

# **BANGLADESH ENVIRONMENTAL SUSTAINABILITY AND TRANSFORMATION PROJECT (BEST)**

## **RESETTLEMENT POLICY FRAMEWORK (RPF)**

**Department of Environment (DoE)**

**Bangladesh Bank (BB)**

**Bangladesh Road Transport Authority (BRTA)**

**Bangladesh Hi-Tech Park Authority (BHTPA)**

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## ABBREVIATIONS

AP	Affected Person
ARAP	Abbreviated Resettlement Action Plan
ARIPA 2017	Acquisition and Requisition of Immovable Property Act, 2017
BB	Bangladesh Bank
BEST	Bangladesh environmental sustainability and transformation project
BHTPA	Bangladesh High Teck Park Authority
BRTA	Bangladesh Road Transport Authority
CBO	Community Based Organization
CCL	Cash Compensation under Law
CIO	Chief Implementation Officer
CPD	Continuous Professional Development
CPR	Common Property Resources
DDR	Due Diligence Report
DoE	Department of Environment
EA	Executing Agency
ED	Executive Director
EHS	Environmental Health and Safety
ESS	Environmental and Social Standards
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
EP	Entitled Person
FGD	Focus Group Discussion
GoB	Government of Bangladesh
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GRS	Grievance Redress System
GBV	Gender Based Violence
IA	Implementing Agency
IoL	Inventory of Losses
IP	Indigenous Peoples
IPF	Investment Project Financing
IVC	Inventory Verification Committee
IQAC	Institutional Quality Assurance Cell
LMP	Labor Management Plan
M&E	Monitoring and Evaluation
MoEFCC	Ministry of Environment, Forest and Climate Change
NGO	Non-Governmental Organizations
PAH	Project Affected Households
PAP	Project Affected Persons
PAI	Project Area of Influence
PAVC	Property Assessment and Valuation Committee
PD	Project Director
PIU	Project Implementation Unit
PMO	Project Management Office
PMU	Project Management Unit
PPR	Public Procurement Rule
PSC	Project Steering Committee
PVAC	Property Valuation Advisory Committee
RAC	Relocation Advisory Committee
RAP	Resettlement Action Plan
RCS	Replacement Cost Study
RPF	Resettlement Policy Framework
ROW	Right of Way
RV	Replacement Value
SES	Socio-economic survey
SEP	Stakeholder Engagement Plan
SEC	Small Ethnic community
SECDPF	Small Ethnic community Development Planning Framework

SECDP	Small Ethnic Community Development Plan
TOR	Terms of Reference
TTO	Technology Transfer Offices
VLD	Voluntary Land Donation
WB	World Bank
WBG	World Bank Group

## Glossary

**“Associated Facilities”** means facilities or activities that are not funded as part of the project but are: (a) directly and significantly related to the project; and (b) carried out, or planned to be carried out, contemporaneously with the project; and (c) necessary for the project to be viable and would not have been constructed, expanded or conducted if the project did not exist.

**“Census”** is a complete count of the population affected by a project activity including collation of demographic and property information. This will identify and determine the number of Project Affected Persons (PAP) and the nature and levels of impact.

**“Cut-off date”** is the date by which PAPs and their affected assets, as relevant, have been identified and new entrants to the site cannot make claims to compensation or resettlement assistance. Persons whose ownership, use of occupancy prior to the cut-off date can be demonstrated remain eligible for assistance, regardless of their identification in the census.

**“Involuntary resettlement”** means the involuntary taking of land resulting in direct economic and social impacts caused by the involuntary taking of land resulting in relocation or loss of shelter; loss of assets or access to assets; or loss of income sources or means of livelihood, whether or not the PAP has moved to another location and causes adverse impacts on the livelihoods of the displaced persons due to Involuntary restriction of access to legally designated parks and protected areas.

**“Land acquisition”** refers to all methods of obtaining land for project purposes, which may include outright purchase, expropriation of property and acquisition of access rights, such as easements or rights of way. Land acquisition may also include: (a) acquisition of unoccupied or unutilized land whether or not the landholder relies upon such land for income or livelihood purposes; (b) repossession of public land that is used or occupied by individuals or households; and (c) project impacts that result in land being submerged or otherwise rendered unusable or inaccessible.

**“Livelihood”** refers to the full range of means that individuals, families and communities utilize to make a living, such as wage-based income, agriculture, fishing, foraging, other natural resource- based livelihoods, petty trade and bartering.

**“Negotiated settlements”** refers to situations where the Borrower needs to acquire specific land or restrict its use for project purposes, but rather than doing so through an expropriation proceeding, the Borrower first tries to arrive at a mutually agreeable negotiated settlement with the landowner/user.

**“Project affected persons” (PAPs)** means persons who are impacted by involuntary resettlement as defined below.

**“Replacement cost (RC)”** is defined as a method of valuation yielding compensation sufficient to replace assets, plus necessary transaction costs associated with asset replacement. Where functioning markets exist, replacement cost is the market value as established through independent and competent real estate valuation, plus transaction costs. Where functioning markets do not exist, replacement cost may be determined through alternative means, such as calculation of output value for land or productive assets, or

the undepreciated value of replacement material and labor for construction of structures or other fixed assets, plus transaction costs. In all instances where physical displacement results in loss of shelter, replacement cost must at least be sufficient to enable purchase or construction of housing that meets acceptable minimum community standards of quality and safety. The valuation method for determining replacement cost should be documented and included in relevant resettlement planning documents. Transaction costs include administrative charges, registration or title fees, reasonable moving expenses, and any similar costs imposed on affected persons. To ensure compensation at replacement cost, planned compensation rates may require updating in project areas where inflation is high or the period of time between calculation of compensation rates and delivery of compensation is extensive.

**“Resettlement Action Plan (RAP)”** is a resettlement instrument (document) to be prepared when subproject locations are identified. RAPs contain specific and legally binding requirements to be abided by to resettle and compensate the affected party before implementation of the project activities causing adverse impacts.

**“Resettlement Assistance”** means the measures to ensure that project affected persons who may require to be physically relocated are provided with assistance such as moving allowances, residential housing or rentals whichever is feasible and as required, for ease of resettlement during relocation.

**“Restrictions on land use”** refers to limitations or prohibitions on the use of agricultural, residential, commercial or other land that are directly introduced and put into effect as part of the project. These may include restrictions on access to legally designated parks and protected areas, restrictions on access to other common property resources, restrictions on land use within utility easements or safety zones.

**“Security of tenure”** means that resettled individuals or communities are resettled to a site that they can legally occupy, where they are protected from the risk of eviction and where the tenure rights provided to them are socially and culturally appropriate. In no event will resettled persons be provided tenure rights that are in effect weaker than the rights they had to the land or assets from which they have been displaced.

**“Voluntary Land Donation”** means communities or individuals may agree to voluntarily provide land for sub-projects for desired community benefits with “informed consent and power of choice”.

**Informed consent** means the people involved are fully knowledgeable about the project and its implications and consequences and freely agree to participate in the project. Power of choice refers to the people involved have option to agree or disagree, without adverse consequences imposed formally or informally by others.

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# Executive Summary

## Introduction

This Resettlement Policy Framework (RPF) is prepared in accordance with Government of Bangladesh's (GoB) legal policy and World Bank's (WB) Environmental and Social Framework, specifically ESS-5 "Land Acquisition, Restrictions on Land and Involuntary Resettlement" for the World Bank funded Bangladesh Environmental Sustainability and Transformation (BEST) Project, to be implemented by the Ministry of Environment Forestry and Climate Change (MOEFCC)/ Department of Environment (DOE) through its existing structures in close coordination with Bangladesh Bank (BB), Bangladesh Road Transport Authority (BRTA) and Bangladesh High Tech Park Authority (BHTPA). Since the details and locations of the subprojects at this point are not yet finalized, the project has developed this Resettlement Policy Framework (RPF). The purpose of this RPF is to clarify resettlement principles, organizational arrangements, and design criteria to be applied to subprojects and/or project components to be prepared during project implementation. The RPF address all types of acquisition, requisition, and impact on informal settlers to guide the Implementing Agency (IA) should there be decision later in the project to acquire private lands. Once the individual civil works locations are defined and the necessary information becomes available, this framework will be guide the preparation of more specific Resettlement Action Plan/s (RAP/s) proportionate to potential risks and impacts. No physical and/or economic displacement will occur until plans required by ESS5 have been finalized and approved by the World Bank.

## Project Components

The project will support five components:

### **Component 1: Environmental Governance and Infrastructure (US\$225 million)**

This component will support MoEFCC/DoE to lay concrete regulatory, institutional, financing and capacity foundations for the achievement of its long-term vision of helping the country 'live in harmony with nature and achieve net zero emissions by 2050'.

### **Component 2: Green Financing for Air Pollution Control (US\$185 million)**

To meet the raising demands for green financing, this component will support BB to pilot a green credit guarantee scheme (CCGS) to incentivize the financial sector to support green investments in targeted polluting sectors.

### **Component 3: Vehicle Emission Control (US\$35 million)**

This component will support (a) the development of five new VICs through PPP arrangements, (b) technical assistance to improve BRTA's capacity in vehicle inspection, and (c) project management at BRTA.

### **Component 4: E-waste Management Infrastructure (US\$55 million)**

Built on tightened regulatory and enforcement pressures to be created under Component 1, this component will support the development of an e-waste management infrastructure on a pilot basis through PPP arrangements to demonstrate technical, financial, and ES feasibility of e-waste management in line with the newly issued E-waste Management Rules.

### **Component 5: Contingent Emergency Response Component, CERC (US\$0 million)**

This component will provide an ex-ante mechanism for the GoB to gain rapid access to WB financing to respond to an eligible crisis or emergency that causes major adverse economic and/or social impacts.

## **Project Location**

The project activities will cover at different geographical areas of Bangladesh. For constructing of district environmental offices there are 30 districts proposed that do not have environmental offices. However exact location and design of these environmental offices are yet to be finalized. Same for Regional/Divisional laboratories, the specific sites and design are still to be decided. For constructing VICs, potential districts are preliminary proposed at Mymensingh, Noakhali, Faridpur, Comilla, and Rangamati and improving 4 existing ones at Dhaka, Chottogram, Khulna and Rahshahi). However, these sites may be changed because of accessibility and technical requirements. For e-waste management facility pilot project at Kaliakoir Hi-Tech Park, there are proposed alternate sites in Kaliakoir, the specific sites and the adopted technology will be fixed during implementation after engaging of private sector. Financing demands for a number of tunnel kilns, HHK (Hybrid Hoffman Kiln) kilns and AAC, municipal waste recycling and composting facilities, clean stove production facilities, and rooftop solar systems are being considered, the locations of which are yet to be finalized.

## **Legal and policy principles governing resettlement**

The Acquisition and Requisition of Immovable Property Act 2017 (ARIPA) is the principal legislation governing eminent domain for land acquisition and requisition in Bangladesh. ARIPA 2017, detailed the land acquisition process from section 4 to section 19 and land requisition process from section 20 to section 28. ARIPA 2017 under section 4 (13) permits the acquisition of the community properties if it is for a public purpose provided the project for which the land is acquired provides for similar types of assets in some other appropriate place or reconstruct the community properties.

Since October 2018, all World Bank funded Investment Project Financing (IPF) are required to follow the Environmental and Social Framework (ESF) consisting ten (10) Environment and Social Standards (ESS). Among the 10 standards, ESS5 on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons. The Implementing Agency (IA) has prepared this RPF following the guidelines suggested under ESS5 and the ARIPA 2017.

## **Entitlement and eligibility criteria**

The RPF stipulates eligibility and provisions for compensating all types of losses (land, crops/trees, structures, business/employment, and workdays/wages). All PAPs including non-titled or informal dwellers will be compensated for lost assets (crops, structures, trees and/or business losses) and will receive (i) compensation (as required, to match replacement value), and/or (ii) replacement land, structures, seedlings, other resettlement assistance such as shifting allowance, assistance with rebuilding structures, compensation for loss of workdays/income.

## **Consultation and participation**

Since, the Project is yet to determine the land plot for the civil works, public consultation will take place at a later date when the plots are decided. The consultations will be held to ensure People's participation, in particular from the people of the impacted area. Given the COVID-19 pandemic situation, managing public consultation and stakeholder engagement in the Project needs to adhere to national requirements and any updated guidance issued by WHO. The alternative ways

of managing consultations and stakeholder engagement will be in accordance with the local applicable laws and policies, especially those related to media and communication.

### Grievance Redress Mechanism

The DoE/BB/BRTA/BHTPA has established a procedure to deal with and resolve any queries as well as address complaints and grievances about any irregularities in the application of the guidelines adopted in this RPF for assessment and mitigation of social and environmental impacts through grievance redress mechanism (GRM). The GRM will deal with complaints and grievances related to both social/resettlement and environmental issues in this Project.

### Institutional and implementation arrangements

For efficient and smooth implementation of the project, suitable institutional arrangements are necessary to manage and implement the RPF and the subsequent RAPs. Project Institutional arrangement consist of Project Steering Committee (PSC), Project Communication and Monitoring Unit (PCMU) and the Project Implementation Units (PIUs). Institutional arrangements required for implementation of Resettlement Plans includes capacity augmentation of DoE/BB/BRTA/BHTPA, Deputy Commissioners offices, appointment of consulting firm, formation of various committees like: GRC, PAVC, PRAC, etc.

### Tentative Budget

A tentative budget is proposed below, which may be changed/updated once the RAPs are prepared. This budget does not include the cost of land acquisition and resettlement. The budget will be reflected in the Client’s Development Project proforma (DPP)

Items	Man-month	Cost (in USD)				
		DoE	BB	BRTA	BHTPA	Total
Senior Social Development with resettlement experience	24					From project fund
Consulting firm for RAP preparation	Lump-sum	50,000				50,000
RAP Implementing Agency (consulting firm)	Lump-sum	50,000				50,000
M&E	Lump-sum	15,000				15,000
Grievance handling cost	Lump-sum					10,000
<b>Total (USD)</b>						125,000
<b>Total (million BDT (1 USD=84BDT))</b>						10.62

### Monitoring

The IA i.e. DoE/BB/BRTA/BHTPA will be responsible for the overall coordination and supervision of the land issues and for reporting the results and the process followed for implementation of project activities to the World Bank. The IA i.e. DoE/BB/BRTA/BHTPA will also appoint a Monitoring and Evaluation (M&E) Consultancy Firm who will provide support in monitoring project progress and associated impacts in the project areas. In addition to that, the implementation of the social and environmental management plans, including RPF and RAPs will also be supervised by the firm. In the time of reporting, the M&E firm will report to the PD of the DoE/BB/BRTA/BHTPA. PIUs. M&E

Firm will be responsible for: (i) collecting updated data from the relevant agencies, institutions, and units of the project to produce RPF/RAPs implementation progress reports; (ii) conducting physical inspections for RAP implementation; (iii) support M&E at the subproject level.

## Chapter 1: Introduction and Project Description

### 1.1 Background

This Resettlement Policy Framework (RPF) is prepared in accordance with Government of Bangladesh's (GoB) legal policy (ARIPA 2017) and World Bank's (WB) Environmental and Social Framework, specifically ESS-5 "Land Acquisition, Restrictions on Land and Involuntary Resettlement" for the World Bank funded Bangladesh Environmental Sustainability and Transformation Project, to be implemented by the Ministry of Environment Forestry and Climate Change (MOEFCC)/ Department of Environment (DOE) through its existing structures in close coordination with Bangladesh Bank (BB), Bangladesh Road Transport Authority (BRTA) and Bangladesh High Tech Park Authority (BHTPA).

However, BEST project and its sub-projects' location and design are not known as yet (though Districts of interventions have been selected) therefore, depth and breadth of risks and impacts are not known. Though broad District locations have been specified for project activities, specific locations and design, of BEST sub-projects are yet to be selected. For example, for Component 1—office buildings and laboratory site locations are yet to be identified, though broad-based districts are somewhat known. There are 30 Districts where DoE's offices are not there and therefore are potential candidates for setting up the offices where number of environmental offices to be constructed sites and design of which will be done after appraisal. For Component 2—borrowers/operators, design and sites for brick kilns, municipal waste recycling etc. will likely be selected after appraisal. Similarly, for Component 3—location of VICs final sites will be selected after meeting some mandatory criteria like access and exit roads are yet to be finalized. For Component 4—there are several candidates sites for e-waste recycle plant at Kaliakor high tech park, final site and adopted technology will be selected and operated by engaging private sectors operator under PPP arrangement and are yet to be selected.

Since the details and locations of the subprojects at this point are not yet finalized, the project has developed this Resettlement Policy Framework (RPF). The purpose of this RPF is to clarify resettlement principles, organizational arrangements, and design criteria to be applied to subprojects and/or project components to be prepared during project implementation. There may cases of temporary requisition and presence of informal settlers in public land. The RPF address all types of acquisition, requisition and affect on informal settlers to guide the Implementing Agency (IA) should there be decision later in the project to acquire private lands.

Once the individual sub-project locations are defined and the necessary information becomes available, this framework will guide the preparation of specific Resettlement Action Plans (RAP/s) proportionate to potential risks and impacts. No physical and/or economic displacement will occur until plans required by ESS5 have been finalized and approved by the World Bank.

The RPF provides policies and procedures to determine requirements of the World Bank's ESS 5 on Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement, to assess potential risks and impacts, to identify detailed steps to develop appropriate mitigation measures, including mitigation and compensation for the impact caused under the project. Specifically, the RPF covers the following:

- Reviews the existing national legal and regulatory framework of Bangladesh and compares it with World Bank's ESS 5 on Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement for identifying gaps and providing gap filling measures.
- Describes and defines the process for preparing RAPs, cut-off dates for title and non-title holders, valuation process of impacted assets/ properties etc.
- Provides the principles and methods to be used in valuation of losses, and a description of eligibility and entitlements.
- Identifies the consultation mechanism and approaches to be adopted while preparing and implementing RAPs including public disclosure.
- Describes and defines monitoring and evaluation arrangement and roles and responsibilities of different stakeholders.
- Outlines the legal framework, eligibility criteria of displaced population, valuation methodology, compensation provision, and entitlement matrix and implementation process.
- Outlines implementation arrangement including schedule and grievance redress mechanism
- Outlines principles and objectives governing resettlement preparation and implementation
- Capacity development of the related stakeholders including MOEFCC (DoE), BB, BRTA and BHTPA, other related government agencies and local industries to identify the impacts and manage the related risks in accordance with ESS 5.

## 1.2 Project Components and Subcomponents

The Project Development Objectives (PDO) are to strengthen the capacity of the GoB in environmental management and to reduce pollution discharges and emissions from targeted sources. The indicators proposed to measure the achievement of the project's PDOs are: a) Completion of ECA amendment, b) Completion of DoE restructuring, c) Improved daily disclosure of ambient air quality information, d) Reduction in PM<sub>2.5</sub> emissions from targeted sources and e) Reduction in GHG emission from targeted sources.

Project design has prioritized investment needs for environmental management and pollution management based on time and resource available to the project and readiness of specific investment activities. The project will support five components:

### **Component 1: Environmental Governance and Infrastructure (US\$225 million)**

This component will support MoEFCC/DoE to lay concrete regulatory, institutional, financing and capacity foundations for the achievement of its long-term vision of helping the country 'live in harmony with nature and achieve net zero emissions by 2050'. Specifically, this component will support (a) regulatory and policy reforms to reposition the regulatory mandate of DoE from action-oriented pollution control to goal-oriented protection and improvement of environmental quality and promotion of green growth; (b) institutional reforms to shift DoE's organizational structure towards specialization and decentralization with improved human and financial resources, essential environmental infrastructure, and capable financing and technical institutions; (c) capacity building to support MoEFCC/ DoE and its key stakeholders develop adequate technical capacity in environmental management and green growth; and (d) project management of MoEFCC/ DoE activities. As women are most affected by climate change and environmental pollution, they will be engaged as critical stakeholders in the implementation of this component and will be offered equal opportunities in the DoE recruitments and capacity-building activities.

## **Component 2: Green Financing for Air Pollution Control (US\$185 million)**

To meet the raising demands for green financing, this component will support BB to pilot a green credit guarantee scheme (GCGS) to incentivize the financial sector to support green investments in targeted polluting sectors. This scheme will provide partial credit guarantee to cover a share of the default risk that Private Finance Initiatives (PFIs) may face in extending loans to green investments, along with technical assistance to improve the understanding of PFIs and targeted sectors on green technologies and matching grant support to incentivize the targeted sectors to make green investments. Recognizing high health costs of air pollution and high contributions of particulate matters from the brick kiln sector, conventional cook stoves, waste management and thermoelectric generation, this pilot GCGS will first focus on investments to reduce air pollution control from these targeted sectors. In addition, the GCGS will explore effective ways to incentivize private sector investments in (a) municipal waste recycling and composting investments to reduce GHG and particulate emission from waste management practices (b) clean stove production to help reduce indoor air pollution, and (c) rooftop solar systems to reduce demands for thermoelectricity and thus avoid GHG and particulate emission from associated thermoelectric generation processes.

## **Component 3: Vehicle Emission Control (US\$35 million)**

This component will support (a) the development of new VICs through PPP arrangements, (b) technical assistance to improve BRTA's capacity in vehicle inspection, and (c) project management at BRTA. Implementation of this component will be closely coordinated with the WB's Road Safety Program, under which four of BRTA's existing but non-functional VICs will be rehabilitated. With regulatory reforms supported under Component 1.1, it is expected that BRTA will work with DoE to develop a national vehicle inspection system to control not only vehicle emission from the country's existing fleet but also emission from imported vehicles (new or used) and new vehicles produced in the country. These actions will help Bangladesh gradually remove noncompliance vehicles from its road and thus reduce both GHG and air pollution from its vehicles.

## **Component 4: E-waste Management Infrastructure (US\$55 million)**

Built on tightened regulatory and enforcement pressures to be created under Component 1, this component will support (a) the development of an e-waste management infrastructure on a pilot basis through PPP arrangements to demonstrate technical, financial, and ES feasibility of e-waste management in line with the newly issued E-waste Management Rules; (b) technical assistance to support proper operations of the pilot new infrastructure and implement other relevant provisions of the new e-waste management rules; and (c) project management at the BHTPA. It is expected that successful piloting of this facility and this modality (including EPR schemes, formalization of value chain, and PPP for waste infrastructure development) will facilitate MoEFCC/DoE to develop an Integrated Waste Management (IWM) strategy and associated investment programs under Component 1.

## **Component 5: Contingent Emergency Response Component, CERC (US\$0 million)**

This component will provide an ex-ante mechanism for the GoB to gain rapid access to WB financing to respond to an eligible crisis or emergency that causes major adverse economic and/or social impacts.

The project components and sub-components as summarized at **Error! Reference source not found.** to understand the potential impacts recognized under ESS5 of the World Bank.



