



**GOVERNMENT OF THE PEOPLE'S REPUBLIC OF BANGLADESH
MINISTRY OF ROAD TRANSPORT AND BRIDGES
ROAD TRANSPORT AND HIGHWAYS DIVISION
ROADS AND HIGHWAYS DEPARTMENT**

**Sylhet-Charkhai-Sheola Highway Improvement Project
IDA Credit No. 7166 – BD**



Resettlement Action Plan (RAP)

November 2025



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TABLE OF CONTENTS

ABBREVIATION.....	iv
EXECUTIVE SUMMARY.....	vi
1 PROJECT DESCRIPTION.....	1
1.1 Background.....	1
1.2 Rationale for updating Resettlement Action Plan (RAP).....	1
1.3 The Sylhet-Charkhai-Sheola Highway Improvement Project.....	2
1.4 Co-operation of Local Administration.....	5
1.5 Socioeconomic Benefit.....	5
1.6 Methodology.....	5
1.7 Measures to Minimize Impacts.....	6
1.8 Structure of RAP.....	7
2 LAND ACQUISITION AND RESETTLEMENT.....	8
2.1 Introduction.....	8
2.2 Scope of Land Acquisition.....	8
2.3 Overall Impacts of the Project Area.....	8
2.4 Key Impacts of the Project.....	9
2.5 Impacts by Categories of Affected Households, CPRs and Other Entities.....	10
2.6 Magnitude of Impacts on Households, CPRs and Other Entities Losing Primary Structure in LOT 1, 2 and 3.....	15
2.7 Affected Community/Common Property Resources (CPRs) and Government & Other Entities.....	15
2.8 nature of Impacts of the Affected Primary Structures.....	15
2.9 nature of Impacts of the Affected Secondary Structures.....	16
2.10 Impacts on Trees and Crops.....	16
2.11 Impacts on Business.....	17
2.12 Impacts on Employment.....	18
2.13 Impacts on House Owners' Rental Income.....	18
2.14 Impacts on Tenants.....	19
3 BASELINE SOCIOECONOMIC CHARACTERISTICS.....	23
3.1 Socioeconomic Data and Analysis.....	23
3.2 Consultation, Information Disclosure and Participation.....	35
4 IMPLEMENTATION ARRANGEMENTS.....	43
4.1 Legal and Policy Framework.....	43
4.2 Entitlements, Assistance and Benefits.....	46
4.3 Relocation and Resettlement.....	51
4.4 Income and Livelihood Restoration Plan.....	60
4.5 Grievance Redress Mechanisms.....	63
4.6 Indicative land acquisition and Resettlement Budget.....	68
4.7 Institutional Arrangements for RAP Implementation.....	82
4.8 Monitoring and Evaluation.....	89
GLOSSARY.....	94
ANNEXES.....	98
Enclosed in the Separate Volume.....	98

LIST OF TABLES

Table 0-1: Lot Wise Overall Project Impacts in the Sylhet-Charkhai-Sheola Highway Improvement Project.....	vii
Table 0-2: Summary of the Consultations with the Project Bénéficiaires, Stakeholders, Project Affected Persons (PAPs), Business Owners, and Other Relevant Parties.....	x
Table 0-3: Summary of Major Project Impacts showing Comparison between the Original and Updated RAP.....	xiv
Table 1-1: Lot wise Affected Upazilas, City Corporation and Unions under the Project.....	5
Table 2-1: Lot Wise Affected Land (in Acre) to be acquired as per the Updating Design for Sylhet-Charkhai-Sheola Highway Improvement Project.....	8
Table 2-2: Lot Wise Type of Land to be Acquired in the Sylhet-Charkhai-Sheola Highway Improvement Project.....	9
Table 2-3: Lot Wise Total Affected Households Losing Primary & Secondary Structures by Type.....	10
Table 2-4: Lot Wise Affected Households Losing Both Primary & Secondary Structures by Type.....	11
Table 2-5: Lot Wise Number of Fully and Partially Affected Households Losing Only Primary Structures by Type.....	12
Table 2-6: Lot Wise Number of Fully and Partially Affected Households Losing Only Secondary Structures by Type.....	12
Table 2-7: Lot Wise Number of Fully and Partially Affected Community/Common Property Resources (CPRs) & other Entities Losing Primary and Secondary Structures by Type.....	13
Table 2-8: Lot Wise Floor Areas (SqL) of Affected Primary Structures by Ownership Type in the Sylhet-Charkhai-Sheola Highway Improvement Project.....	15
Table 2-9: Lot Wise Distribution of Affected Trees of Title, Non-title Households including CPRs and Other Entities by Category.....	17
Table 2-10: Lot Wise Impacts on THs, NTHs, & Tenants are Operated business in the Project Alignment.....	18
Table 2-11: Lot Wise Number of Affected Wage Earner(s)/Employee(s) in Business/Industrial Institutions by Type of Employers in the Sylhet-Charkhai-Sheola Highway Improvement Project.....	18
Table 2-12: Lot Wise Affected Rented Out Structures under the Sylhet-Charkhai-Sheola Highway Improvement Project.....	18
Table 2-13: Lot Wise Affected Tenants by Type in the Sylhet-Charkhai-Sheola Highway Improvement Project.....	19

Table 2-14: Lot Wise Distribution of Losing 10% of Total Income (Severely Affected) and Vulnerable Households in the Sylhet-Charkhai-Sheola Highway Improvement Project.....	20
Table 2-15: Lot Wise Overall Project Impacts in the Sylhet-Charkhai-Sheola Highway Improvement Project.....	21
Table 3-1: Lot Wise Distribution of Households by Sex in the Sylhet-Charkhai-Sheola Highway Improvement Project.....	23
Table 3-2: Lot-Wise Affected Households and Population by Household Size in the Sylhet-Charkhai-Sheola Highway Improvement Project.....	23
Table 3-3: Lot Wise Distribution of Affected Population, Household Size and Sex Ratio in the Sylhet-Charkhai-Sheola Highway Improvement Project.....	24
Table 3-4: Lot Wise Distribution of Other Affected Individual Population in Sylhet-Charkhai-Sheola Highway Improvement Project.....	25
Table 3-5: Lot Wise Affected Population by Religion in the Sylhet-Charkhai-Sheola Highway Improvement Project.....	25
Table 3-6: Lot Wise Age Composition of the Affected Population in Sylhet-Charkhai-Sheola Highway Improvement Project.....	26
Table 3-7: Lot Wise Marital Status of the Affected Population in the Sylhet-Charkhai-Sheola Highway Improvement Project.....	27
Table 3-8: Lot Wise Distribution of Affected HHs Population (7 Years and Above) by Education Level.....	28
Table 3-9: Lot Wise Distribution of Affected Household Heads (HHs) by Primary Occupation in the Sylhet-Charkhai-Sheola Highway Improvement Project.....	29
Table 3-10: Lot Wise Distribution of Members of Affected HHs by Primary Occupation in the Sylhet-Charkhai-Sheola Highway Improvement Project.....	30
Table 3-11: Distribution of Households by Annual Income in the Project Area.....	31
Table 3-12: Distribution of Households by Annual Expenditure in the Project Area.....	32
Table 3-13: Lot Wise Non-title Holders on RHD Land/Govt. Land by Utilization Category of Structure in the Project Area.....	35
Table 3-14: Consultation Meetings organized along the road alignment.....	36
Table 3-15: Consultation Meetings and FGDs.....	36
Table 3-16: Venues, date, time frame and participants of Stakeholders' Consultation Meetings, FGDs & KIIs.....	37
Table 4-1: Entitlement Matrix for Sylhet-Charkhai-Sheola Highway Improvement Project.....	47
Table 4-2: Displacement and Relocation of Residential HHs.....	51
Table 4-3: Displacement and Relocation of Commercial /Businesses.....	52
Table 4-4: Displacement and Relocation of Residential HHs and Businesses.....	52
Table 4-5: Displacement and Relocation of Community Property Resources and Other Entities Affected by Primary and Secondary Structures.....	52
Table 4-6: Types of Impacts on Income Loss of Affected Households.....	60
Table 4-7: Proposed Trade for Occupational Skill Development (OSD) Trainings.....	62
Table 4-8: GRC Members at the Field Level.....	65
Table 4-9: Members of the Project-Level GRC.....	66
Table 4-10: Processes for Filing GRC Cases at Different Levels of GRCs are Given Below:.....	67
Table 4-11: Summary of LA and Resettlement Budget (Indicative).....	71
Table 4-12: Lot wise Indicative Budget for Land.....	72
Table 4-13: Affected Primary Structures of the Title & Non-title HHs, CPRs & other Entities in the Sylhet-Charkhai-Sheola Highway Improvement Project.....	73
Table 4-14: Affected Secondary Structures of the Title & Non-title HHs, CPRs & other Entities in the Sylhet-Charkhai-Sheola Highway Improvement Project.....	75
Table 4-15: Estimated Amount of Compensation for Trees in the Sylhet-Charkhai-Sheola Highway Improvement Project.....	77
Table 4-16: Estimated Amount of Compensation for Standing Crops/Fish Stock.....	78
Table 4-17: Breakup of Indicative Budget for Resettlement Benefits and Assistance.....	79
Table 4-18: Implementation Arrangements.....	82
Table 4-19: PAVC Members.....	85
Table 4-20: LAP and RAP Implementation Schedule.....	87
Table 4-21: Monitoring Issues and Indicators.....	90
Table 4-22: Reporting Requirements.....	93

LIST OF FIGURES

Figure 1-1: Project Location Map of Proposed Area in the Sylhet-Charkhai-Sheola Highway Improvement Project.....	4
Figure 3-1: Households by Sex.....	23
Figure 3-2: Affected Population, Household Size and Sex Ratio.....	24
Figure 3-3: Affected Population by Religion.....	25
Figure 3-4: Total Affected Male and Female Population.....	27
Figure 3-5: Dependency Ratio.....	27
Figure 3-6: Distribution of Households by Annual Income.....	32
Figure 4-1: Compensation Mechanism for Non-Title Holder EPs.....	45
Figure 4-2: Institutional Arrangement for RAP Implementation.....	84



ABBREVIATION

AC Land	: Assistant Commissioner, Land
ACCESS	: Accelerating Transport and Trade Connectivity in Eastern South Asia
ADB	: Asian Development Bank
AIDS	: Acquired Immunodeficiency Syndrome
AP	: Affected Person
APD	: Additional Project Director
ARIPA, 2017	: Acquisition and Requisition of Immovable Property Act, 2017
BCIM	: Bangladesh-China, India and Myanmar
BWDB	: Bangladesh Water Development Board
BR	: Bangladesh Railway
BBS 2022	: Bangladesh Bureau of Statistics-2022
BDT	: Bangladesh Taka
BG	: Business Grant
BFD	: Bangladesh Forest Department
BIN	: Business Identification Number
BMP	: Biodiversity Management Plan
CCL	: Cash Compensation under Law
CMP	: Current Market Price
CMIS	: Computerized Management Information System
CMVs	: Current Market Values
CoC	: Code of Conduct
COD	: Cut-off-Date
COVID-19	: Coronavirus Disease 2019
CoI	: Corridor of Impact
CPR	: Common or Community Property Resource
CSC	: Construction Supervision Consultants
CRO	: Chief Resettlement Officer
DAE	: Department of Agricultural Extension
DAM	: Department of Agricultural Marketing
DC	: Deputy Commissioner
DF	: Department of Forest
DPs	: Displaced Persons
DoE	: Department of Environment
DPD	: Deputy Project Director
DPM	: Deputy Project Manager
DSM	: Design Supervision & Management Consultant
EA	: Executing Agency
E&SC	: Environmental & Social Consultant
E&SSC	: Environmental and Social Safeguard Consultant
EHS&G	: Environmental and Health Safety Guidelines
EM	: Entitlement Matrix
EPs	: Entitle Persons
ESF	: Environmental and Social Framework
ESIA	: Environmental and Social Impact Assessment
ESMP	: Environmental and Social Management Plan
ESS	: Environmental and Social Strategy
EGD	: Environmental and Social Focus Group Discussion

FOB	: Foot Over-bridge
FOs	: Field Officers
GAP	: Gender Action Plan
GBV	: Gender Based Violence
GIP	: Good International and Industry Practices
GoB	: Government of Bangladesh
GRC	: Grievance Redress Committee
GRM	: Grievance Redress Mechanism
GRS	: Grievance Redress Services
HIV	: Human Immunodeficiency Virus
HHs	: Households
IBAS	: Integrated Budget and Accounting System
INGO	: Implementing NGO
IOL	: Inventory of Losses
IPF	: Investment Project Financing
IGA	: Income Generating Activities
ILRP	: Income and Livelihood Restoration Program
IR	: Involuntary Resettlement
ITS	: Intelligent Traffic System
KIIs	: Key Informant Interviews
Km	: Kilometer
Km ²	: Square Kilometer
LA	: Land Acquisition
LAO	: Land Acquisition Officer
LAP	: Land Acquisition Plan
LAR	: Land Acquisition and Resettlement
LCS	: Labor Contracting Society
LDT	: Land Development Tax
LGED	: Local Government Engineering Department
LGI	: Local Government Institutions
LHS	: Labor Health and Safety
LO	: Landowner
MIS	: Management Information System
MPR	: Monthly Progress Report
M&E	: Monitoring & Evaluation
MPA	: Multiphase Programmatic Approach
MP	: Member of Parliament
MoL	: Ministry of Land
MoRTB	: Ministry of Road Transport and Bridges
NWDP	: National Women Development Policy
NTHHs	: Non-Title Holder Households
OCC	: One-Stop Crisis Cell
OSD	: Occupational Skill Development
OFC	: Optical Fiber Cable
OHS	: Occupational Health and Safety
PAPs	: Project Affected Persons
PAEs	: Project Affected Entities
PAHs	: Project Affected Households
PEA	: Project Execution Agency
PD	: Project Director
PDCPR	: Project Displace Community Property Resources
PDPs	: Project Displaced Persons
PDB	: Project Displaced Business
PDEs	: Project Displaced Entities
PDHs	: Project Displaced Households
PDOEs	: Project Displaced Other Entities
PIC	: Project Implementation Committee

PIU	:	Project Implementation Unit
PMs	:	Project Managers
PMO	:	Project Management Office
POPs	:	Pedestrian Overpasses
PDHH	:	Project Displaced Household
PRAC	:	Physical Relocation Assistance Committee
PSC	:	Project Steering Committee
PV	:	Property Valuation Survey
PAVC	:	Property Assessment and Valuation Committee
PWD	:	Public Works Department
RP	:	Resettlement Plan
RAP	:	Resettlement Action Plan
RC	:	Replacement Cost
RG	:	Reconstruction Grant
RHD	:	Roads and Highways Department
RMFD	:	Road Maintenance Fund Board Act
ROs	:	Resettlement Officers
RoR	:	Records of Rights
RoW	:	Right of Way
RPF	:	Resettlement Policy Framework
RS	:	Revisionary Survey
RTSICP	:	Road Transport Sector Integration and Coordination Platform
RV	:	Replacement Value
SA	:	State Acquisition
SCDP	:	Safe Corridor Demonstration Program
SCMs	:	Stakeholder Consultation Meetings
SBD	:	Standard Bidding Documents
SEA	:	Sexual Exploitation and Abuse
SEID	:	Stakeholder Engagement and Information Disclosure
SEP	:	Stakeholder Engagement Plan
SES	:	Socioeconomic Survey
SH	:	Sexual Harassment
SMVT	:	Slow Moving Vehicle Traffic
SMP	:	Social Management Plan
SMR	:	Social Monitoring Report
THHs	:	Title Holder Households
TGBs	:	Target Group Beneficiaries
TG	:	Transfer Grant
TMC	:	Transportation Management Center
TMP	:	Traffic Management Plan
TNA	:	Training Needs Assessment
ToR	:	Terms of Reference
UNO	:	Upazila Nirbahi Officer
VOPs	:	Vehicular Overpasses
WB	:	World Bank



