including both Bengali and ethnic households can voice their concerns without fear of retribution. The mechanism will be made known to all Project Affected Persons (PAPs) through public consultations, community meetings, and information dissemination campaigns. The GRM will operate at multiple levels, starting from the local level to higher tiers if necessary, ensuring issues are resolved as close to the source as possible.

120. By establishing a responsive and culturally appropriate grievance mechanism, the project not only complies with national policies such as the Acquisition and Requisition of Immovable Property Act (ARIPA) 2017, but also aligns with ADB's Safeguard Policy Statement (2009), which emphasizes meaningful consultation and grievance redress as part of a rights-based resettlement process.

### B. Principles of GRM

121. The GRM is anchored on the following principles that guide the Project:

- a) **Transparency.** The Project will keep the affected person informed about the progress made in resolving the grievances and provide sufficient information about the mechanism's performance to build confidence in its effectiveness and meet any public interest at stake. The SEC especially the *karbaris* must be (i) made aware of the complaints and issues reported, (ii) involved in their redress, and (iii) informed on progress made in resolving grievances. Confidentiality of the dialogue between parties and of individuals' identities should be provided where necessary.
- b) **Empowering and participatory.** SEC, *karbaris*, affected persons, beneficiaries, CSOs and other stakeholders are encouraged to participate and bring complaints,

issues and comments to the attention of Project management. More importantly, communities should be involved in problem solving.

- c) **Socially inclusive.** The whole community is given the opportunity to raise concerns and the right to be accorded a response. The grievance system will allow anyone, especially the SEC, poor, the disadvantaged groups, the women, to raise grievance or complaints, be heard and involved on redressal process.
- d) **Culturally appropriate.** ADRFs will be constituted for land dispute resolution where the *karbaris* and PDC in SEC will be members in grievance redress council.
- e) **Simple and accessible.** Procedures to file complaints and seek redress are kept simple and easy to understand by the SEC and affected people. Complaints and queries may be sent through different accessible means such, as but not limited to, installation of grievance box in subproject areas, walk-in to district offices, PDC representatives, *karbari*, message or call to grievance hotline, or an email to the Project website.
- f) **Confidentiality.** The identities of affected people and other stakeholders are kept confidential upon request. This encourages people to voluntarily participate in the GRM process, and file complaints and/or comments.

### C. Functions of GRM

- a) Response to grievance and comments is ensured within an acceptable timeline. The corresponding action is responsive and commensurate to complaint or issue. The GRM entails objective and independent practice to promote fair procedures and encourages people to use. Thus, GRM will enhance the Project's contribution to participatory development. In all instances, conflict of interest or perceptions of it will be investigated and avoided.
- b) The GRM will establish multiple channels by which grievances can be received by the PMU. The procedures will be easy for all the diverse groups of affected persons to understand and be made known to them and consider the many facets involved in making the mechanism accessible including AP access to transportation and roads and their literacy and education levels, as well as their access to such communications facilities as telephones, mail, and the internet. The project will ensure consultation is organized in a congenial environment without intimidation and should be culturally appropriate and acceptable to SEC and gender sensitive.
- c) To ensure the GRM is in line with the ADB SPS, the GRM will be a time-bound, simple, transparent, gender- and culturally- responsive in addressing feedback, concerns and suggestions of, and facilitation of solutions for, all the relevant stakeholders of the project (i.e., local community, contractors, and other members in the value chain, including from small ethnic communities (SECs), women, and other vulnerable groups
- d) Accessibility will be facilitated through provision of the following services: (i) grievance boxes in subproject areas, (ii) walk-in to district offices, (iii) speak to PDC representatives or *karbari*, (iv) message or call the grievance hotline, or (iv) email the Project website. The PMU is to establish a GRM hotline and project website for APs to contact. A phone number and web address will be defined during project readiness. Complaints received through the hotline and website will be documented and fed to