Table 1 Key Activities of Components/Subcomponents

Component	Sub-Component	Activities/ Investments	Location	Design	Potential Impacts	Implication for the Project
Component 1: Environmental Governance and Infrastructure	1.1 Regulatory Reforms	ECA amendment, develop a new Climate Change Act, and amend existing, and develop new, ECA related rules, environmental discharge standards and technical guidelines. Develop additional policies and strategies during project implementation	No physical activities under component 1.1.	No physical activities under component 1.1.	No physical activities under component 1.1. This component will positively contribute to regulatory reforms by new regulations, policies, standards, guideline and strategies that can result in improved ES conditions.	Currently this Component does not foresee any implication for ESS5
	1.2 Institutional Reforms	Creation of 30 district DoE offices. Filling the existing vacancies of DoE staff Establishment of an Environmental research and technology institute and an environmental fund Development of legal, financial and organizational structure of the fund and operating procedure and policy based on domestic best practices. Among others, it is expected that the fund will have three special windows: (a) technology promotion to support the pilot and scaling up of green technologies; (b) waste management to support local governments to invest in integrated waste management infrastructure;	No physical activities under component 1.2.	No physical activities under component 1.2.	No physical activities under component 1.2. This component will cover institutional reforms of DoE organization structure and increase in DoE staff number.  Potential risks of discrimination to disadvantaged and vulnerable communities, groups and individuals including women will be addressed by providing equal career opportunities in DoE's recruitment process;  The environmental research and technology institute will assist the DoE in policy research, identification, and promotion of green	Currently this Component does not foresee any implication for ESS5

Component	Sub-Component	Activities/ Investments	Location	Design	Potential Impacts	Implication for the Project
					<p>technologies and technical training within and beyond the DoE;</p> <p>The Environment Fund will help DoE mobilize sustainable financing to strengthen its ability of working with different stakeholders on concrete environmental conservation actions such as policy studies, Research and Development (R&amp;D) and technology pilots, and citizen engagements during and beyond project implementation.</p>	
	1.3Capacity Building and Environmental Infrastructure	<p>Improve technical capacity of DoE's existing, new and future staff Environmental monitoring capacity enhancement of DoE. DoE will construct 15 office buildings and 3 divisional laboratories. Development of CWQMSs and Development of an Environmental Information System Upgradation of IT infrastructure of DoE's Provide Training to different Stakeholder Group, including: Training program of on-the-job and off-site training programs on various technical issues; Certification program</p>	<p>Office Buildings: Will be set up in some of the 30 Districts, the selection of which will be made after appraisal; Laboratories: Will be set up in 6 Divisions, the location of which will be confirmed after appraisal;</p>	Will not be done before appraisal	<p>Component 1.3 will have potential ES impacts because of construction activities, impacts include, among others, noise, vibration and Air pollution; Water pollution &amp; drainage congestion; Land filling and soil contamination; Solid waste generation;</p>	<p>The component will acquire private land for some of its planned District offices. Besides, informal settlers may be present in the project areas who may need to be resettled. Their presence will be confirmed through screening. This RPF is developed to guide development of site-specific RAPs/A-RAPs</p>

Component	Sub-Component	Activities/ Investments	Location	Design	Potential Impacts	Implication for the Project
		<p>to support the certification of all DOE laboratories through the development and adoption of standard operation procedures and participation in external quality assurance schemes; Development of an expert pool with identified domestic and international experts;</p> <p>Targeted training for judges, magistrates, law enforcement and targeted industries on environmental regulations;</p> <p>development a general environmental curricula of the country's education system and the curricula of environmental majors at colleges;</p> <p>Public engagements through online and in-person consultations and awareness raising campaigns; and</p> <p>Technical training on AQM, WQM, inventory development, source apportionment/contribution analysis, and air and water modelling and forecasting.</p>			<p>traffic / mobility / access;</p> <p>impacts to physical cultural resources; Impact on disposing accidental chemical waste from laboratories;</p> <p>Labor related risk (Occupational and Community health and safety);</p> <p>Presence of ethnic communities and associated risks and impacts on them; and issues related to the COVID-19 pandemic;</p> <p>Positive impacts are:</p> <p>However, this component will expand DoE's institutional capacity and enforcement of environmental regulations all over the country;</p> <p>Proposed new monitoring stations will provide very useful information (including data from new monitoring vehicles and vessels) that will help strengthen enforcement and compliance;</p>	<p>to address the issue mentioned.</p>

Component	Sub-Component	Activities/ Investments	Location	Design	Potential Impacts	Implication for the Project
	1.4 Project Management of MoEFCC/DoE Activities	Set up a Project Monitoring and Coordination Unit (PCMU) at MoEFCC and PIU at DoE Support PSC to supervise and facilitate project implementation. Perform reform actions by PBC	No physical activities under component 1.4.	No physical activities under component 1.4.	No environmental or social impacts are envisaged  Adequate ES staff and resources will be a part of the PCMU and PIUs to implement the ESMF	Currently this Component does not foresee any implication for ESS5
Component 2: Green Financing for Air Pollution Control	2.1. Green Credit Guarantee Scheme	Develop a GCGS to finance in the four targeted sectors: brick manufacturing, municipal waste recycling and composting, cookstove, and rooftop solar systems;  Manage the implementation of this GCGS;  Provide grants in order to ensure the achievement of the objective of BEST project; and  Support BB's costs to manage the operation of the proposed GCGS.	Brick Kilns: These will be built on existing land of old brickfields. Location and borrowers are yet to be known;  Municipal Waste Recycling: Location and likely operators are yet to be selected;  Clean Stove Production: Production location not yet determined;  Rooftop Solar: Not defined yet;	Will not be done before appraisal	Component 2.1 will have potential ES impacts because of construction activities, impacts include, among others,  Noise, vibration and Air pollution;  Land filling and soil contamination;  Solid waste generation;  Labor associated risk (Community health and safety; presence of ethnic community, community health and safety and issues related to the COVID-19 pandemic);  However, Brick Sector Transformation will have	The component is not likely to require the acquisition of any private land and all construction activities will be on the existing land. However, informal settlers may be present in the project areas who may need to be resettled. Their presence will be confirmed through screening. The RPF will guide development of site-specific RAPs/A-RAPs to address the issue mentioned.

Component	Sub-Component	Activities/ Investments	Location	Design	Potential Impacts	Implication for the Project
					beneficial impacts during its operation: <ul style="list-style-type: none"> <li>• Drastic reduction in direct PM and GHG emission (i.e., by about 80%)</li> <li>• Elimination of topsoil use</li> <li>• Minimization of land footprint for the production facilities for same production due to round the year production;</li> <li>• Improvement in job quality and reduced exposure to air pollution;</li> <li>• Use of waste material such as coal ash as filler; and</li> <li>• No hazardous materials involved.</li> </ul>	
	2.2. Technical Assistance	Provide much needed technical assistances to BB, PFIs, and targeted beneficiaries on green technologies promoted by the project; and  Support targeted awareness raising events to reduce the demand for bricks produced from traditional technologies and increase the demand for bricks produced from new production technologies.	No physical activities under component 2.2.	No physical activities under component 2.2.	No physical activities under component 2.2. This component will positively contribute to systemic management of emission control by introducing non fire brick kiln other green investments that can result in improved ES conditions.	Currently this Component does not foresee any implication for ESS5

Component	Sub-Component	Activities/ Investments	Location	Design	Potential Impacts	Implication for the Project
	2.3. Project Management	Support BB's cost to manage the operation of the proposed GCGS support BB to set up its PIU	No physical activities under component 2.3.	No physical activities under component 2.3.	No environmental or social impacts are envisaged  Adequate ES staff and resources will be a part of the PCMU and PIUs to implement the ESMF	Currently this Component does not foresee any implication for ESS5
Component 3: Vehicle Emission Control	3.1. Vehicle Inspection	Support BRTA to pilot the development of five new VICs through a PPP arrangement; and  Perform mandatory safety and emission inspections of in-use vehicles.	Vehicle Inspection Centers: Location needs set criteria including entrance and exit for vehicles. A number of candidates sites have been proposed but exact criteria yet to be met. Will be done after appraisal;	Will not be done before appraisal	Component 3.1 will have potential ES impacts because of construction activities, impacts includes, among others,  <ul style="list-style-type: none"> <li>Noise, vibration and Air pollution;</li> <li>Land filling and soil contamination;</li> <li>Solid waste generation;</li> <li>Labor associated risk (Occupational and Community health and safety and issues related to the COVID-19 pandemic)</li> <li>Presence of ethnic communities and impact on them</li> </ul> However, VICs will have beneficial impacts during its operation:  <ul style="list-style-type: none"> <li>Reduction of vehicular emission through enforcement of emission</li> </ul>	The component may not require any private land and all construction activities will be on the BRTA existing land. However, informal settlers may be present in the project area who may need to resettle. Their presence will be confirmed through screening. The RPF will guide development of site-specific RAPs/A-RAPs to address the issue mentioned.

Component	Sub-Component	Activities/ Investments	Location	Design	Potential Impacts	Implication for the Project
					standards <ul style="list-style-type: none"> <li>• Increased safety and accident reduction though fitness examination</li> <li>• Improvement of vehicular maintenance and reduction in fuel consumption</li> <li>• No hazardous materials involved</li> </ul>	
	3.2. Technical Assistance	Develop its capacity to manage vehicle inspection for both safety and emission control;  Explore different modalities to support the development and operations of such centers;  Develop a strategy and implementation plan to establish a national vehicle inspection system; and  Support BRTA to develop/revise its road-side vehicle inspection guidelines and carry out effective cooperation with DoE to improve enforcement of vehicle inspections.	No physical activities under component 3.2.	No physical activities under component 3.2.	No physical activities under component 3.2. This component will positively contribute to systemic management of emission control that can result in improved ES conditions.	Currently this Component does not foresee any implication for ESS5
	3.3. Project Management at BRTA	Support BRTA to set up its project management unit (PIU) to manage Component 3 of the project;	No physical activities under component 3.3.	No physical activities under component 3.3.	No environmental or social impacts are envisaged  Adequate ES staff and resources will be a part of	Currently this Component does not foresee any implication for ESS5

Component	Sub-Component	Activities/ Investments	Location	Design	Potential Impacts	Implication for the Project
		Support the PIU to review specific technical issues identified during project implementation;  support incremental operating costs incurred by the PIU.			the PCMU and PIUs to implement the ESMF	
Component 4: E-waste Management Infrastructure	4.1. Pilot E-waste Management Infrastructure	Support BHTPA to develop new e-waste management infrastructure including an e-waste processing facility and a proper disposal site within the Kaliakoir HTP through PPP arrangements,	E-Waste Management Facility: Location will be at Kaliakoir HTP. A number of potential sites have been earmarked but not selected yet. Will be done after appraisal. Also, private sector selection will be done during implementation;	Will not be done before appraisal	Component 4.1 will have potential ES impacts because of construction activities impacts include, among others,  Noise, vibration and Air pollution;  Land filling and soil contamination;  Solid Waste generation;  Labor associated risk (Occupational health and safety; SEA/SH and issues related to the COVID-19 pandemic);  The environmental benefits of establishing a new pilot e-waste management infrastructure are:  • Haphazard disposal of e-waste materials will be reduced with associated health risks reduction	The component may not require any private land and all construction activities will be on the BHTPA existing land. However, informal settlers may be present in the project area who may need to resettle. Their presence will be confirmed through screening. The RPF will guide development of site-specific RAPs/A-RAPs to address the issue mentioned.

Component	Sub-Component	Activities/ Investments	Location	Design	Potential Impacts	Implication for the Project
					<ul style="list-style-type: none"> <li>• Through recovery and recycling of electronic components and valued materials (e.g., Gold) economic benefits will be derived</li> <li>• The terms and condition of the PPP shall clearly mention requirement of appropriate due diligences of environmental of the recycling facility will introduce technically sound management where Good International Industry Practice (GIIP) is followed for waste management as well.</li> </ul>	
	4.2. Technical Assistance	<p>Develop a pilot e-waste collection program for national government agencies and public institutions;</p> <p>Pilot eco-design (as a part of EPR) scheme for high-tech firms operating in hi-tech parks managed by BHTPA, and</p> <p>pilot monitoring program of the operation of the pilot e-waste management infrastructure; and</p> <p>Support development of e-waste database to be managed by DoE.</p>	No physical activities under component 4.2.	No physical activities under component 4.2.	No physical activities under component 4.2. This component will positively contribute to systemic management of e-waste that can result in improved ES conditions.	Currently this Component does not foresee any implication for ESS5

Component	Sub-Component	Activities/ Investments	Location	Design	Potential Impacts	Implication for the Project
	4.3. Project Management	Support BHTPA to set up its PIU	No physical activities under component 4.3.	No physical activities under component 4.3.	No environmental or social impacts are envisaged  Adequate ES staff and resources will be a part of the PCMU and PIUs to implement the ESMF	Currently this Component does not foresee any implication for ESS5
Component 5: CERC Contingency Emergency Response Component	Not defined, Zero allocation	Will provide an ex-ante mechanism for the Government of Bangladesh to gain rapid access to Bank financing to respond to an eligible crisis or emergency that causes major adverse economic and/or social impacts.	Not defined, Zero allocation	Not defined, Zero allocation	If CERC triggered, potential impacts should be measured through preparing separate ESMF.	Currently this Component does not foresee any implication for ESS5

### 1.3 Project Location

The project activities will cover at different geographical area of Bangladesh. For constructing of district environmental offices there are 30 districts proposed that do not have environmental offices (at Barguna, Barisal, Jhalokati, Pirojpur, Khagrachhari, Lakshmipur, Rangamati, Madaripur, Rajbari, Shariatpur, Chuadanga, Jhenaidah, Khulna, Magura, Meherpur, Narail, Jamalpur, Mymensingh, Bogra, Joypurhat, Natore, Chapainawabganj, Sirajganj, Gaibandha, Kurigram, Lalmonirhat, Nilphamari, Panchagarh, Thakurgaon, Sunamganj and Sylhet Districts). However exact location and design are yet to be finalized. Same for 6 Regional/Divisional laboratories (at Khulna, Barisal, Mymensingh, Rajshahi, Sylhet and Rangpur Divisions), the specific sites and design are still to be decided. For constructing 5 VICs, 5 potential districts are preliminary proposed at Mymensingh, Noakhali, Faridpur, Comilla, and Rangamati and improving 4 existing ones at Dhaka, Chottogram, Khulna and Rajshahi). However, these sites may be changed because of accessibility and technical requirement. For e-waste management facility pilot project at Kaliakoir Hi-Tech Park, there are proposed some alternate sites in Kaliakoir, the specific sites and the adopted technology will be fixed during implementation after engaging of private sector. Financing demands for a number of tunnel kilns, HHK (Hybrid Hoffman Kiln) kilns and AAC, municipal waste recycling and composting facilities, clean stove production facilities, and rooftop solar systems are being considered, the locations of which are yet to be finalized.

Tentative locations of each component of the proposed BEST Project are provided in **Figure 1**. This might be changed during implementation based on the site-specific technical requirements.

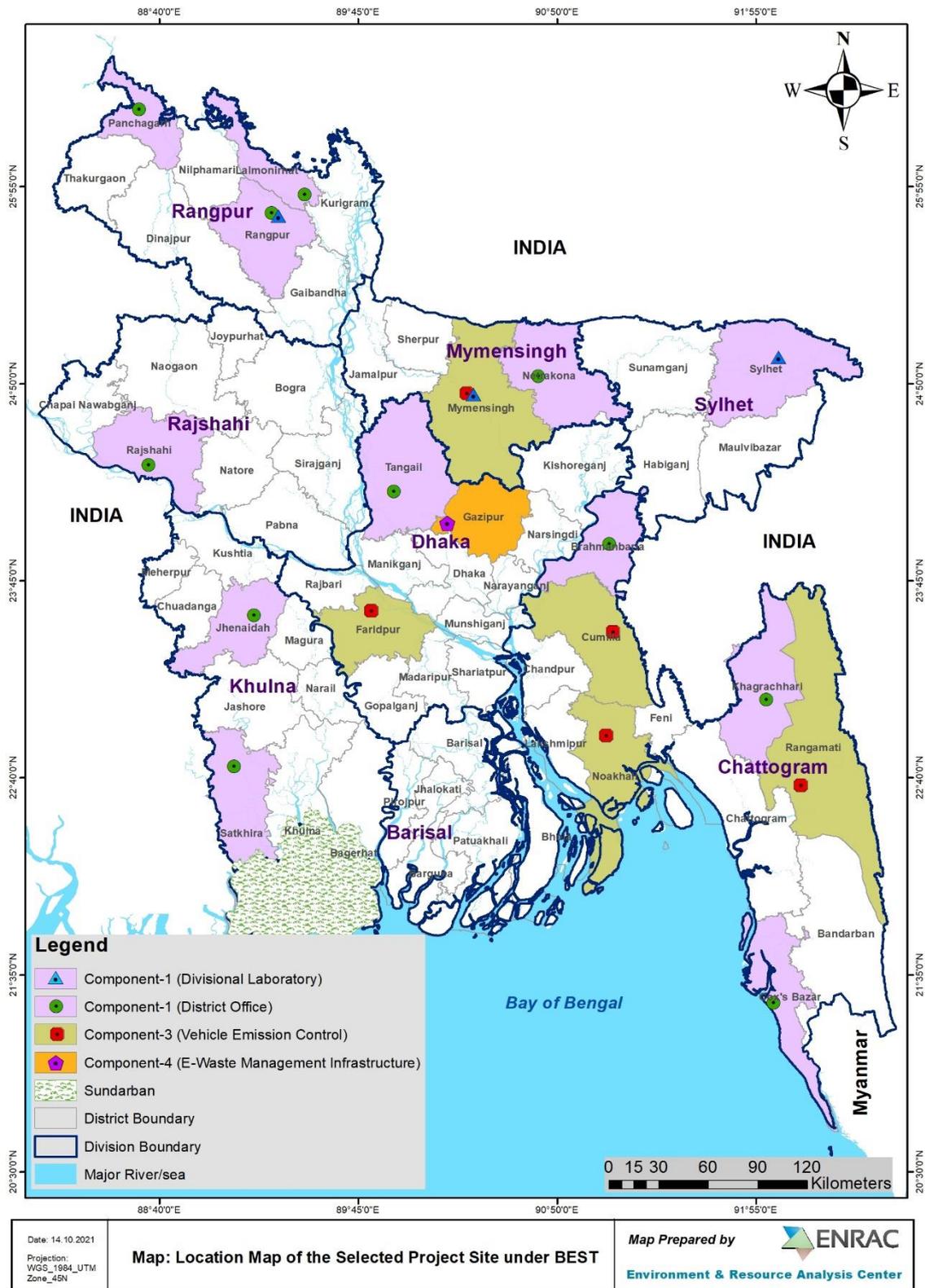


Figure 1: Location Map of the Candidate Project Sites under BEST<sup>1</sup>

<sup>1</sup> Locations shown in the map at the potential districts are tentative, these might be changed during implementation based on the site-specific technical requirements.

## 1.4 Principles for the RAPs Preparation

The following principles will be followed governing RAPs preparation and implementation.

- Acquisition of land and other assets, and resettlement of people will be avoided or minimized as much as possible by identifying possible alternative project designs and appropriate social, economic, operation and engineering solutions that have the least impact on populations in the project area.
- Forced eviction will be avoided.
- Affected households will be eligible for compensation and rehabilitation assistance, irrespective of tenure status, social or economic standing and any such factors that discriminate against achievement of the resettlement objectives. Lack of legal rights to lost assets or tenure status and social or economic status will not bar the affected households from entitlements to compensation and assistance.
- No site clearing will be done in anticipation or before being considered for inclusion in the project site.
- Affected households residing, working, doing business and/or cultivating land within the impact area during the conduct of the census and in the detailed measurement survey (DMS), are entitled to be compensated for their lost assets, incomes and businesses at replacement cost, and will be provided with assistance to improve or at least maintain their pre-project living standards, income-earning capacity and production levels.
- Affected households will be fully consulted and given the opportunity to participate in matters that will affect their lives during the design, implementation and operation. Moreover, plans for the acquisition and use of assets will be carried out in consultation with the affected households who will receive prior information of the compensation and other assistance available to them.
- Any acquisition of, or restriction on access to, resources owned or managed by the affected households as a common property such as pasture area will be mitigated by arrangements that will ensure they have access to equivalent resources.
- There will be no deductions in compensation payments for structures or other affected assets for salvage value, depreciation, taxes, stamp duties, fees, or other payments.
- There will be effective mechanisms for hearing and resolving grievances during the planning and implementation of the component subprojects.
- If ownership over any affected asset is under dispute, the case will be handled in accordance with the grievance redress mechanism agreed with the Executing Agency (EA).
- Temporarily affected land and structures will be restored to pre-project conditions following the requisition procedures.
- Existing social, cultural, and religious practices will be respected.
- Special measures will be incorporated in the RAPs to complement mitigation and enhancement activities to protect socially and economically vulnerable groups at high risk of impoverishment. Appropriate assistance will be provided to help them improve their socioeconomic status.
- Particular attention will be paid to the needs of vulnerable and disadvantaged groups as those individuals or groups who, by virtue of, their age, gender, ethnicity, religion, physical, mental or other disability, social, civic or health status, sexual orientation, gender identity, economic disadvantages or indigenous status, and/or dependence on unique natural

resources, may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits and ensure their participation in consultations.

- Adequate resources will be identified and committed during the preparation of the RAPs. This includes adequate budgetary support fully committed and made available to cover the costs of compensation, resettlement and rehabilitation within the agreed implementation period for the project; and, adequate human resources for supervision, liaison and monitoring of land acquisition, resettlement and rehabilitation activities.
- Appropriate reporting, monitoring and evaluation mechanisms will be identified and set in place as part of the resettlement management system.
- The RAPs or its summary will be translated into local language (Bangla) and placed in district and sub-district offices for the reference of affected households and other interested groups.
- Civil works contractors will not be issued a notice of possession for any given geographic location in accordance with the approved RAPs until (a) compensation payment at replacement cost have been satisfactorily completed for that area; (b) agreed rehabilitation program by the Implementing Agency (IA) and affected persons is in place; and (c) the area is free from all encumbrances. The RAPs implementation consultant will submit the report with written consent of the affected individual/HH. This will be verified by the PIUs and certified by the PCMU.
- Cash compensation for affected households losing commercial structures will be made available well ahead of civil works to allow the affected households sufficient lead time for reconstruction and to re-establish the business. No demolition of assets and/or entry to properties will be done until the affected household is fully compensated and relocated.

## Chapter 2: RAPs Preparation, Approval and Disclosure Process

### 2.1 Resettlement Planning Process

Screening is required for components and subcomponents with physical works/interventions. The social screening will occur during the project preparation stage as soon as fairly accurate site location(s) is (are) known for the sub-project.

The social screening will be used to assess potential project impacts. The screening will provide preliminary information regarding the nature, extent, and timing of the social issues to be addressed in the subsequent phases, as well as identify issues that can be verified on the ground. It will also help to identify opportunities for avoidance or minimization early in the project cycle so that the design process can be informed appropriately. The screening will help determine what assessments need to be conducted and how much time is needed for regulatory clearances (if any). If further assessments and plans (such as RAPs, ARAPs, etc.) are deemed necessary, these plans will be prepared according to the guidelines provided in this RPF. Following resettlement planning procedures will be followed Table 2.

*Table 2 Screening Procedures, Responsibility and Timing*

Screening and Preparation Step	Responsibility	Timing
<b>Identification of project activities/locations</b>	Project Implementation Unit (PIU) together with Social Specialist	After identification of potential location(s) in consultations with the local people.
<b>Social screening of project activities</b>	PIU (and consultants: Social Specialist) to conduct social screening based on site visits and initial consultations with potential project affected people and local government as well as other agencies working in/near the proposed location(s).  PIU to prepare screening report.  World Bank ES team will review the screening summary reports and suggest, especially for the intervention which requires further Assessment/plan.	Within 2 weeks of identifying potential locations(s).
Preparation of specific plans and instruments (RAPs, ARAPs) for the intervention where further detailed social studies is required	Based on the survey outcomes and qualitative data from the consultation and following the guideline of RPF, RAPs will be prepared. DoE/BB/BRTA/BHTPA will also prepare land acquisition plan with the support of implementing firms and submit to DC office.	RAPs will be prepared and approved before land acquisition starts to ensure all land acquisition and involuntary resettlement practices are in line with RAPs and ESS5
Implementation of mitigation measures and plans	Once the RAPs are approved by ministry and World Bank, PIU will implement the same with the support of Consulting firm and DC office. World Bank E&S team will review the status of implementation through supervision.	Approximately in one year or as recommended in RAPs.