EXECUTIVE SUMMARY

A. DESCRIPTION OF THE PROJECT

- i. The Government of the People's Republic of Bangladesh has signed an agreement for a Credit from the World Bank to finance the Accelerating Transport and Trade Connectivity in Eastern South Asia (ACCESS) Program - Bangladesh Phase 1, a part of the World Bank's Multiphase Programmatic Approach (MPA). As per part 2(5) of the agreement, upgrading the Sylhet-Charkhai-Sheola section (43 kilometers) from a two-lane single carriageway to a climate-resilient four-lane dual carriageway, connecting the Sheola Land Port with the Dhaka-Sylhet Highway which will be implemented by the Roads and Highways Department (RHD) (Ministry of Road, Transport and Bridges). The Project has been approved by the Government of Bangladesh (GoB) in the ECNEC meeting on 11 April 2023.
- ii. The Sylhet-Charkhai-Sheola Road is a significant link in the national Highway Network. There is no separate provision for slow-moving vehicular traffic (SMVT) or non-motorized traffic (NMT). There are capacity constraints caused by congested junctions, roadside parking, markets, and built-up areas. Road safety is inadequate on the existing road as it is over crowded with different types of vehicles, including rickshaws, bicycles, motorcycles, cars, buses and trucks. When vehicles break down, it reduces the highway to a single lane leading to traffic delays and congestion. The road is generally in a deplorable state, with the border point. Undoubtedly, it has a detrimental effect on both cross-border commerce at Sheola Land Port and agricultural growth in the surrounding region.
- iii. The upgradation of Sylhet-Charkhai-Sheola road aims at ensuring substantial safety provisions for the movement of local traffic and slow-moving vehicular traffic (SMVT) through enabling separate service lane on both sides of the highway where necessary, ensuring a safer road for the vulnerable road users by providing EWCD (Elderly, Women, Children and Differently-abled person) friendly highway infrastructures and reducing road accidents and road hazards and enhancing trade and commerce activities by expanding regional connectivity with BBIN (Bangladesh-Bhutan-India-Nepal) Corridor, SASEC (South Asia Sub-regional Economic Cooperation) Corridor, Asian Highway, BIMSTEC (Bay of Bengal Initiative for Multi-Sectoral Technical and Economic Cooperation) Corridor, BCIM (Bangladesh-China-India-Myanmar Economic) corridor, SAARC (South Asian Association for Regional Cooperation) Corridor and thus contribute to the economic growth of the country.
- iv. Improving the Sylhet-Charkhai-Sheola existing road into a four-lane highway will increase the capacity of the road, which will boost the national economic growth and facilitate sub-regional cooperation and trade. It will improve efficiency in the movement of goods to and from markets and access to social benefits and services.
- v. The RHD analyzed three alternative options during planning for the project. The objective is typically to evaluate different approaches to achieve better cost-efficiency, sustainability, traffic management, environmental impact, and long-term maintenance ensuring minimum LA and resettlement impact. The three alternative options were (i) without-project alternative, (ii) minimum-built alternative, and (iii) full-length widening alternative, which can be explored, depending on the context of the project, such as new road construction, upgrading existing roads, bypasses, etc.
- vi. The RHD considered the third option, "Full-length Widening Alternative", for widening from the existing 2-lane to a 4-lane divided carriageway, with or without adding a slow-moving transport lane. Option (iii) was chosen which minimizes LA & resettlement impacts in the following ways:
 - The amount of land acquisition will be significantly less for a standard 4-lane highway without developing bypasses to avoid significant loss of agricultural land and thereby negatively impact on the livelihood of many farmers including green-field alignment.
 - Flyover and overpasses were proposed in Bazaar areas to minimize LA and resettlement.
 - In city area, service lane is adjusted to 4.8m rather than 5.5m to minimize LA in developed area.
 - Omission of service lane in Lot-2 where traffic demand is less to ensure minimum Resettlement impact, and V.I.5 Alignment has been modified to save cultural heritage (e.g. 400 years old Jaigirdar Mosque) and environmental landmarks such as mini hills (local name Tillas).
- vii. The ACCESS Program has prepared a Resettlement Policy Framework (RPF) following the World Bank's Environmental and Social Framework (ESF) and its Environmental and Social Standard (ESS)5: "Land Acquisition, Restrictions on Land Use and Involuntary Resettlement". A resettlement plan was previously prepared during the feasibility study under an ADB funded TA project based on ADB's safeguards policy. The present Resettlement Action Plan (RAP) is updated with the latest census data and relevant assessments that meet



the requirements of the World Bank's ESS5.

B. IMPACT OF LAND ACQUISITION AND RESETTLEMENT

viii. The improvement of the Sylhet-Charkhai-Sheola Road will be carried out mainly using previously acquired land. However, additional land will be required where the existing road reserve is not adequate to improve the 2-lane to 4-lane highway including the slow-moving vehicle traffic lane, and where the road will be substantially straightened. The 43 Km requires the acquisition of 168.4303 acres of private and different agencies' lands under the Sylhet district. Lot-wise a detailed category of land to be acquired has been furnished in **Table 2-1**.

ix. There is a total of 1,601 affected households (HHs), Common/Community Property Resources (CPRs), and other entities. A total of 1,457 HHs (including 771 THHs & 686 NTHHs) are affected by losing primary and secondary structures in the project area. A total of 67 CPRs (including title CPRs 52 and non-title CPRs 15) and 77 government and other entities (including 21 title entities and 56 non-Title entities) are affected along the road alignment. A total of 6,835 affected people (including 5,632 affected people belonging to 1,457 affected HHs and 1,203 individual affected persons who are tenants & wage earners). Mitigation measures are suggested as per the Resettlement Policy Framework (RPF) of the World Bank and the Entitlement Matrix (EM) of this Resettlement Action Plan (RAP).

x. Project impacts with another indirect aspect of the census that is presented below.

Table 0-1: Lot Wise Overall Project Impacts in the Sylhet-Charkhai-Sheola Highway Improvement Project							
Sl. No.	Project Impacts		Unit	Unit/Quantity			
				Lot-1	Lot-2	Lot-3	Total
INVOLUNTARY LAND ACQUISITION (LA) FOR THE PROJECT							
A	Amount of Land to be acquired (acre)		Acre	70.9492	53.2103	44.2708	168.4303
IMPACT OF HOUSEHOLDS, CPRs AND ENTITIES DUE TO LA							
B-1	1	Affected Households Losing Both Primary & Secondary Structure.	No.	89	49	37	175
	2	Affected Households Losing Only Primary Structure.	No.	588	490	105	1,183
	3	Affected Households Losing Only Secondary Structure.	No.	59	30	10	99
	Total Affected Households			No.	736	569	152
B-2	1	Affected Community Property Resources on Private Land	No.	23	18	11	52
		Affected Community Property Resources on Govt. Land	No.	10	3	2	15
		Affected Community Property Resources (CPRs)	No.	33	21	13	67
	2	Other Entities with Title to Land	No.	16	4	1	21
		Other Entities without Title to Land	No.	32	21	3	56
		Affected Govt. Offices/Agencies and other Entities	No.	48	25	4	77
Total Affected CPRs, Govt. Offices/Agencies and other Entities			No.	81	46	17	144
B	Total Affected HHs, CPRs & Other Entities (Sum of B-1 & B-2)		No.	817	615	169	1,601
C	C-1	Affected THHs Losing Residences	No.	112	60	53	225
	C-2	Affected THHs Losing Own Commercial Structures	No.	273	137	38	448
	C-3	Affected THHs Losing Own Residential-cum-Commercial Structures	No.	57	22	19	98
	Total THHs Losing Residential, Commercial and Residential-cum-Commercial Structures (Sum of C-1, C-2 & C-3)			No.	442	219	110
D	D-1	Affected NTHHs Losing Residences	No.	17	21	6	44
	D-2	Affected NTHHs Losing Own Commercial Structures	No.	274	323	34	631
	D-3	Affected NTHHs Losing Own Residential-cum-Commercial Structures	No.	3	6	2	11
	Total NTHHs Losing Residential, Commercial and Residential-cum-Commercial Structures (Sum of D-1, D-2 & D-3)			No.	294	350	42
Total THHs & NTHHs Losing Residential, Commercial and Residential-cum-Commercial Structures (Sum of C & D)			No.	736	569	152	1,457
Affected Area of Primary Structures of THHs & NTHHs including CPRs & other Entities							
E	E-1	Affected Area of Pucca Primary Structures	Sft.	238,814	63,524	45,866	348,204
	E-2	Affected Area of Semi-pucca Primary Structures	Sft.	106,517	72,055	53,134	231,706
	E-3	Affected Area of Tin-made Primary Structures	Sft.	15,071	29,386	26,826	71,283
	E-4	Affected Area of Katcha Primary Structures	Sft.	12,408	17,410	4,578	34,396
Affected Major Items under Secondary Structure of THHs & NTHHs including CPRs & other Entities							
F	F-1	Affected Graves under Graveyard	No.	144	5	100	249
	F-2	Affected Toilet	No.	55	39	24	118
	F-3	Affected Tubewell	No.	23	14	19	56
G	G-1	Affected Trees of Private & Other Agencies Land	No.	8,427	1,990	4,531	14,948



Table 0-1: Lot Wise Overall Project Impacts in the Sylhet-Charkhai-Sheola Highway Improvement Project

Sl. No.	Project Impacts	Unit	Unit/Quantity			
			Lot-1	Lot-2	Lot-3	Total
G-2	Immature trees owned by Social Forestry under Forest Department	No.	0		765	765
	Total Affected Tree (Sum of G-1 & G-2)	No.	8,427	1,990	5,296	15,713
H-1	1 Affected THs are Operated Small Business ²	No.	53	51	15	119
	2 Affected NTHs are Operated Small Business	No.	197	206	22	425
	3 Affected Tenants are Operated Small Business	No.	262	222	79	563
	Affected THs, NTHs, & Tenants are Operated Small Business	No.	512	479	116	1,107
H-2	1 Affected THs are Operated Large Business ³	No.	19	9	5	33
	2 Affected NTHs are Operated Large Business	No.	0	2	1	3
	3 Affected Tenants are Operated Large Business	No.	131	69	16	216
	Affected THs, NTHs, & Tenants are Operated Large Business	No.	150	80	22	252
H	Total Affected THs, NTHs, & Tenants are operated Small & Large Business (Sum of H-1 & H-2)	No.	662	559	138	1,359
I	Affected loss of Rented Out under THHs & NTHHs	No.	245	173	57	475
J	Affected loss of Rented in (Tenants) under THHs & NTHHs	No.	466	311	133	910
K	Affected Temporary Loss of Income as Wage Earners	No.	157	117	19	293
L	Losing 10% of Total Income (Severely Affected) and Vulnerable Households (Male-228 & Female-15) and (THs-170 and NTHs-73)	No.	153	76	14	243
M	Project Affected Population belongs to Affected HHs.	No.	2,429	2,483	720	5,632

Source: Census Survey conducted by BCL, July - December 2024

Note: (i) Households have been considered based on the affected structure's owners.

(ii) The total impact may be changed after the joint survey by PAVC and Deputy Commissioner's award book as a result the RAP will be updated.

C. SOCIOECONOMIC PROFILE

xi. Socioeconomic profile of the affected people under the Project is detailed in the Chapter-3 of this RAP. A summary of the socioeconomic status has been described as follows:

- Distribution of Affected Households and Population by Sex-** Out of a total of 1,457 affected HHs, male-headed HHs are 1,406 (96.50%) [including 710 (96.47%), 555 (97.54%) and 141 (92.76%) in Lot-1, Lot-2 and Lot-3 respectively], while female-headed HHs 51 (3.48%) [including 26 (3.53%), 14 (2.46%) and 11 (7.24%) in Lot-1, Lot-2 and Lot-3 respectively] (Ref. Table 3-1). The average household size of the affected households is 3.9 which is slightly lower than the national average household size (3.98) [Population & Housing Census 2022, National Report (Volume 1), Bangladesh Bureau of Statistics (BBS), Published in November 2023] (BBS, 2022). (Ref. Table 3-2). On the other hand, out of the 5,632 population of affected HHs including male, female and Hijra (third gender) populations, there are 3,135, 2,495, and 2 respectively (Table 3-3). Individual affected population is 1,203, where 910 tenants (886 male and 24 female), where 131 residential tenants, 340 commercial tenants and 439 residential-cum-commercial tenants and 293 wage earners (288 male and 5 female) in the project area (Table 3-4).
- Dependency and Literacy Ratio:** The total dependency ratio is found 48.77% of the affected households in the project area which is near the national ratio (52.63%) (Table 3-6). The literacy rate (7 years and above) is found 97.03% of the population belonging to affected households in the project area, which is higher than the national ratio (74.80%) [Population and Housing Census 2022, National Report (Volume 1), Published in November 2023] (Ref. Table 3-8).
- Annual Income of Affected Households-** Out of a total of 1,457 affected HHs, the highest households are 559 (38.39%), whose annual income level is BDT 144,001 to BDT 300,000 with an average annual income of BDT 235,965. The annual income level of 342 (23.47%) households is BDT 300,001 to BDT 500,000. Their average annual income of the households is BDT 394,757 only. Annual income up to BDT 144,000⁴

¹ Trees under 10 cm Diameter at Breast Height (DBH) are considered immature trees (Ref. Bangladesh Forest Inventory (BFI))

² Small Business: An informal roadside shop/business with employees or without employee, which have no trade license, Tax Identification Number (TIN), Business Identification Number (BIN) (Usually used in similar RHD projects)

³ Large Business: A business/enterprise which is registered with trade license, Tax Identification Number (TIN), Business Identification Number (BIN) and higher turnover/assets (Usually used in similar RHD projects)

⁴ Based on Bangladesh Bureau of Statistics (BBS 2022) Household Income and Expenditure Survey (HIES) data, the national poverty level of the affected HHs has been considered as BDT 144,000 per year (12,000 per month) for each HH following the calculation below:

(i) Average poverty line of national level in 2022 = BDT 2255/person/month

has been considered as the highest ceiling of poverty determination in the proposed project. Out of 1 457 affected households, 67 households (4.53%) have an annual income within BDT 144,000 (Table 3-11). These affected households can be considered poor and vulnerable households based on their annual income level.

xii. Different information on the above-mentioned aspects is based on the census and baseline data may be changed during joint survey/verification for the implementation of RAP/Deputy Commissioner's Award Book and accordingly the RAP will be updated.