- the correct level of GRM for facilitation. Awareness of grievance redress procedures will be created through public awareness, outreach campaigns and clear signage with grievance focal person's contact details and procedure on how to file a complaint, including in Bangla or major SEC dialects on project sites. Redress through the GRM does not impede access to the country's judicial or administrative remedies.
- e) Gender- and cultural- responsiveness will be supported through: (i) use of local issue resolution methods, (ii) membership of the SECs or their representative at the first tier GRM at field/village level; (iii) availability of the GRM form in local/SEC dialects or languages to the extent these have a written form and on information signage.
  - f) For any grievance filed by a marginalized or vulnerable person, such as a SEC member or poor person, extra attention will be paid to ensuring the following: (i) complainant will be aided in recording their grievance (field staff to write up verbal complaint verbatim), (ii) complainant can be represented and supported by a local leader (such as an SEC leader), (iii) the outcome of the grievance will be delivered in writing and in person by the GRO responsible, to ensure comprehension of the outcome and any follow up actions. All grievances shall be recorded in grievance register (including in Bengali or local language), and entire process shall be tracked and reported through quarterly and annual progress reports and semi-annual social and environmental safeguards monitoring reports. The GRM process shall include the following stages.

#### **D. Levels of GRM**

- a) The GRM for this project will have three tiers. Tier 1 will be at site level, referring to the site engineer from construction team, or as deemed appropriate and available at site, under the jurisdiction of PMU. The DSCMC consultant will support in coordination and resolution. Para Development Committee (PDC) will serve as community representative in tier one. Tier 2 is represented by a Grievance Redress Committee (GRC) which is established at project level, with PMU and LAO from DC office to support with resolution. Hill District councils being the community representatives. The final tier will be at central level headed by PSC for issues that require ministry level decisions.
- b) The PMU will ensure the redressal of complaints, including anonymous complaints, and issues of non-compliance, in accordance with national regulations and the ADB Accountability Mechanism Policy 2012. However, the affected person has every right to bring their issue to a court of law. The overall model of GRM for this project is summarized in Figure 3.

#### **E. Tier 1: Site level**

122. At site level, the construction team will be the first tier of the GRM for all social and environmental concerns, excepting land dispute resolution. The complaints resolution should be within seven days and will follow the same steps in filing the complaint as mentioned above. Any affected person can approach the site engineer or any member of the PDC. The Social safeguards specialist will ensure to provide support throughout the grievance problem-solving

process. The PDC will convene weekly to coordinate on any complaints lodged at the PDC level. If project site level representative and PDC are unable to resolve the issue to the satisfaction of the affected person, the issues can be forwarded to the GRC level in tier 2 within seven days.

123. Tier-1 is composed of:

- (i) Karbari/PDC member
- (ii) Contractor's site engineer/representative member secretary
- (iii) One female local leader as Member
- (iv) Social safeguards specialist from contracted DSCMC as Member
- (v) PMU representative as Chairperson

#### **F. Tier 2: Project Level**

124. For environmental or social safeguards related complaints that cannot be settled at the site level, the T2 GRC, at Project level will provide a simple process for the affected person to raise their concerns and get them resolved within seven days. The affected persons will be informed of their right to file complaints to the GRC.

125. The GRC will receive unresolved grievances of the affected persons through the DSCMC specialist, and will assist the affected person in lodging their resettlement claims in a format acceptable to the GRC at PMU level. All complaints will be received at the office of the PMU, or by the GRC.

126. The GRC at project level will settle the issues within seven days after receiving complaints. The PMU representative, as chairperson of the GRC, upon receipt of complaints, will organize a GRC meeting. GRC at T2 will pass a resolution which will be formally conveyed to the concerned affected persons through the DSCMC consultant. The key functions of a GRC will be as follows:

- (i) Record, categorize and prioritize any grievances;
- (ii) Settle grievances in consultation with affected persons/representatives, project staff and other stakeholders;
- (iii) Inform the aggrieved parties about the resolutions; and
- (iv) Forward any unresolved complaints to the PSC level committee.

127. The T2 GRC is composed of:

- (i) Project Director of PMU as Chairperson
- (ii) ADC (Revenue)/Land Officer of Hill District Council as appropriate in resolution
- (iii) One female local leader as Member if required
- (iv) DSCMC safeguards specialist will provide as Member Secretary

128. If not resolved at the GRC level within seven days, the matter will be referred immediately to the PSC level through PMU.