## 2.2 Detailed Assessment and Survey

PIU/ DoE/BB/BRTA/BHTPA will conduct socioeconomic survey(s), with appropriate socioeconomic baseline data to identify all persons who will be affected by the project and to assess the project's socioeconomic impacts on them. Once the detailed design is finalized, the required social surveys will be conducted, if necessary, with the support of a consultancy firm or NGO. Based on this survey outcomes, a social impact assessment will be done which will include potential social impacts, income and livelihood of displaced persons and gender-disaggregated information pertaining to the economic and socio-cultural conditions of displaced persons. The project's potential social impacts and risks will be assessed against the requirements presented in this RPF and applicable laws and regulations of the jurisdictions in which the project operates that pertain to involuntary resettlement matters.

The census will cover 100% of affected persons. The purpose of the census is to: (i) register who the potentially affected persons are; (ii) assess their income and livelihoods; and (iii) inventory of their assets affected due to the project; (iv) gender-disaggregated and where relevant ethnicity-disaggregated in case of presence of small ethnic communities, information pertaining to the economic and socio-cultural conditions of displaced persons. Before census survey, consultation must be conducted with all affected households. The purpose of the baseline socioeconomic sample survey of affected persons is to establish monitoring and evaluation parameters. It will be used as a benchmark for monitoring the socioeconomic status of affected persons. The survey will cover at least 30% of affected persons and 20% of significantly affected persons and rest 50% may cover samples from the project impact zone. The survey will also collect gender-disaggregated data to address gender issues in resettlement. The survey will carry out the following: (i) preparation of accurate maps of the subproject area; and (ii) analysis of social structures and income resources of the population.

As part of the social impact assessment, the project will identify individuals and groups who may be differentially or disproportionately affected by the project because of their disadvantaged or vulnerable status. Where such individuals and groups are identified, PIU will propose and implement targeted measures, so that adverse impacts do not fall disproportionately on them and they are not disadvantaged in relation to sharing the benefits and opportunities resulting from development.

### **The census and socio-economic survey will identify**

- The scope and scale of land acquisition and impacts on structures and other fixed assets;
- Any project imposed restrictions on use of, or access to, land or natural resources;
- Identifying public or community infrastructure, property or services that may be affected;
- Characteristics of displaced HHs, baseline information's on livelihood and standards of living;
- land tenure and transfer systems, including an inventory of common property natural resources from which people derive their livelihoods and sustenance, non- title-based usufruct systems (including fishing, grazing, or use of forest areas) governed by local recognized land allocation mechanisms, and any issues raised by different tenure systems in the project area;
- the patterns of social interaction in the affected communities, including social networks and social support systems, and how they will be affected by the project; and
- Social and cultural characteristics of displaced communities, including a description of formal and informal institutions that may be relevant to the consultation strategy and to designing and implementing the resettlement activities.

### 2.3 Preparation of RAPs

The RAPs will be based on the social impact assessment and meaningful consultation with the affected persons. It will include the results and findings of the census of affected persons, and their entitlements to restore losses, institutional mechanisms and schedules, budgets, assessment of feasible income restoration mechanisms, grievance redress mechanisms, and results monitoring mechanisms. RAPs will comply with the principles outlined in this agreed RPF. Disbursement of compensation payments and entitlements will be made prior to displacement.

RAPs will include measures to ensure that the displaced persons are (i) informed about their options and entitlements pertaining to compensation, relocation, and rehabilitation; (ii) consulted on resettlement options and choices; and (iii) provided with resettlement alternatives. During the identification of the impacts of resettlement and resettlement planning, and implementation, the EA will pay adequate attention to gender concerns, including specific measures addressing the need of female headed households, gender-inclusive consultation, information disclosure, and grievance mechanisms, to ensure that both men and women receive adequate and appropriate compensation for their lost property and resettlement assistance, if required, as well as assistance to restore and improve their incomes and living standards. The resettlement plan will specify the income and livelihoods restoration strategy, the institutional arrangements, the monitoring and reporting framework, the budget, and the time-bound implementation schedule. **Guideline to prepare a RAP is in Annex 2.**

It is expected that the number of affected people under any single subproject will be less than 200 people and the land parcel required for each office will be less than 0.4 acre. In such cases, an abbreviated RAPs (A-RAPs) can be prepared. If the number of affected people exceeds 200, full RAPs will be developed.

The abbreviated RAPs will include several standard sections, such as: description of project impact and valuation of affected assets, description of affected people and of their basic socioeconomic and demographic characteristics, institutional arrangement and implementation procedures, compensation and assistance to be provided to affected people; results of consultations, monitoring and evaluation procedures, timeline and budget, at minimum. The data on the project-affected households are considered as an important component of the RAPs; however, due to respect for privacy, the information relating to particular individuals and households shall not be subject to public disclosure. Data collected at the beginning of the RAPs process can then be used as a baseline to ensure affected persons and households are able to maintain, or preferably improve, their standard of living to pre-project levels.

Where full RAPs need to be developed, it should include the following at minimum: (i) baseline census and socioeconomic survey information; (ii) specific compensation rates and standards; (iii) policy entitlements related to any additional impacts which are not identified in this RPF but which are identified through the census or survey during implementation; (iv) programs for improvement or restoration of livelihoods and standards of living; (v) implementation schedule for resettlement activities; (vi) and detailed cost estimate.

### 2.4 Disclosure and Approval

The following steps should be followed after full/ abbreviated RAP preparation:

- The draft RAPs shall be subject to discussion with PAPs who will receive a copy of the RAP a week before the discussion. Public consultations shall be attended by PAPs, IA, PSC representatives and RAPs preparation firm's/NGO's representatives.
- After the discussion, comments and proposals shall be reflected in the RAPs.

- The RAPs shall include a section of the consultation process with the matrix of comments and proposals for the inclusion and implementation thereof.
- The Social Specialist of PIUs shall submit the RAPs to the DoE/BB/BRTA/BHTPA for approval.
- After inclusion of the comments received as a result of disclosure of the RAP and after approval thereof by the DoE/BB/BRTA/BHTPA, the RAPs shall be officially sent to the WB for review and confirmation on the compliance with ESS5 and other applicable policies/procedures.
- Once the World Bank confirms the acceptability of the quality of each RAP, it shall be disclosed on the WB website, published as final RAPs on the DoE/BB/BRTA/BHTPA website and re-shared with all stakeholders. Private information about PAs shall not be made publicly available.

No changes shall be made to the compensation entitlement matrix, eligibility criteria, compensation rates, or provisions for assistance without the prior World Bank's consent.

## Chapter 3: Potential Impacts, Eligibility Criteria, and Procedures for Defining Various Categories of Affected People

### 3.1 Potential ES impact and risks

The project aims at improving ambient air and surface water quality and waste management practices at selected localities of Bangladesh. The existing status of air and water quality is expected to improve and waste disposal recycling, reuse and management practices will also be enhanced. Given the project design, the project activities would not lead to generation and releases of any additional pollutants; rather it provides the mechanisms to reduce the generation and releases of pollutants and thus bring down health hazard risks associated with such pollutants. A screening exercise was conducted for the component/sub-components under BEST project using the screening formats provided in this RAF (**Annex 1**), based on sub-project activities. Both environment and social risks of the project are rated Substantial largely due to the relatively weak E&S capacity of the implementing agencies; their inexperience on the ESF; and the wide range of subprojects that can only be assessed, prepared, and appraised during implementation.

#### **Environmental Risks and Impacts-**

The following environmental risks are anticipated during the project implementation stage:

- Construction related works involved with the project would lead to dust, noise and light pollution in the project area and affect the project affected persons, the elderly, children, the pregnant mothers and people with respiratory diseases adversely;
- A good number of plants, vehicles and machinery would be in use during construction of various facilities of the project. This would lead to burning of fossil fuel and use and unsafe disposal of lubricants that would emit CO<sub>2</sub>, CO and GHG beside polluting soil and ground water.
- Construction related waste, when not disposed properly, would affect the air and water quality of the project area adversely.
- Since the project would support the management of electronic and other wastes, these may pose risks to the environment and public health. There remain residual health risks to the community even after project interventions on the management of such wastes.

#### **Social Risks and Impacts, including Land related impacts-**

Overall, the project would benefit the greater society and the public health in Bangladesh and people in the project areas in particular by improving air and water quality and effectively managing selected brick kilns, electronic wastes and vehicular pollution and policy reforms and capacity building of DOE. However, the following social risks are anticipated:

- Due to possible land acquisition, people that may have economic and physical displacement and informal settlers may need to resettle which would need intervention for subsequent livelihood restoration and resettlement.
- People may not be compensated fully or not compensated at all before the beginning of project activities. No work will be allowed to be undertaken before full payment of compensation.
- During the construction phase, significant number of workers will be employed by the contractors for various civil works most of which will be locally recruited. The impact of the

labor issues, including OHS, waste generation and communicable diseases, will be of concern.

- Though SEA/SH risk is Low, there may be possibility of SEA/SH in the community.
- Pedestrian movement and safety in the subproject areas would be adversely affected by traffic congestion as additional transports would ply carrying construction material, waste/debris transportation to dump site.
- Temporary job loss of Brick Kiln workers would take place at the selected traditional Kilns as these adopt the Hybrid Hofman Kiln (HHK) and tunnel kiln technologies at the initial years of project implementation.
- Small ethnic communities residing in the project area could be affected by the project activities. This may demand development of standalone Small Ethnic Community Development Plan (SECDPP).
- The Project is being implemented amidst COVID-19 outbreak, which is likely to affect health of both the workers and the communities. Absence of PPE, not using Mask and Gloves, lack of training on handling a COVID patient, non-compliance of social distancing protocol and lack of awareness etc. would exacerbate the situation.

Notable positive impacts of the project include:

- As DOE would undergo ‘Institutional Reform’, some 622 new posts will be filled up through providing ‘Equal career Opportunity’ by the end of the project implementation. Local unemployed persons irrespective of gender would be able to secure jobs in the project area.
- Besides 30 new district offices and 6 regional/Divisional laboratories would involve construction work at different Division and District HQ creating job opportunity and economic activities linking infrastructural development.
- The brick kiln workers would find job round the year after conversion of ecofriendly kilns. They would also be able to work in a more conducive environmental condition devoid of burning of firewood and Sulphur rich coal.
- As 5 new Vehicle Inspection Centers (VICs) under PPP will be developed along with rehabilitating existing 4 VICs managed by BRTA, job opportunity would be created for a good number of local technical personnel. This would also ease the hassle of the vehicle owners in getting vehicle fitness certificates.
- E-waste processing facility at Kaliakair HTP would process and recycle maximum 100,000 tons of e-waste per annum and segregate metals and plastic. This would create jobs, bring new technologies and would improve the air and surface water quality.
- Effective Citizen engagement, discussion with research organizations and CBOs would raise the acceptance level of the project amongst the general mass.

Overall, the positive social impacts of the project are likely to be substantial compared to negative impacts and risks.

### 3.2 Project Principles

The involuntary taking of land results in relocation or loss of shelter; and loss of assets or access to assets or loss of income sources or means of livelihood, whether or not the PAPs must move to another location. Meaningful consultations with the affected persons, local authorities and community leaders will therefore allow for establishment of criteria by which displaced persons will be deemed eligible for compensation and other resettlement assistances. Affected persons will be classified as:

- (i) persons who have formal legal rights to land or assets
- (ii) persons who do not have formal legal rights to land or assets, but have a claim to land or assets that is recognized or recognizable under national law; or
- (iii) Persons who have no recognizable legal right or claim to the land or assets they occupy or use.

Those covered under (i) and (ii) above are to be provided compensation for the land they lose, and other assistance in accordance with this RPF. Persons covered under (iii) above are to be provided with resettlement assistance in lieu of compensation for the land they occupy, and other assistance, as necessary, to achieve the objectives set out in this RPF, if they occupy the project area prior to a cut-off date established by the project authorities in close consultation with the potential PAPs, local community leaders and the respective local authorities and acceptable to the World Bank.

Persons who encroach on the area after the cut-off date are not entitled to compensation or any other form of resettlement assistance. All persons included in (a), (b) or (c) above are to be provided with compensation for loss of assets other than land. It is therefore clear that all project affected persons irrespective of their status or whether they have formal titles, legal rights or not, informal settlers or otherwise encroaching illegally on land, are eligible for some kind of assistance if they occupied the land or had use of it, before the entitlement cut-off date.

### 3.3 Methods to Determine Cut-Off Date

Cut-off date is the date after which eligibility for compensation or resettlement assistance will not be considered. It will be established to identify the non-land assets that will qualify for compensation and discourage abuse of the mitigation policies by defrauding the project. Date of service of notice under Section 4 of Land Acquisition and Requisition of Property Act (ARIPA 2017) is considered as legal cut-off dates for the landowners. The day of the census survey to be the cut-off date for the informal settlers and encroachers and recognized as social cut off dates.

### 3.4 Eligibility Criteria

For all types of losses (land, crops/trees, structures, business/employment, and workdays/wages), RPF stipulates eligibility and provisions for compensation. The lost assets (crops, structures, trees and/or business losses) of all PAPs including non-titled or informal dwellers will be compensated

The PAPs who are entitled to compensation under the project include:

- People whose structures are partially or completely affected by the Project, whether temporarily or permanently;
- Persons whose residential, commercial, and/or agricultural properties are in part or fully affected by the Project;
- Persons whose businesses are affected in part, or in total, (temporarily or permanently) by the Project;
- Persons whose employment or hired labour or share-cropping agreement is affected, temporarily or permanently, by the Project;
- Persons whose crops (annual and perennial) and/or trees are affected in part, or in total, by the Project; and

- Persons whose access to community resources or property is affected in part, or in total, by the Project.

Other than PAPs, any entities affected by the project within the project influenced are entitled for the compensation. If any Common Property Resources (CPR) are affected or unavoidable, according to section 4(13) and 20(1) of ARIPA 2017, CPRs can be acquired or requisitioned.

Where land is to be acquired, titled or legal owner will receive compensation for land acquired by the Project at replacement cost. This will be in cash at replacement value or land-for-land with a combination of productive potential, location advantages, and other factors of which is at least equivalent to the advantages of the land taken to the satisfaction of the PAP (of equal size and/or productive value and be satisfactory to the PAP). Non-titled PAPs are not eligible for compensation for land but will receive compensation for assets attached to land and other assistance as required, in lieu of land compensation.

DC will pay compensation to all title holders. If spouses (female) are land owners will receive the compensation directly from DC. PIU will pay additional payment, resettlement benefits and livelihood to female spouse directly. The payment of compensation and resettlement assistance to both spouses and intra HHs analysis to access different impacts will be analysed during RAP preparation and compensation will be paid accordingly. Households headed by single women with dependents and other vulnerable households will be eligible for further assistance to fully mitigate project impacts.

Compensation eligibility will be limited by a cut-off date to be set for the project and PAPs who settle in the affected areas after the cut-off date will not be eligible for compensation. They, however, will be given sufficient advance notice, requested to vacate premises and dismantle affected structures prior to project implementation. Their dismantled structures will not be confiscated and they will not pay any fine or sanction. Forced eviction will only be considered after all other efforts are exhausted.

### 3.5 Entitlements matrix: Eligible PAPs, Assets and Compensation Guidelines

Table 3 below presents the Project’s entitlement matrix, based on potential losses.

*Table 3: Eligibility and Entitlements Matrix*

Unit of Entitlement	Entitlements
Impact category 1: Acquisition of agricultural, homestead, commercial, water bodies (ponds) land	
<b>Legal owner(s) as identified by Deputy Commissioner (DC) in the process of CCL payment.</b>	<ul style="list-style-type: none"> <li>• Cash compensation under law (CCL) which includes 200% premium</li> <li>• Replacement Value (RV) and dislocation Allowance as recommended by PAVC.</li> <li>• If RV is higher than CCL, the difference will be paid by IA.</li> <li>• If the remaining land is unusable, the compensation provided will be calculated based on the total land affected (i.e., the actual land lost plus the remaining unusable land).</li> </ul>
Impact category 2: Requisition of agricultural, homestead, commercial, water bodies (ponds) land	
<b>Legal owner(s) as identified by Deputy Commissioner (DC) in the process of CCL payment.</b>	<ul style="list-style-type: none"> <li>• Rental price of land as determined by DC with consultation with the land owners and the IA following the guideline of ARIPA 2017</li> <li>• Replacement Value (RV) and dislocation Allowance as recommended by PVAC, if any assets other than the land is affected and required relocation.</li> <li>• If the land or assets are leased to third party, compensation to the third party and income loss to the owners will be paid as recommended by DC</li> </ul>

Unit of Entitlement	Entitlements
	<ul style="list-style-type: none"> <li>if the remaining land is unusable, the compensation provided will be calculated based on the total land requisitioned (i.e., the actual land required plus the remaining unusable land).</li> <li>Requisition can be maximum of 2 years Land has to be returned to the owner as original condition, otherwise compensation has to be paid as decided by DC and land owner.</li> </ul>
Impact category 3: Loss of residential, commercial structures with title to land	
<b>Legal owner(s) as identified by DC in the process of CCL payment.</b>	<ul style="list-style-type: none"> <li>Cash compensation under law (CCL) which includes 100% premium or RV whichever is higher</li> <li>If RV is higher than CCL, the difference will be paid by the IA as top-up.</li> <li>Transfer Grant at actual cost which will include labor cost and transportation cost</li> <li>Reconstruction Grant in actual cost which will include land development, labor cost and transportation cost</li> <li>The IA in collaboration with local government and RAC will make best efforts to identify alternative residential or commercial sites for the affected HHs.</li> <li>Owner will be allowed to take away all salvageable materials free of cost.</li> <li>Dismantling cost for non-shiftable structure will be determined by the PVAC based on the actual price and consultation with affected HHs.</li> </ul>
Impact category 4: Loss of residential, commercial structures without title to land (informal settlers/vendors/encroachers)	
<b>Non-titled persons owners, vendors and encroachers those own residential and commercial structures (shiftable and non-shift able built on GoB land as found during census</b>	<ul style="list-style-type: none"> <li>Replacement value of the structure as determined by PVAC in consultation with affected HHs.</li> <li>Transfer Grant at actual cost which will include labor cost and transportation cost</li> <li>Reconstruction Grant in actual cost which will include land development, labor cost and transportation cost</li> <li>The IA in collaboration with local government and RAC will make best efforts to identify alternative residential or commercial sites for the affected HHs.</li> <li>Owner will be allowed to take away all salvageable materials free of cost.</li> <li>Dismantling cost for non-shift able structure will be determined by the PVAC based on the actual price and consultation with affected HHs.</li> </ul>
Impact category 5: Loss of common property resources (CPR) with or without title to land	
<ul style="list-style-type: none"> <li><b>Legal owners (land, structures, trees or any other assets) identified by DC in the process of CCL payment.</b></li> <li><b>Socially recognized owners/ non-titled (structures, trees or any other assets) affected on the ROW as identified by Census and verified by IVC.</b></li> </ul>	<ul style="list-style-type: none"> <li>Cash compensation under law (CCL) which includes 200% premium for land (title holder)</li> <li>If RV of land is higher than CCL, the difference will be paid by the IA as top-up.</li> <li>Cash compensation under law (CCL) which includes 100% premium for assets other than land (tittle holder)</li> <li>If RV of assets other than land is higher than CCL, the difference will be paid by the IA as top-up (title holder)</li> <li>Replacement Value (RV) of structure, trees or any other assets other than land for non-titled holder</li> <li>Transfer Grant at actual cost which will include labor cost and transportation cost</li> <li>Reconstruction Grant in actual cost which will include land development, labor cost and transportation cost</li> </ul>

Unit of Entitlement	Entitlements
	<ul style="list-style-type: none"> <li>Owner will be allowed to take away all salvageable materials free of cost.</li> <li>Dismantling cost for non-shift able structure will be determined by the PVAC based on the actual price and consultation with affected HHs.</li> </ul> <p>Or</p> <ul style="list-style-type: none"> <li>Project will construct a new community property in consultation with community and / or managing committee</li> <li>No community property cannot be demolished until new one is constructed.</li> </ul>
Impact category 6: Loss of timber and fruit bearing trees, bamboo and banana groves	
<ul style="list-style-type: none"> <li>Legal owner(s) as identified by the DC in the process of CCL payment.</li> <li>Socially recognized owners of trees grown on public or other land, as identified by Census and verified by PVAC.</li> </ul>	<ul style="list-style-type: none"> <li>Timber trees and bamboo: RV of trees and bamboo.</li> <li>Fruit-bearing trees without timber: if the tree is at or near fruit-bearing stage, the estimated current market value of the fruit.</li> <li>Fruit-bearing trees with timber: RV for the timber, and estimated current market value of fruit.</li> <li>Banana groves: RV of all trees and estimated current value of one-time crop of each full-grown tree.</li> <li>Owners will be allowed to fell trees and take the timber, free of cost after payment of CCL or RV as applicable.</li> </ul>
Impact category 7: Loss of standing crops/fish stock	
<ul style="list-style-type: none"> <li>Owner cultivators as identified in joint verification by DC and the IA.</li> <li>Socially recognized owners of crops/fish stock as identified by Census and verified by PVAC. <ul style="list-style-type: none"> <li>Sharecroppers</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Cash compensation under law (CCL) which includes 100% premium for title holder and sharecroppers</li> <li>100% top-up payment on DC's CCL for legal owners and sharecroppers</li> <li>Replacement value of crops if planted on GoB land by informal settlers and /or sharecroppers</li> <li>1-month advance notice to be issued in time to harvest standing crops. If not possible, the value of standing crops at full harvest value will be paid.</li> <li>RV of existing standing crops/fish stock</li> <li>Owners will be allowed to harvest crops and fish stock.</li> </ul>
Impact category 8: Loss of leased /mortgaged in land/ponds	
<p>Leaseholder with legal papers.</p> <p>Socially recognized lessee or sharecropper, in case of customary informal tenancy arrangements, including socially recognized agreements.</p>	<ul style="list-style-type: none"> <li>RV of crops/fish stock.</li> <li>Outstanding lease money back to the lessee by the owner as per agreement.</li> <li>Dislocation Allowance will be calculated according to the recommendation of PVC and based on the current market rate.</li> </ul>
Impact category 9: Loss of income from displaced commercial/ industrial premises (owner operated)	
<p>Any proprietor or businessman or artisan operating in premises, at the time of issuance of Notice u/s 4 and/or during Census.</p>	<p>One-time Assistance for alternate rental based on the average rental rate/month within the project influence area determined by PAVC and transitional allowance @ three months rental cost.</p>
Impact category 10: Temporary loss of income (wage earners in agriculture, commerce & small business and industry) for title and non-title	
<ul style="list-style-type: none"> <li>Regular wage earners affected by the acquisition.</li> </ul>	<ul style="list-style-type: none"> <li>Grant to cover temporary loss of regular wage income @ average wage/day in the locality for 30 days for wage labour or as determined by PVAC</li> </ul>

Unit of Entitlement	Entitlements
<ul style="list-style-type: none"> <li>Also applicable for non-titled</li> </ul>	<ul style="list-style-type: none"> <li>Income and livelihood restoration assistance, to be created by the Project.</li> </ul>
Impact category 11: Loss of income from rented -out and access to rented-in residential/ commercial premises	
<b>Owner of the rented-out premises as identified by Census and verified by PVAC. Household/person rented-in any such structure as identified by Census and verified by PVAC.</b>	One-time Assistance for alternate rental based on the average rental rate/month within the project influence area determined by PVAC and transitional allowance @ three months rental cost. Actual shifting assistance
Impact category 12 Adverse Impact on Host Population Due to Relocation of PAPs	
<b>Households relocated to the host villages</b>	Enhancement of carrying capacity of common civic amenities/utilities of the host communities as per assessment by the IA.
Impact Category 13: Severally affected and Vulnerable HHs and livelihood assistance	
<ul style="list-style-type: none"> <li>Persons losing more than 10% of their income from all sources as identified by Census and verified by PVAC.</li> <li>Informal settlers</li> </ul>	<ul style="list-style-type: none"> <li>Income restoration grants for three months based on the average monthly income loss Skill training and credit support under income generation program.</li> <li>Special Assistance of a one-time payment for vulnerable household as each female-headed, disabled-headed, elderly-headed and poor household as decided by RAC</li> <li>All the vendors and informal settlers will be eligible for Skill training and credit support under income generation program.</li> </ul>
Impact Category 14: UNFORESEEN ADVERSE IMPACTS	
<b>Households/persons affected by any unforeseen impact identified during RAP implementation</b>	Entitlements will be determined as per the resettlement policy framework
Impact category 15: Construction induced impact	
<b>Title and non-title land structure, tree and /or any type of assets owners</b>	<ul style="list-style-type: none"> <li>RV of damaged land structure, tree, crops/fish stock and /or any type of assets owners as determined by PVAC and affected land /asset owners</li> <li>Owner will be allowed to take away all salvageable materials free of cost.</li> </ul>

### 3.6 Voluntary Land Donation (VLD)

The ARIPA 2017 does not cover land donation policy. This project will also not have any voluntary land donation.