D. INFORMATION DISCLOSURE, CONSULTATION, AND PARTICIPATION

xiii. The key stakeholders of this project are local elites, local government representatives, project affected persons (PAPs) and owners of affected land, owners of affected structures (title and non-titles), affected commercial and business enterprises, representatives of CPRs, wage earners, poor, pro-poor, squatters, vulnerable persons and groups, affected female headed HHs, disadvantaged, and underprivileged groups, transport drivers, worker groups and media representatives. The affected people were informed about relevant necessary information, such as the project goals and objectives, potential social, land acquisition & resettlement impacts on them, and ARIPA 2017, as well as the environment and social standards ESS5 of the World Bank.

xiv. During the Feasibility Study and Detailed Design of the Sylhet-Charkhai-Sheola Highway Improvement Project, one (1) public consultation meeting (PCM) with the general public of the locality was held along the road alignment on 29 April 2019 at Jhalo-para Government Primary School, Sylhet Sadar, Sylhet. Four focus group discussions (FGDs) were held with the following groups: (a) transport workers on 24 April 2019 at Chadnighat Bazaar Motor Parts Business Multipurpose Office, Golapganj Upazila, Sylhet; (b) small and medium level businessmen on 28 April 2019 at Hetimongj Bazaar Somobay Samity Office, Fulbari Union, Golapganj Upazila, Sylhet; (c) small and medium businessmen on 1 May 2019 at Ahmad Khan Road, Golapganj Upazila, Sylhet; (d) businessmen and transport workers on 4 May 2019 at Union Parishad Office, Charkhai Union, Beanibazar Upazila, Sylhet. In addition to these, one (1) community consultation meeting (CCM) was held along the road alignment on 5 May 2019 at the Supreme Convention Hall in Sheola Union, Beanibazar Upazila, Sylhet, with the affected landowners and the people of the entire community. A total of 571 participants attended the PCM, FGDs, and CCM. The summary of the consultations of this stage is provided in Table 3-14 of subsection 3.2.4 under Chapter 3 of this report and in Annex-3.4.

xv. During Resettlement Policy Framework (RPF) preparation stage of the Sylhet-Charkhai-Sheola Highway Improvement Project, six (6) focus group discussions (FGDs) were held with the following groups: (a) transport workers on 24 April 2019 at Golapganj Upazila, Sylhet; (b) small/medium-level businessperson on 28 April 2019 at Fulbari Union, Golapganj Upazila, Sylhet; (c) local people on 30 April 2019 at Sylhet City Corporation, Sylhet; (d) local people on 30 April 2019 at Beanibazar Upazila, Sylhet; (e) small/medium-level businessperson on 1 May 2019 at Golapganj Upazila, Sylhet; (f) businessperson and transport workers on 4 May 2019 at Beanibazar Upazila, Sylhet. Beside these, one (1) community consultation was held on 5 May 2019 at Beanibazar, Sylhet, with the PAPs and community people. The total number of participants were 95 containing 65 males and 30 females. The summary of the consultations of this stage is provided in Table 3-15 of subsection 3.2.4 under Chapter 3 of this report and in Annex-3.4.

xvi. For the purpose of updating the Design and Safeguard Documents, including the preparation of the RAP and the census, four (4) stakeholder consultation meetings with a total of 178 participants, including 149 males and 29 females; eighteen (18) FGDs with a total of 179 participants, including 138 males and 41 females; and thirty-nine (39) Key Informant Interviews (KIIs) with a total of 195 participants, including 172 males and 23 females, were conducted during the period from July 2024 to December 2024. The mentioned consultations as well as active participations gave the stakeholders a chance to facilitate to express their views, concerns, suggestions, etc. about the mitigation measures that would be adopted in the project. The summary of the consultations held with project beneficiaries, stakeholders, project-affected persons (PAPs), business owners, and other relevant parties of this stage is presented in below Table 0-2 and Table 3-16 of subsection 3.2.4 under Chapter 3 of this report. Detailed information highlighting key concerns and feedback of the project beneficiaries, stakeholders, project-affected persons (PAPs), business owners, and other relevant parties are provided in Annex-3.4, Annex-3.5, and Annex-3.6.

(ii) Average household size = 4.26; Annual level in 2022 = 4.26

(iii) Monthly income for vulnerable household = BDT: 2753*4.26= BDT 11,736 (Rounded up BDT 12,000 per month)



Table 0-2: Summary of the Consultations with the Project Beneficiaries, Stakeholders, Stakeholders, Project Affected Persons (PAPs), Business Owners, and Other Relevant Parties

Category of Participants	Meeting Details with Date	Key Concern	Mitigation Measures
<p>A. Stakeholder Consultation Meetings (SCMs)</p> <p>(i) Stakeholders: RHD Consultants, RHD Personnel, DDE Personnel, RHD Assistant Engineer, UP Chairman and UP members</p> <p>(ii) Project Beneficiaries: Affected Business Owners, Affected Female Headed HHs, Vulnerable HHs and Affected Wage Earners.</p> <p>(iii) Project Affected persons: Affected Land owners, Affected Structures Owners as NTHs and Local Elites,</p> <p>(iv) Representatives of CPRs</p> <p>(v) Media persons and Journalists, etc.</p>	<p>(i) Stakeholder Consultation Meeting at No. 2, Fulbari Union Parishad Conference Room, Fulbari, Golapganj, Sylhet on 04/12/2024; (ii) Stakeholder Consultation Meeting at Dabag Union Parishad Conference room, Dabag Union Parishad, Beanubazar, Sylhet on 04/12/2024; (iii) Stakeholder Consultation Meeting at No. 2, Charkhai Union Parishad Office, Charkhai Union Parishad, Charkhai, Beanubazar, Sylhet on 26/11/2024; and (iv) Stakeholder Consultation Meeting at No. 2, Gopalganj Union Parishad Complex, Golapganj Union Parishad, Golapganj, Sylhet on 14/11/2024.</p>	<ul style="list-style-type: none"> Land acquisition/ requisition and resettlement. Compensation for loss of land, structures, trees, crops, fish stock, business and livelihoods. Compensation for affected non-titleholders. Compensation for affected Community/Common Property Resources (CPRs) like Graveyards, Madrassas, Schools, Mosques, etc. Resettlement and compensation for affected of business and shop owner. Environmental Impacts and Issues. Health and Safety Issues. Present situation of road condition and local markets in the project area. Monitor the environmental pollution during the construction period. Tree cutting. Waste management and drainage system. 	<ul style="list-style-type: none"> Engineers and design team will review to minimize the land acquisition as per requirements and information will be disclosed and informed to the RHD authority. All compensation will be paid according to current market price following GoB Act ARIPA, 2017 and the guidelines ESS5 of WB. DC office and PAVC will determine and recommend the compensation. Environmental issues that have an adverse effect on the environment will be solved by the contractor. Necessary actions (Safe Road Crossing Facilities) will be taken for health and road safety, which will be constructed in front of educational institutions, and flyovers will be constructed in the Madrassas, Schools, Mosques, & market areas as per requirement. The project team noted the tree cutting concern and information will be disclosed and communicated to the RHD authority for a potential mitigation strategy. The necessity of public toilet facility, drainage system and waste management/dumping system will be reviewed by the engineers and design team and information will be disclosed and communicated to the RHD authority. RHD will establish an on-site monitoring system through the contractor to prevent environmental pollution during the construction period.
<p>B. Focus Group Discussions (FGDs)</p> <p>(i) UP Chairmen & Members, (ii) School Management Committee & Teachers, (iii) Female Group, (iv) Mosque & Madrasa Management Committee, (v) Businessmen Group, (vi) Affected Day Laborers and Wage Earners, (vii) Affected Land Owners Group, (viii) Market Association Committee, (ix) Drivers/Helpers of Bus/ Truck/ CNG/Rickshaw Puller (Low Income Group), (x) Workers Association,</p>	<p>Focus Group Discussion (FGD) with: (i) Small Businessmen Group at Kuchai, Zakiganj Road, Dakshin Surma, Sylhet on 21/08/2024; (ii) Affected Day Laborers and Wage Earners at Dabag Bazar on 22/10/2024; (iii) Affected Land Owners Group at Ramdha/Trimahani on 02/11/2024; (iv) Affected small and Medium Businessmen Group at Chowmahani Bazar on 03/11/2024; (v) Affected Tenants Group at Ramdha/Trimahani on 04/11/2024; (vi) Affected Market Committee at Khairunganj Bazar on 23/11/2024; (vii) Business Group at Nur Mansion Market on 25/11/2024; (viii) Affected Land Owners Group (with women) at No.-2, Charkhai Union Parishad Office on 26/11/2024; (ix) Affected UP Chairman & Members at No.-3, Dabag Union Parishad</p>	<ul style="list-style-type: none"> Dependency on business and compensation for loss of business. Loss of Livelihood and Impact Employment Opportunity Training Program for the affected person/household Prior notice before displacement. Payment before displacement. Compensation and replacement cost for loss of land, structures and other assets. Other re-settlement benefits. 	<ul style="list-style-type: none"> Compensation will be paid for business loss. Proper compensation and livelihood assistance will be ensured for the PAPs according to the GoB Act ARIPA 2017 and the guidelines ESS5 of WB. The project authority will ensure proper compensation for the PAPs according to the current market price following the GoB Act ARIPA 2017 and the guidelines ESS5 of WB. Alternative options will be sought to minimize impacts, or a compensation approach will be adopted. In the case of compensation, payments

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Table 0-2: Summary of the Consultations with the Project Beneficiaries, Stakeholders, Project Affected Persons (PAPs), Business Owners, and Other Relevant Parties

Category of Participants	Meeting Details with Date	Key Concern	Mitigation Measures
Association, etc.	<p>Office on 26/11/2024; (x) Affected Day Laborers at Land Port area of Sumrangi at Sheola Land Port Field on 26/11/2024; (xi) Affected small and Medium Businessmen Group at/around Foods Shop, Boitkor Bazar on 26/11/2024; (xii) Transport Workers and affected Drivers/Helpers of Bus/ Trucks/ CNG/ Rickshaw Puller (Low Income Group) at Sultanpur bazar/ Westbag on 26/11/2024; (xiii) Transport Workers Association at Sylhet Bus Terminal on 27-11-2024; (xiv) Female Group at Golagganj Union Parishad on 27/11/2024; (xv) School Management Committee and Teachers at Kadamtali Government Primary School on 28/11/2024; (xvi) Mosque & Madrasa Management Committee and Teachers at Jamia Magidia Islamia Mosque and Madrasa on 28/11/2024; (xvii) Market Association Committee at Kuehai, Jakiganj road on 28/11/2024; and (xviii) Bus Owners Association, Sylhet Sadar at Bus Terminal Area on 29-11-2024.</p>	<ul style="list-style-type: none"> Alternative location for business or market Available options for relocation Flood at Dylbag and Charkhai union due to low project road. Road safety issues and accidents Compensation for affected laborers and other workers Unhealthy environment for the laborer and workers Training Program for the affected persons. Construction of widen road/flyover Compensation for the loss of income. Traffic and Road Conditions Police and Unauthorized Vehicles History and Goals of the Bus and Truck Labor Society Transportation Statistics Terminal Maintenance and Cleanliness Social Issues and Gender Dynamics Community Infrastructure and Roads Accessibility Migration Trends Present road condition. Establishment and Purpose of the Committee Support for the Resettlement Project Concerns Regarding Resettlement Impact of Traffic-Related Issues Recent Elections and New Committee Members Traffic Congestion 	<ul style="list-style-type: none"> will be made at replacement cost as per ESS5 of the World Bank. RHD will take necessary actions to ensure road safety from flood damage and height of the embankment. The female group in Golagganj, Sylhet, has expressed significant interest and is perceived to be in favor of the project. Safe road crossing facilities will be ensured. The affected entities will be compensated properly. The market committee members are in favor of the proposed project and appreciate initiatives like this.
C. Key Informant Interviews (KIIs) (i) Upazila Nirbahi Officers (UNOs) of respective upazilas; (ii) Assistant Commissioners (Land) of respective upazilas; (iii) Sub-registrars of respective upazilas; (iv) Upazila Agricultural Officers of respective upazilas; (v) Forest Guards of respective forest	<p>Key Informant Interview (KII) with: (i) UNO, Sylhet Sadar Upazila, Sylhet on 31/07/24, 21/08/24 and 18/09/24; (ii) UNO, South Surma Upazila, Sylhet on 31/07/24, 22/08/24 and 18/09/24; (iii) UNO, Golagganj Upazila, Sylhet on 31/07/24, 22/08/24, 18/09/24; (iv) UNO, Beanibazar Upazila, Sylhet on 31/07/24, 22/08/24, 22/08/24 and 18/09/24; (v) Assistant</p>	<ul style="list-style-type: none"> Delays and disputes in land acquisition due to incomplete or contested records. Loss of forest cover, roadside plantations, and biodiversity. Potential unrest or protests during land acquisition. 	<ul style="list-style-type: none"> Early verification of land titles and boundaries, fast-track dispute resolution and public disclosure of compensation rates; Joint forest inventory, compensatory plantation programs, strict monitoring and protection measures;

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Table 0-2: Summary of the Consultations with the Project Beneficiaries, Stakeholders, Project Affected Persons (PAPs), Business Owners, and Other Relevant Parties