#### **G. Tier 3: Central Level**

129. Complaints that cannot be settled at the GRC T2 level should be elevated to the Project Steering Committee for grievance redressal and resolution within 15 days. The T3 GRC will meet whenever a case is brought to its attention and determine the merit of each grievance brought to

their level. The authorities and responsibilities of the PSC and its rules of business will be part of the PDB Executive Order. The PSC will provide feedback to PMU for resolution.

130. The T3 is composed of:

- (i) PSC representative as Chairperson (minimum Joint Secretary level officer from Power Division)
- (ii) Representative from the PDB as Member
- (iii) PMU nominated representative as Member
- (iv) Project Director (Chief Engineer) PMU as Member Secretary

131. None of the three levels of the GRM possess any legal mandate or authority to resolve land issues, they rather act as an advisory body or facilitator to try to resolve issues between the affected household/person and the Project. Any complaints of ownership or other suits, to be resolved by judicial system, will not be resolved by project's GRM. The affected person always has other recourse through the Government legal channels. However, every effort will be made to avoid this by applying traditional conflict resolution procedures in negotiating resolutions to complaints. Should an affected person wish to pursue legal recourse at any point prior to approaching, during interaction with, or after interacting with the GRM, the PMU, PMU and DSCMC will ensure that support is given to the affected person to prepare a case. No fees will be charged to the affected person for such assistance.

#### **H. Relevant GRM Activities**

- (i) **Court of Law.** The GRM notwithstanding, an aggrieved person will have access to Bangladesh Legal System at any stage, Accessing the court of law is not dependent on the outcome of the GRM.
- (ii) **ADB Accountability Mechanism.** If the established GRM is not able to resolve the issue, the affected person can use the ADB Accountability Mechanism through directly contacting (in writing) the Complaint Receiving Officer at ADB headquarters. Before submitting a complaint to the Accountability Mechanism, it is recommended that affected people make good faith effort to resolve their issues by working with the Bangladesh Resident Mission. Only after doing that, and if they are still dissatisfied, they could approach the Accountability Mechanism. The ADB Accountability Mechanism information will be included in the project-relevant information to be distributed to the affected communities.
- (iii) **Consultation and Information Dissemination.** Consultation will include group meetings, and one-on-one discussion with affected persons, to be announced in advance and conducted at the time and day agreed on with the affected persons or their representatives. Non-literate affected persons will be assisted to understand the grievance redress process. The GRM process will be explained to them in indigenous dialects by the Social Safeguard Specialist and project site team of PMU. The public especially the SEC and affected persons will be made aware of the GRM through consultation meetings, focus group discussions and inclusion of the GRM hotline and relevant details in the Project information booklet.
- (iv) **Record Keeping.** A grievance database system will be established by CHTRC. Records of all grievances received, including contact details of affected person, date

of complaint/grievance received, nature of grievance, agreed actions and measures, dates of meetings conducted and resolutions with linked documentation are recorded in the database. The number of grievances recorded and resolved, and the outcomes will be displayed/disclosed in the PMU office, and on the website of PMU (to be developed in project readiness), as well as reported in the semiannual environmental, IR and IP safeguards monitoring reports to be submitted to ADB. The PMU, with support from the GROs composed of the Environmental Management/Climate Adaptation Expert, Land Acquisition Expert, and SEC Expert, will be responsible for maintaining the grievance database system.

- (v) **Costs.** All costs involved in resolving the complaints (meetings, consultations, communication, and reporting/information dissemination) will be borne by the PMU. Cost estimates for grievance redress are included in resettlement cost estimates.

## **I. Scope and Jurisdiction of GRC**

132. The scope of work and jurisdiction of GRC are:

- (i) The GRC shall review, consider and resolve grievances, related to social/resettlement and environmental mitigations during implementation, received by the committee.
- (ii) Any grievances presented to the GRC should ideally be resolved on the first day of hearing or within a period of one month, in cases of complicated cases requiring additional investigations.
- (iii) Grievances of persons affected during project implementation will also be reviewed by GRC.
- (iv) GRC decisions should ideally be arrived at through consensus, failing which resolution will be based on majority vote. Any decision made by the GRC must be within the purview of social, resettlement and environmental policy framework.
- (v) The GRC will not deal with any matters pending in the court of law. But if the parties agree on through a written appeal, GRC can mediate. The parties will withdraw the litigation.
- (vi) A minimum three (3) members shall form the quorum for the meeting of the GRC.
- (vii) The Legal Adviser will not play role as member but will put his lawful advice/suggestion during GRC sessions.