## Chapter 4: Legal Framework and policies related to Land Acquisition and Resettlement

### 4.1 Land Acquisition policy of Bangladesh Government

The Acquisition and Requisition of Immovable Property Act 2017 (ARIPA) is the principal legislation governing eminent domain for land acquisition and requisition in Bangladesh. ARIPA 2017, detailed the land acquisition process from section 4 to section 19 and land requisition process from section 20 to section 28. According to ARIPA 2017, compensation to be paid for affected land, structures, trees, crops and any other damages caused by such acquisition. Under the ARIPA 2017, The Deputy Commissioner (DC) determines the value of the acquired assets as at the date of issuing the notice of acquisition under section 4(1). The DCs there after enhance the assessed value by 200% and another

100% premium for loss of standing crops, structures and income due to compulsory nature of the acquisition. The compensation such determined is called the Cash Compensation under Law (CCL). If the land acquired has standing crops cultivated by a tenant (Bargadar) under a legally constituted written agreement, the law requires that compensation money be paid in cash to the tenants as per the agreement. ARIPA 2017 under section 4 (13) permits the acquisition of the community properties if it is for a public purpose provided that project for which the land is acquired provides for similar types of assets in some other appropriate place or reconstruct the community properties.

Households and assets moved from land already acquired in the past for project purposes and/or government khas land are not included in the acquisition proposal and therefore excluded for considerations for compensation under the law. Lands acquired for a particular public purpose cannot be used for any other purpose. Furthermore, the Act under its section 15 provides for the acquisition of entire houses/buildings if their owners request to acquire the entire house or building against partial acquisition. The government is obliged to pay compensation for the assets acquired.

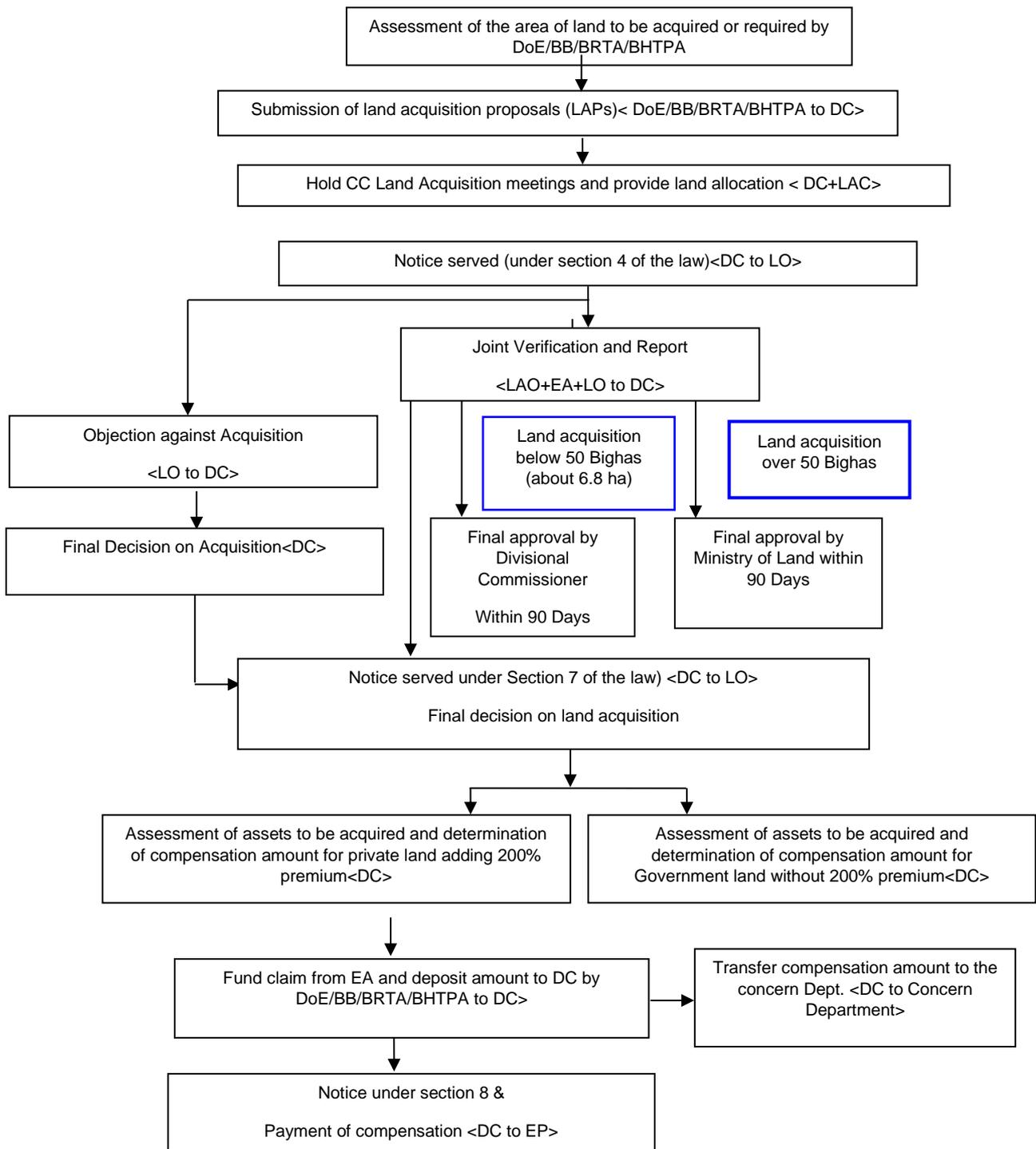
Table 4: Land Acquisition Process under ARIPA, 2017

Relevant Section	Steps in the process	Responsibility under ARIPA, 2017
Section 4(1)	Publication of preliminary notice of acquisition of property for a public purpose	Deputy Commissioner
Section 4 (3) (1) (i)	Prior to the publication of section 4(1) notice; Identify the present status of the land, structures and trees through videography, still pictures or appropriate technology.	Deputy Commissioner
Section 4 (3) (1) (ii)	After the publication of the section 4(1) notice a joint verification should be conducted with potentially affected households and relevant organizations.	Deputy Commissioner
Section 4 (7)	After publication of preliminary notice under the section 4(1), if any household has changed the status of the land for beneficial purposes, changed status will not be added to the joint verification notice.	Deputy Commissioner

Relevant Section	Steps in the process	Responsibility under ARIPA, 2017
Section 4 (8)	If the affected person is not happy with the joint verification assessment, he/she can complain to Deputy Commissioner within 7 days of issuing sec 4(1) notice.	Affected Person
Section 4 (9)	Hearing by Deputy Commissioner within 15 working days after receiving the complaints. In case of government priority projects, hearing will be within 10 working days.	Deputy Commissioner
Section 5 (1)	Objections to acquisition by interested parties, within 15 days of the issue of section 4 (1) Notice	Affected Person
Section 5 (2)	Deputy Commissioner submits hearing report within 30 working days after the date of the sec 5(1) notice. In the case of government priority projects, it will be within 15 working days.	Deputy Commissioner
Section 5 (3)	DC submits his report to the (i) Government (for properties that exceed 16.50 acres; (ii) Divisional Commissioner for properties that do not exceed 50 standard bighas. Deputy Commissioner makes the final decision If no objections were raised within 30 days of inquiry. In case of government priority project, it will be 15 days	Deputy Commissioner
Section 6 (1) (1)	Government makes the final decision on acquisition within 60 working days after receiving report from the Deputy Commissioner under sec 5(3) notice.	Government
Section 6 (1) (2)	Divisional Commissioner makes the decision within 15 days or with reasons within 30 days since the submission of the report by Deputy Commissioner under sec 5(3) notice.	Divisional Commissioner
Section 7 (1)	Publication of the Notice of final decision to acquire the property and notifying the interested parties to submit their claims for compensation	Deputy Commissioner
Section 7 (2)	Interested parties submit their interests in the property and claims for compensation within 15 working days (in case of priority project 7 days).	Affected Person
Section 7 (3)	Individual notices have to be served to all interested persons including the shareholders within 15 days of issuing Section 7(1) notice	Deputy Commissioner
Section 8 (1)	Deputy Commissioner makes a valuation of the property to be acquired as at the date of issuing Section 4 Notice; determine the compensation; and apportionment of compensation among parties interested.	Deputy Commissioner
Section 8 (3)	DC informs the award of compensation to the interested parties and sends the estimate of compensation to the requiring agency/person within 7 days of making the compensation decision	Deputy Commissioner
Section 8 (4)	The requiring agency/person deposits the estimated award of compensation with the Deputy Commissioner within 120 days of receiving the estimate.	Deputy Commissioner

Relevant Section	Steps in the process	Responsibility under ARIPA, 2017
Section 9 (1)	During valuation of assets, Deputy Commissioner will consider the following: (i) Average market price of land of the same category in the last 12 months; (ii) Impact on existing crops and trees; (iii) Impact on other remaining adjacent properties; (iv) Impact on properties and income; and (v) Relocation cost for businesses, residential dwellings etc.	Deputy Commissioner
Section 9 (2)	Additional 200% compensation on current mouza rate is added to the estimated value. If private organizations acquire, added compensation will be 300%.	Deputy Commissioner
Section 9 (3)	Additional 100% compensation on top of the current market price for impacts mentioned under sec 9(1) and (2)	Deputy Commissioner
Section 9 (4)	Appropriate action should be taken for relocation on top of the above mentioned sub-sections.	
Section 10 (2)	If an entitled person does not consent to receive compensation, or if there is no competent person to receive compensation, or in the case of any dispute with the title to receive compensation, Deputy Commissioner deposits the compensation amount in a deposit account in the Public Account of the Republic and Deputy Commissioner acquires the land. But if any person complains about the ownership of the land, with appeal, he/she will be able to collect the amount from Deputy Commissioner. There is no fixed time for this.	Deputy Commissioner
Section 11 (1)	Deputy Commissioner awards the compensation to entitled parties within 60 days of receiving the deposit from the requiring agency/person.	Deputy Commissioner
Section 12	When the property acquired contains standing crops cultivated by bargadar (shareholders), such portion of the compensation will be determined by the Deputy Commissioner and will be paid to the bargadar in cash.	Deputy Commissioner

According to the initial field screening, small ethnic people are expected to be affected by the project specially VIC at Rangamati and DoE districts office at Khagrachhari. However, if small ethnic people are identified during socio economic survey, a separate SECDP plan will be prepared following the guidelines of ESS7 and thus detailed legal framework will be described.



(EA=Executing Agency DC=Deputy Commissioner)

Figure 2: Land Acquisition and Compensation Payment Process under ARIPA, 2017

## 4.2 Land Requisition Policy of Bangladesh:

For requisition of land for temporary purposes, the Acquisition and Requisition of Immovable Property Act 2017 (ARIPA) is the principal legislation governing eminent domain land acquisition and requisition in Bangladesh. The Act requires compensation to be paid for: (i) vacating the requisitioned property (ii) reoccupying the property upon released from the requisition (iii) damaged the cost to the property during period of requisition including the expenses that may have to be incurred for restoring to the original condition.

However, if temporary land is required for the project (requisition) it will be done through willing seller-willing buyer modality with mutually agreed upon conditions.

## 4.3 The World Bank environment and social standards

Since October 2018, all World Bank Funded Investment Project Financing (IPF) are required to follow the Environmental and Social Framework (ESF) consisting ten (10) Environment and Social Standards (ESS). These ESSs set out their requirement for the borrowers relating to the identification and assessment of environmental and social risks and impacts associated with any project. The ESSs support the borrowers in achieving good international practice relating to environmental and social sustainability, assist them in fulfilling their national and international environmental and social obligations, enhance transparency and accountability and ensure sustainable development outcome through ongoing stakeholder engagement. Among the 10 standards, ESS5 on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons. DoE/BB/BRTA/BHTPA has prepared this RPF following the guidelines suggested under ESS5.

### 4.3.1 Objectives of ESS 5

- To avoid involuntary resettlement or, when unavoidable, minimize involuntary resettlement by exploring project design alternatives;
- To avoid forced eviction;
- To mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use by: (a) providing timely compensation for loss of assets at replacement cost and (b) assisting displaced persons in their efforts to improve, or at least restore, their livelihoods and living standards, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.
- To improve living conditions of poor or vulnerable persons who are physically displaced, through provision of adequate housing, access to services and facilities, and security of tenure.
- To conceive and execute resettlement activities as sustainable development programs, providing sufficient investment resources to enable displaced persons to benefit directly from the project, as the nature of the project may warrant.
- To ensure that resettlement activities are planned and implemented with appropriate disclosure of information, meaningful consultation, and the informed participation of those affected.

#### 4.3.2 Applicability of ESS 5

ESS5 will apply as the direct social and economic impacts of a project that are permanent or temporary and are caused by the involuntary taking of land resulting in (i) relocation or loss of shelter; (ii) loss of assets or access to assets; (iii) loss of income sources or means of livelihood, whether or not the affected persons must move to another location; or (iv) the involuntary restriction of access to legally designated parks and protected areas resulting in adverse impacts on the livelihoods of the displaced persons. The ESS5 also applies in case any subproject activities found as 'linked' or 'associated facility'. This ESS requirements and provisions apply to all components of DoE/BB/BRTA/BHTPA that result in involuntary resettlement, regardless of the source of financing. Non-applicability of ESS5 is attached with **Appendix 4**. This ESS applies to permanent or temporary physical and economic displacement resulting from the following types of land acquisition or restrictions on land use undertaken or imposed in connection with project implementation:

- a) Land rights or land use rights acquired or restricted through expropriation or other compulsory procedures in accordance with national law;
- b) Land rights or land use rights acquired or restricted through negotiated settlements with property owners or those with legal rights to the land, if failure to reach settlement would have resulted in expropriation or other compulsory procedures;
- c) Restrictions on land use and access to natural resources that cause a community or groups within a community to lose access to resource usage where they have traditional or customary tenure, or recognizable usage rights. This may include situations where legally designated protected areas, forests, biodiversity areas or buffer zones are established in connection with the project;
- d) Relocation of people without formal, traditional, or recognizable usage rights, who are occupying or utilizing land prior to a project specific cut-off date;
- e) Displacement of people as a result of project impacts that render their land unusable or inaccessible;
- f) Restriction on access to land or use of other resources including communal property and natural resources such as marine and aquatic resources, timber and non-timber forest products, fresh water, medicinal plants, hunting and gathering grounds and grazing and cropping areas;
- g) Land rights or claims to land or resources relinquished by individuals or communities without full payment of compensation; and
- h) Land acquisition or land use restrictions occurring prior to the project, but which were undertaken or initiated in anticipation of, or in preparation for, the project.
- i) If temporary land is required for requisition it will be done through willing buyer-willing seller modalities under mutually agreed upon conditions.

**Forced eviction:** The DoE/BB/BRTA/BHTPA will not resort to forced evictions of affected persons. The exercise of eminent domain, compulsory acquisition or similar powers by DC will not be considered to be forced eviction providing it complies with the requirements of ARIPA 2017 and the provisions of this ESS, and is conducted in a manner consistent with basic principles of due process. Due process is including the following types of procedural protections:

- consultation with all affected household;
- adequate and reasonable notice for all affected persons prior to the scheduled date of eviction;
- information on the proposed evictions;

- where groups of people are involved impartial observers will be presented during eviction;
- all persons carrying out the eviction will be properly identified;
- evictions are not to take place in inclement weather or at night, or during festivals or holidays unless the affected persons consent otherwise;
- provision of legal remedies; and
- provision, where possible, of legal aid to persons who are in need of it to seek redress from the courts.

#### 4.4 Gaps between ESS5 and ARIPA 2017 and Gap filling measures

The following are the key gaps of the ARIPA, 2017 vis-a-vis the World Bank ESS5 are presented in **Table 05**

*Table 5: Gaps between GOB policies/act and ESS5*

Sl. No	Gaps between WB ESS 5 and GOB	Gap-filling measures /actions taken in this Project
1	Gaps with regard to avoidance and minimized project impacts	The project designs adopted aimed to minimize impacts and adjusted tracks and station design further to reduce impacts and risk.
2	ARIPA 2017 does not require the preparation of resettlement plan or resettlement action plan (RAPs);	RAP/s will be prepared for all sub-projects interventions and without the approval of RAP/s by the bank, construction works will not be started.
3	ARIPA 2017 recognize title owners only; informal settlers are not covered. DC declare cut-off date only for title-holders	All affected persons including titled, non-titled, encroachers will be identified for the compensation and assistance at full replacement cost Cutt-off date for non-title holder will be consider the date of census survey.
4	Existing acts and methods of assessments do not ensure full replacement costs and transitional support	If the compensation according to the ARIPA 2017 do not meet the replacement cost, additional top-up payments will ensure replacement cost at current market price together with transitional support
5	Consultation with affected communities not legally required under ARIPA 2017	Extensive consultations will be carried out during all phases of the project. A separate SEP will be prepared.
6	The affected land owners can object to the acquisition in the beginning, but once hearing is done and settled, there is no scope of further complaint during the acquisition process.	There is a provision of four-tier grievance redress mechanism in the project. 1 <sup>st</sup> level GRC is local GRC (LGRC), 2 <sup>nd</sup> level is district GRC, 3 <sup>rd</sup> level is PIU level and final is PSC level. People will first approach to LGRC and will request to forward case to district GRC if not settled at LGRC. If required, GRC will be forwarded to 3 <sup>rd</sup> and 4 <sup>th</sup> Aggrieved person may go to court at
7	Relocation assistance or support allowed for tittle holders only under ARIPA 2017.No support is allowed for the informal settlers/illegal	Affected households and businesses will receive relocation assistance and support from the project irrespective of titled, non-titled, encroachers etc.
8	Income and livelihood restoration assistance is restricted only to additional 100% compensation	The project benefits include income and livelihood restoration, including training for alternative incomes, and seed grants for small businesses. Vulnerable people will be also included livelihood restoration program
9	There is no policy against land restriction and force eviction	Force eviction and land restriction is not allowed in this project. However, the exercise of eminent domain, compulsory acquisition or similar powers by DC will not be considered to be forced eviction providing it complies with

Sl. No	Gaps between WB ESS 5 and GOB	Gap-filling measures /actions taken in this Project
10	ARIPA 2017 do not consider / recognize impacts imposed by the associate facilities. The act even does not explicitly cover restriction	A common approach will be taken and impact and risk assessment will be conducted for the associated facilities as well. Impact and risk assessment will be also conducted for any kind of “restriction of access” by the project.
11	ARIPA 2017 does not have any provision to give special attention to the vulnerable groups like women, disables, ultra-poor or	Special attention will be taken by the project for the vulnerable groups for i.e. additional grant, livelihood training, job opportunities during construction etc.
12	There is no provision for voluntary land donation	ESS5 clearly describes voluntary land donation procedures.

#### 4.5 ESS 5 Requirements:

**Project design:** Project will screen out any land acquisition, and will avoid temporary land requisition, voluntary land donation or restrictions on land use as much as possible. For this purpose, project will consider feasible alternative project designs to avoid or minimize land acquisition or restrictions on land use, especially where this would result in physical or economic displacement. The overall principle will be to balance the environmental, social, and financial costs and benefits, while paying particular attention to impacts on the women, poor and vulnerable.

**Compensation and benefits for affected persons:** All lands proposed to be acquired, requisitioned, affected structures, trees, business, community property and crops under the project will be compensated as per replacement cost consistent with both government and ESS 5. When land acquisition or restrictions on land use (whether permanent or temporary) cannot be avoided, project will offer affected persons compensation at replacement cost, and other assistance as may be necessary to help them improve or at least restore their standards of living or livelihoods to the pre-project level. Compensation standards for categories of land and fixed assets will be disclosed and applied consistently. Compensation rates may be subject to upward adjustment where negotiation strategies are employed. In all cases, a clear basis for calculation of compensation will be documented, and compensation distributed in accordance with transparent procedures.

**Impacts on Temples, Mosques, Madrasahs and Grave:** It is expected that no community properties will be affected due to project interventions. However, if affected, project will provide compensation and relocation assistance to all community groups for respective community facilities. Project with the support of local government and implementing firm will provide all necessary assistance including finding out alternative sites for relocation of the establishments. Some of the CPRs are very sensitive on religious and social ground and will require consultation with the management committees and local people during relocation. Adequate funds for compensation will be kept in the budget for land acquisition and reconstruction, so that the committee may build new community structures.

#### Measures for Relocation of the CPRs

As per land acquisition law of Bangladesh Common Property Resources such as mosque, school, graveyard, *madrasha*, temple cannot be acquired without obtaining a no-objection certificate from the Management Committee of the concerned CPR. Nevertheless, CPRs would be relocated for

execution of such development project. For relocation of these CPRs the following points should be taken into consideration:

### **i. Relocation of Mosques**

Each of the mosques has a management committee. The mosques are being maintained with financial assistance of the local people. This is a very sensitive religious institution in this almost exclusively Muslim community. Muslims go to the mosque to pray five times in a day. Therefore, it is critical that the management committee and the mosque users will be consulted before the acquisition of the mosque and during the relocation process. Before shifting of the existing mosque, a new one will have to be established so that people can continue praying without interruption. It should be ensured that the new mosque would be of better quality than the previous one.

### **ii. Relocation of Temple/Church**

As per land acquisition law, these cannot be acquired. But due to greater interest of the Project, the temples and church may be purchased in consultation with the concerned community. In that case, the temple and church management committee will be consulted before relocation and will need to provide the Project owners with a no-objection statement for acquisition of the Temple/Church. A new temple and church will be established in the respective communities with easy accessibility. The compensation will be paid to the management committee in case of the community-operated temples and churches. In the case of a family-operated temple the project will pay compensation and reestablishment of such is the responsibility of the HH operating the temple after compensation is paid to them.