Category of Participants	Meeting Details with Date	Key Concern	Mitigation Measures
<p>Officer, (vi) Ranger of Forest Department, (vii) Officers-in-Charge (OCs), (viii) Executive Engineer of RHD in Sylhet, (ix) Executive Engineer of PWD in Sylhet, (x) Deputy Director of DAE in Sylhet, (xi) Deputy Director of DAE in Sylhet, (xii) UP Chairmans/Panel Chairmans of respective areas, (xiii) Deputy Commissioner (DC) of Sylhet District, (xiv) ADC of Sylhet District, (xv) LAO of Sylhet District, (xvi) Commanding Officer (CO) of 34, Bangladesh Infantry Regiment (BIR) in Sylhet, (xvii) Chief Executive Officer (CEO) of Sylhet City Corporation (SCC) and (xviii) Administrator of Sylhet City Corporation (SCC).</p>	<p>Commissioner (Land), Sylhet Sadar Upazila, Sylhet on 31/07/24, 22/08/24 and 18/09/24; (vi) Assistant Commissioner (Land), South Surma Upazila, Sylhet on 31/07/24, 22/08/24 and 18/09/24; (vii) Assistant Commissioner (Land), Golapganj Upazila, Sylhet on 31/07/24, 22/08/24 and 18/09/24; (viii) Assistant Commissioner (Land), Beanibazar Upazila, Sylhet on 31/07/24, 22/08/24 and 18/09/24; (ix) Sub-register, Sylhet Sadar Upazila, Sylhet on 31/07/24, 22/08/24 and 18/09/24; (x) Sub-register, South Surma Upazila, Sylhet on 31/07/24, 22/08/24 and 18/09/24; (xi) Sub-register, Golapganj Upazila, Sylhet on 31/07/24, 22/08/24 and 18/09/24; (xii) Sub-register, Beanibazar Upazila, Sylhet on 31/07/24, 22/08/24 and 18/09/24; (xiii) Upazila Agricultural Officer, Sylhet Sadar Upazila, Sylhet on 31/07/24, 22/08/24 and 18/09/24; (xiv) Upazila Agricultural Officer, South Surma Upazila, Sylhet on 31/07/24, 22/08/24 and 18/09/24; (xv) Upazila Agricultural Officer, Golapganj, Sylhet on 31/07/24, 22/08/24 and 18/09/24; (xvi) Upazila Agricultural Officer, Beanibazar Upazila, Sylhet on 31/07/24, 22/08/24 and 18/09/24; (xvii) Divisional Forest Officer, Forest Department, Sylhet on 18/09/24; (xviii) Ranger, Forest Department, Beanibazar Upazila on 18/09/24; (xix) Officer in Charge (OC), Kotwali Model Police Station, Sylhet Sadar Thana, Sylhet on 31/07/24; (xx) Officer in Charge (OC), South Surma Thana, Sylhet on 31/07/24; (xxi) Officer in Charge (OC), Golapganj Thana, Sylhet on 31/07/24; (xxii) Officer in Charge (OC), Beanibazar Thana, Sylhet on 01/08/24; (xxiii) Executive Engineer, RHD, Sylhet Division, Sylhet on 11/09/24, 23/10/24, 14/11/24 and 03/12/24; (xxiv) Executive Engineer, PWD, Sylhet Division, Sylhet on 14/11/24; (xxv) Deputy Director, Department of Environment, Sylhet on 03/12/2024; (xxvi) Deputy Director, Department of Agriculture Extension, Sylhet on 04/12/2024; (xxvii) Chairman/Panel Chairmans, Sheola Union, Beanibazar Upazila, Sylhet on 31/07/24; (xxviii) Chairmans/Panel Chairman, Dubag Union, Beanibazar Upazila, Sylhet on 31/07/24, 23/10/24 and 14/11/24; (xxix) Chairmans/Panel Chairmans, Charkhat Union, Beanibazar Upazila, Sylhet on</p>	<p>RAP implementation delays affecting construction schedule. Environmental compliance risks (pollution, clearance conditions). Loss of agricultural land, crops and fish stock. Community dissatisfaction over compensation. Coordination challenges across different upazilas and agencies. Displacement of urban residents and disruption of municipal services</p>	<p>Security plan prioritizing community engagement, assign police liaison officers and use local mediators for conflict resolution. Integrate RAP timeline into construction plan, regular coordination meetings with engineering teams and contingency time and budget allocation. Include EMP requirements in contractor agreements, regular environmental monitoring and penalties for non-compliance. Schedule clearance after harvest, fair market compensation for crops/trees and livelihood restoration support (inputs, training). Engage local elected representatives in consultations, establish GRM committees and budget for replacement of community facilities. District-level RAP oversight committee chaired by DC and regular reporting and review meetings. Coordinate with Sylhet City Corporation for resettlement planning, identify serviced, relocation sites, rapid reinstatement of utilities and access.</p>



Table 0-2: Summary of the Consultations with the Project Beneficiaries, Stakeholders, Project Affected Persons (PAPs), Business Owners, and Other Relevant Parties

Category of Participants	Meeting Details with Date	Key Concern	Mitigation Measures
	<p>31/07/24, 23/10/24 and 14/11/24; (xxx) Chairman/Panel Chairman, Fulbari Union, Golagganj Upazila, Sylhet on 31/07/24; (xxx) Chairman/Panel Chairman, Golagganj Union, Golagganj Upazila, Sylhet on 31/07/24, 23/10/24 and 14/11/24; (xxx) Chairman/Panel Chairman, Alimgar Union, Benabazar Upazila, Sylhet on 31/07/24, 23/10/24 and 14/11/24; (xxxiii) Chairman/Panel Chairman, Dhaka Dakshin Union, Golagganj Upazila, Sylhet on 31/07/24; (xxxiv) Deputy Commissioner, Sylhet District, Sylhet on 30/07/24, 17/09/24, 11/09/24, 23/10/24, 14/11/24 and 03/12/24; (xxxv) Additional Deputy Commissioner, Sylhet District, Sylhet on 30/07/24, 17/09/24, 11/09/24, 23/10/24, 14/11/24 and 03/12/24; (xxxvi) Land Acquisition Officer, Deputy Commissioner Office, Sylhet District, Sylhet on 30/07/24, 17/09/24, 11/09/24, 23/10/24, 14/11/24 and 03/12/24; (xxxvii) Commanding Officer (CO), 34, Bangladesh Infantry Regiment (BIR), Sylhet on 18/09/24; (xxxviii) Chief Executive Officer, Sylhet City Corporation, Sylhet on 31/07/24; and (xxxix) Administrator, Sylhet City Corporation, Sylhet on 17/09/24.</p>		



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xvii. Total of seventy four (74) events have been organized in the consultations, public participation, and information disclosure process. Out of 74 events, seven (7) stakeholders' consultation meeting, twenty eight (28) FGDs and thirty nine (39) KIIs have been organized in the project area since feasibility and design. In total 1,218 people participated and discussed the consultation programs under Sylhet-Charkhai-Sheola Highway Improvement Project. The consultations and FGDs will be continued throughout the project duration.

E. LEGAL AND POLICY FRAMEWORK

xviii. During the feasibility study under an ADB funded TA project, a resettlement plan (RP) was previously prepared from October 2019 to February 2020 based on ADB's safeguards policy. The present Resettlement Action Plan (RAP) has been updated (July to December 2024) with the latest census data and relevant assessments to align with the World Bank's ESS5. Summary of the key changes between the original and updated RAP is given in the following table.

SL. No.	Type of Asset/Property Affected	Unit/Quantity	Original RP (ADB)	Updated RAP (World Bank ESS5)	Remarks
1.	Date of Preparation of RAP		October 2019 to February 2020	July-December 2024	
2.	Reason behind the update of RAP				This was previously prepared during the feasibility study under an ADB funded TA project based on ADB's safeguards policy. The present Resettlement Action Plan (RAP) is updated with the latest census data and relevant assessments that meet the requirements of the World Bank's ESS5.
3.	Land to be Acquired	Acre	247.13	168.4303	The quantity of land acquisition has been reduced.
4.	Affected THs	No.	422	771	As per updated census report.
5.	Affected NTHs	No.	276	686	As per updated census report.
6.	Affected population	No.	2,790	5,632	As per TH and NTH according to updated census report.
7.	Affected No. of CPR	No.	16	67	As per updated census report, most (57 nos.) of impacted by partially/secondary structure only.
8.	No. of rented HHs (both residential and commercial)	No.	650	910	Affected loss of rented in (Tenants) under THs & NTHs
9.	No. of business owner	No.	904	1,359	As per updated census report.
10.	No. of affected wage earners	No.	555	293	During census migrated from the project alignment.

F. ENTITLEMENTS, ASSISTANCE AND BENEFITS

xix. The Entitlements, assistance and benefits have been developed in the form of an Entitlement Matrix (EM) of the RAP (Ref. Table 4-1). The entitlement matrix is prepared considering GoB's policies related to the Land Acquisition and Requisition Act (ARIPA, 2017), ESS5 of World Bank, Resettlement Plan Framework (RPF) for Access Program Bangladesh Phase-I Project, Census and Socioeconomic survey conducted during the period from July 2019 to December 2024.

G. RELOCATION AND RESETTLEMENT

xx. Relocation options were identified based on census, IOL and socioeconomic survey and also on feedback from PAPs during consultations to be physically displaced in the project areas. The affected households would prefer to stay at nearby places for their affected residences and/or businesses for main reasons, such as they would like to (i) sustain income earning from unaffected land & assets and livelihoods and (ii) remain close to their neighbors and relatives. The findings show that 216 (80.30%) of HHs (THHs and NTHHs) losing residential and/or structures opted for self-relocation while 25 (9.29%) of residential HHs urged project assistance to find land or Government land (Khash land) only for relocation **Annex-4(Table 4-3)**. On the other hand, 843 (78.13%) of total affected commercial HHs (THHs and NTHHs) opted for self-relocation and 125 (11.58%) opted to have project assistance to find land or Government land (Khash land) for their relocation **Annex-4(Table 4-4)**. An almost similar trend was found in the case of affected residential households-cum-commercial HHs (THHs and NTHHs) who opted for self-relocation **Annex-4(Table 4-5)**. All the affected owners of structures with title to land preferred adequate cash compensation for their structures and land as per the ARIPA, 2017. On the other hand, affected NTHs including squatters will be given Replacement Value (RV) and Resettlement benefits by RHD for their affected structures. The PIU in collaboration with the local government and INGO will make the best efforts to identify alternative residential and commercial land or Government land for the affected HHs in case of full replacement.

xxi. Out of a total of 67 Common or Community Property Resources (CPRs) including 52 Title CPRs and 15 non-Title CPRs will lose structures. On the other hand, 77 other entities including 21 Title other entities and 56 non-Title other entities will lose structures (**Ref. Table 2-7**). All of them will be self-relocated providing replacement value of affected assets including resettlement assistance. A total of 67 CPRs will be affected among them 8 fully and 59 partially/only secondary structures will be impacted. The roles and responsibilities for reconstruction with the guidelines, assisting identification of the land for the relocation for fully affected CPRs and coverage of full replacement costs will be paid to the representatives/committee of CPRs. Consultation with the local religious leaders and representatives/committee of CPRs will be continued on a regular basis.

H. INCOME AND LIVELIHOOD RESTORATION PLAN

xxii. Losing 10% of Total Income (Severely Affected) and Vulnerable Households are 243 as identified including women headed households 15 and will be given additional support for their livelihood and income restoration. Short-term income and livelihood restoration programs have been suggested in **Section 4.4 of Chapter 4**.

I. GRIEVANCE REDRESS MECHANISM

xxiii. RHD has already established a strong public grievance redress and monitoring mechanism for Sylhet-Charkhai-Sheola highway. The link is [https://rhd.portal.gov.bd/site/page/f21b6d05-b654-461b-97d1-0a9f3d19a0b6/GRM-\(Grievance-Redress-Mechanism\)](https://rhd.portal.gov.bd/site/page/f21b6d05-b654-461b-97d1-0a9f3d19a0b6/GRM-(Grievance-Redress-Mechanism)). The PIU will also establish the grievance redress mechanism at two tiers of GRCs for the whole project period. The GRCs will be as (i) Field Level GRC and (ii) Project Level GRC to resolve complaints or grievances related to social, resettlement, environmental issues, and issues of SEA/SH/GBV including LHS (labour Health and Safety) (**Section 4.5 of the Chapter 4**).

J. INDICATIVE BUDGET FOR LAND ACQUISITION AND RESETTLEMENT

xxiv. The total indicative budget for land acquisition and resettlement is BDT 7,235,359,991.69 equivalent to USD 59,560,092.12 (1 USD=121.48 BDT, Source: EXCHANGE-RATES.org, Date: 25 March 2025) including land acquisition alone will require an estimated amount to BDT 6,867,926,634.51 due to three times the value of land and two times the value of other affected assets and resettlement budget BDT 367,433,357.18. The detail of budget breakdown is furnished in **Table 4-11**.

K. INSTITUTIONAL ARRANGEMENT FOR RAP IMPLEMENTATION

xxv. The Project Implementation Unit (PIU) of RHD under the Ministry of Road Transport and Bridges (MoRTB) is the Executing Agency (EA). The PIU is headed by the Project Director (PD). The PIU will have the position of the Chief Resettlement Officer (CRO) at the same level as the Additional Project Director (APD). The CRO will be responsible for the implementation of all resettlement activities as per the policy guidance, coordination, planning, monitoring and reporting. At the Field level, the CRO will be assisted by Project Managers (PMs) as the Resettlement Officers (RO) and Deputy Project Managers (DPM) or Field Officers (FO) and other Field staff as necessary. A representative of the PIU will act as the Convener (Project Manager) of the Property Assessment and Valuation Committee (PAVC) is to undertake a plot to plot survey in the affected areas, determining/assessing the actual quantum and Replacement Value (RV) of affected properties/ losses/ entitlements and Resettlement Action Plan (RAP) of all category of the Displaced Persons (DPs).

compare the data with the assessment made by the DC office and establish the loss of livelihood and resettlement. An INGO is appointed for the implementation of RAP on behalf of RHD. There will be a Social Safeguard team under the Project Implementation Consultant (PIC) and PIU of the project. They will be responsible for the monitoring and supervision of the Land Acquisition Proposals (LAPs) and Resettlement Action Plan (RAP) implementation activities.

L. RAP IMPLEMENTATION SCHEDULE

xxvi. The implementation schedule of RAP for the Sylhet-Charkhai-Sheola Highway Improvement Project is planned as per Land Acquisition and RAP activities. The major activities are scheduled as Land Acquisition, Social Preparation including Information campaign, Payment of Compensation and Resettlement Benefits, Assistance in Relocation, Grievance Redress, MIS and Monitoring, Implementation of ILRP, Consultation Meetings, FGDs & KIIs and Reporting. The details of major activities are shown in the **Table 4-20**. INGO has already been recruited and RAP activities have been commenced on December 2024. The completion of RAP implementation is targeted in about 30 months from December 2024. (Subsection 4.7.2 under Chapter 4).

M. MONITORING AND EVALUATION

xxvii. To ensure the effective and efficient implementation of involuntary resettlement, internal and external monitoring systems have been planned. The Implementing NGO (INGO) under the guidance of PIU and Project Implementation Consultant (PIC) will collect and analyze information for monitoring on the RAP implementation systematically and continuously. The PIU and PIC will prepare compliance monitoring and evaluation (M&E) reports. The Social Safeguard team under the PIC and PIU of the project will monitor the overall Resettlement activities, verify INGO's reports and submit monitoring report to the PIU. Resettlement Division of Roads and Highways Department, Implementation Monitoring & Evaluation Division (IMED) of Government of Bangladesh, Ministry of Road Transport and Bridges (MoRTB), Foreign Aided Projects Audit Directorate (FAPAD) will monitor the implementation of Land Acquisition (LA) and Resettlement Action Plan (RAP) as external monitors. World Bank Social Safeguard Team & periodic mission will also monitor the LA & RAP implementation of the Project. Third Party independent monitoring will review all the social standard Due-Diligence Reports prepared for this project. The extent of monitoring activities will be proportionate to the project's risks and impacts. Affected persons will be consulted during the monitoring process. Periodic monitoring reports will be prepared and disclosed, and affected persons will be informed about monitoring results on time.

xxviii. The PIU will collect relevant information/reports periodically, assess the progress of LA & RAP implementation including monitoring reports and submit to the World Bank, MoRTB, Chief Engineer of RHD.