## **J. Filing Grievance Cases and Resolution Process**

133. The persons or entities with a concern or complaint will file their grievance petitions with the GRM focal points without any fear and intimidation. Where required, the GRC will assist the aggrieved people in drafting the complaints. All grievance cases must be submitted in writing to the Chairperson, GRC at the Ward level, the first tier GRM. The complainant may be represented by him/ herself or appointed agent such as locally elected officials/legal advisors. The resolution made by GRC will be communicated to the concerned aggrieved person in writing. If dissatisfied with the resolution of the GRC, the concern aggrieved person may request through the convener of Ward level GRC, a further review of the judgment at the Project level GRC, second tier GRM. The case with review requested to the first tier GRM, will be forwarded to the Convener of the

project level GRC, with all documentations by the local level GRC. If the disputant remains unsatisfied at the second tier, he/she can go to the formal court of law.

134. GRC meetings will be held in the GRM secretariat or at any other location(s) as agreed with the complainants. If needed, GRC members may undertake field visits to verify and review the issues on dispute and take technical clarifications from the legal advisor/consultant at the PMU. Complaints resolved at any tier of the GRM and accepted by the aggrieved persons will be approved by the Project Director for implementation or actions.

135. The complaints received at any tier of the GRM will be heard, investigated and resolved within one calendar month from the date of registering the complaints.

#### **K. Documentation and Monitoring**

136. To ensure impartiality and transparency, hearings on complaints at the GRC level will remain open to the public. The GRCs will record the details of the complaints and their resolution in a register and document all proceedings including hearing, resolution and closing of the cases.

137. The GRM Registrar Book will contain (1) Case no. with date and channel of receipt, (2) Name of complainant with gender and contact details, (3) Story of the complaints, (4) Method of resolution with details of site verification and hearing, (5) Decision of GRC and agreement, and (6) Management actions to implement the agreed decisions.

138. Grievance resolution will be a continuous process during project implementation. The conveners' office at PMU will keep records of all resolved and unresolved complaints and grievances (one file for each case record) and make them available for review as and when asked for by any other interested persons/entities. The PMU, with help from the Design & Supervision and Contract Management Consultant (DSCMC) will also prepare periodic reports on the grievance resolution process and publish these on their website.

#### **L. GRM Procedure by the Government**

139. According to the GRM procedure, if anyone cannot file an objection to the local community, he/she can object through the website. At this stage a complainer can complain through the website by entering a mobile number, full name, email (if any). Objections can be given by complain box on the website. There's a website-based GR system developed by the government. A sample Photographs is presented below:



## **IX. MONITORING, REPORTING AND EVALUATION**

141. The project is aimed to expand BPDB's power distribution network in 26 municipalities in Rangamati, Bandarban and Khagrachori with 40% accessed by members from small ethnic community. To achieve this target implementation of the SECPF should be supervised and monitored by the Project Director (PD) of the project along with the various officials of the Project Management Unit (PMU) with the support from Design & Supervision and Contract Management Consultant (DSCMC). Monitoring activities will be done internally by the PMU to assess the effectiveness of implementation the SECPF. The day-to-day activities of the SECPF implementation will also be monitored by the social safeguards specialist working under Design & Supervision and Contract Management Consultant (DSCMC) for the project, who will collect monthly SEC segregated data and include cumulative progress in semiannual social safeguards monitoring reports.

142. Monitoring, as an integral part of project implementation, must be given due consideration for the implementation of the SECPF to be successful and to be completed in a timely fashion, according to the SECPF implementation schedule.