### **iii. Relocation of Graveyard/mazar**

According to the GoB ARIPA 2017, graveyards cannot be acquired by the Project. But in many projects with extensive RAPs, graveyards have been relocated with the cooperation of the local people. The community and the management committee of the graveyard will be consulted in detail regarding the relocation. The religious leaders will be included in the decision-making process and all costs for relocation will be borne by the Project.

The following steps will be followed during relocation of the graveyard:

- The affected community will identify an alternate location
- The Project will buy or acquire or take possession of the alternative land for relocation of the graveyard
- The Project will develop the graveyard with all infrastructures available in the present one; at least up to the existing standard, if possible, with improved conditions such as boundary wall, levelling of land, inside paths, mosque or other infrastructures related to a graveyard
- The Project will transfer all the top soils from the existing graveyard (one-meter depth) to the new one by following religious customs and norms

All these steps will either be undertaken by the PIU with full compensation depending the agreement reached by both parties. The project will have a big role in keeping the liaison

with the community and ensure all necessary support as required and desired by the affected community. The PIU and the Grievance Redress Committee (GRC) will have an important role in this respect.

Compensation will be made to the management committee covering the land, boundary wall, inside paths and other infrastructures, trees (if any in the affected graveyard), registration cost and stamp duty to buy new land and If any other losses are identified

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

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

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

**Community engagement:** Project will engage with affected communities through the process of stakeholder engagement described in ESS10 on Stakeholder Engagement and Information Disclosure. Decision-making processes related to resettlement and livelihood restoration will include options and alternatives from which affected persons may choose. Disclosure of relevant information and meaningful participation of affected communities and persons will take place during the consideration of alternative project designs, and thereafter throughout the planning, implementation, monitoring, and evaluation of the compensation process, livelihood restoration activities, and relocation process.

**Grievance mechanism:** The Project has developed a grievance mechanism in accordance with ESS10 to address specific concerns about compensation, relocation or livelihood restoration measures raised by displaced persons (or others) in a timely fashion. The project GRM will also address management of Gender Based Violence (GBV) and a separate labor GRM has been developed as well with the guidelines of ESS 2 and ESS 10.

**Planning and implementation :** Where land acquisition or restrictions on land use are unavoidable, project will, as part of the environmental and social assessment, conduct census, inventory of losses(IOL) and socio-economic survey (SES) to identify the persons who will be affected by the project, to establish an inventory of land and assets to be affected, to determine who will be eligible for compensation and assistance, and to discourage ineligible persons, such as opportunistic settlers, from claiming benefits. The social assessment will also address the claims of communities or groups who, for valid reasons, may not be present in the project area during the time of the census, such as seasonal resource users. In conjunction with the census, the project will establish a cutoff date for eligibility. Information regarding the cut-off date will be well documented and will be disseminated throughout the project area at regular intervals in written and (as appropriate) non-written forms and in relevant local languages. This will include posted warnings that persons settling in the project area after the cutoff date may be subject to removal.

## Chapter 5: Methods of Valuing Affected Assets

### 5.1 Type of Compensation Payment

Compensation for all land use and assets in kind or cash as guided by the entitlement matrix will be required for the following:

- Land;
- Affected trees
- Residential buildings, structures and fixtures;
- Cultivated crops (both cash and food crops) and trees;
- Affected Business
- Informal settlers
- Community Resource Properties
- Construction Induced Impacts

In addition, disturbance allowance, storage of goods, replacement of lost services and other assistance will be given, as outlined in the Entitlement Matrix. However, this is for guidance only and it is essential that at the time of detailed RAPs preparation current market values and replacement cost values are used to establish actual compensation. All cash amounts will be adjusted to reflect any economic changes and buying power of currency since the preparation of this RPF. The PAVC will evaluate the compensation amounts recommended in the RAPs and ensure that they reflect market reality and that it is consistent with Bangladesh laws as long as it meets the requirements of WB ESS5. It is to be noted that If temporary land is required for requisition it will be done though willing buyer-willing seller modalities under mutually agreed upon conditions.

### 5.2 Compensation payment method

#### 5.2.1 Valuation method for land

In the event of permanent land acquisition of titled land, the first premise is provision of replacement land. In the case where no alternative land is available within a reasonable distance such as to minimize disruption to other aspects of socio-economic life, cash compensation at full replacement value should be provided. This should be valued based on the prevailing market value in the locality to purchase an equally productive plot of land in the same locality. In addition, any associated costs of purchasing the land i.e., taxes, registration fees will need to be included in the compensation.

In addition, the PAP will be compensated for any permanent improvements made to the land (for instance irrigation structures). This will be calculated based on the price of making the permanent improvement at current prevailing market rates for labor, equipment and materials.

Where land lost is only a small proportion of total land owned by the PAP, but renders the remaining land as unusable, the compensation provided should be calculated based on the total land affected (i.e., the actual land lost plus the remaining unusable land). If land is required temporarily, standing crop will be compensated at fully matured market rate or government rate, whichever is higher. The compensation will be paid to the sharecroppers rather than the owner, where the tiller is not the owner (e.g. tenant or share cropper). There will hence be no adjustment in the terms of the rent of share cropping agreement. Aside from the payment for standing crop, the project will ensure that the land is returned to its original form so it is suitable to resume its former use.

### 5.2.2 Valuation method for structure

Structures' replacement values will be based on:

- Depreciation of the structures are not allowed.
- Transition allowance will be provided, if a place needs to be rented before new house construction
- Measurements of structures and detail of materials used.
- Average replacement costs of different types of household buildings.
- Structures based on collection of information on the numbers and types of materials used to construct different types of structures (e.g. poles, bricks, rafters, bundles of straw, corrugated iron sheets, doors etc.). Prices of these items collected in different local markets.
- Costs for transportation and delivery of these items to the acquired/ replacement land or building site.
- Estimates of construction of new buildings including labor required.
- Compensation will be made for structures that are (i) abandoned because of relocation or resettlement of an individual or household, or (ii) directly damaged by subproject activities.

### 5.2.3 Valuation method for trees and crops

The current prices for the crops will be determined taking into account the forest and agricultural department recommended rate and the highest market price, whichever is higher. Where land is rented, 2 seasons or annual crop estimate, depending on the crop will be compensated. Where land is owned, aside from the replacement land or cash compensation for land, the owner will also get compensation for 2 seasons or annual crop estimates depending on the crop. The crops used will be the ones that are currently or have most recently been cultivated on that land. In addition, PAPs will be encouraged to harvest their produce before loss of land. In order to ensure that this is possible, and that appropriate market prices are received for yields, there needs to be consultation beforehand so that harvesting can be properly planned. The value of the labor invested in preparing agricultural land will be compensated at the average wage in the community for the same period of time. The rate used for land compensation should be updated to reflect values at the time compensation is paid.

All the affected trees within the RoW will be identified through census and IOL. For perennial trees, cash compensation at replacement cost is equivalent to current market value given the type, age, and productive value (future production) at the time of compensation. Timber trees will be based on diameter at four feet height at current market value.

Fruit trees will be compensated to the owner based on the price of a replacement sapling along with the annual value of the fruit produced by that tree for the number of years it will take the sapling to reach full maturity, using Government or highest market price, whichever is higher.

## 5.3 Determination and Payment of Top-up

Where an owner loses lands and other assets in more than one mouza or land administration unit, the person will be counted once, and his/her top-up will be paid as a single amount. The amount of top-up payment to be received by the affected person will be determined by comparing the total amount of CCL paid by the DCs for lands and other assets acquired in all mouzas with the total

replacement costs and/or market prices thereof. Top-up payment will be counted in a manner that positive differences will be counted as positive but negative differences will be calculated as zero. But if any PAP produces more than one CCL together (for one category of loss such as land or structure) before the NGO for top-up payment where one CCL carries positive difference between CCL and RV and another carries negative difference, the top-up amount will be calculated considering both CCL and if there is additional payment found from the calculation arrangement for payment will be made.

**Partial CCL and Top-up Payment:** Where DC's CCL payment is not made together for all lands and other assets acquired from an owner due to legal disputes or other reasons, the top-up payment will be determined for the acquisitions as a whole but pay on the lands and other assets for which CCL has been paid. Top-up for the rest will be paid whenever the CCL payment is made after resolution of the disputes.

Compensations/entitlements due to the PAPs, including those who are not covered by the ARIPA 2017, but eligible according to RAPs and ESS 5, will be paid in full before they are resettled from the acquired private and public lands. Based on the principles proposed for impact mitigation, the following matrix defines the specific entitlements for different types of losses, entitled persons, and the institutional responsibility to implement them. If temporary land is required for requisition it will be done through willing buyer-willing seller modalities under mutually agreed upon conditions.

## Chapter 6: Consultation and Participation

A standalone SEP has been prepared for BEST project which will be the main guiding document for the project in managing stakeholders' engagement. The following sections are summarizing the ESS10 requirements for stakeholder's consultations and information disclosures.

### 6.1 Purpose of stakeholder's engagement:

Consultations with affected people and communities are the starting point for all resettlement related activities. Experience indicates that involuntary resettlement generally leads the affected population to facing severe problems in the socio-economic life making them apprehensive towards the Project. Project aims to provide a two-way communication channel between the stakeholders and the scheme proponents. Already, a standalone Stakeholder Engagement Plan (SEP) has been prepared for this project. Stakeholder consultations have been extensively reported in SEP containing Project background, Socio economic context, Consultation and Communication Strategy etc. applying ESS 10, which will be followed through the project cycles. This chapter mainly focuses on the people's opinion about relocation, resettlement, project messages, planning about resettlement relocation of the displaced households.

As defined by the ESF and ESS10, stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. According to ESS10, Stakeholder engagement is most effective when initiated at an early stage of the project development process and is an integral part of early project decisions and the assessment, management and monitoring of the project. The IA and other stakeholders will ensure the following engagement procedures:

- Project will engage meaningful consultations with all stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- Project will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.

### 6.2 Project Stakeholders

Stakeholders are people, groups, or institutions, which are likely to be impacted (either negatively or positively) by the proposed Project interventions or those who can influence the outcome of the Project. The affected stakeholders include all directly affected persons such as title owners losing land, physically displaced people living on their own land, informal settlers and businessmen residing in project area and indirectly affected persons and communities/ host communities. The

interested party stakeholders are NGOs, community-based organizations, community development projects, governance agencies, development partners, media, community leaders, civil society, traders etc. During preparation of the RPF, the IA has identified different stakeholders. A summary of potential project stakeholders for RPF are given below Table 6. Detailed project stakeholder analysis is described with SEP.

Table 6: Project stakeholder analysis for RPF

Stakeholder group	Interest/cause in engagement
Local landowners, informal settlers and vulnerable groups	Project sites are yet to be confirmed. As such should there be land acquisition title, non-titled people may be affected. Potential vulnerable groups, affected communities and other interested parties living in close vicinity to the project areas
Local businessmen and entrepreneurs	May need to resettle for project activities
Contractors, sub-contractors, wage labor, vendors and suppliers	Different labors, contractors, sub-contractors, suppliers and vendors will be engaged with construction works etc of this project.
Local community leaders	Represents interests of affected communities (land users, local businessmen etc.) and vulnerable groups
Administrative body of various Ministries	Legislative and executive authorities. Functions of supervision and monitoring
Local government and administrative bodies	Due to the development and construction works, local administrative permissions are required
DoE, BB, BRTA , BHTPA and MoEFCC	Main implementation body of the Project
NGOs and Women organizations in the area	Represents the interests of different interested parties and vulnerable groups, different women organizations in the project will be highly interested with the project as during the implementation and operational stage, there may be issues of GBV and employment of local women in the project.
Mass media (Print and Electronic)	They are intermediaries for informing the general public about the planned activities of the project developer and for information disclosure in connection with the proposed Project.

### 6.3 Stakeholder Engagement at COVID-19 outbreak

These restrictions have implications for WB-supported operations. In particular, they will affect Bank requirements for public consultation and stakeholder engagement in projects, both under implementation and preparation. WHO has issued technical guidance in dealing with COVID-19, including:

Risk Communication and Community Engagement (RCCE) Action Plan Guidance Preparedness and Response;

- RCCE readiness and response;
- COVID-19 risk communication package for healthcare facilities;
- Getting your workplace ready for COVID-19;
- A guide to preventing and addressing the social stigma associated with COVID-19.

All these documents are available on the WHO website through the following link: <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance>. With growing concern about the risk of virus spread, there is an urgent need to adjust the approach and methodology for continuing stakeholder consultation and engagement, the following are some considerations while selecting channels of communication, considering the current COVID-19 situation under the BEST project:

- Avoid public gatherings (considering national restrictions), including public hearings, workshops and community meetings;
- If smaller meetings are permitted, conduct consultations in small-group sessions, such as focus group meetings. If not permitted, make all reasonable efforts to conduct meetings through online channels, including WebEx, Zoom and Skype;
- Be sure that everyone involved in stakeholder planning articulate and express their understandings on social behaviors and good hygiene practices and that any stakeholder engagement events be preceded with the procedure of articulating such hygienic practices;
- Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chat groups appropriate for the purpose, based on the type and category of stakeholders;
- Where direct engagement with project-affected people or beneficiaries is necessary, identify channels for direct communication with each affected household via a context-specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators;
- Each of the proposed channels of engagement should clearly specify how feedback and suggestions can be provided by stakeholders;
- However, in situations where none of the above means of communication is considered adequate for required consultations with stakeholders, PIUs should discuss whether the project activity can be rescheduled to a later time. Where it is not possible to postpone the activity or where the postponement is likely to be for more than a few weeks, PIUs should consult WB Teams to obtain advice and guidance.

#### 6.4 Public consultation and participation

The consultation and participation process in preparing and disclosing the RAF was limited to selected stakeholders both at the project area and at the regional and national level, since specific sub-projects have not been identified yet. Stakeholders' consultation and engagement at the individual household level was not carried out during the preparation of the RAF. However, this will be done at the sub-projects level once they are identified and will be more inclusive irrespective of gender, profession, religion and age groups during conducting RAPs. The various tools identified in the SEP will be used for consultations including household level interviews, participatory rural appraisal, FGDs, stakeholders' consultation meetings, issue specific consultation meetings, open

meetings, and workshops at both local and national levels. During RAPs, consultation meetings and FGDs will be carried out in all selected Unions (lowest administrative unit) and local level workshops will be organized in all selected Upazilas (sub-district) to ensure a comprehensive coverage of the entire program area and provide them specific list of interventions.

## **6.5 Stakeholders engagement plan for project implementation**

Stakeholder engagement activities will need to provide stakeholder groups with relevant information and opportunities to voice their views on issues that matter to them. The activity types and their frequency are adapted to the three main project stages: project preparation (including design, procurement of contractors and supplies), construction, and operation and maintenance.

Table 7: Future stakeholder engagement activities

Stage	Target stakeholders	Topic(s) of Engagement	Method(s) used	Location/frequency	Responsibilities
Stage 1: Project preparation (Project design, Scoping, ESMF/ESCP/SEP Disclosure)	<p><b>Component 1: Environmental Governance</b></p> <p>Ministry of Finance</p> <ul style="list-style-type: none"> <li>- Finance Division,</li> <li>- Banking Division,</li> <li>- Economic Relations Division</li> </ul> <p>Ministry of Law, Justice and Parliamentary Affairs Parliamentary Committee on Environment, Forest and Climate Change Bangladesh Civil Services (BCS)</p> <p>CBOs/ Think Tank on Environmental Issues Media</p> <p>BUET EQMS Consulting Limited Bangladesh Council of Scientific and Industrial Research (BCSIR) International Union for Conservation of Nature and Natural Resources (IUCN) Research Organizations and other Universities working on Environmental issues</p> <p>Local NGOs working on HR, Gender, Labor, Environment and Waste Management including Medical Waste: Waste Concern, PRISM Bangladesh, Geocycle Bangladesh etc.</p> <p>WB-IDA, IFC Other DPs including ADB, JICA, the Foreign, Commonwealth and Development Office (FCDO)</p> <p>General Public including women representatives, who are most adversely impacted by climate change and environmental pollution as well as those whose lands will be acquired</p>	<p>ESMF, ESIA, ESCP, SEP; Project scope and rationale; Project Design; Project E&amp;S principles; Grievance mechanism process</p>	<p>Correspondences (Phone, Emails, Text, instant messaging) for normal communication</p> <p>Face-to-face meetings maintaining health protocol;</p> <p>Formal Meetings maintaining health protocol;</p> <p>FGD, KII with the research Entities maintaining health protocol;</p> <p>One-on-one meetings maintaining health protocol;</p> <p>Virtual Meeting</p> <p>Public meetings for Component 2 and 3 - separate meetings for women, the disabled and the vulnerable group basing on social norm of the project area while maintaining health protocol;</p> <p>Discussion in Radio/TV emissions/media on the project</p> <p>Using the web based social media communication means;</p> <p>Disclosure of written information: brochures, posters, flyers in Bangla, website Information boards or desks</p> <p>Grievance mechanism</p> <p>Local newspaper</p>	<p>At the MOEFCC/DOE HQ, BB, BRTA, BHTPA, and other locations suggested by the stakeholders of components 2, 3 and 4.</p> <p>Initially the frequency of the meetings would be more – weekly, fortnightly, monthly, web -based meetings at short notices on need basis etc. After the project design is completed, meetings could be fortnightly and monthly or as decided by the IAs.</p>	<p>PIUs of 4 IAs</p>

Stage	Target stakeholders	Topic(s) of Engagement	Method(s) used	Location/frequency	Responsibilities
	<p>All type of Industries and Factories that emit pollutants in the country and their Associations (BGMEA, BKEMA, REHAB, Tannery Association, Paint production and Dyeing Industries, Insecticide/pesticide Industries, Brick Kilns, Stone Crushing Industries, Cement Factories, Steel Re-rolling Mills, Ship Breaking Industries, Tobacco Companies etc.</p> <p><b>Component 2: Green Financing</b></p> <p>MOF Planning Commission MOEFCC/DOE BB</p> <p>Selected Eligible Brick kilns ready for HHK and Tunnel Kiln Modification Bangladesh Brick Manufacturing Owners Association (BBMOA) Bangladesh Auto Brick Manufacturers Association (BABMA) Brickfield Workers Association Workers in the selected Brickfields and their family members National/International Vendors and Contractors</p> <p>Coal Exporters, Suppliers and transport sector people including owners, drivers and laborers involved in transporting Coal and fire wood to the Brick Kilns Petty shopkeepers, restaurant owners etc. beside the Brick Kilns whose business in primarily dependent on the Brickfield Workers</p> <p>General public, targeted consumers, land owners</p> <p>Industrial Associations Media Outlets, civil society NGOs/CBOs working on Labor, Gender and Community health Issues</p> <p>BUET Bangladesh Housing and Building Research Institute</p>		<p>Face-to-face meetings maintaining health protocol;</p> <p>Formal Meetings with PFIs and Selected Technical Institute identified to support the Brick Kiln Green CGS Scheme maintaining health protocol;</p> <p>Public Meetings with the selected Brick kiln owners, their associations and workers association etc. maintaining health protocol;</p> <p>FGD, KII with the research Entities maintaining health protocol;</p> <p>One-on-one meetings maintaining health protocol;</p> <p>Virtual Meeting</p> <p>Disclosure of written information: brochures, posters, flyers in Bangla, website Information boards or desks</p> <p>Grievance mechanism</p> <p>Local newspaper</p>		

Stage	Target stakeholders	Topic(s) of Engagement	Method(s) used	Location/frequency	Responsibilities
	<p>EQMS Consulting Limited  Bangladesh Council of Scientific and Industrial Research (BCSIR)  International Union for Conservation of Nature and Natural Resources (IUCN)  Local NGOs working on HR, Gender, Labor, Environment and Waste Management.  Research Organizations and other Universities working on Environmental issues</p> <p>Bangladesh Bank  Credit Guarantee Unit  Sustainable Finance Department (Technical Oversight)</p> <p>5-10 selected Participating Financial Institutions (PFI)  Selected Technical Institute identified to support the Brick Kiln Green CGS Scheme</p> <p>WB-IDA, IFC  Other DPs including ADB, JICA, the Foreign, Commonwealth and Development Office (FCDO)  International and domestic donors of Environment Fund</p> <p><b>Component 3: Vehicle Emission Inspection</b></p> <p>Ministry of Finance  MOEFCC  DOE  PPP Partners responsible for developing 5 new Vehicle Inspection Centers</p> <p>BRTA  Dhaka Transport Coordination Authority (DTCA)  Dhaka Transport Coordination Board (DTCB)  Roads and Highways Department  Dhaka Metropolitan Police (Traffic Division)</p> <p>Private and Commercial Vehicle Owners  Different Transport Owners and Transport Workers Association</p> <p>National/International Vendors and Contractors  Local community and businessmen</p>		<p>Face-to-face meetings maintaining health protocol;</p> <p>Formal Meetings with PPP Partners, DTCA, DTCB, and small-scale public meetings with different Transport Owners and Transport Workers Association maintaining health protocol;</p> <p>FGD, KII with the research Entities maintaining health protocol;</p> <p>One-on-one meetings with WB and PPP partners maintaining health protocol;</p> <p>Virtual Meeting  Disclosure of written information: brochures, posters, flyers in Bangla, website  Information boards or desks</p> <p>Grievance mechanism</p>		

Stage	Target stakeholders	Topic(s) of Engagement	Method(s) used	Location/frequency	Responsibilities
	<p>Media NGOs/CBOs working on HR, Gender, Labor, Environment and Community health Issues Research Organizations and other Universities working on Environmental issues</p> <p>WB-IDA, IFC Other DPs including ADB, JICA, the Foreign, Commonwealth and Development Office (FCDO)</p> <p><b>Component 4: E-waste Management Facility</b></p> <p>MOF MOLGRD&amp;C MOEFCC/DOE MOPTI PM's Office (BEZA) BHTPA PPP partners involved with E-waste management facility at Kaliakair HTP and other HTPs managed by BHTPA across the country</p> <p>National/International Vendors and Contractors and Local businessmen interested to have a share in the contract of the E waste Management Facility</p> <p>General Public and local community in the sub-project areas</p> <p>Producers, dealers, collection centers, refurbishing companies, dismantlers, recyclers, auctioneers, consumers and bulk consumers involved in the sale, purchase and processing of electrical and electronic equipment or components</p> <p>Bulk users of electronic gadgets namely Military, Para military and Intelligence Organizations, Civil Aviation Authority, mobile phone companies, embassies, Hotels, Commercial Banks, ICT gadget/mobile phone manufacturers, Service sector including Hotels and Tourism, E-Commerce entities, manufacturers, Hospitals and diagnostic Centers, large shopping malls selling computers, mobile phones etc. at Eastern Plaza, Banani DCC Market, Elephant Road, BCS Computer City at Agargaon, Cineplexes, and other users of computers, radio frequency items, radar, mobile</p>		<p>Face-to-face meetings with WB, DPs, PPP Partners, and HTPs maintaining health protocol;</p> <p>Formal Meetings with National/International Vendors and Contractors Of E-waste management facility at Kaliakair HTP and IT Business Associations maintaining health protocol;</p> <p>FGD, KII with the research Entities maintaining health protocol;</p> <p>One-on-one meetings with WB and PPP partners maintaining health protocol;</p> <p>Virtual Meeting</p> <p>Disclosure of written information: brochures, posters, flyers in Bangla, website Information boards or desks</p> <p>Grievance mechanism</p> <p>One-to One/ Formal Meetings/Face-to-face meetings with WB, DPs, PPP Partners, and</p>		