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1 PROJECT DESCRIPTION

1.1 BACKGROUND

1. The Government of the People's Republic of Bangladesh is receiving a Credit from the World Bank to finance the Accelerating Transport and Trade Connectivity in Eastern South Asia (ACCESS) Program - Bangladesh Phase-1, a part of the World Bank's Multiphase Programmatic Approach (MPA). As per part-2(5) of the loan agreement, upgrading the Sylhet-Charkhai-Sheola section (43 kilometers) from a two-lane single carriageway to a climate-resilient four-lane dual carriageway, connecting the Sheola Land Port with the Dhaka-Sylhet Highway, which will be implemented by the Roads and Highways Department (RHD) (Ministry of Road, Transport and Bridges) and is termed as the Sylhet-Charkhai-Sheola Highway Improvement Project.

2. The upgrading of the Sylhet-Charkhai-Sheola road aims to ensure substantial safety provisions for the movement of local traffic and slow-moving vehicular traffic (SMVT) by enabling separate service lanes on both sides of the highway where necessary, ensuring a safer road for the vulnerable road users by providing EWCD (Elderly, Women, Children and Differently Abled Person) friendly highway infrastructures, and reducing road accidents and road hazards.

3. The RHD analyzed three alternative options during planning for the project. The objective is typically to evaluate different approaches to achieve better cost-efficiency, sustainability, traffic management, environmental impact, and long-term maintenance ensuring minimum LA and resettlement impact. The three alternative options were (i) without-project alternative, (ii) minimum-built alternative, and (iii) full-length widening alternative, which can be explored, depending on the context of the project, such as new road construction, upgrading existing roads, bypasses, etc.

4. The RHD considered the third option, "Full-length Widening Alternative", for widening from the existing 2-lane to a 4-lane divided carriageway, with or without adding a slow-moving transport lane. Option (iii) was chosen which minimizes LA & resettlement impacts in the following ways:

- ▶ The amount of land acquisition will be significantly less for a standard 4-lane highway without developing bypasses to avoid significant loss of agricultural land and thereby negatively impact on the livelihood of many farmers including green-field alignment,
- ▶ Flyover and overpasses were proposed in Bazaar areas to minimize LA and resettlement,
- ▶ In city area, service lane is adjusted to 4.8m rather than 5.5m to minimize LA in developed area,
- ▶ Omission of service lane in Lot-2 where traffic demand is less to ensure minimum Resettlement impact, and
- ▶ Alignment has been modified to save cultural heritage (e.g. 400 years old Jaigirdar Mosque) and environmental landmarks such as mini hills (local name Tillas).

5. Improvement of the existing 2-lane road over the length of approximately 43 km into a 4-lane divided carriageway with service lanes on both sides. To withstand heavy loads (truck traffic) as well as extreme weather conditions, polymer-modified bitumen (PMB) will be used for pavement. As a part of regional connectivity, the Sylhet-Charkhai-Sheola Highway (43 km) will be developed with improvement/widening of 3 bridges and 31 culverts. Construction of 4-foot over bridges, flyovers, overpasses, bus bays and intersections.

6. Additional work is the installation of ITS components (CCTV, fiber optic cable, vehicle detection components, travel advisory display message board installation, etc.) along the highway, including setting up a Transportation Management Center (TMC).

1.2 RATIONALE FOR UPDATING RESETTLEMENT ACTION PLAN (RAP)

7. The project's risk requirements and considering the large-scale land-related impacts envisaged under the project, RHD as the implementing agency will update a Resettlement Action Plan (RAP) as per the guidelines of the project RPF for managing the impacts emerging from specific investments in this road section as elaborated under the Task-including review/updating of the existing Land Acquisition Plan (LAP), as required, based on the revised design and RoW of the road. A completed list of affected Households (HHs), Common or Community Property Resources (CPRs) and other govt. & non-govt. entities due to loss of land including residential, commercial, agricultural and other type of lands, loss of residential and commercial structures and other assets such as trees, standing crops, fish-stock, and loss of income and livelihoods, etc. including relevant compensations in the RAP as follows:

- ▶ Inventory of loss including loss by each PAP regarding their total asset base;
- ▶ Entitlements (monetary compensation and other benefits under the project);



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- ▶ Extract from public registry or other documents for proving the titles (if not registered in public registry);
- ▶ Consents from the PAPs regarding the implementation of rehabilitation works on their property;
- ▶ Understanding that PAPs have the choice to opt out of the Project;
- ▶ Copies of the PAPs' National ID card with contact address and phone number; and
- ▶ Videos/Photos of the project affected property/area etc.

8. The existing Resettlement Plan (RP) was prepared in 2019 with an ADB financed Technical Assistance (TA) project, the Sub-regional Road Transport Project Preparatory Facility (SRTPPF-II). The existing RP has been modified and prepared as the Resettlement Action Plan (RAP) to meet the pragmatic needs of potential users of the Sylhet-Charkhai-Sheola Highway Improvement Project as per the final/updated design requirements, enactment of the ARIPA2017, RPF for Access Program Bangladesh Phase 1 Project as well as the environment and social standards ESS5 (ESSs 1, 2, 5, 7 & 10) of the World Bank. There are significant changes in road design, lane, land acquisition, etc. such as, the scope of acquiring land for 6 lanes in Lot 2 and Lot 3 have been reduced. Locations of seven (7) pedestrian crossings have been modified to accommodate road safety issues mainly to address road-crossing students. According to the modified design resettlement scope and impact are incorporated in updated RAP.

1.3 THE SYLHET-CHARKHAI-SHEOLA HIGHWAY IMPROVEMENT PROJECT

9. The Sylhet-Charkhai-Sheola road segment is an important part of Bangladesh-China, India and Myanmar (BCIM) corridor and South Asia Sub-regional Economic Corridor (SASEC)-5. Upgradation of 43 km²-lane Sylhet-Charkhai-Sheola road to a climate-resilient 4-lane road including improvement/widening of 3 bridges & 31 culverts, construction of 4 foot over bridges with flyovers, overpasses, bus bay and intersections and connecting the Sheola Land Port with the Dhaka-Sylhet Highway. The main objective is to modify/update the existing social safeguard related as well as engineering design related documents for successful implementation of the project. This assignment includes tasks (i, ii & iii) as below:

- ▶ **Task-i:** Updating the existing Resettlement Action Plan (RAP), Land Acquisition Plan (LAP) and Gender Action Plan (GAP) for the Sylhet-Charkhai-Sheola Highway Improvement Project according to the guideline of the project and Resettlement Policy Framework (RPF).
- ▶ **Task-ii:** Updating the existing Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plan (ESMP) for Sylhet-Charkhai-Sheola Highway Improvement Project according to the guideline of World Bank's Environmental and Social Framework (ESF).
- ▶ **Task-iii:** Updating the existing Geometric Design, BoQ & relevant Technical Specification for Civil Work Lot for Sylhet-Charkhai-Sheola Highway.

10. The other aims of upgradation of Sylhet-Charkhai-Sheola road as below:

- ▶ Ensure substantial safety provisions for the movement of local traffic and slow-moving vehicular traffic (SMVT);
- ▶ Providing separate service lanes on both sides of the highway where necessary.
- ▶ Ensure a safer road for the vulnerable road users by providing EWCD (Elderly, Women, Children and Differently abled person); and
- ▶ Make friendly highway infrastructures by reducing road accidents and road hazards.

11. The task-i also includes reviewing /updating of the existing land acquisition proposal (LAP), as required, based on the revised design and RoW of the road. Based on the overall guidance provided in the Resettlement Policy Framework (RPF) prepared for the RHD components of the project and based on the specific design details being finalized by the project as below.

- ▶ Review and prepare the updated RAP that would be aligned to these project documents and would govern all the resettlement related issues in the Sylhet - Charkhai - Sheola Road alignment.
- ▶ Use the final design specifications to base its land-related surveys and studies to assess impacts and compensation.
- ▶ Update extent of land acquisition, payment of compensations, involuntary resettlement including economic and physical displacement and will follow the structure proposed for RAP preparation provided at the end of the ToR;
- ▶ Review and update the existing RAP by incorporating new PAPs if this results from changes in the RoW of the road;
- ▶ Review and update the existing LAP by incorporating new PAPs if this results from changes in the RoW of the road;
- ▶ Review and update the monitoring plan for RAP implementation as spelt out in the RPF;



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- ▶ Update the institutional responsibilities detailed in the RPF for implementation, grievance redress, monitoring and reporting;
- ▶ Carry out any other activities required by RPF for the ACCESS Bangladesh;
- ▶ Ensure that the RAP is developed in full compliance with these policies and Resettlement Policy Framework (RPF) and ESS5; and
- ▶ LAP will include all required information as per the prescribed format of the government.

12. The existing 43 Km long road starts at Kadamtali about 1 Km from south end of Keane Bridge in Sylhet city and ends at Sheola Land Port at border with India. This road passes through several markets and built-up area of Sylhet Sadar, South Surma, Golapganj and Beanibazar Upzilas under Sylhet District. The road passes towards east direction (with slightly Southern direction) until it reaches Sutarkandi at 43 Km. The road passes through Sylhet town by South side of Surma River at about 7 Km where the road crosses a recently designed Sylhet bypass (Dhaka –Zafong road). In Sylhet town section, there is a roundabout of 0.8 Km and underpass at 1.8 Km below Humayun Rashid Square and Shahjalal Bridge Road.

13. The proposed RoW width of the project road at urban and rural areas varies according to final design of project road. For urban areas the proposed width of RoW is 37.4 meter in maximum areas and this is 22.8 meters for almost in all rural areas. No provision for borrow-pits has been considered within RoW adopted. The land acquisition requirement has been kept to the minimum for development of the road meeting the design standards.

14. As shown in **Figure 1-1**, the highway has been divided in 3 (three) lots under Work Lot, namely Lot-1, Lot-2 & Lot-3 and the starting chainage and ending chainage for each Lot is given in **Table 1-1**.



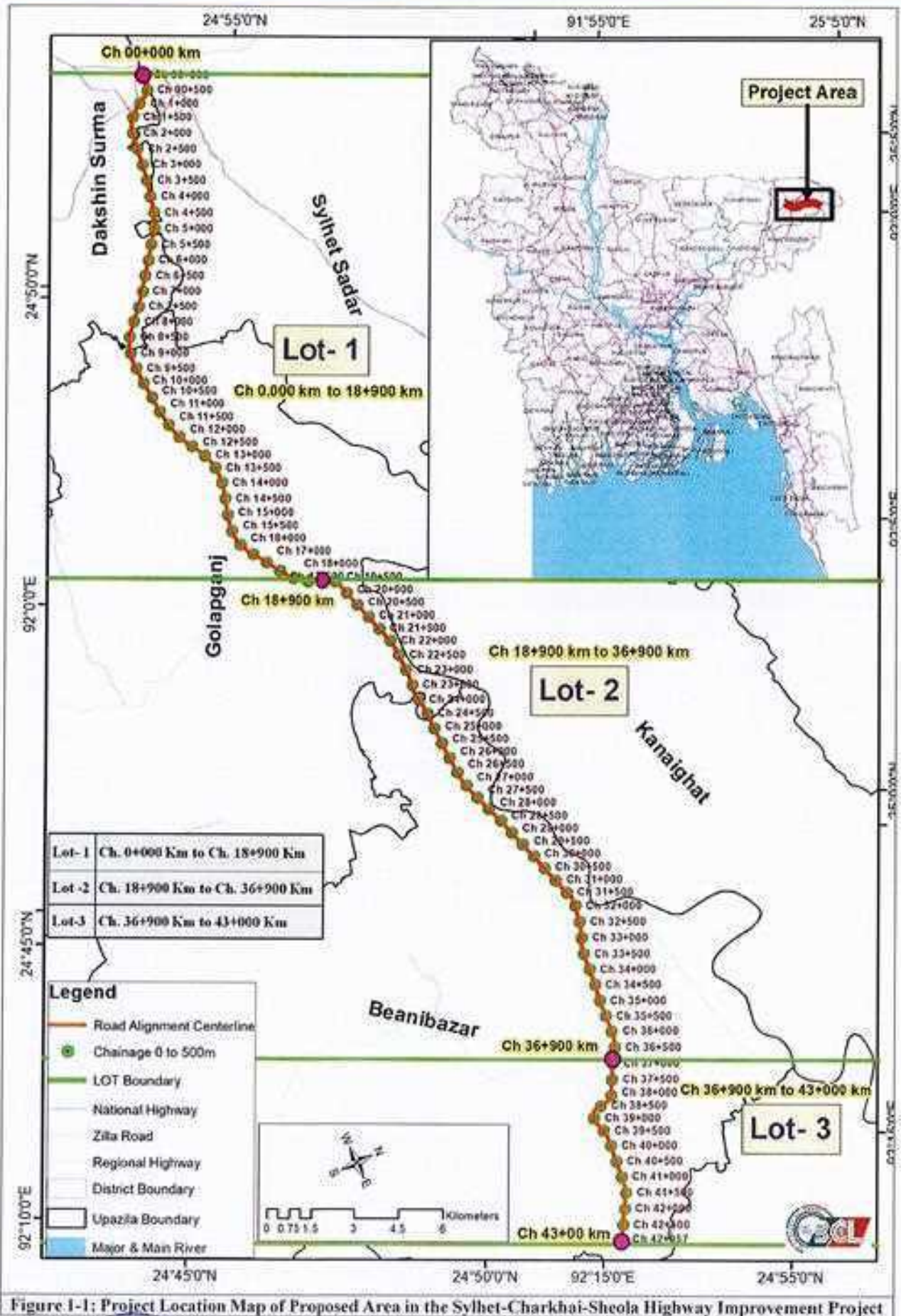


Figure 1-1: Project Location Map of Proposed Area in the Sylhet-Charkhai-Sheola Highway Improvement Project



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1.4 CO-OPERATION OF LOCAL ADMINISTRATION

15. As listed in **Table 1-1**, implementation of RAP will require cooperation from the administration at different levels of affected Union Parishad, Union Land Office, Assistant Commissioner (AC Land) Office, Upazila Land Settlement Office, Upazila Parishad, Upazila Nirbahi Office (UNO), Pourashava, Zila Parishad, City Corporation, Deputy Commissioner (DC), Divisional Commissioner Offices. They have significant roles in land acquisition for effective implementation of the project and implementation of RAP as well.

Lot	Chainage (Km. + M.)	Geographic Location	District	Upazila within the Project RoW	Union/City Corporation within the Project RoW
Lot- 1	Ch. 0+000 Km to Ch. 18+900 Km	Kadamali Square of Sylhet Sadar to after Golapganj Bazar	Sylhet	Sylhet Sadar	• Sylhet City Corporation
				Dakshin Surma	• Kuchai Union
				Golapganj	• Fulbari Union • Lakshmi Pasha Union • Golapganj Union
Lot -2	Ch. 18+900 Km to Ch. 36+900 Km	After Golapganj Bazar to before Sheola Bridge	Sylhet	Golapganj	• Golapganj Union • Bagha Union • Dhaka Dakshin Union
				Beanibazar	• Alinagar Union • Charkhai Union
Lot-3	Ch. 36+900 Km to 43 Km	Before Sheola Bridge to Sheola Land Port	Sylhet	Beanibazar	• Dubag Union • Sheola Union

1.5 SOCIOECONOMIC BENEFIT

16. The expected socioeconomic benefits are summarized below:

- ▶ The project will provide improved connectivity to local road networks as well as to regional and international road transport corridors facilitating smoother and speedier transportation of goods and services.
- ▶ Reduced vehicle operating costs resulting in lower transport costs for freight and passengers.
- ▶ Wider access to the local people to improved basic amenities and basic services such as markets, health facilities, schools, workplaces, administrative services and so on.
- ▶ Minimized road accidents and increased travel comforts.
- ▶ Savings on road maintenance costs.