143. The objectives of the monitoring and evaluation will be:

- (i) To collect and analyses information, and to report on the progress of implementation of activities under the SECPF.
- (ii) Using performance monitoring indicators to ensure that inputs are being provided, procedures are followed, and outputs are monitored to attain desired objectives.
- (iii) To detect any problems early, and correct them with the minimum of delay, ensuring timely management action.
- (iv) To assess the adequacy of organizational mechanisms for implementing the SECPF; and
- (v) To apply the necessary corrective measures and actions at the policy level, if any failures are detected.

### **A. Institutional Arrangement for Monitoring**

144. BPDB will carry out internal monitoring of the SECPF implementation involving the PMU offices, Social Safeguards Specialist working under Design & Supervision and Contract Management Consultant (DSCMC) for the project. An independent External Monitoring Consultant will carry out M&E independently. The Social Safeguards Specialist under DSCMC will oversee and monitor safeguard compliance of the project. The project affected persons, their community will also participate in the M&E process.

### **B. Reporting Requirement**

145. The Reporting Requirement under the Resettlement and Small Ethnic Community Plan (RSECP) will ensure that progress and performance of implementation of SECPF are systematically documented and communicated. The Social Safeguards Specialist working under Design & Supervision and Contract Management Consultant (DSCMC) will be responsible for preparing and submitting monthly and quarterly progress reports to the Project Management Unit (PMU), detailing activities under provision of SECPF. These reports will also highlight challenges, corrective actions taken, and progress against key indicators.

146. The Design & Supervision and Contract Management Consultant (DSCMC) will compile and validate the field level inputs and submit semi-annual consolidated monitoring reports to the Bangladesh Power Development Board (BPDB) and the Asian Development Bank (ADB). These reports must meet the ADB's standards for transparency and safeguard compliance, particularly in documenting the delivery of entitlements to indigenous peoples and other vulnerable groups.

147. Field level SEC segregated data should be collected by the field offices of PMU to ensure project's target of inclusion of SEC people to achieve project objectives.

## **Annex A. Terms of Reference: Social Safeguards Specialist**

### **Objective and Purpose of the Assignment**

The Social safeguards Specialist will work on behalf of the Executing Agency BPDB to provide technical, analytical and coordination support in ensuring compliance of “Sustainable Energy Development and Empowering Communities in Chattogram Hill Tracks Project” with National and ADB SPS 2009 requirements for land acquisition and resettlement with intermittent input of 36 months spread over the total project implementation period. The consultant will support BPDB to comply with National and ADB safeguards requirements on resettlement and land acquisition, support in implementation, monitoring safeguards issues including inclusive consultation with vulnerable communities, women, Tribal people, and ensure inclusion of Tribal communities proportionately as project beneficiaries, and preparation of semiannual social safeguards report to comply with ADB safeguards requirements on Involuntary Resettlement and Indigenous Peoples.

The period of service would be intermittent basis throughout 05 years of project implementation period.

### **Scope of Work**

The Resettlement Specialist will work and coordinate with the respective Project Management Unit, Project Implementation Units, and other consultants. He/she will help BPDB to prepare and finalize resettlement documents, prepare, update and implement Resettlement Plans as required, and ensure compliance with SPS 2009 and ADB's public disclosure requirements. Major tasks include i) prepare and update the Resettlement Plan (RP) for the project, as required, ii) Assist the EA to implement RP, compensation payment to the affected persons according to agreed mitigation measures, iii) ensure, documentation and progress in compensation payments in semiannual monitoring report. iv) maintain a database to reflect updates on Resettlement progress and inclusion of Tribal and ethnic communities as project beneficiaries, v) assist and support in Grievance Redress process as a part of Grievance Redress Mechanism (GRM) and participate in other committee meetings as required, vi) ensure conducting stakeholder consultation meetings and documentation, (v) A final report with comprehensive updates on compensation and evaluation of livelihood impacts, inclusion of Tribal-ethnic communities as project beneficiaries, and (vi) ensure field verification and coordination DC and LAO offices as required.