Stage	Target stakeholders	Topic(s) of Engagement	Method(s) used	Location/frequency	Responsibilities
	<p>phones, jammers and other electronic generating E-waste. Similar entities at the Division and District HQs are also to be considered</p> <p>Scavenger that collect the E-waste items from landfills and open dustbins for recycling and the buyer Chain of the E-waste recyclable goods</p> <p>BUET EQMS Consulting Limited Research Organizations and other Universities working on Environmental issues Bangladesh Council of Scientific and Industrial Research (BCSIR) International Union for Conservation of Nature and Natural Resources (IUCN)</p> <p>Media NGOs/CBOs working on HR, Gender, Labor, Environment and Community health Issues Local NGOs working on Waste Management</p> <p>WB-IDA, IFC Other DPs including ADB, JICA, the Foreign, Commonwealth and Development Office (FCDO), Norwegian Embassy, UNIDO, GIZ, UNDP</p> <p><b>Component 5: Contingency Emergency Response Component (CERC)</b></p> <p>MOF, MOEFCC/DOE, BB, BRTA, BHTPA, PFIs, PPP Partners</p> <p>WB-IDA, IFC Other DPs including ADB, JICA, the Foreign, Commonwealth and Development Office (FCDO), Norwegian Embassy, UNIDO, GIZ, UNDP</p>		<p>PFIs by MOF, MOEFCC/DOE, BRTA and BHTPA maintaining health protocol;</p> <p>Virtual Meetings</p>		

Stage	Target stakeholders	Topic(s) of Engagement	Method(s) used	Location/frequency	Responsibilities
				As and when needed.	
STAGE 2: Project Implementation	<p><b>Component 1: Environmental Governance</b></p> <p>Ministry of Finance  Ministry of Environment, Forest and Climate Change (MOEFCC)  Department of Environment (DOE)  Ministry of Road Transport and Bridges (MORTB)  Ministry of Local Government, Rural Development and Cooperatives (MOLGRDC)  Ministry of Posts, Telecommunications and Information Technology (MOPTI)  Prime Minister’s Office (BEZA)  Ministry of Law, Justice and Parliamentary Affairs  Parliamentary Committee on Environment, Forest and Climate Change  Bangladesh Civil Services (BCS)</p> <p>General Public including women representatives, who are most adversely impacted by climate change and environmental pollution</p> <p>WB-IDA, IFC  Other DPs</p> <p><b>Component 2: Green Financing</b></p> <p>MOF  Planning Commission  MOEFCC/DOE  Bangladesh Bank  - Credit Guarantee Unit  - Sustainable Finance Department (Technical Oversight)</p> <p>Selected Eligible Brick kilns ready for HHK and Tunnel Kiln Modification</p>	<p>Grievance mechanism  OHS of the workforce Health and safety impacts (EMF, community H&amp;S, community concerns)  Employment opportunities  Project status</p>	<p>Face-to-face meetings maintaining health protocol;  Formal Meetings with PPP Partners, other implementing entities, contractors, suppliers, supervising Technical Institutes etc. maintaining health protocol;  Virtual Meeting and  One-on-one meetings with WB and PPP partners and PFIs maintaining health protocol;  Disclosure of written information: brochures, posters, flyers in Bangla intimating progress of the work, any design change etc.  Updating website at regular interval  Information boards or desks  Grievance mechanism</p>	<p>At the MOEFCC/DOE HQ, BB, BRTA, BHTPA, and the sub project sites or other locations as suggested by PPP partners, PFIs etc. for components 2, 3 and 4.  Initially the frequency of the meetings would be more –fortnightly, and monthly;  As the implementation gains tempo, the meetings could be every 2/3 months and as and when needed.  web -based meetings at short notices on need basis etc.  Periodic Communication through mass/social media as needed  Notice boards updated bi-weekly  Routine interactions  Brochures in local offices</p>	<p>MOEFCC/DOE HQ, BB, BRTA, and BHTPA and their implementing staffs at the sub-project level</p>

Stage	Target stakeholders	Topic(s) of Engagement	Method(s) used	Location/frequency	Responsibilities
	<p>Bangladesh Brick Manufacturing Owners Association (BBMOA)  Bangladesh Auto Brick Manufacturers Association (BABMA)  Brickfield Workers Association  Workers in the selected Brickfields and their family members  National/International Vendors and Contractors</p> <p>5-10 selected Participating Financial Institutions (PFI)  Selected Technical Institute identified to support the Brick Kiln Green CGS Scheme</p> <p>WB-IDA, IFC  Other DPs  International and domestic donors of Environment Fund</p> <p><b>Component 3: Vehicle Emission Inspection</b></p> <p>Ministry of Finance  MOEFCC  DOE  PPP Partners responsible for developing 5 new Vehicle Inspection Centers</p> <p>BRTA  Dhaka Transport Coordination Authority (DTCA)  Dhaka Transport Coordination Board (DTCB)  Roads and Highways Department  Dhaka Metropolitan Police (Traffic Division)</p> <p>Private and Commercial Vehicle Owners  Different Transport Owners and Transport Workers Association</p> <p>National/International Vendors and Contractors</p> <p>WB-IDA, IFC  Other DPs</p> <p><b>Component 4: E-waste Management Facility</b></p> <p>MOF</p>				

Stage	Target stakeholders	Topic(s) of Engagement	Method(s) used	Location/frequency	Responsibilities
	<p>MOLGRD&amp;C MOEFCC/DOE MOPTI PM's Office (BEZA) BHTPA PPP partners involved with E-waste management facility at Kaliakair HTP and other HTPs managed by BHTPA across the country</p> <p>National/International Vendors and Contractors working on developing E waste Management Facility</p> <p>WB-IDA, IFC Other DPs</p> <p><b>Component 5: Contingency Emergency Response Component (CERC)</b></p> <p>MOF, MOEFCC/DOE, BB, BRTA, BHTPA, PFIs, PPP Partners</p> <p>WB-IDA, IFC Other DPs</p>			As and when needed.	
STAGE 3: Operation and maintenance	<p><b>Component 1: Environmental Governance</b></p> <p>Ministry of Environment, Forest and Climate Change (MOEFCC) Department of Environment (DOE)</p> <p>General Public including women representatives, who are most adversely impacted by climate change and environmental pollution</p> <p><b>Component 2: Green Financing</b></p> <p>MOEFCC/DOE Bangladesh Bank Selected Eligible Brick kilns ready for HHK and Tunnel Kiln Modification 5-10 selected Participating Financial Institutions (PFI) Selected Technical Institute to support the Brick Kiln Green CGS Scheme</p> <p><b>Component 3: Vehicle Emission Inspection</b></p>	<p>DOE is more agile with regulatory changes and updating of ECA 1995, Institutional Reforms and Capacity Building.</p> <p>Air Quality improvement in greater Dhaka City and suburbs and whole country, efficient E-waste disposal, and less pollutant brick kiln producing bricks without using coal and firewood</p> <p>Satisfaction with engagement activities and GRM</p>	<p>Outreach to individual PAPs/beneficiaries while maintaining health protocol;</p> <p>Alternatively using the web based social media communication means, wherever possible;</p> <p>MOEFCC/DOE Website to update changes that took place upon completion of implementation of the project.</p>	<p>Outreach as needed</p> <p>Meetings in affected people and villages (as needed/requested)</p> <p>Monthly (newsletter)</p>	<p>MOEFCC/DOE HQ, BB, BRTA, and BHTPA staffs at the HQ level and project staffs at the newly completed Kaliakair E-Waste Management facility, newly established Vehicle Inspection Centers, and Divisional Laboratories and newly constructed District offices and upgraded Brick Kilns</p>

Stage	Target stakeholders	Topic(s) of Engagement	Method(s) used	Location/frequency	Responsibilities
	<p>MOEFCCDOE /PPP Partners responsible for developing 5 new Vehicle Inspection Centers</p> <p>BRTA Dhaka Transport Coordination Authority (DTCA) Dhaka Transport Coordination Board (DTCB) Roads and Highways Department Dhaka Metropolitan Police (Traffic Division)</p> <p>Private and Commercial Vehicle Owners Different Transport Owners and Transport Workers Association</p> <p><b>Component 4: E-waste Management Facility</b></p> <p>MOEFCC/DOE MOPTI BHTPA PPP partners involved with E-waste management facility at Kaliakair HTP and other HTPs managed by BHTPA across the country</p> <p>Producers, dealers, collection centers, refurbishing companies, dismantlers, recyclers, auctioneers, consumers and bulk consumers involved in the sale, purchase and processing of electrical and electronic equipment or components</p> <p>Bulk users of electronic gadgets namely Military, Para military and Intelligence Organizations, Civil Aviation Authority, mobile phone companies, embassies, Hotels, Commercial Banks, ICT gadget/mobile phone manufacturers, Service sector including Hotels and Tourism, E-Commerce entities, manufacturers, Hospitals and diagnostic Centers, large shopping malls selling computers, mobile phones etc. at Eastern Plaza, Banani DCC Market, Elephant Road, BCS Computer City at Agargaon, Cineplexes, and other users of computers, radio frequency items, radar, mobile phones, jammers and other electronic generating E-waste. Similar entities at the Division and District HQs are also to be considered</p>			As and when needed.	PPP Partners and PFIs could also educate on their experience with the project and suggest measures to improve future involvements.

Stage	Target stakeholders	Topic(s) of Engagement	Method(s) used	Location/frequency	Responsibilities
	<p data-bbox="304 252 757 300"><b>Component 5: Contingency Emergency Response Component (CERC)</b></p> <p data-bbox="304 331 824 354">MOF, MOEFCC/DOE, BB, BRTA, BHTPA, PFIs, PPP Partners</p>				

## 6.6 Description of Information Disclosure Methods

The draft RAF report of BEST will be disclosed to the local and national level stakeholders through different methods as described below.

**Workshop:** A national workshop will be held at Dhaka to present the detailed project, including ES aspects of BEST to the key stakeholders. In addition, stakeholders' meetings will be held at sub-project areas to disclose the results of RAPs, following COVID-19 protocols mentioned earlier. The workshops will also help to resolve conflicting issues among stakeholders. Besides, FGDs and personal interviews will be carried out at all selected sites of the BEST project area to generate communities' views and concerns.

**Availability of the Document:** Summary of the RAF report will be translated into Bengali language and disseminated locally. The full report (in English) and the summary (in Bengali) will also be uploaded to the website of DoE, BB, BRTA, BHTPA and WB. A hard copy of the RAF will also be available at the DoE, BRTA and BHTPA District offices. Inputs from the stakeholders will be taken in to consideration for future updates of RPF/RAPs and the stakeholders will be intimated on how their inputs have been taken in to consideration, closing the feedback loop.

## Chapter 7: Grievance Redress Mechanism

### 7.1 Introduction

The various stakeholders including PAPs, other interested parties, aspirant job seekers, Contractors/Vendors and suppliers, Research Organizations, CSOs CBOs and the common people may wish to communicate suggestions, comments or complaints at any time by using the project's Grievance Redress Mechanism (GRM). Owing to the involvement of four IAs namely MOEFCC/DOE, BB, BRTA and BHTPA in the project, individual IA would need to develop its own GRM that along with SEA/SH and GBV related issues. Separate Labor related GRM has to be developed by IAs where labor and construction work would be involved. The overall objectives of the GRM are to:

- Provide a transparent process for timely identification and resolution of issues affecting the project and people, including issues related to the social and environmental impact. Strengthen accountability to the beneficiaries, including project-affected people.
- Decrease the risk of poor management of construction activities due to early-warning mechanism.
- Record and address GBV services related complaints, including SEA/SH.

The GRM will be accessible to all Internal, external, and international stakeholders, including affected people, community members, civil society, media, vulnerable people and other interested parties. External stakeholders at the international level could use the GRM to submit complaints, feedback, queries, suggestions, or even compliments related to the overall management and implementation of the BEST Project. The GRM is intended to address issues and complaints in an efficient, timely, and cost-effective manner. A separate mechanism will be available for the workers working under contractors and sub-contractors at different sub-project sites throughout the country as per the guidance of ESS2. The GRM would also be made available online so that grievances could be submitted without the need for physical interaction, especially during the time of COVID-19 pandemic.

Four IAs would be involved with the implementation of the project components and the GRM must be suited basing on the ground realities. DOE, being responsible of performing M&E activities at the project level, should be kept in the loop to record all the grievances received by different IAs. Individual PIUs of the IAs would be responsible for the GRM for their component related grievances and feed DoE PIU with all the grievance related information and the outcome so that DoE as the coordinator of GRM for the project has all the information from other PIUs. For effective functioning of the GRM, IAs to define various levels of the Grievance Redress Committees (GRCs) and composition of the committees and modus operandi of lodging a complaint and the timeframe and hierarchy of addressing those suiting the activities of various components of the project. There is a necessity to have a field level GRM wherever construction related works are planned, be it DoE offices at District HQs and laboratories at the Region/Division HQs, modernization of 20-30 brick kilns, construction of 5 VICs or E waste management Infrastructure at Kaliakair HTP.

The GRM should be user friendly and easily approachable, particularly by the physically and mentally disabled, marginalized and the vulnerable groups including the ethnic minorities, when available.

### 7.2 Objectives of GRM

The fundamental objectives of the GRM, implemented through the GRC serving as a para-legal body, are to resolve any resettlement-related grievances locally in consultation with the aggrieved

party to facilitate smooth implementation of the social and environmental action plans. Another important objective is to democratize the development process at the local level and to establish accountability to the affected people. The procedures will however not a person’s right to go to the courts of law pre-empt.

### 7.3 Grievance Redress Committees (GRC)

Grievance redress committees (GRC) will be formed to receive and resolve complaints as well as grievances from aggrieved persons from the local stakeholders including the project-affected persons. Based on consensus, the procedure will help to resolve issues/conflicts amicably and quickly, saving the aggrieved persons from having to resort to expensive, time-consuming legal actions. The procedure will, however, not pre-empt a person’s right to go to the courts of law.

### 7.4 Composition of GRC

#### Subproject level GRM

A Grievance Redress Committee (GRC) should be formed for each sub-project site where the local community, CSOs, CBOs, local NGOs working on Gender and GBV issues, contractors, suppliers etc. when aggrieved, could lodge their complaints for immediate redressal in situ. The IAs should form such GRCs ensuring acceptability of the members, and easy accessibility by the affected persons. The Secretariat for local GRC will be at the office of the sub-project. The GRC will ensure proper presentation of complaints and grievances as well as impartial hearings and investigations, and transparent resolutions. Where grievances are among the affected persons, the membership composition of the GRCs will take into account any traditional conflict resolution arrangements that communities may practice. If the aggrieved person is a female, the GRC will ask the concerned female representative from the community/local NGO to participate in the hearings. Members of the GRCs will be nominated by the by the IAs through consultation with their staffs in the sub-project sites and the local administration/local leadership. A grassroots level GRC should have a Convener, a Member-secretary and 3-5 members where at least two could be female members. The GRC members should be respectable and impartial educated personalities. A suggested GRC at subproject level is given below:

#### GRC composition at Subproject level

1. Senior Field Level Officer responsible for the sub-project	Convener
2. Local UP Member/Ward Councilor	Member
3. An SMC member/Teacher from Govt. Primary School	Member
4. Representative from Local Women’s Group /Local NGO	Member
5. Community Leader from the PAP/ VG/ethnic community, when available	Member
6. A field level officer nominated by the Convener	Member-Secretary

All complaints will be received at the office of the sub-project site. A ‘Complaint Box’ should be kept at the site for ease of submission of written complaints. All cases at the subproject level will be heard and solved **within 10 days of their receipt**. The E&S Specialists at the PIUs will make periodic visit to the subproject sites, interact with the communities and affected persons, and pick up issues of concerns, complaints and suggestions to register with the GRM books. Grievances

received through any channel will be registered and a notification of receipt with assurance of necessary review and resolution given in writing to the aggrieved persons. If a decision at Subproject Level is unacceptable to the aggrieved person(s), the Subproject Level GRC should refer the case to the GRC at the PIU with the minutes of the hearings.

**Composition at PIU and PCMU level**

PD or his representative would be the Convener and Social Management Specialist at the PIU will be the Secretary for the PIU level GRC. A member from the affected community under the PIU will also be made a member.

GRC Membership at PIU Level

Project Director (PD) of PIUs	Convener
Social Specialist	Member Secretary
One female representative from PIUs (DoE/BB/BRTA/BHTPA)	Member
A representative from affected community	Member

Convener/Member Secretary of the Field Level GRC would present the case at the PIU level GRC. At the PIU level, decisions on unresolved cases, if any, will be made in **no more than 15 days** from receipt of the complaint by an official designated by the PD. A decision agreed with the aggrieved person(s) at any level of hearing will be binding upon the IA. There will be budgetary allocation for Subproject Level GRC members to participate in the PIU level GRC meetings.

If a person who submits a grievance is not satisfied with the resolution at the subproject level, he or she may request it be elevated to the PIU level GRC. If they are not satisfied with the ultimate resolution by the PIU, they may elevate it to PCMU level who will solve the issues in 15 days time. The Project Coordinating Director will be Convener of such PCMU level GRC with the Social Specialist of the particular PIU will act as Secretary. A representative of the aggrieved community will also be made a member of PCMU level GRC. In case such solution is not accepted, the complainant may pursue legal remedies in court or pursue other avenues. Throughout the entire process, DOE PIU at the Project Level will maintain detailed record of all deliberations, investigations, findings, and actions, and will maintain a summary log that tracks the overall process.

GRC Membership at PCMU Level

Additional Secretary of MoEFCC as the Project Coordination Director (PCD)	Convener
Social Specialist of concerned PIU	Member Secretary
Gender Focal Person of MoEFCC	Member
Representative of affected people	Member

The composition of GRC at the PIU and Subproject Level should be communicated through project website, billboard at the sub-project site and other locations of public gathering in the vicinity, posters, flyers and through social media in Bangla and English indicating name of the contact person, location, contact number, email address etc.

The following steps will be followed for the successful implementation of GRM:

- **Step 1:** Project stakeholders will be able to provide feedback and report/record complaints through several channels: in person at offices (DOE, BB, BRTA and BHTPA), Complaint Box located at the sub-project sites, and to the Convener by mail, telephone, and email. There could be occasions when the complainant might shy away from identifying oneself. In such cases most of the complaints could be of common nature affecting a group/ indicating corruption in the implementation by some quarter etc. and not affecting an individual. These complaints should also be addressed in the same manner as if the complainant has an identity and if found correct, appropriate measures be taken and communicated to all concerned.
- **Step 2:** Complaints and feedback will be compiled in each level and recorded in a register. He or she will place the grievances to the committee and the complained person with the goal to resolve complaints within ten days of receipt at Subproject level.
- **Step 3:** As soon as the complaint is received, the responsible person will communicate with the complainant and provide information on the likely course of action and the anticipated timeframe for resolution of the complaint. This step involves gathering information about the grievance to determine the facts surrounding the issue and verifying the complaint's validity, and then developing a proposed resolution. Depending on the nature of the complaint, the process can include site visits, document reviews, a meeting with the complainant (if known and willing to engage), and meetings with others (both those associated with the project and outside) who may have knowledge or can otherwise help resolve the issue. All activities taken during this and the other steps will be fully documented, and any resolution logged in the register. If complaints are not resolved within ten days, the responsible person will forward the complaint to the PIU GRC along with relevant documents for action at PIU GRC's end. The complainant must be informed about this matter immediately.
- **Step 4:** All efforts must be made to come to some amicable solution by PIU level GRC within 15 days from receipt of the complaint from Subproject level. This step involves informing those to submit complaints, feedback, and questions about how issues were resolved, or providing answers to questions. Whenever possible, complainants should be informed of the proposed resolution in person. If the complainant is not satisfied with the resolution, he or she will be informed of further options, which would include elevating the complaint to PCMU level which would take 15 days to provide a solution. Data on grievances and/or original grievance logs will be made available to World Bank missions on request, and summaries of grievances and resolutions will be included in periodic reports to the World Bank.

## 7.5 Grievance logs

As noted previously, the PIUs will maintain a grievance log. This log will include at least the following information:

- Individual reference number
- Name of the person submitting the complaint, question, or other feedback, address and/or contact information (unless the complaint has been submitted anonymously or is GBV related)
- Details of the complaint, feedback, or question/her location and details of his / her complaint.
- Date of the complaint.
- Name of person assigned to deal with the complaint (acknowledge to the complainant, investigate, propose resolutions, etc.)
- Details of proposed resolution, including person(s) who will be responsible for authorizing and implementing any corrective actions that are part of the proposed resolution
- Date when proposed resolution was communicated to the complainant (unless anonymous)
- Date when the complainant acknowledged, in writing if possible, being informed of the proposed resolution
- Details of whether the complainant was satisfied with the resolution, and whether the complaint can be closed out
- If necessary, details of various GRC levels, referrals, activities, and decisions
- Date when the resolution is implemented (if any).

Grievance resolution will be a continuous process in sub-project level activities and implementation of those. The PIUs 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 Bank and any other interested persons/entities. The PIUs will also prepare periodic reports on the grievance resolution process and publish these on their website while DOE to publish a consolidated report encompassing all the PIUs.

### **Monitoring and reporting on grievances**

Details of monitoring and reporting are described above. Day-to-day implementation of the GRM and reporting to the World Bank will be the responsibility of the Implementing Agencies. To ensure management oversight of grievance handling, the PCMU will be responsible for monitoring the overall process, including verification that agreed resolutions are actually implemented.

### **Points of Contact**

Information on the project and future stakeholder engagement programs will be available on the project's website and other places as mentioned at previous section Information can also be obtained from the PIUs. All the PIUs must indicate a dedicated point of contact for recording project related complaints at every level (including SEA/SH related complaints) and passing those to the GRC for necessary action at their end.

The point of contact regarding the stakeholder engagement program and GRM at various levels of the concerned IAs should be informed to the stakeholders and local community. The following information must be provided for ease of communication:

<i>Description</i>	<i>Contact details</i>
<b>Name and position/organization:</b>	
<b>Address:</b>	
<b>Email:</b>	
<b>Telephone:</b>	<b>Mobile Number:</b>
<b>Address of GRM Website when developed:</b>	

## Chapter 8: Institutional and Implementation Arrangements

### 8.1 Institutional arrangement

The overall responsibility for the Project implementation would lie with the MoEFCC(DoE)/BB/BRTA/BHTPA. DoE/BB/BRTA/BHTPA will be the project holder and responsible for managing the E&S risks of the project, including implementation of the RPF and GRM.

For efficient and smooth implementation of the project, suitable institutional arrangements are necessary to manage and implement the RAPs. Project Institutional arrangement consist of Project Steering Committee (PSC), Joint Project Coordination and Monitoring Unit (PCMU) and the Project Implementation Units (PIUs). Institutional arrangements required for implementation of Resettlement Plan includes capacity augmentation of IA, Deputy Commissioners offices, appointment of consulting firm, formation of various committees like: GRC, PAVC, RAC, etc.

### 8.2 Roles and Responsibilities

#### **Project Steering Committee (PSC)**

A joint PSC will be created under the leadership of Secretary of MoEFCC and representatives of Ministry of Finance (Finance Division, Financial Institutions Division, Economic Relations Division), PC, BB, Ministry of Road Transport and Bridges, MOPTI, MLGRDC, and PM Office (BEZA) who will effectively coordinate stakeholders' participation in different project activities.