17. The above-mentioned benefits can be tangibly measured by comparing the baseline situation and post-project scenario through an evaluation study during the operation phase.

1.6 METHODOLOGY

1.6.1 DATA GENERATION

18. Data were generated through formal and informal Focus Group Discussions (FGDs), Key Informant Interviews (KIIs), and Stakeholders' Consultation Meetings (SCMs) at different bazars or suitable places in the project area. More specifically, census, IOL and socioeconomic survey have been conducted with 1,457 PDPs/PDHs/PDEs from July 2024 to December 2024. Collected data from the Census has been checked, entered into the database, computed and analyzed for preparation of the RAP.

1.6.2 CENSUS AND INVENTORY OF LOSSES

19. The census and inventory of Loss (IoL) survey were conducted in the lot 1, 2 & 3 within demarcated RoW for all affected households, shop owners/business holders, squatters, encroachers, tenants, wage earners/workers, and entities irrespective of title to the land. The width of RoW varies based on the location and elevation of the road. The Resettlement enumerators used a census and IOL form and visited house to house within the RoW to collect information from the household head or his/her senior proxy. All landowners, structure owners, businessmen, tenants, pond owners, and community property representatives were covered by the census and IOL survey. Census and IoL surveys were undertaken from July 2024 to December 2024.

1.6.3 SOCIOECONOMIC SURVEY

20. The Socioeconomic Survey (SES) was conducted simultaneously while carrying out census and IOL surveys for all households (100%) and owners of affected businesses. This SES established baseline information on major economic activities, detailed livelihood sources and incomes, assets owned, and other socioeconomic

indicators in the project-affected area. Structure marking and Video Filming were also done during the census and IOL survey from July 2024 to December 2024.

1.6.4 PROPERTY VALUATION SURVEY

21. Property Valuation Survey (PVS) based on current market value, was conducted for the affected land, structures, trees and other assets by collecting information from the stakeholders, the project-affected mouzas in Lot-1, Lot-2 and Lot-3. In this regard, prices of the affected properties were collected from potential sellers and buyers, deed writers, religious leaders, teachers, etc. A minimum of 110 persons were interviewed in a mouza. Government rates were also collected from the Sub-Registrar's Offices for land, PWD for structures and concerned Forest Department for trees. Replacement Value (RV) of all assets, land, structures, trees, crops, and others have been determined based on the Property Market Survey and Government documents including other similar projects in the same geographical area. However, DC provides the market price and additional 200% as CCL for land, 100% for structures, trees, others which makes the replacement value for affected assets. Besides, affected owners will be allowed to take away salvageable house construction materials free of cost. If the CCL is lower than RV, then the difference (Top Up) will be paid by the project (Section 4.6 in Chapter 4 of the RAP). PAVC will further verify the compensation amount to the PAPs before payment and will ensure that compensation is at least equal to the replacement value. Detailed information on the rates of land, structures, trees, crops, etc. is presented in the Chapter 4.

1.6.5 STAKEHOLDERS CONSULTATION MEETING

22. During the Feasibility Study and Detailed Design of the Sylhet-Charkhai-Sheola Highway Improvement Project, one (1) public consultation meeting (PCM), four (4) FGDs, and one (1) community consultation meeting (CCM) were conducted along the road alignment. A total of 571 participants attended in the PCM, FGDs and CCM. Six (6) FGDs and one (1) community consultation with PAPs and community people were conducted during the preparation Resettlement Policy Framework (RPF). The total number of participants were 95 containing 65 males and 30 females. For the purpose of updating the Design and Safeguard Documents, including the preparation of the RAP and the census, four (4) stakeholder consultation meetings with a total of 178 participants, including 149 males and 29 females; eighteen (18) FGDs with a total of 179 participants, including 138 males and 41 females; and thirty-nine (39) Key Informant Interviews (KIIs) with a total of 195 participants, including 172 males and 23 females, were conducted during the period from July 2024 to December 2024. The consultations mentioned as well as active participation gave the stakeholders a chance to facilitate expressing their views, concerns, suggestions, etc., about the mitigation measures that would be adopted in the project. The social and environmental aspects of the project were the key issues of discussion at the meetings. The consultations and FGDs will be continued throughout the project duration. Details of the minutes of these consultation meetings, attendance of participants and photographs are presented **Annex-3**.

1.6.6 CUT-OFF-DATE

23. The commencement date of 31 July 2024 of the census survey has been established as the social cut-off date for non-title affected HHs and persons. It was disseminated among the affected HHs, PAPs and stakeholders as described in detail in section 4.1 of Chapter 4. On the other hand, service of notice under Section 4 of ARIPA, 2017 will be the cut-off date for the legal owners of the property to be acquired.

1.7 MEASURES TO MINIMIZE IMPACTS

24. It is preferred to use the land owned by RHD and other government agencies for the implementation of the project to minimize the use of private land for this project. The alignment was adjusted to avoid sensitive structures or locations in the project area. Impacts identified during stakeholders' consultation meetings, conducting Focus Group Discussions (FGD), Key Informant Interviews (KII), census, IOL and socioeconomic survey. An Entitlement Matrix (EM) considering the type of losses/affected assets, entitle persons, entitlements, or compensations to prepare the RAP has been followed to reduce the social risks and impacts.

25. The important measures to minimize the impact are:

- (i) For Lot 2 and Lot 3, the highway was reduced to 4 lanes from 6 lanes (including service lane) without the SMVT lane considering site visit, traffic data analysis of various links of the project road, World Bank safety audit report, etc.
- (ii) Reducing the scope eventually causes less land acquisition, which is a time-consuming factor for our country. Initially, the proposed land acquisition quantity was 247.13 acres, which has been reduced to 168.4303 acres now.
- (iii) The project has 06 no. of flyovers and overpasses in all bazar areas to mitigate loss of markets and



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residential buildings. The bazar areas covered by these structures are the intersection of R250 and N2, Hetimongj, Golapganj, Ranaping, Ramdha and Charkhaibazar.

- (iv) There is a heritage structure in the project alignment in lot 2 called "Jaigirdar Jame Mosque" at chainage 23+500 km, which was built almost 400 years ago. This is avoided from the alignment as a part of the mitigation measure.
- (v) Lots of large Common Property Resources (CPRs), e.g., mosques, madrasas, and graveyards have been avoided in Lot 1, 2 and 3. For example: Mohammadpur Purba Jame Moshjid at chainage 26+200 km, Fajilfur Madrasha at chainage 22+100 km, Fokitila Koborstan at chainage 21+700 km, etc.;
- (vi) There are some Key Point Installations (KPIs) in the alignment of Lot 1 and 2 for which the alignment has been modified as a part of mitigation measure. Such as: Beanibazar 33/11 KV Indoor Electricity Sub-station at chainage 25+400 km, etc.

1.8 STRUCTURE OF RAP

26. This RAP has been structured as follows:

Chapter-1 presents (i) project description and rationale for updating the resettlement action plan.

Chapter-2 presents the overall impacts as land acquisition and resettlement including degree of impacts on residential houses, affected businesses, vulnerable households and groups and affected CPRs.

Chapter-3 presents the baseline socioeconomic characteristics of the affected households and businesses, and findings of different relevant stakeholders' consultations; information disclosure and participation of different relevant stakeholders.

Chapter-4 contains eight sections as follows:

Section-4.1 presents the relevant legal and policy framework related to land acquisition and resettlement activities associated with the project.

Section-4.2 the entitlement matrix and benefits for each category of impact.

Section-4.3 focuses on the relocation and resettlement.

Section-4.4 focuses on Income and livelihood restoration.

Section-4.5 contains Grievance Redress Mechanisms (GRM).

Section-4.6 focuses on the indicative land acquisition and resettlement budget.

Section-4.7 institutional arrangements for the implementation of the Resettlement Action Plan (RAP).

Section-4.8 focuses on monitoring and evaluation of the process of implementation of LAP & RAP.



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2 LAND ACQUISITION AND RESETTLEMENT

2.1 INTRODUCTION

27. This chapter mainly focuses on land acquisition and resettlement of Project Displaced Persons (PDPs), Project Displaced Households (PDHs), Community or Common Property Resources (CPRs) and other govt. & non-govt. entitles due to loss of land including residential, commercial, agricultural and other type of lands, loss of residential and commercial structures and other assets, such as trees, standing crops, fish-stock, and loss of income, livelihoods, etc.

2.2 SCOPE OF LAND ACQUISITION

28. The improvement of the Sylhet-Charkhai-Sheola Road will be carried out mainly using available previous acquired land. However, additional land will be required where the existing road reserve is not adequate to improve 2-lane to 4-lane highways including the slow-moving vehicle traffic lane, and where the road will be substantially straightened. The 43 km requires acquisition of 168.4303 acres including 70.9492(42.12%) acres, 53.2103 (31.59%) acres, & 44.2708 (26.28%) acres in Lot-1, 2, & 3 respectively of private, govt. and other agency lands under the Sylhet district. The lot wise detail category of land to be acquired has been furnished in the Table 2-1. The existing 43 Km long road starts at Kadamtali about 1 Km from south end of Keane Bridge in Sylhet city and ends at Sheola Land Port at border with India.

Table 2-1: Lot Wise Affected Land (in Acre) to be acquired as per the Updating Design for Sylhet-Charkhai-Sheola Highway Improvement Project

Particular	Lot-1			Lot-2			Lot-3			Grand Total
	Private and other agency/ Govt. Department			Private and other agency/ Govt. Department			Private and other agency/ Govt. Department			
	Private	Other Agency /Govt. Dept.	Total	Private	Other Agency /Govt. Dept.	Total	Private	Other Agency /Govt. Dept.	Total	
Land to be Acquired (Acre)	63.7021	7.2470	70.9492	47.3736	5.8368	53.2103	37.2890	6.9817	44.2708	168.4303
Percentage (%)			42.12%			31.59%			26.28%	100%
Chainage in Km	Ch. 0+000 km to Ch. 18+900 km			Ch. 18+900 km to Ch. 36+900 km			Ch. 36+900 km to 43 km			
Geographic Location	Kadamtali Square of Sylhet Sadar to after Golapganj Bazar			After Golapganj Bazar to before Sheola Bridge			Before Sheola Bridge to Sheola Land Port			

Source: Census and IOL survey conducted by BCL, July - December 2024 and LAP of the Project

2.3 OVERALL IMPACTS OF THE PROJECT AREA

The degree of impacts due to Land Acquisition (LA) and Involuntary Resettlement (IR) has been assessed and determined based on the Census and IOL data. In this context, there are two types of impacts, which are taken into consideration, such as (i) land acquisition impacts including impacts on affected land and structures, and (ii) impact on resettlement and relocation.



2.4 KEY IMPACTS OF THE PROJECT

29. It is found that structures and various businesses are getting affected due to land acquisition for implementation of the Sylhet-Charkhai-Sheola Highway Improvement Project Annex-2(Figures 2-1, 2-2 & 2-3). In addition to this, residential and commercial structures within the proposed RoW under the Sylhet-Charkhai-Sheola Highway Improvement Project are likely to be affected.

30. All proposed Land Acquisition Plans (LAPs) are located in Sylhet Sadar, Golapganj and Beani Bazar Upazilas of Sylhet district. There are 10 LAPs are being executed by Deputy Commissioner, Sylhet district. Table 2-2 shows that the highest amount of acquired site type of land is 52,2439(31.02%) acres of "168.4303" followed by 36,4447 (21.64%) acres amon type of land and further followed by 16,3918 (9.73%) acres homestead type of land. The lowest amount land is 0.0148 (0.01%) acre Chhankhola type of land. Detailed information on amounts & percentages of land by types of acquired land in the Sylhet-Charkhai-Sheola Highway Improvement Project is presented in Table 2-2.

Table 2-2: Lot Wise Type of Land to be Acquired in the Sylhet-Charkhai-Sheola Highway Improvement Project

Sl. No.	Type of Land	Acquired by Type of Land (in Acrr)										Total Acquired Land of Lot-1,2&3 (in Acre)			
		LOT-1			LOT-2			LOT-3			Total	Private Land	Govt. Land	Grand Total	%
		Private Land	Govt. Land	Total	Private Land	Govt. Land	Total	Private Land	Govt. Land	Total					
1	Homestead	7.0360	0.1681	7.1981	6.5334	0.3505	6.8839	1.9980	0.3117	2.3098	15.4614	0.8303	16.3918	9.73	
2	Site	31.8309	0.9332	32.7641	2.4815	0.0599	2.5414	13.5790	3.3594	16.9384	47.8914	4.3525	52.2439	31.02	
3	Amen	1.3155	0	1.3155	15.6965	0.2016	15.8982	17.7897	1.4413	19.2310	34.8018	1.6429	36.4447	21.64	
4	Aush	0.0728	0	0.0728	0	0	0	0	0	0	0.0728	0	0.0728	0.04	
5	Vita	1.1478	0.3484	1.4963	0.7777	0.0067	0.7845	0.1287	0.1794	0.3081	2.0543	0.5346	2.5889	1.54	
6	Viti	0.9170	0.0258	0.9437	0.0633	0.0097	0.0730	0	0	0	0.0813	0.0355	0.1067	0.60	
7	Chera	6.8216	0.6444	7.4660	1.4216	0.2259	1.6475	2.0468	0.6635	2.7104	10.2901	1.5138	11.8239	7.02	
8	Barondi	0.0724	0	0.0724	0.4240	0	0.4240	0	0	0	0.4964	0	0.4964	0.29	
9	Dokan	2.2514	0.0689	2.3202	0.3169	0.0669	0.8838	0.0900	0.0200	0.1100	3.1583	0.1558	3.3140	1.97	
10	Sala	0.0232	0.0004	0.0234	0.0686	0	0.0686	0.0920	0	0	0.0466	0.0690	0.1156	0.07	
11	Duba	0.8378	0.0066	0.8444	2.4156	0.1931	2.6087	0.3261	0.0800	0.4061	3.5796	0.2797	3.8593	2.29	
12	Habor	0	0.0271	0.0271	0	0.0161	0.0161	0	0	0	0	0.0432	0.0432	0.03	
13	Boni	1.0092	0	1.0092	8.2820	0.2511	8.5331	0.0085	0	0.0085	9.2997	0.2511	9.5508	5.67	
14	Goapl	0	0	0	0.0576	0.2009	0.2585	0	0	0	0.0576	0.2009	0.2585	0.15	
15	Peod	0.3896	0	0.3896	0.9156	0.0004	0.9160	0.1192	0	0.1192	1.4244	0.0004	1.4248	0.85	
16	Peod-Bank	0	0	0	0.1970	0	0.1970	0	0	0	0.1970	0	0.1970	0.12	
17	Road	0.4915	1.2675	1.7588	0.4156	0.0924	0.5080	0.1688	0.0547	0.2235	1.0759	1.4143	2.4902	1.48	
18	Saruk/ Highway	0	0.0116	0.0116	0	0	0	0	0	0	0	0.0116	0.0116	0.01	
19	Path	0.1448	0.0327	0.1775	0.0896	0	0.0896	0	0	0	0.2343	0.0327	0.2671	0.16	
20	Gravyard	2.0349	0	2.0349	0.5515	0.0982	0.6497	0.1733	0	0.1733	2.7597	0.0982	2.8579	1.70	
21	Garden	0.4831	0	0.4831	0.0964	0	0.0964	0.0220	0	0.0220	0.6015	0	0.6015	0.36	
22	Chhankhai	0.0967	0	0.0967	0	0	0	0	0	0	0.0967	0	0.0967	0.06	
23	Nuvamuli	0	0	0	0.1441	0	0.1441	0	0	0	0.1441	0	0.1441	0.09	
24	Chhankhola	0	0	0	0.0148	0	0.0148	0	0	0	0.0148	0	0.0148	0.01	
25	Laxek/ Fallow Land	0	0	0	3.6606	1.1395	4.8001	0	0	0	3.6606	1.1395	4.8001	2.85	
26	Fallow Land	0	0	0	0.0935	0	0.0935	0	0	0	0.0935	0	0.0935	0.06	
27	Market/Bazar/Hat	0.1128	0.5327	0.2455	0	0	0	0	0	0	0.1128	0.1327	0.2455	0.15	
28	Factory	0	0.1125	0.1125	0	0	0	0	0	0	0	0.1125	0.1125	0.07	
29	School/Madrasah/ Academy	0.4749	0.7999	1.2748	0.5007	0.3776	0.8783	0.0432	0.6533	0.6965	1.0188	1.8308	2.8496	1.69	
30	Mosque	0.3076	0.1461	0.4537	0.1271	0.0679	0.1950	0.1100	0.0747	0.1847	0.5447	0.2887	0.8334	0.49	
31	Caral	0	0.0589	0.0589	0	0.0630	0.0630	0	0	0	0	0.1219	0.1219	0.07	