### **Detailed Tasks/Expected Outcomes**

The Social safeguards specialist will perform the following tasks:

- (i) Preparation and implementing the RP and assisting BPDB in all works related to compensation payment, land acquisition and resettlement.
- (ii) Assist and conduct socioeconomic surveys, data collection, maintain segregated data for male and female affected persons and meaningful consultations with project affected people for implementation and monitoring the RP as per national and ADB SPS 2009.
- (iii) Work closely with DC office, CHT District Council and other government departments for RP implementation and land acquisition works to assist BPDP.
- (iv) Conduct 01 inception and 01 refresher capacity building training on social safeguards for BPDB, contractors, and consultants.
- (v) Prepare Combined Semiannual Social Monitoring Report for implementation of Resettlement and Tribal Peoples Plan, and Tribal Peoples Planning Framework for BPDB in complying with ADB's disclosure requirements as per the ADB SPS 2009.
- (vi) Conduct any other Social Safeguard related works as per ADB SPS 2009 to support BPDP during project implementation works.

## **Minimum Qualification Requirements**

### **Education**

Master's Degree in Development Studies/ or other relevant departments

### **Work experience**

- 10 years' experience in monitoring involuntary resettlement for development projects, including experience in land acquisition, previous works in CHT is required.
- Intensive field-based experience in developing social safeguard planning documents of a project would be an advantage

### **Technical knowledge**

- Familiarity with ADB's Safeguards Policy Statement is must
- Proficiency with social impact analysis, social assessments, and PRA
- Basic knowledge of computer applications adopted by a multilateral organization.
- Competent use of information technology, particularly in the design and management of database and other knowledge management systems.
- Effective report writing and communication skills in English.

## Annex B. Grievance Recording Form

Ministry of Chittagong Hill Tracts Affairs

Extension of Power Distribution System Network in Three Hill Districts Project

SL	GRIEVANCE RECORDING FORM			
1.	Date of Grievance Reporting			
2.	Full Name of AP / Complainant			
3.	Gender of AP/ Complainant		Male	Female
4.	ID of AP (voters ID/passport number/driving license/any other ID)			
5.	Address of AP/ Complainant			
6.	Contact Information	Phone:	Email:	
7.	Mode of communicating grievance ( <i>circle the number below</i> )			
8.	Oral	Oral (but not AP)	Written	Written (by other)
	1	2	3	4
9.	Mode of Contact ( <i>circle the number below</i> )			
	Phone	Email	UP Chairman/ Mouza Headman/ UP Member/ Karbari/ Local Community Leader	Others (specify)
	1	2	3	4

10.	Type of Grievance ( <i>circle as many reported</i> )			
	Unaware of project component boundary	1	Safety of women	7
	Parcel missed in measurement	2	Damage to crops due to construction	8
	Parcel measurement error	3	Inappropriate restoration scheme livelihood	9
	Disagreement over rates used for valuation	4	Loss of access	10
	Mistakes in compensation agreement/ID reference	5	Others (Specify)	11
	Delay in compensation payment	6		

11.	Description of Grievance:		
12.	Frequency of Grievance ( <i>circle the number</i> ):		
	• One time incident	1	
	• Happened more than once	2	
	• On-going	3	
13.	Expected resolution to stated grievance:		
14.	Signature/Thumb impression of AP/Complainant		Date:
15.	Name and Signature of the Official recording grievance		Date:
16.	Has AP been handed a copy of the grievance form	Yes	No
Status of Resolution			
17.	<b>By GRC</b>		Date:
Resolution details:			
Has AP/ Complainant been notified?		Yes	No
Is Grievance resolved/closed?		Yes	Not resolved. Referred to Provincial Administrator
If case is closed, then Signature of AP/ Complainant to show agreement		Date:	
Name and signature of the Official		Date:	
18	<b>By Hill District Council</b>		Date:
Resolution details:			
Has AP/ Complainant been notified?		Yes	No
Is Grievance resolved/closed		Yes	Not resolved. Referred to IPMU/WAF
If case is closed, then Signature of AP/ Complainant to show agreement		Date:	

Name and signature of the Official		Date:	
19.	<b>BY Regional Council</b>	Date:	
Resolution details:			
Has AP/ Complainant been notified?		Yes	No
Is Grievance resolved/closed?		Yes	Not resolved. Referred to Court
If case is closed, then Signature of AP/ Complainant to show agreement		Date:	
Name and signature of the Official		Date:	
20.	<b>By Court</b>	Date:	
Resolution details:			
Is Grievance resolved/closed?		Yes	No
Name and signature of the Official		Date:	
<b>DECISION OF THE COURT IS FINAL</b>			

## **Annex C: Outline of Small Ethnic Communities Plan**

This outline is part of the ADB Safeguard Requirements. An Indigenous Peoples plan (IPP) is required for all projects with impacts on tribes, minor races, ethnic sects and communities. Its level of detail and comprehensiveness is commensurate with the significance of potential impacts on tribes, minor races, ethnic sects and communities. The substantive aspects of this outline will guide the preparation of IPPs, although not necessarily in the order shown.