The PSC will meet twice a year to:

- review implementation results of a given year;
- proposed implementation plans for the next year at the end of an implementation year;
- review implementation progress and approve adjustments needed in the middle of an implementation year

#### **Joint Project Coordination and Monitoring Unit (PCMU)**

A joint PCMU will be established under the MoEFCC with an additional secretary of MoEFCC to serve as the project coordination director (PCD). This unit will include members from DoE, BB, BRTA and BHTPA and facilitate coordination of all four implementing agencies and provide secretarial support to PSC. A project management firm will be recruited to support PCMU in managing these tasks. The PCMU will:

- coordinate inter agency and harmonize actions;
- get all necessary technical support from all implementing agencies;
- coordinate with other GoB stakeholders and DPs on all project related issues;
- collect project implementation information from all four implementing agencies;
- prepare consolidated project implementation progress reports on a quarterly basis; and
- submit quarterly reports to the PSC and the WB for review

#### **Project Implementation Units (PIUs)**

The overall responsibility of environmental performance, including ESMF/ESIA/ESMP implementation of the project, will rest with the four individual PIUs. All four PIUs will have their

own PD and Monitoring and Evaluation Specialist, ES Specialist, Financial Management and Procurement Specialist (except BB). Additional technical experts will be mobilized to support the PIU as needed. DoE PIU will also recruit a project management firm during the initial years to support Component 1 implementation.

Also, the PIU will engage independent consultants to supervise the contractors assuring ES management requirements and measures on their execution of construction-related, infrastructural development and other activities that have significant environmental impacts identified in the ESMF/ESIA. The PIU will ensure adherence to the monitoring parameters, including quality requirements, as well as all ESMP measures.

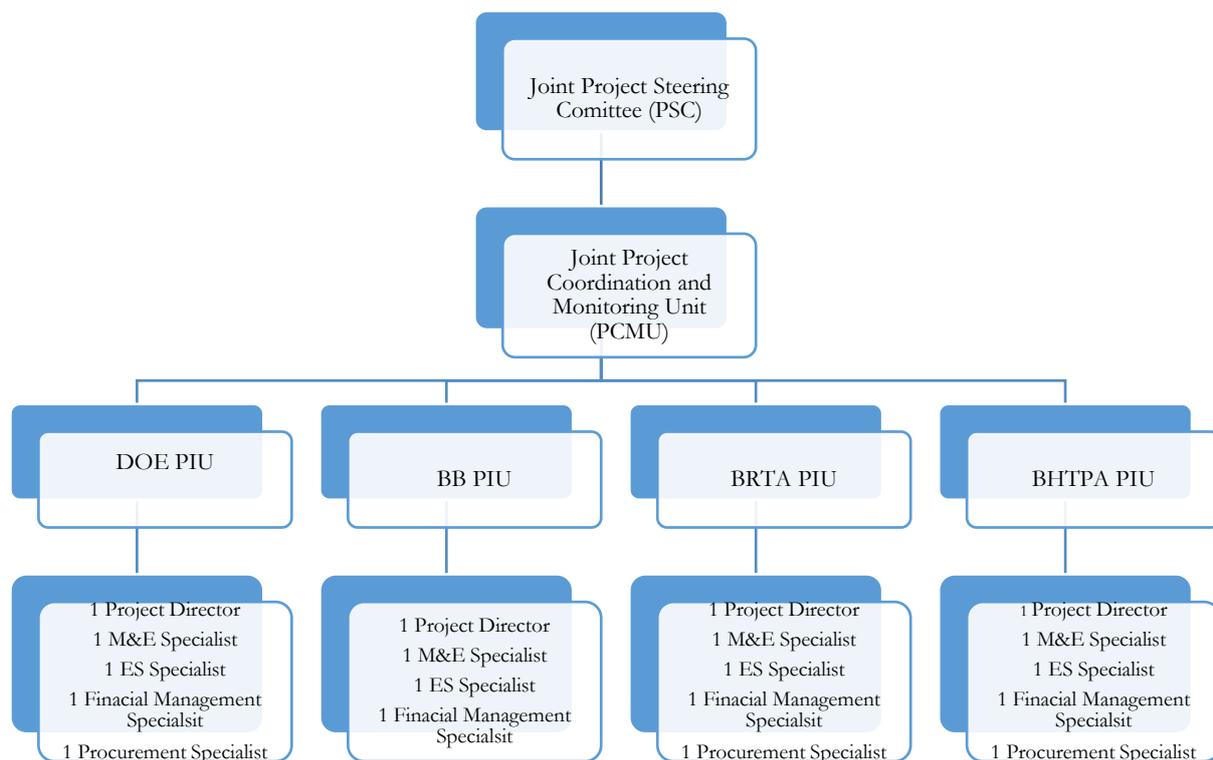


Figure 3: Organizational Setup for Environmental and Social Management

**Roles and responsibility of RAP preparation firm:** The IA will hire consulting firm to support the preparation of RAPs. During RAP preparation regularly keep good coordination with PIUs for area demarcation, census, socio-economic and IOL survey and RAP preparation.

**Roles and responsibility of RAP Implementing Consulting Firm:** Consulting Firm will support the PIUs when and where required. A Consulting Firm will work closely with PIUs. The role of Consulting Firm will be to facilitate sound implementation of the land related issues of the project. The Consulting Firm will work as a bridge between the Project Authority and the affected persons.

MoEFCC approves the LAPs and RAPs of the project prepared by the PIUs with the support of the consulting firm. MoEFCC is also responsible for approving different committees like Grievance Redress Committee (GRC), Property Valuation Advisory Committee (PVAC) and Resettlement

Advisory Committee (RAC) and Inventory Verification Committee (IVC) proposed in the RAPs through gazette notification.

Implementation of RAPs for affected persons will be carried out in eight (8) steps. PIU will ensure implementation of the RAPs with the support of the consulting firm.

**Step-1: Formation and Preparation**

- Organize inception meeting with relevant stakeholders
- Provide safeguard orientation to the team according to ESS 2, ESS 5, ESS 7 and ESS 7
- Capacity building through organizing training and workshop
- Institutional Arrangements & Logistics
- Submit inception report and require approval from RAPs verification survey

**Step-2: Develop Implementation Tools/Mechanism**

- Develop tools and materials for information campaign (i.e. Booklet, Leaflet, etc.)
- Develop monitoring tools for implementation progress
- Develop reporting format such as monthly/quarterly/semi-annual/annual
- Develop/update GRC application form
- Develop/update focus group meeting checklist
- Develop format of Entitled Persons file and Entitlement Card
- Develop format of payment debit voucher
- Develop ID card format for the EPs
- Develop computerized Management Information System (MIS)
- Develop internal server for data management, sharing and monitoring

**Step-3: Land Acquisition**

- Liaise with DC office in case of land acquisition and compensation payment
- Assist DC offices in land acquisition process
- Assist in serving notice under section 4 and Joint Verification
- Assist in serving notice under section 7
- Assist in preparation of LA estimate and award book
- Assist in serving notice under section 8 by DCs
- Assist PAPs in updating record of rights and receiving compensation
- Assist DC office during transfer of land

**Step-4: Social Preparation and Information Dissemination**

- Formation of focused groups with various occupation groups at the field

- Information campaign
- Disclosure of RAP policy
- Regular meetings with affected people for updating record of rights and other documents for receiving compensation from DC office and DoE/BB/BRTA/BHTPA
- Consult the displaced people to get ready for relocation after getting compensation
- Develop ideas, script, and mechanism for organizing and executing awareness campaign outside the RAP implementation
- Organize, follow-up and recap various awareness campaign

#### **Step-5: Payment of Compensation**

- Collection of award book from the DC office
- Collection of CCL from PAPs after getting compensation
- Prepare CCL statement as per DC payment
- Devise ID number for each of the entitled persons
- Preparation of EP file and EC
- Preparation indent (EP payment list)
- Opening Bank Account by the APs
- Prepare ID cards for the EPs using photograph
- Calculate Individual entitlement based on category of losses and policy of the RAPs
- Prepare Debit voucher and other necessary documents for making payment of additional compensation and other benefits
- Payment of additional grants and resettlement benefits
- Assist EPs in producing Grievances, if any

#### **Step-6: Relocation/Resettlement**

- Payment of resettlement benefits to EPs
- Assess relocation options of the PAPs and provide facilities in relocation choices
- Assist APs in moving private graves (if requested by the affected households)
- Assist displaced households/EPs in relocation and resettlement
- Support APs in retitling and updating of their record of rights
- Implement Income and Livelihood Restoration Program (ILRP)
- Develop training need assessment report & training materials for ILRP
- Assist to relocate common public property
- Give moral support to affected person in terms of resettlement

### Step-7: Establishment of Grievance Mechanism

- Development/finalization of format for grievance cases including
- Assist PAPs in producing grievances
- Conduct meetings on GRM
- Disclose GRM process among the people
- Resolve grievances and report on monthly basis

### Step-8: Submission of Progress Report

- Generate progress reports for real-time monitoring of RAP implementation progress using user-friendly menu driven software
- Share the draft report with project authority and relevant stakeholders
- Incorporate feedback and response
- Submission of final reports.

*Table 8: RPF related activities, responsibility and approval authority*

Actions	Responsibility	Approval authority
<b>RAP preparation stage</b>		
<b>Census, SES, IoL and Property Valuation Survey (PVS) for RAP preparation</b>	PIUs with the support of implementing firm	PCMU
<b>Consultation with affected HHS and relevant Stakeholders</b>	PIUs with the support of implementing firm	PCMU
<b>Preparation of RAP/s</b>	PIUs with the support of implementing firm	PCMU, MoEFCC and World Bank
<b>RAP Implementation stage</b>		
<b>Land acquisition and compensation for title holder</b>	PIUs with the support of implementing firm	DC
<b>Compensation for non-titleholder</b>	PIUs with the support of implementing firm	MoEFCC and World Bank
<b>Top-up payment for tittle and non-title</b>	PIUs with the support of implementing firm	MoEFCC and World Bank
<b>PVAC formation</b>	PIUs	MoEFCC
<b>GRC formation</b>	PIUs	MoEFCC
<b>RAC formation</b>	PIUs	MoEFCC
<b>Implementation of RAP and quarterly implementation report</b>	PIUs with the support of implementing firm	PCMU and World Bank

Actions	Responsibility	Approval authority
<b>Monitoring</b>		
<b>Internal monitoring report</b>	PIU with the support of DoE/BB/BRTA/BHTPA	PCMU and World Bank
<b>External monitoring report</b>	External monitor	PCMU and World Bank

### 8.3 Capacity Building

The IA will develop a comprehensive course plan and materials to train staffs and consultants which will contribute in the long-term capacity building in environmental and social management. Environmental and social management training will help ensure that the requirements of the ESS and subsequent social management are clearly understood and followed by all project personnel throughout the project period. The PIU will ensure, in collaboration with the PSC that these training are provided to all required Project personnel. The social training program will be finalized before the commencement of the project. The training will be provided to the PCMU, PIU staffs and representatives, construction contractors, and other staff engaged in the Project. Training will cover all staff levels, ranging from the management and supervisory to the skilled and unskilled categories. The scope of the training will cover general environmental and social awareness and the requirements of the ESS5 and other ESSs, with special emphasis on sensitizing the project staff to the social and genders aspects of the area. Different raining programs will be initiated which can be realigned based on the needs Table (10)

Table 9: Training

Contents	Participants	Responsibility	Schedule
<b>Introduction to World Bank ESF</b>	PCMU, PIU, local government staffs and contractors	MoEFCC, DoE, BB, BRTA, BHTPA and PIUs	<b>Prior to the start of the Project activities.</b>
<b>ESF guidelines and RPF</b>	PCMU, PIU, local government staffs and contractors	MoEFCC, DoE, BB, BRTA, BHTPA and PIUs	<b>Prior to the start of the Project activities.</b>
<b>Screening method, social survey procedures, RAP and LAP preparation</b>	PCMU, PIU, local government staffs and contractors	MoEFCC, DoE, BB, BRTA, BHTPA and PIUs	<b>Prior to the start of the Project activities.</b>
<b>Training on ESS 2, ESS10 and ESS5</b>	PCMU, PIU, local government staffs and contractors	MoEFCC, DoE, BB, BRTA, BHTPA and PIUs	<b>Prior to the start of the field activities.</b>
<b>Preparation and review of RPF, RAP, and IPP</b>	PCMU, PIU, Monitoring and supervision consultant	MoEFCC, DoE, BB, BRTA, BHTPA and PIUs	<b>Prior to the start of the field activities.</b>
<b>Grievance Mechanism and handling procedures</b>	Contractors, PIU, consulting firms, Construction crew	MoEFCC, DoE, BB, BRTA, BHTPA and PIUs	<b>Prior to the start of the construction activities.</b>

Contents	Participants	Responsibility	Schedule
			(To be repeated as needed)
<b>Internal and External Monitoring procedures and reporting</b>	<b>PCMU, PIUs and Consulting firms, contractors</b>	MoEFCC, DoE, BB, BRTA, BHTPA and PIUs	<b>Before and during the construction activities.</b>  (To be repeated as needed)

## 8.4 Guidelines for bid documents

Bid documents for preparation of RAPs will be prepared by interested firms need to incorporate relevant items from the RPF. All the RPF related documents will be inserted with the bid documents for RAP implementation firm, construction and supervision firm and external monitor. Therefore, during preparation of tender documents, the PIUs needs to ensure that:

- All relevant RPF items relevant for contractors and firms are included in tender documents (specifications and BOQs)
- Provide clear information to potential bidders regarding social considerations for the work package/s
- Submission of supporting documentation/materials of previous experience and track record on RAP preparation and implementation should be mentioned in the instructions to bidders
- Evaluation of submitted bids should include criteria for adequacy of RAP preparation and implementation responses and costing's

## 8.5 Budget

The DoE/BB/BRTA/BHTPA will make specific budgetary provisions for the implementation of the present RAF. Besides the salary and other entitlements of the personnel engaged in the implementation of RAF, DoE/BB/BRTA/BHTPA will also make earmarked budgetary allocations from BEST project budget for the IPs. The budgetary allocations will be clearly mentioned in the site-specific IPs to be prepared (as and when needed).

A tentative budget is proposed below Table 11, which may be changed/updated once the RAPs are being prepared. This budget does not include the cost of land acquisition and resettlement.

Table 10: A tentative budget for RAF implementations

Items	Man-month	Cost (in USD)				
		DoE	BB	BRTA	BHTPA	Total
Senior Social Development with resettlement experience	24					From project fund
Consulting firm for RAP preparation	Lump-sum	50,000				50,000

RAP Implementing Agency (consulting firm)	Lump-sum	50,000				50,000
M&E	Lump-sum	15,000				15,000
Grievance handling cost	Lump-sum					10,000
<b>Total (USD)</b>						125,000
<b>Total (million BDT (1 USD=84BDT))</b>						10.62

**Note- Cost of land acquisition and resettlement- Unknown at this stage as land acquisition and resettlement impact to be identified**

## Chapter 9: MONITORING

DoE/BB/BRTA/BHTPA will conduct regular monitoring and evaluation of the updating and implementation of the RAPs. Monitoring and evaluation are intended to help ensure that the resettlement action plan is prepared and implemented according to the resettlement policy framework. Moreover, external monitor of the project will review all the RAP/s prepared for this project. External monitor will establish dialogue with the affected communities and ensure that their concerns and suggestions are incorporated and implemented in the project. External monitor will work closely with the PIUs and internal monitoring team to implement the RAP and specifically responsible for implementation of proposed compensation, rehabilitation, and income restoration measures, consultations with affected persons (APs) during rehabilitation activities and assisting in grievance redress. He or she will prepare resettlement training programs and workshops for the staff of the PIUs and contractors.

The IA i.e. DoE/BB/BRTA/BHTPA will be responsible for the overall coordination and supervision of the land issues and for reporting the results and the process followed for implementation of project activities to the World Bank. The IA i.e. DoE/BB/BRTA/BHTPA will also appoint a Monitoring and Evaluation (M&E) Consultancy Firm who will provide support in monitoring project progress and associated impacts in the project areas. In addition to that, the implementation of the social and environmental management plans, including RPF and RAP will also be supervised by the firm. In the time of reporting, the M&E firm will report to the Chief Engineer and PD of the IA. M&E Firm will be responsible for: (i) collecting updated data from the relevant agencies, institutions and units of the project to produce RPF/RAP implementation progress reports; (ii) conducting physical inspections for RAP implementation; (iii) support M&E at the subproject level.

The IA will establish procedures to monitor and evaluate the implementation of the plans under the RPF and will take corrective actions as necessary during implementation to achieve the objectives of this RPF. The extent of monitoring activities will be proportionate to the project's risks and impacts. For all subprojects with significant involuntary resettlement impacts (in case the Project later decides to acquire land), the IA will retain competent resettlement professionals to monitor the implementation of resettlement plans, design corrective actions as necessary, provide advice on compliance with this RPF and produce periodic monitoring reports. Affected persons will be consulted during the monitoring process. Periodic monitoring reports will be prepared, and affected persons will be informed about monitoring results in a timely manner.

### Internal and External monitoring

The PIUs will conduct regular monitoring and evaluation of the updating and implementation of the RAP. Monitoring and evaluation are intended to help ensure that the resettlement action plan (RAP) is prepared and implemented according to the resettlement policy framework (RPF). Moreover, external monitor of the project will review all the RAP/s prepared for this project. External M&E Firm will establish dialogue with the affected communities and ensure that their concerns and suggestions are incorporated and implemented in the project. The M&E Firm will work closely with the PIU and internal monitoring team to implement the RAP and specifically responsible for implementation of proposed compensation, rehabilitation, and income restoration measures, consultations with affected persons (APs) during rehabilitation activities and assisting

in grievance redress. He or she will prepare resettlement training programs and workshops for the staff of the PIU and contractors.

During project preparation, and as part of the RAP, the PIU will develop a monitoring and reporting framework for resettlement activities. Central to this framework are the census of PAPs and the inventory of assets that constituted the basis for the agreed RAP. The PIU is responsible for overseeing the progress in resettlement preparation and implementation through regular progress reports, submitted through normal channels, monitoring key indicators of finance, inputs and activities. The PIU will submit RAP implementation progress report to PCMU, PSC and MoEFCC on a regular basis

In addition to internal monitoring, the M&E Firm will be engaged to provide an independent periodic assessment of resettlement implementation and impacts, to verify internal reporting and monitoring, and to suggest adjustment of delivery mechanisms and procedures as required. A social and economic assessment of the results of delivered entitlements and a measurement of the income and standards of living of the PAPs before and after resettlement are integral components of this monitoring activity. To function effectively, the firm responsible for external monitoring should be independent of the governmental agencies involved in resettlement implementation. Regular external monitoring should begin along with implementation activities and continue until the end of the project.

The following activities are the standard functions of the M&E Firm:

- Verification of internal reports, by field check
  - Interview a random sample of PAPs in open-ended discussions to assess their knowledge and concerns regarding the resettlement process, their entitlements and rehabilitation measures.
  - Participate as an observer in public consultations for PAPs at the project level. (Organizing these meetings is the responsibility of the implementing agency)
  - Observe the functioning of the resettlement operation at all levels to assess its effectiveness and compliance with the RAP.
  - Check the type of grievance issues and the functioning of grievance redress mechanisms by reviewing processing of appeals at all levels and interviewing aggrieved PAPs.
  - Survey the standards of living of the PAPs (and that of an unaffected control group where feasible) before and after implementation of resettlement to assess the whether the standards of living of the PAPs have improved or been maintained.
  - Advise project management unit regarding possible improvements in the implementation of the RAP.

The PIUs will establish procedures to monitor and evaluate the implementation of the plan and will take corrective action as necessary during implementation to achieve the objectives of the ESS. The extent of monitoring activities will be proportionate to the project's risks and impacts. For this the PIUs will ensure competent professionals to monitor the implementation of RAP/s, design corrective actions as necessary, provide advice to PIU, and consulting firms on compliance with ESS and periodic monitoring reports will be prepared and affected persons will be informed about monitoring results in a timely manner.

Table 11: Monitoring process of key indicators

Monitoring Aspects	Potential Indicators
<b>Delivery of Entitlements</b>	<ul style="list-style-type: none"> <li>• Entitlements disbursed, compared with number and category of losses set out in the entitlement matrix.</li> <li>• Disbursements against timelines.</li> <li>• Identification of the displaced persons losing land temporarily, e.g. through soil disposal, borrow pits, contractors' camps, been included.</li> <li>• Timely disbursements of the agreed transport costs, relocation costs, income substitution support, and any resettlement allowances, according to schedule.</li> <li>• Documented evidence of land acquisition completed with transfer of title</li> <li>• Documented evidence of land requisition/rented</li> <li>• Percentage of compensation paid for land acquisition/requisition or rented</li> <li>• Percentages of compensation paid for the affected structures/assets/crops/trees</li> <li>• Restoration of social infrastructure and services.</li> <li>• Affected businesses receiving entitlements, including transfer and payments for net losses resulting from lost business.</li> </ul>
<b>“Private-Private” disputes</b>	<ul style="list-style-type: none"> <li>• clear and adequate rules for the recognition of relevant land tenure rights is provided</li> <li>• fair criteria and functioning, transparent and participatory processes for resolving competing tenure claims are established</li> <li>• efforts are taken to inform affected people about their rights and access to impartial advice are provided</li> </ul>
<b>Consultation</b>	<ul style="list-style-type: none"> <li>• Strategy for consultation and information disclosure is prepared</li> <li>• Consultations organized as scheduled</li> <li>• Project information's are disclosed</li> <li>• Affected, interested, disadvantage and vulnerable groups are identified</li> <li>• views of disadvantage and vulnerable groups are considered during designing the entitlement and special measures are taken</li> <li>• Schedules are planned for the various stakeholder engagement activities</li> <li>• Knowledge of entitlements by the relevant stakeholders including project affected people</li> <li>• If tribal people are affected, separate consultation has to be conducted with them</li> </ul>
<b>Grievances</b>	<ul style="list-style-type: none"> <li>• Operationalization of the grievance redress mechanism proposed with RPF.</li> <li>• Operationalization of the GRM for labor and GBV</li> <li>• Information on the resolution of the grievances</li> <li>• Process by which people affected by the project can voice their grievances and concerns</li> <li>• Process to document complaints and concerns</li> <li>• Grievance recording (e.g. MIS, grievance log book)</li> <li>• Stipulated timeframes for acknowledgement and resolution of complaints</li> <li>• Awareness raising, or communications efforts to inform stakeholders about the GRM and appeals process to analyze complaints and share feedback with management</li> <li>• Grievance reports published and frequency</li> </ul>
<b>Communications and Participation</b>	<ul style="list-style-type: none"> <li>• Number of general meetings (for both men and women).</li> <li>• Percentage of women out of total participants.</li> <li>• Number of meetings exclusively with women.</li> <li>• Number of meetings exclusively with vulnerable groups.</li> <li>• Number of meetings at new sites.</li> <li>• Number of meetings between hosts and the displaced persons.</li> </ul>

Monitoring Aspects	Potential Indicators
	<ul style="list-style-type: none"> <li>• Level of participation in meetings (of women, men, and vulnerable groups).</li> <li>• Level of information communicated—adequate or inadequate.</li> <li>• Information disclosure.</li> <li>• Translation of information disclosure in the local languages.</li> </ul>
<b>Budget and Time Frame</b>	<ul style="list-style-type: none"> <li>• Social Specialist/expert appointed and mobilized on schedule for the field and office work.</li> <li>• Capacity building and training activities completed on schedule.</li> <li>• Achieving resettlement implementation activities against the agreed implementation plan.</li> <li>• Funds allocation for resettlement to implementing agencies on time.</li> <li>• Receipt of scheduled funds by resettlement offices.</li> <li>• Funds disbursement according to the resettlement action plan.</li> <li>• Social preparation phase as per schedule.</li> </ul>
<b>Livelihood and Income Restoration</b>	<ul style="list-style-type: none"> <li>• Types of training and number of participants in each.</li> <li>• Number of displaced persons who have restored their income and livelihood patterns (women, men, and vulnerable groups).</li> <li>• Number of new employment activities.</li> <li>• Extent of participation in rehabilitation programs.</li> <li>• Degree of satisfaction with support received for livelihood programs/activities.</li> <li>• Percentage of displaced persons who improved their income (women, men, and vulnerable groups)</li> <li>• Percentage of displaced persons who improved their standard of living (women, men, and vulnerable groups)</li> <li>• Number of displaced persons with replacement agriculture land (women, men, and vulnerable groups)</li> <li>• Quantity of land owned/contracted by displaced persons (women, men and vulnerable groups)</li> </ul>
<b>Voluntary land Donation</b>	<ul style="list-style-type: none"> <li>• The Project will not have any land donation</li> </ul>
<b>Temporary Land Requisition</b>	<ul style="list-style-type: none"> <li>• If temporary land is required for requisition it will be done through willing buyer-willing seller modalities under mutually agreed upon conditions.</li> </ul>

The PIUs will prepare a monthly report to be submitted to the PCMU. These reports will summarize the following:

- Progress in implementing this RAP and subsequent other social planning documents, etc.;
- Findings of the monitoring programs, with emphasis on any breaches of the control standards, action levels or standards of general site management;
- Summary of any complaints by external bodies and actions taken / to be taken; and
- Relevant changes or possible changes in legislation, regulations and international practices.