Table 2-2: Lot Wise Type of Land to be Acquired in the Sylhet-Charlkhai-Sheola Highway Improvement Project

SL No.	Type of Land	Acquired by Type of Land (in Acre)										Total Acquired Land of Lot-1,2&3 (in Acre)		
		LOT-1			LOT-2			LOT-3			Private Land	Govt. Land	Grand Total	%
		Private Land	Govt. Land	Total	Private Land	Govt. Land	Total	Private Land	Govt. Land	Total				
32	Office (Union Parishad Office/Land Office/ Bank Officer T&T Office/Training Office)	0	0.3957	0.3957	0.0459	0.1263	0.1722	0	0.1437	0.1437	0.0459	0.6657	0.7116	0.42
33	Gas Field/Filling Station/Petrol Pumps/Petrol Houses/Gas Line	0.1834	0.4445	0.6279	0.1141	0	0.1141	0	0	0	0.2975	0.4445	0.7420	0.44
34	Playing Ground/School Ground	0.0842	0.3112	0.8154	0	0.1771	0.1771	0	0	0	0.0842	0.9083	0.9925	0.59
35	Field	0.0730	0	0.0730	0.0489	0	0.0489	0	0	0	0.1219	0	0.1219	0.07
36	Store House/Goodown	0	0.1326	0.1326	0	0	0	0	0	0	0	0.1326	0.1326	0.08
37	Saw Mill	0.1623	0	0.1623	0.0739	0	0.0739	0	0	0	0.1762	0	0.1762	0.10
38	Rice Mill	0	0.0084	0.0084	0	0	0	0	0	0	0.0084	0.0084	0.11	
39	Post Office	0	0.0246	0.0246	0	0	0	0	0	0	0.0246	0.0246	0.31	
40	Brick Field	0.0310	0	0.0310	0	1.5912	1.5912	0	0	0	0.0310	1.5912	1.6222	0.96
41	Colony	0.0084	0	0.0084	0	0	0	0	0	0	0.0084	0	0.0084	0.00
42	Community Center	0.0638	0	0.0638	0.1032	0	0.1032	0	0	0	0.1670	0	0.1670	0.10
43	Tila Bari	0	0	0	0.2225	0	0.2225	0	0	0	0.2225	0	0.2225	0.13
44	Tila	0	0	0	0	0	0	0	0	0	0	0	0	0.00
45	Dargah	0	0	0	0.0936	0	0.0936	0	0	0	0.0936	0	0.0936	0.06
46	Oil Mill	0	0	0	0.0103	0	0.0103	0	0	0	0.0103	0	0.0103	0.01
47	Dam	0	0	0	0.0412	0.0154	0.0566	0	0	0	0.0412	0.0154	0.0566	0.03
48	Hospital	0	0	0	0.0091	0.0091	0.0091	0	0	0	0	0.0091	0.0091	0.01
49	Others	5.2897	0.7253	6.0152	8.197	1.2474	1.2474	0.6857	0	0	6.7951	1.1532	7.9483	4.72
Total		63.7021	7.2470	70.9492	47.3736	5.8368	53.2103	37.2890	6.9817	44.2708	148.3647	20.0655	168.4303	100

Source: Census Survey conducted by BCL, July - December 2024 and LAP of the Project.

2.5 IMPACTS BY CATEGORIES OF AFFECTED HOUSEHOLDS, CPRS AND OTHER ENTITIES

Impacts on Primary and Secondary Structures by Type of Households

Table 2-3 presents lot wise distribution of total number of affected households including residential, commercial and residential-cum-commercial are 1,457 HHs [including 771(52.90%) THHs, and 686(47.10%) NTHHs] by losing primary and secondary structures in the project area. According to Census and IOL survey, total affected residential HHs are 269 HHs (including 225 THHs and 44 NTHHs). Total affected commercial HHs are 1,079 (including 448 THHs and 631 NTHHs). Total affected residential-cum-commercial HHs are 109 (including 98 THHs and 11 NTHHs). Lot wise detailed information is presented in Table 2-3.

Table 2-3: Lot Wise Total Affected Households Losing Primary & Secondary Structures by Type

Type of Structure	Lot-1			Lot-2			Lot-3			Total HHs in the Project Area			
	Tile HHs	Non-Tile HHs	Total	Tile HHs	Non-Tile HHs	Total	Tile HHs	Non-Tile HHs	Total	Tile HHs	Non-Tile HHs	Grand Total	%
	Residential	112	17	129	60	21	81	53	6	59	225	44	269
Commercial	273	274	547	137	323	460	38	34	72	448	631	1,079	74.1
Residential-cum-Commercial	57	3	60	22	6	28	10	2	21	98	11	109	7.5
Total	442	294	736	219	350	569	110	42	152	771	686	1,457	100
%	60.1	39.9	100	38.5	61.5	100	72.4	27.6	100	82.90	17.10	100	

Source: Census Survey conducted by BCL, July - December 2024



Fully and Partially Affected Households Losing both Primary and Secondary Structures

32. Table 2-4 presents lot wise distribution of 101 fully affected HHs (including 46 HHs, 25 HHs, and 30 HHs in Lot-1, Lot-2 and Lot-3 respectively), who are Title, non-Title owners of residential, commercial structures and residential-cum-commercial losing both primary and secondary structures in the project area. Out of 101 (100%) HHs losing both primary and secondary structures, where THHs 89 (88.12%) (including 51 residential, 22 commercial and 16 residential-cum-commercial), and NTHs 12 (11.88%) (including 3 residential and 9 commercial).

33. Lot wise distribution of 74 partially affected HHs (including 43 HHs, 24 HHs, and 7 HHs in Lot-1, Lot-2 and Lot-3 respectively), who are Title, non-Title owners of residential, commercial structures and residential-cum-commercial losing both primary and secondary structures in the project area. Out of 74 (100%) partially affected HHs losing both primary and secondary structures, where THHs 69 (93.24%) (including 39 residential, 17 commercial and 13 residential-cum-commercial), and NTHs 5 (6.76%) (including 3 residential and 2 commercial). Lot wise detailed information is presented in Table 2-4.

Table 2-4: Lot Wise Affected Households Losing Both Primary & Secondary Structures by Type

Type of Structure	Lot-1			Lot-2			Lot-3			Total HHs in the Project Area			
	Title HHs	Non-Title HHs	Total	Title HHs	Non-Title HHs	Total	Title HHs	Non-Title HHs	Total	Title HHs	Non-Title HHs	Grand Total	%
Fully Affected Households Losing both Primary and Secondary Structures by Type													
Residential	19	2	21	12	1	13	20	0	20	51	3	54	30.86
Commercial	11	4	15	5	3	8	6	2	8	22	9	31	17.71
Residential-cum-Commercial	10	0	10	4	0	4	2	0	2	16	0	16	9.14
Total	40	6	46	21	4	25	28	2	30	89	12	101	57.71
%	66.96	13.04	100	84.00	16.00	100	93.33	6.67	100	88.12	11.88	100	
Partially Affected Households Losing both Primary and Secondary Structures by Type													
Residential	21	0	21	16	3	19	2	0	2	39	3	42	24.00
Commercial	13	1	14	2	0	2	2	1	3	17	2	19	10.86
Residential-cum-Commercial	8	0	8	3	0	3	2	0	2	13	0	13	7.43
Total	42	1	43	21	3	24	6	1	7	69	5	74	42.29
%	97.67	2.33	100	87.50	12.50	100	85.71	14.29	100	93.24	6.76	100	
Grand Total	82	7	89	42	7	49	34	3	37	158	17	175	100
%	92.13	7.87	100	85.71	14.29	100	91.89	8.11	100	90.29	9.71	100	

Source: Census survey conducted by BCL, July - December 2024

Fully and Partially Affected Households Losing Only Primary Structures

34. Table 2-5 shows that lot wise distribution of 1,183 affected HHs (including 588 HHs, 490 HHs, and 105 HHs in Lot-1, Lot-2 and Lot-3 respectively), who are Title, non-Title and encroacher owners of homestead, commercial structures and businesses losing only primary structures in the project area. Out of 1,183 (100%) HHs losing only primary structures, where THHs 557 (47.08%) and NTHs 626 (52.92%) on the own land and government land both in the project area. Lot wise detailed information is presented in Table 2-5.

35. Table 2-5 shows that 927 households will be affected fully including 440 (47.46%), 402 (43.37%), and 85 (9.17%) in Lot-1, Lot-2 and Lot-3 respectively. Out of 927 (100%) HHs losing only homestead, commercial structures and businesses primary structures fully, where THHs 325 (35.06%) (including 46 residential, 249 commercial and 30 residential-cum-commercial), NTHs 602 (64.94%) (including 10 residential, 585 commercial and 7 residential-cum-commercial) on the own land and government land both in the project area. Lot wise detailed information is presented in Table 2-5.

36. Table 2-5 shows that 256 households will be affected partially including 148 (57.81%), 88 (34.38%), and 20 (7.81%) in Lot-1, Lot-2 and Lot-3 respectively. Out



of 256 (100%) HHs losing only homestead, commercial structures and businesses primary structures partially, where THHs 232 (90.63%) (including 45 residential, 151 commercial and 36 residential-cum-commercial), NTHs 24 (9.37%) (including 21 commercial and 3 residential-cum-commercial) on the own land and government land both in the project area. Lot wise detailed information is presented in **Table 2-5**.

Table 2-5: Lot Wise Number of Fully and Partially Affected Households Losing Only Primary Structures by Type

Type of Structure	Lot-1			Lot-2			Lot-3			Total HHs in the Project Area			%
	Title HHs	Non-Title HHs	Total	Title HHs	Non-Title HHs	Total	Title HHs	Non-Title HHs	Total	Title HHs	Non-Title HHs	Grand Total	
Fully Affected Households Losing Primary Structures by Type													
Residential	19	1	20	12	4	16	15	5	20	46	10	56	4.73
Commercial	143	262	405	81	295	376	25	28	53	249	585	834	70.50
Residential-cum-Commercial	13	1	15	5	5	10	11	1	12	30	7	37	3.13
Total	176	264	440	98	304	402	51	34	85	325	602	927	78.36
%	40.00	60.00	100	24.38	75.62	100	60.00	40.00	100	35.06	64.94	100	
Partially Affected Households Losing Primary Structures by Type													
Residential	23	0	23	11	0	11	11	0	11	45	0	45	3.80
Commercial	99	1	100	48	19	67	4	1	5	151	21	172	14.34
Residential-cum-Commercial	23	2	25	9	1	10	4	0	4	36	3	39	3.30
Total	145	3	148	68	20	88	19	1	20	232	24	256	21.64
%	97.97	2.03	100	77.27	22.73	100	95.00	5.00	100	90.63	9.37	100	
Grand Total	321	267	588	166	324	490	70	35	105	557	626	1183	100
%	54.59	45.41	100	33.88	66.12	100	66.67	33.33	100	47.08	52.92	100	

Source: Census Survey conducted by BCL July - December 2024

Fully and Partially Affected Households and Businesses Losing Only Secondary Structures

37. **Table 2-6** shows that lot wise distribution of 99 affected HHs (including 59 HHs, 30 HHs, and 10 HHs in Lot-1, Lot-2 and Lot-3 respectively), who are title and non-title owners of homestead, commercial structures and businesses losing only secondary structures in the project area. Out of 99(100%) HHs losing only secondary structures, where THHs 56(56.57%) and NTHs 43 (43.43%) on the own land and government land both in the project area. Lot wise detailed information is presented in **Table 2-6**.

38. **Table 2-6** shows that 90 households will be affected fully including 53 (58.89%), 27 (30%), and 10 (11.11%) in Lot-1, Lot-2 and Lot-3 respectively. Out of 90 (100%) HHs losing only homestead, commercial structures and businesses secondary structures fully, where THHs 48 (53.33%) (including 39 residential, 6 commercial and 3 residential-cum-commercial), NTHs 42 (46.67%) (including 27 residential, 14 commercial and 1 residential-cum-commercial) on the own land and government land both in the project area. Lot wise detailed information is presented in **Table 2-6**.

39. **Table 2-6** shows that 9 households will be affected partially including 6 (67%), 3 (33%), and 0 (0%) in Lot-1, Lot-2 and Lot-3 respectively. Out of 9 (100%) HHs losing only residential, commercial structures and businesses secondary structures partially, where THHs 8 (88.89%) (including 5 residential, & 3 commercial), NTHs 1(11.11%) (including 1 residential on the own land and government land both in the project area. Lot wise detailed information is presented in **Table 2-6**.