### **Executive Summary of the Indigenous Peoples Plan**

This section concisely describes the critical facts, significant findings, and recommended actions.

### **Description of the Project**

This section provides a general description of the project; discusses project components and activities that may bring impacts on tribes, minor races, ethnic sects and communities; and identify project area.

### **Social Impact Assessment**

This section:

- (i) reviews the legal and institutional framework applicable to tribes, minor races, ethnic sects and communities in project context.
- (ii) provides baseline information on the demographic, social, cultural, and political characteristics of the affected tribes, minor races, ethnic sects and communities; the land and territories that they have traditionally owned or customarily used or occupied; and the natural resources on which they depend.
- (iii) identifies key project stakeholders and elaborate a culturally appropriate and gender-sensitive process for meaningful consultation with tribes, minor races, ethnic sects and communities at each stage of project preparation and implementation, taking the review and baseline information into account.
- (iv) assesses, based on meaningful consultation with the affected tribes, minor races, ethnic sects and communities, the potential adverse and positive effects of the project. Critical to the determination of potential adverse impacts is a gender-sensitive analysis of the relative vulnerability of, and risks to, the affected tribes, minor races, ethnic sects and communities given their particular circumstances and close ties to land and natural resources, as well as their lack of access to opportunities relative to those available to other social groups in the communities, regions, or national societies in which they live.
- (v) includes a gender-sensitive assessment of the affected tribes, minor races, ethnic sects and communities' perceptions about the project and its impact on their social, economic, and cultural status.
- (vi) identifies and recommends, based on meaningful consultation with the affected tribes, minor races, ethnic sects and communities, the measures necessary to avoid adverse effects or, if such measures are not possible, identifies measures to minimize, mitigate, and/or compensate for such effects and to ensure that the tribes, minor races, ethnic sects and communities receive culturally appropriate benefits under the project.

## **Information Disclosure, Consultation and Participation**

This section:

- (i) describes the information disclosure, consultation and participation process with the affected tribes, minor races, ethnic sects and communities that was carried out during project preparation;
- (ii) summarizes their comments on the results of the social impact assessment and identifies concerns raised during consultation and how these have been addressed in project design;
- (iii) in the case of project activities requiring broad community support, documents the process and outcome of consultations with affected tribes, minor races, ethnic sects and communities and
- (iv) any agreement resulting from such consultations for the project activities and safeguard measures addressing the impacts of such activities;
- (v) describes consultation and participation mechanisms to be used during
- (vi) implementation to ensure tribes, minor races, ethnic sects and communities participation during implementation; and
- (vii) confirms disclosure of the draft and final IPP to the affected tribes, minor races, ethnic sects and communities.

## **Beneficial Measures**

This section specifies the measures to ensure that the tribes, minor races, ethnic sects and communities receive social and economic benefits that are culturally appropriate, and gender responsive.

## **Mitigative Measures**

This section specifies the measures to avoid adverse impacts on tribes, minor races, ethnic sects and communities; and where the avoidance is impossible, specifies the measures to minimize, mitigate and compensate for identified unavoidable adverse impacts for each affected tribes, minor races, ethnic sects and communities.

## **Capacity Building**

This section provides measures to strengthen the social, legal, and technical capabilities of (a) government institutions to address tribes, minor races, ethnic sects and communities issues in the project area; and (b) tribes, minor races, ethnic sects and communities organizations in the project area to enable them to represent the affected tribes, minor races, ethnic sects and communities more effectively.

## **Grievance Redress Mechanism**

This section describes the procedures to redress grievances by affected tribes, minor races, ethnic sects and communities. It also explains how the procedures are accessible to tribes, minor races, ethnic sects and communities and culturally appropriate and gender sensitive.