Monitoring of and reporting on the project must be complemented by an effective GRM proposed in RPF in order to address issues arising from project implementation. GRM will help to detect unanticipated or recurring problems, and to manage them. The project implementing agency sets up and supports the GRM, in a manner satisfactory to the World Bank, to receive, manage and facilitate resolution of stakeholders' concerns and grievances in a timely manner. It is important

that the GRM is designed to accommodate all issues raised, including issues related to labor influx. The way to make complaints needs to be simple and well publicized. The GRM is usually scaled to the risks and potential adverse impacts of the project. The following factors will be considered in the project for the effective GRM:

(i) their publicity and accessibility, (ii) the transparency of their operation, (iii) the credibility of their decision-making process and structure, (iv) their confidentiality and hence protection from any potential retaliation, and (v) the effectiveness of the associated business processes to resolve grievances where appropriate.

*Table 12: Reporting Requirements*

Report/Document	Description	Prepared By	Submitted To	When
<b>Training Records</b>	Register of all Trainings and Capacity Building activities conducted under the project	PIUs with the support of consultants.	PD	Within 3 weeks of any training/capacity building activity
<b>Completed Social Screening Forms</b>	Identifies Potential Environmental and Social Issues	PIUs	PD	After completing forms
<b>GRM Records</b>	Register of grievances received and actions taken	GRC or Consultants during construction phase and then Implementing Agency officer thereafter	PD	Monthly
<b>Preparation of RAP</b>	Site specific RAP will be prepared	PIUs with the support of NGO/consulting firm	PD	Within 3 months of deployment
<b>Internal Monitoring</b>	Monitoring data as defined in the RPF	PIUs and/or Consultants	PD	Monthly
<b>External Monitor</b>	Monitoring data as defined in the RPF	External monitor	World Bank	Every quarter

## Appendix 1: Social Screening Form

This form will be filled up at the direction of the PIUs with support from the community members at Union and Upazila Level and must be submitted to PDs and PIUs.

### General Information

Title of the Project.....

Location including coordinates .....

Screening Date.....

Probable Involuntary Resettlement Effects	Yes	No	Not Known	Remarks
<b>Involuntary Acquisition of Land/ Land Donation/ Land Taking</b>				
Will the project require land for the proposed intervention				
1. If yes, will there be any land acquisition?				
2. Is the site for land acquisition known?				
3. Is the ownership status and current usage of land known? If yes, please provide detail information at remarks column.				
4. Is there any possibility of voluntary land donation? (The Project will not have any land donation.)				
5. Will there be loss of residential and commercial structures due to land acquisition? If yes, please provide detail information at remarks column.				
Is there any presence of informal settlers within the project area? If yes, please provide detail information at remarks column.				
6. Will there be loss of agricultural and other productive assets due to land acquisition? If yes, please provide detail information at remarks column.				

<b>Probable Involuntary Resettlement Effects</b>	<b>Yes</b>	<b>No</b>	<b>Not Known</b>	<b>Remarks</b>
-				
7. Will there be losses of trees, and fixed assets due to land acquisition? If yes, please provide detail information at remarks column.				
8. Will there be loss of businesses or enterprises due to land acquisition? If yes, please provide detail information at remarks column.				
9. Will there be loss of income sources and means of livelihoods due to land acquisition? If yes, please provide detail information at remarks column.				
<b>Involuntary restrictions on land use or on access to legally designated parks and protected areas</b>				
10. Will people lose access to natural resources, communal facilities and services due to project interventions? If yes, please provide detail information at remarks column.				
11. If land use is changed, will it have an adverse impact on social and economic activities? If yes, please provide detail information at remarks column.				
12. Will access to land and resources owned communally or by the state be restricted? If yes, please provide detail information at remarks column.				
Will there be any impact on SEC Land?				
<b>Information on Displaced Persons:</b>				
Any estimate of the likely number of persons that will be displaced by the Project? <input type="checkbox"/> No <input type="checkbox"/> Yes				
If yes, approximately how many?				
Are any of them poor, female-heads of households, or vulnerable to poverty risks? <input type="checkbox"/> No <input type="checkbox"/> Yes				
Are any displaced persons from indigenous or ethnic minority groups? <input type="checkbox"/> No <input type="checkbox"/> Yes				
During Screening, project authority will conduct consultation with the primary and secondary stakeholders and provide their observations in the following sections (13 to 18)				

Probable Involuntary Resettlement Effects	Yes	No	Not Known	Remarks
-				
13: Who are the stakeholders of the project?				
Answer:				
14: What social and cultural factors affect the ability of stakeholders to participate or benefit from the proposed policy or project?				
Answer:				
15: Are project objectives consistent with their needs, interests and capacity?				
Answer:				
16: What will be the impact of the project or sub-project on the various stakeholders, especially women and vulnerable groups?				
Answer:				
17: What social risks might affect project or sub-project success?				
Answer:				
18: Has the project authority or any other organizations conducted any consultations with the affected community or people? If yes. Please provide a summary.				
Answer:				

This Screening sheet must be completed for each of the proposed projects by the respective social team and forwarded to the Social Specialist in Respective PMU along with the following enclosures.

(**Enclosures:** Land details for the project sites, location, survey numbers, extent available and required, land use classification, current use of the site, land ownership, alienation/acquisition status, as required, along with a certificate giving availability of sites required for the project by the DoE/BB/BRTA/BHTPA.)

### Project Categorization and Need for Standard Instruments, Oversight

Project Category	<input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> Substantial <input type="checkbox"/> High
Key Reasons	
Environmental and Social Instruments Required	<input type="checkbox"/> Detailed ESIA and ESMP <input type="checkbox"/> ESA <input type="checkbox"/> RAP <input type="checkbox"/> Site-specific ESMP

Status	Agency / Official	Name, Signature with Date and Seal
Prepared by	Social Specialist	
	Social Expert / in-charge	
Checked and Categorized	PIUs	
	Social Specialist	
Reviewed & accepted by	WB	
	Social Specialist	

## Appendix 2: Guideline to prepare a Resettlement Action Plan (RAP)

1. **Description of the project.** General description of the project and identification of the project area.
2. **Potential impacts:** Identification of (a)the project components or activities that give rise to displacement, explaining why the selected land must be acquired for use within the timeframe of the project;(b)the zone of impact of such components or activities;(c)the scope and scale of land acquisition and impacts on structures and other fixed assets;(d)any project-imposed restrictions on use of, or access to, land or natural resources;(e)alternatives considered to avoid or minimize displacement and why those were rejected; and(f )the mechanisms established to minimize displacement, to the extent possible, during project implementation
3. **Objectives:** The main objectives of the resettlement program.
4. **Census survey and baseline socioeconomic studies:** The findings of a household-level census identifying and enumerating affected persons, and, with the involvement of affected persons, surveying land, structures and other fixed assets to be affected by the project .The census survey also serves other essential functions: (a)identifying characteristics of displaced house-holds, including a description of production systems, labor, and household organization; and baseline information on livelihoods (including, as relevant, production levels and income derived from both formal and informal economic activities) and standards of living (including health status) of the displaced population;(b)information on vulnerable groups or persons for whom special provisions may have to be made; (c)identifying public or community infrastructure, property or services that may be affected; (d)providing a basis for the design of, and budgeting for, the resettlement program;(e)in conjunction with establishment of a cutoff date, providing a basis for excluding ineligible people from compensation and resettlement assistance; and (f )establishing baseline conditions for monitoring and evaluation purposes .As the Bank may deem relevant, additional studies on the following subjects may be required to supplement or inform the census survey:(g)land tenure and transfer systems, including an inventory of common property natural resources from which people derive their livelihoods and sustenance, non-title-based usufruct systems (including fishing, grazing, or use of forest areas) governed by local recognized land allocation mechanisms, and any issues raised by different tenure systems in the project area;(h)the patterns of social interaction in the affected communities, including social net-works and social support systems, and how they will be affected by the project; and(i)social and cultural characteristics of displaced communities, including a description of for-mal and informal institutions (e .g ., community organizations, ritual groups, nongovernmental organizations (NGOs)) that may be relevant to the consultation strategy and to designing and implementing the resettlement activities
5. **Legal framework:** The findings of an analysis of the legal framework, covering:(a)the scope of the power of compulsory acquisition and imposition of land use restriction and the nature of compensation associated with it, in terms of both the valuation methodology and the timing of payment;(b)the applicable legal and administrative procedures, including a description of the remedies available to displaced persons in the judicial process and the normal timeframe for such procedures, and any available grievance redress mechanisms that may be relevant to the project;(c)laws and regulations relating to the agencies responsible for implementing resettlement activities; and(d)gaps, if any, between local laws and practices covering compulsory acquisition, imposition of land use restrictions and provision of resettlement measures and ESS5, and the mechanisms to bridge such gaps .
6. **Institutional framework.** The findings of an analysis of the institutional framework covering:(a) the identification of agencies responsible for resettlement activities and NGOs/CSOs that may have a role in project implementation, including providing support for displaced persons;(b)an assessment of the institutional capacity of such agencies and NGOs/CSOs; and(c)any steps that are proposed to enhance

the institutional capacity of agencies and NGOs/CSOs responsible for resettlement implementation

7. **Eligibility.** Definition of displaced persons and criteria for determining their eligibility for compensation and other resettlement assistance, including relevant cutoff dates.
8. **Valuation of and compensation for losses.** The methodology to be used in valuing losses to determine their replacement cost; and a description of the proposed types and levels of compensation for land, natural resources and other assets under local law and such supplementary measures as are necessary to achieve replacement cost for them.
9. **Community participation.** Involvement of displaced persons (including host communities, where relevant):(a) a description of the strategy for consultation with, and participation of, displaced persons in the design and implementation of the resettlement activities;(b) a summary of the views expressed and how these views were taken into account in preparing the resettlement plan;(c) a review of the resettlement alternatives presented and the choices made by displaced persons regarding options available to them; and(d) institutionalized arrangements by which displaced people can communicate their concerns to project authorities throughout planning and implementation, and measures to ensure that such vulnerable groups as indigenous people, ethnic minorities, the landless, and women are adequately represented .
10. **Implementation schedule.** An implementation schedule providing anticipated dates for displacement, and estimated initiation and completion dates for all resettlement plan activities. The schedule should indicate how the resettlement activities are linked to the implementation of the overall project.
11. **Costs and budget.** Tables showing categorized cost estimates for all resettlement activities, including allowances for inflation, population growth, and other contingencies; timetables for expenditures; sources of funds; and arrangements for timely flow of funds, and funding for resettlement, if any, in areas outside the jurisdiction of the implementing agencies.
12. **Grievance redress mechanism.** The plan describes affordable and accessible procedures for third-party settlement of disputes arising from displacement or resettlement; such grievance mechanisms should take into account the availability of judicial recourse and community and traditional dispute settlement mechanisms.
13. **Monitoring and evaluation.** Arrangements for monitoring of displacement and resettlement activities by the implementing agency, supplemented by third-party monitors as considered appropriate by the Bank, to ensure complete and objective information; performance monitoring indicators to measure inputs, outputs, and outcomes for resettlement activities; involvement of the displaced persons in the monitoring process; evaluation of results for a reasonable period after all resettlement activities have been completed; using the results of resettlement monitoring to guide subsequent implementation .
14. **Arrangements for adaptive management.** The plan should include provisions for adapting resettlement implementation in response to unanticipated changes in project conditions, or unanticipated obstacles to achieving satisfactory resettlement outcomes.

### Appendix 3: Quarterly grievance report and Grievance Form

Period from..... to..... 20.....

Project Phase:.....

Case No.	Complainant's name, gender and location	Nature of complaints and expectation of complainant	Date of Petition submitted	Method of resolution with dates	Decisions and date of communication to the complainant	Agreement with and commitment to complainant	Progress (solved/pending)	Reason, if pending

Grievance Form			
Grievance reference number (to be completed by Project):			
Contact details (may be submitted anonymously)	Name (s):		
	Address:		
	Telephone:		
	Email:		
How would you prefer to be contacted (check one)	By mail/post: <input type="checkbox"/>	By phone: <input type="checkbox"/>	By email <input type="checkbox"/>
Preferred language	<input type="checkbox"/> Bangla	<input type="checkbox"/> English	
Provide details of your grievance. Please describe the problem, who it happened to, when and where it happened, how many times, etc. Describe in as much detail as possible.			
What is your suggested resolution for the grievance, if you have one? Is there something you would like DOE/BB/BRTA/BHTPA or another party/person to do to solve the problem?			
How have you submitted this form to the project?	Website <input type="checkbox"/>	Email <input type="checkbox"/>	By hand <input type="checkbox"/>
	In person <input type="checkbox"/>	By telephone <input type="checkbox"/>	Other (specify) <input type="checkbox"/>
Who filled out this form (If not the person named above)?	Name and contact details:		

Signature			
Name of DOE/BB/ BRTA/BHTPA official assigned responsibility			
Resolved or referred to GRC1?	<input type="checkbox"/> Resolved	<input type="checkbox"/> Referred	If referred, date:
Resolved referred to GRC2?	<input type="checkbox"/> Resolved	<input type="checkbox"/> Referred	If referred, date:
<b>Completion</b>			
Final resolution (briefly describe)			
	Short description	Accepted? (Y/N)	Acknowledgement signature
1 <sup>st</sup> proposed solution			
2 <sup>nd</sup> proposed solution			
3 <sup>rd</sup> proposed solution			

## Appendix 4: Terms of Reference for External M&E Firm

### **PROJECT BACKGROUND**

*(This will be reflected from PAD or the Introduction Chapter)*

### **KEY OBJECTIVE OF EXTERNAL MONITORING**

The primary objective for engaging an independent M&E Firm is to review the efficacy of internal monitoring, design and conduct periodic third party monitoring and provide feedback to PIUs and DoE/BB/BRTA/BHTPA on policy improvement and enhancement of RAP implementation process. The M&E Firm will review implementation process as per set policies in the RAPs and assess the achievement of resettlement objectives, the changes in living standards and livelihoods, restoration of the economic and social base of the affected people, the effectiveness, impact and sustainability of entitlements, the need for further mitigation measures if any, and to learn strategic lessons for future policy formulation and planning.

### **SCOPE OF WORK**

The scope of work of the M&E Firm will include the following tasks:

1. To develop specific monitoring indicators for undertaking monitoring of all aspects of Resettlement Action Plans (RAPs)
2. To review and verify the progress in land acquisition/resettlement implementation of the Project.
3. Identify the strengths and weaknesses of the land acquisition/resettlement objectives and approaches, implementation strategies.
4. Evaluate and assess the adequacy of compensation given to the APs and the livelihood opportunities and incomes as well as the quality of life of PAPs of project-induced changes.
5. Identification of the categories of impacts and evaluation of the quality and timeliness of delivering entitlements (compensation and rehabilitation measures) for each category and how the entitlements were used and their impact and adequacy to meet the specified objectives of the Plans. The quality and timeliness of delivering entitlements, and the sufficiency of entitlements as per approved policy.
6. To analyze the pre-and post-project socio-economic conditions of the affected people. In the absence of baseline socio-economic data on income and living standards and given the difficulty of APs having accurate recollection of their pre-project income and living standards, develop some quality checks on the information to be obtained from the APs. Such quality checks could include verification by neighbors and local village leaders. The methodology for assessment should be very explicit, noting any qualifications.
7. Review results of internal monitoring and verify claims through sampling check at the field level to assess whether land acquisition/resettlement objectives have been generally met. Involve the affected people and community groups in assessing the impact of land acquisition for monitoring and evaluation purposes.

8. To monitor and assess the adequacy and effectiveness of the consultative process with affected APs, particularly those vulnerable, including the adequacy and effectiveness of grievance procedures and legal redress available to the affected parties, and dissemination of information about these.
9. Identify, quantify, and qualify the types of conflicts and grievances reported and resolved and the consultation and participation procedures.
10. Provide a summary of whether involuntary resettlement was implemented (a) in accordance with the RAPs, and (b) in accordance with the stated policy.
11. To review the quality and suitability of the relocation sites from the perspective of the both affected and host communities.
12. Verify expenditure & adequacy of budget for resettlement activities.
13. Describe any outstanding actions that are required to bring the resettlement activities in line with the policy and the RAPs. Describe further mitigation measures needed to meet the needs of any affected person or families judged and/or perceiving themselves to be worse off as a result of the Project. Provide a timetable and define budget requirements for these supplementary mitigation measures.
14. Describe any lessons learned that might be useful in developing the new national resettlement policy and legal/institutional framework for involuntary resettlement.

## **METHODOLOGY AND APPROACH**

The general approach to be used is to monitor activities and evaluate impacts ensuring participation of all stakeholders especially women and vulnerable groups. Monitoring tools should include both quantitative and qualitative methods. The external monitor should reach out to cover:

- 100% APs who had property, assets, incomes and activities severely affected by Project works and had to relocate either to resettlement sites or who chose to self-relocate, or whose source of income was severely affected.
- 10% of persons who had property, assets, incomes and activities marginally affected by Project works and did not have to relocate;
- 10% of those affected by off-site project activities by contractors and sub-contractors, including employment, use of land for contractor's camps, pollution, public health etc.;

The monitoring should be supplement by focus group discussions (FGD) which would allow the monitors to consult a range of stakeholders (local government, resettlement field staff, NGOs, community leaders, and, most importantly, APs) and community public meetings which are open public meetings at the resettlement sites to elicit information about performance of various resettlement activities.

## **TEAM COMPOSITION OF THE EXTERNAL M&E FIRM**

The Firm should focus on field-based research on institutional arrangement, implementation strategy, policy objectives and the targets. In addition, data collection, processing and analysis should be performed to pinpoint problem areas and weaknesses and to highlight corrective measures, if needed, to achieve the objectives on schedule. Thus, there is a need for a dedicated

monitoring team with adequate gender representation. Further, it is essential that the central team or field level coordinators responsible for monitoring, are skilled and trained in data base management, interview technique as well as social and economic/finance. Keeping in mind these criteria, the team should ideally include:

Position/expertise	Qualification and experience
<b>1. Team Leader/ Implementation Specialist</b>	Masters in social science/science with 15 years working background in planning, implementation and monitoring of involuntary resettlement for infrastructure projects. Experience in institutional capacity analysis and implementation arrangement for preparation and implementation of resettlement plans, and knowledge in WB ESF and latest social policies of the international development financing institutions in Bangladesh are preferred.
<b>2. Social Impact Specialist</b>	Master's in social science/science with 15 years working experience in social impact assessment including census and socioeconomic surveys, stakeholders' consultation, and analyzing social impacts to identify mitigation measures in compliance with social compliance policies of the international development financing institutions and national legislations. Experience of preparing resettlement framework and action plans and implementation of plans for externally financed projects is essential.
<b>3. Gender Specialist</b>	Master's in social science with 15 years working experience in relevant field; Thorough knowledge of gender issues and their implications in development projects; research and work experience relating to gender issues; and knowledge of techniques and their applications in mobilizing community participation in development programs.
<b>4. Data Analyst</b>	Graduate with working experience and knowledge of software, those are most commonly used in Bangladesh; demonstrated ability to design and implement automated MIS(s) for monitoring progress, comparing targets with achieved progress and the procedural steps.

## TIME FRAME AND REPORTING

The M&E FIRM will be employed initially for a year which may be extended till the end of the project depending on performance.

Quarterly and annual monitoring reports should be submitted to the PIUs with copies to the World Bank. An evaluation report at the end of the Project should be submitted to the PIUs with critical analysis of the achievement of the projects and the performance of PIU and NGO.

The external monitors will provide monitoring and evaluation report covering the following aspects:

- Whether the resettlement activities have been completed as planned and budgeted
- The extent to which the specific objectives and the expected outcomes/results have been achieved and the factors affecting their achievement or non achievement
- The extent to which the overall objective of the Resettlement Plan, pre project or improved social and economic status, livelihood status, have been achieved and the reasons for achievement / non achievement
- Major areas of improvement and key risk factors

- Major lessons learnt and
- Recommendations.

Formats for collection and presentation of monitoring data will be designed in consultation with PIU, consultants and panel of experts.

### **QUALIFICATION OF THE EXTERNAL M&E FIRM**

The M&E Firm will have at least 10 years of experience in resettlement policy analysis and implementation of resettlement plans. Further, work experience and familiarity with all aspects of resettlement operations would be desirable. NGOs, Consulting Firms or University Departments (consultant organization) having requisite capacity and experience as follows can qualify for services of and external monitor for the Project.

- NGOs registered with the Social Welfare Department of the GOB, Consulting Firms registered with the Joint Stock Company or Departments of any recognized university.
- The applicant should have prior experience in social surveys in land-based infrastructure projects and preparation of resettlement plans (RAPs) as per guidelines on involuntary resettlement of World Bank.
- The applicant should have extensive experience in implementation and monitoring of resettlement plans, preparation of implementation tools, and development and operation of automated MIS for monitoring.
- The applicant should be able to produce evidences of monitoring using structured instruments and computerized MIS with set criteria for measuring achievement.
- The applicant should have adequate manpower with capacity and expertise in the field of planning, implementation and monitoring of involuntary resettlement projects as per donor's guidelines.

Interested agencies should submit proposal for the work with a brief statement of the approach, methodology, and relevant information concerning previous experience on monitoring of resettlement implementation and preparation of reports.

The profile of consultant agency, along with full CVs of the team to be engaged, must be submitted along with the proposal.

### **BUDGET AND LOGISTICS**

The budget should include all expenses such as staff salary, office accommodation, training, computer / software, transport, field expenses and other logistics necessary for field activities, data collection, processing and analysis for monitoring and evaluation work. Additional expense claims whatsoever outside the proposed and negotiated budget will not be entertained. VAT, Income Tax and other charges admissible will be deducted at source as per GOB laws.