## **Monitoring, Reporting and Evaluation**

This section describes the mechanisms and benchmarks appropriate to the project for monitoring, and evaluating the implementation of the IPP. It also specifies arrangements for participation of affected tribes, minor races, ethnic sects and

communities in the preparation and validation of monitoring, and evaluation reports.

**Institutional Arrangement**

This section describes institutional arrangement responsibilities and mechanisms for carrying out the various measures of the IPP.

**Budget and Financing**

This section provides an itemized budget for all activities described in the IPP.

## **Annex D. Proposed Outline of Semiannual SEC Safeguards Monitoring Report**

Cover page Disclaimers

Currencies and units of measurement Abbreviations

Glossary

Executive Summary

1. Introduction
  - 1.1. Background of the project
  - 1.2. ADB IP Safeguards and SEC Plan Framework
  - 1.3. Purpose of the report
  - 1.4. Scope of the report
  - 1.5. Methodology
2. SEC in the CHT
3. Project description
4. Project organisation
  - 4.1. Institutional and implementation arrangements
  - 4.2. Organisation of social safeguards implementation, monitoring and reporting
  - 4.3. Progress of the project
5. Monitoring of compliance with SEC Plan Framework requirements
  - 5.1. Land acquisition – compensation for customary land
  - 5.2. Support for small SECs
  - 5.3. Participatory Village Mapping
  - 5.4. Capacity Building on IP Safeguards and SEC issues
  - 5.5. Grievance Redress
  - 5.6. Compliance with respect to Loan Covenant
6. Conclusions and Recommendations Annexes

## Annex E. IP Safeguards Screening Checklist

### IP SAFEGUARDS SUBPROJECT SCREENING CHECKLIST

#### A. GENERAL INFORMATION

Subproject/Intervention	
Details	

#### B. SELECTION CRITERIA (FUNDAMENTAL)

- All subprojects included in the ADB Prohibited Investment Activities List (List provided in Appendix 1) should be excluded from the Project;

#### C. SCREENING CHECKLIST

KEY CONCERNS	YES	NO	Not Known	Remarks
<b>A. Small Ethnic Communities Identification</b>				
1. Are there SEC groups present in or use the subproject area?				
2. Do such SEC groups self-identify as being part of a distinct social and cultural group?				
3. Do such SEC groups maintain collective attachments to distinct habitats or ancestral territories and/or to the natural resources in these habitats and territories?				
4. Do such SEC groups maintain cultural, economic, social, and political institutions distinct from the dominant society and culture?				
5. Do such SEC groups speak a distinct language or dialect?				
6. Has such SEC groups been historically, socially, and economically marginalized, disempowered, excluded, and/or discriminated against?				
<b>B. Identification of Potential Impacts</b>				

7. Will the subproject/intervention directly or indirectly benefit or target SEC?				
8. Will the subproject/intervention directly or indirectly affect SEC's traditional socio-cultural and belief practices? (e.g. child-rearing, health, education, arts, and governance)				
9. Will the subproject affect the livelihood systems of Indigenous Peoples? (e.g., food production system, natural resource management, crafts and trade, employment status)				
10. Will the subproject be in an area (land or territory) occupied, owned, or used by SEC, and/or claimed as ancestral domain?				
<b>C. Identification of Special Requirements</b> <i>Will the subproject activities include:</i>				
11. Commercial development of the cultural resources and knowledge of SEC?				
12. Physical displacement from traditional or customary lands?				
13. Commercial development of natural resources (such as minerals, hydrocarbons, forests, water, hunting or fishing grounds) within customary lands under use that would impact the livelihoods or the cultural, ceremonial, spiritual uses that define the identity and community of SEC?				
14. Establishing legal recognition of rights to lands and territories that are traditionally owned or customarily used, occupied, or claimed by SEC?				
15. Acquisition of lands that are traditionally owned or customarily used, occupied, or claimed by SEC?				

### Anticipated project impacts on Small Ethnic Community

Subproject/Intervention	Anticipated positive effect	Anticipated negative effect
1.		
2.		
3.		
4.		
5.		