Table 2-6: Lot Wise Number of Fully and Partially Affected Households Losing Only Secondary Structures by Type

Type of Structure	Lot-1			Lot-2			Lot-3			Total HHs in the Project Area			%
	Title HHs	Non-Title HHs	Total	Title HHs	Non-Title HHs	Total	Title HHs	Non-Title HHs	Total	Title HHs	Non-Title HHs	Grand Total	
Fully Affected Households Losing Secondary Structures by Type													
Residential	10	0	10	0	0	0	0	0	0	0	0	0	0
Commercial	39	6	45	14	3	17	48	3	51	39	6	45	50.00
Residential-cum-Commercial	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	49	6	55	14	3	17	48	3	51	39	6	45	50.00
%	89.09	10.91	100	82.35	17.65	100	96.00	4.00	100	76.19	23.81	100	
Partially Affected Households Losing Secondary Structures by Type													
Residential	0	0	0	0	0	0	0	0	0	0	0	0	0
Commercial	0	0	0	0	0	0	0	0	0	0	0	0	0
Residential-cum-Commercial	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0	0	0	0
%	0	0	0	0	0	0	0	0	0	0	0	0	0



Table 2-6: Lot Wise Number of Fully and Partially Affected Households Losing Only Secondary Structures by Type

Type of Structure	Lot-1			Lot-2			Lot-3			Total HHs in the Project Area			
	Title HHs	Non-Title HHs	Total	Title HHs	Non-Title HHs	Total	Title HHs	Non-Title HHs	Total	Title HHs	Non-Title HHs	Grand Total	%
	Residential	27	14	41	7	12	19	5	1	6	39	27	66
Commercial	4	6	10	1	6	7	1	2	3	6	14	20	20.20
Residential-cum-Commercial	2	0	2	1	0	1	0	1	1	3	1	4	4.04
Total	33	20	53	9	18	27	6	4	10	48	42	90	90.91
%	67.36	37.74	100	33.33	66.67	100	60.00	40.00	100	53.33	46.67	100	
Partially Affected Households Losing Secondary Structures by Type													
Residential	3	0	3	2	1	3	0	0	0	5	1	6	6.10
Commercial	3	0	3	0	0	0	0	0	0	3	0	3	3.00
Residential-cum-Commercial	0	0	0	0	0	0	0	0	0	0	0	0	0.00
Total	6	0	6	2	1	3	0	0	0	8	1	9	9.09
%	100	0.00	100	66.67	33.33	100	0	0	0	88.89	11.11	100	
Grand Total	39	20	59	11	19	30	6	4	10	56	43	99	100
%	66.10	33.90	100	36.67	63.33	100	60.00	40.00	100	56.57	43.43	100	

Source: Census Survey conducted by BCL, July - December 2024

Fully and Partially Affected Community/Common Property Resources (CPRs) and other Entities Losing Primary and Secondary Structures

40. Table 2-7 shows that lot wise distribution of 144 affected CPRs and other Entities (including 81, 46, and 17 CPRs & other Entities in Lot-1, Lot-2 and Lot-3 respectively), who are title & non-title owners losing their primary and secondary structures in the project area. Out of 144(100%) CPRs & other entities losing only primary & secondary structures, where Title CPRs & entities 73(50.69%), Non-Title CPRs& entities 71(49.31%) on the own land and government land both in the project area. Lot wise detailed information is presented in Table 2-7.

41. Table 2-7 shows that 61 CPRs and other entities will be affected fully including 40 (65.57%), 21(34.43%), and 0 in Lot-1, Lot-2 and Lot-3 respectively. Out of 61 (100%) CPRs & entities losing primary& secondary structures fully, where title CPRs & entities 16(26.23%) and Non-title CPRs & entities 45(73.77%) on the own land and government land both in the project area. Lot wise detailed information is presented in Table 2-7.

42. Table 2-7 shows that 83 CPRs and other entities will be affected partially including 40, 26, and 17 in Lot-1, Lot-2 and Lot-3 respectively, where Title CPRs & entities 57 (68.67%), Non-title CPRs & entities 26 (31.33.63%) on the own land and government land both in the project area. Lot wise detailed information is presented in Table 2-7.

Table 2-7: Lot Wise Number of Fully and Partially Affected Community/Common Property Resources (CPRs) & other Entities Losing Primary and Secondary Structures by Type

Type of Structure	Lot-1			Lot-2			Lot-3			Total HHs in the Project Area			
	Title CPRs & Other Entities	Non-title CPRs & Other Entities	Total	Title CPRs & Other Entities	Non-title CPRs & Other Entities	Total	Title CPRs & Other Entities	Non-title CPRs & Other Entities	Total	Title CPRs & Other Entities	Non-title CPRs & Other Entities	Grand Total	%
	Fully Affected CPRs & Other Entities Losing Primary and Secondary Structures by Type	4	0	4	1	0	1	0	0	0	5	0	5
Mosque	0	1	1	0	0	0	0	0	0	0	1	1	0.69
Maqbar	1	0	1	0	0	0	0	0	0	1	0	1	0.69
Graveyard	0	0	0	0	0	0	0	0	0	1	0	1	0.69
School	0	0	0	1	0	1	0	0	0	1	0	1	0.69



Table 2-7: Lot Wise Number of Fully and Partially Affected Community/Common Property Resources (CPRs) & other Entities Losing Primary and Secondary Structures by Type

Type of Structure	Lot-1			Lot-2			Lot-3			Total HHs in the Project Area			
	Title CPRs & Other Entities	Non-title CPRs & Other Entities	Total	Title CPRs & Other Entities	Non-title CPRs & Other Entities	Total	Title CPRs & Other Entities	Non-title CPRs & Other Entities	Total	Title CPRs & Other Entities	Non-title CPRs & Other Entities	Grand Total	%
Govt. Institution	0	0	0	1	1	2	0	0	0	1	1	2	1.39
Others	7	27	34	1	16	17	0	0	0	8	43	51	35.42
Total	12	28	40	4	17	21	0	0	0	16	45	61	42.86
%	30.00	70.00	100	19.05	80.95	100	0.0	0.0	0.0	26.23	73.77	100	
Partially Affected CPRs & Other Entities Losing Primary and Secondary Structures by Type													
Mosque	8	6	14	6	0	6	4	0	4	18	6	24	16.87
Madrasha	0	1	1	1	0	1	0	0	0	1	1	2	1.59
Majar	1	0	1	0	0	0	0	0	0	1	0	1	0.69
Mosque+ Madrasha	2	0	2	0	0	0	1	0	1	3	0	3	2.08
Majar+ Mosque+ Madrasha	0	0	0	1	0	1	0	0	0	1	0	1	0.69
Crematory	0	0	0	1	0	1	0	0	0	1	0	1	0.69
Graveward	3	0	3	0	0	0	4	0	4	7	0	7	4.86
Idaga	0	0	0	1	0	1	0	0	0	1	0	1	0.69
School	4	0	4	5	1	6	2	1	3	11	2	13	9.03
School & College	2	1	3	0	2	2	0	1	1	2	4	6	4.17
Govt. Institution	3	2	5	1	2	3	0	1	1	4	5	9	6.25
Others	4	3	7	2	3	5	1	2	3	3	8	15	10.42
Total	27	13	40	18	8	26	12	5	17	57	26	83	57.64
%	67.50	32.50	100	69.23	30.77	100	70.59	29.41	100	68.67	31.33	100	
Total CPRs	23	10	33	18	3	21	11	2	13	52	15	67	
Total Other Entities	16	32	48	4	21	25	1	3	4	21	56	77	
Grand Total	39	42	81	22	24	46	12	5	17	73	71	144	100
%	48.15	51.85	100	47.83	52.17	100	70.59	29.41	100	50.69	49.31	100	

Source: Census survey conducted by BCL July - December 2024



Handwritten signature and initials: *M. A. H. Khan* and *SK*

2.6 MAGNITUDE OF IMPACTS ON HOUSEHOLDS, CPRS AND OTHER ENTITIES LOSING PRIMARY STRUCTURE IN LOT 1, 2 AND 3

43. Lot wise degree of land acquisition and resettlement impacts on affected structures are (i) title holder households and (ii) non-title holder households in the project area. Degrees-of impact have been determined considering of floor areas (in sft.) of affected primary structures by type of structures (such as, a. pucca, b. semi-pucca, c. tin-made and d. katcha structures) based on house construction materials. Details are given in Annex-2(Tables 2-1 & 2-2).

2.6.1 AFFECTED TITLE HOLDER HOUSEHOLDS

44. In Lot 1, 2 & 3 the numbers of affected primary structures are broadly categorized as (i) pucca, (ii) semi-pucca, (iii) tin made and (iv) katcha structures. It is found that affected THHs will lose (i) 243 Pucca structures, (ii) 291 Semi-pucca structures, (iii) 72 Tin-made structure and (iv) 17 Katcha structures. THHs will lose their different types of residential, commercial and residential-cum-commercial structures. Degrees of impacts of land acquisition on THHs in Lot-1, 2 & 3 under the Sylhet-Charkhai-Sheola Highway Improvement Project area are given in Annex-2(Table 2-1).

2.6.2 AFFECTED NON-TITLE HOLDER HOUSEHOLDS

45. In Lot 1, 2 & 3 the numbers of affected primary structures are broadly categorized as (i) pucca, (ii) semi-pucca, (iii) tin made (iv) katcha structures. It is found that affected NTHHs will lose (i) 73 Pucca structures, (ii) 195 Semi-pucca structures, (iii) 234 Tin-made structure (iv) 326 Katcha structures. NTHHs will lose their different types of residential, commercial and residential-cum-commercial structures. Degrees of impacts of land acquisition on NTHHs in Lot-1, 2 & 3 under the Sylhet-Charkhai-Sheola Highway Improvement Project area are given in Annex-2(Table 2-2).

2.7 AFFECTED COMMUNITY/Common PROPERTY RESOURCES (CPRS) AND GOVERNMENT & OTHER ENTITIES

46. Total 39 primary structures of CPRs and 39 primary structures of other entities will be affected in Lot 1, 2 & 3 the numbers of affected primary structures are broadly categorized as (i) pucca, (ii) semi-pucca, (iii) tin made (iv) katcha structures. It is found that affected CPRs will lose their 32 Title primary structures, 7 non-title primary structures. On the other hand, affected other entities will lose their 10 Title primary structures, 29 non-title primary structures of residential, commercial and residential-cum-commercial structures. Degrees of impacts of land acquisition on CPRs and government and other entities are presented in Annex-2(Tables 2-1&2-2).

2.8 NATURE OF IMPACTS OF THE AFFECTED PRIMARY STRUCTURES

47. Table 2-8 presents quantity of affected primary structures by type of structure based on construction materials in the project area. Total floor areas of affected HHs non-title primary structures 115,944 sft of which pucca structure with 32,327 sft followed by semi-pucca structures with 35,948 sft, further followed by tin made primary structures with 29,965 sft and katcha structures with 17,704 sft in the project area. Total floor areas of affected HHs title primary structures 502,116 sft of which pucca structure with 269,341 sft followed by semi-pucca structures with 179,110 sft, further followed by tin made primary structures with 40,173 sft and katcha structures with 13,492 sft in the area. Total floor areas of affected CPRs & other entities non-title primary structures 15,575 sft of which pucca structure with 12,350 sft followed by semi-pucca structures with 2,904 sft, further followed by tin-made primary structures with 321 sft in the project area. Total floor areas of affected CPRs & other entities title primary structures 51,954 sft of which pucca structure with 34,186 sft followed by semi-pucca structures with 13,744 sft, tin-made primary structures 824 sft and katcha structures with 3,200 sft in the project area. Detailed information on distribution of Non-title and Title primary structures by type and ownership (Title, Non-title households, CPRs & other entities) is presented in Table 2-8 and Annex-4(Table 4-10).

Sl. No.	Type of HHs, CPRs & Other Entities	Unit	Area of affected Primary Structure			
			Area of Pucca Structure	Area of Semi-pucca Structure	Area of Tin-made Structure	Area of Katcha Structure
Affected HHs Losing Primary Structures in Lot-1						
1.	THHs	Sft	198,716	86,561	8,041	6,723
2.	NTHHs	Sft	13,481	11,564	6,720	5,685
A.	Sub-total	Sft	212,197	98,125	14,761	12,408



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Table 2-8: Lot Wise Floor Areas (Sft.) of Affected Primary Structures by Ownership Type in the Sylhet-Charkhai-Sheola Highway Improvement Project

SL. No.	Type of HHs, CPRs & Other Entities	Unit	Area of affected Primary Structure			
			Area of Pucca Structure	Area of Semi-pucca Structure	Area of Tin-made Structure	Area of Katcha Structure
Affected HHs Losing Primary Structures in Lot-2						
1.	THHs	Sft	28,822	48,040	15,621	6,121
2.	NTHHs	Sft	18,306	19,865	12,930	11,289
B. Sub-total		Sft	47,128	67,905	28,551	17,410
Affected HHs Losing Primary Structures in Lot-3						
1.	THHs	Sft	41,803	44,509	16,511	648
2.	NTHHs	Sft	540	4,519	10,315	730
C. Sub-total		Sft	42,343	49,028	26,826	1,378
Affected HHs Losing Primary Structures in Lot-1, 2, & 3						
1.	THHs	Sft	269,341	179,110	40,173	13,492
2.	NTHHs	Sft	32,327	35,948	29,965	17,704
(i) Total (A+B+C)		Sft	301,668	215,058	70,138	31,196
Affected CPRs and Other Entity Losing Primary Structures in Lot-1						
1.	Title CPRs & Other Entities	Sft	17,249	6,808	280	0
2.	Non-title CPRs & Other Entities	Sft	9,368	1,584	30	0
D. Sub-total		Sft	26,617	8,392	310	0
Affected CPRs and Other Entity Losing Primary Structures in Lot-2						
1.	Title CPRs & Other Entities	Sft	13,942	3,070	544	0
2.	Non-title CPRs & Other Entities	Sft	24,54	1,080	291	0
E. Sub-total		Sft	16,396	4,150	835	0
Affected CPRs and Other Entity Losing Primary Structures in Lot-3						
1.	Title CPRs & Other Entities	Sft	2,995	3,866	0	3,200
2.	Non-title CPRs & Other Entities	Sft	528	240	0	0
F. Sub-total		Sft	3,523	4,106	0	3,200
Affected CPRs and Other Entity Losing Primary Structures in Lot-1, 2, & 3						
1.	Title CPRs & Other Entities	Sft	34,186	13,744	824	3,200
2.	Non-title CPRs & Other Entities	Sft	12,350	2,904	321	0
(ii) Total (D+E+F)		Sft	46,536	16,648	1,145	3,200
1.	Title HHs, CPRs & Other Entities	Sft	303,527	192,854	40,997	16,692
2.	Non-title HHs, CPRs & Other Entities	Sft	44,677	38,852	30,286	17,704
Grand Total (i + ii)		Sft	348,204	231,706	71,283	34,396

Source: Census survey conducted by BCL, July - December 2024

2.9 NATURE OF IMPACTS OF THE AFFECTED SECONDARY STRUCTURES

48. Summary of quantities (e, g., sft, rft, cft, and no.) of various secondary structures (such as, latrines/toilets, tube wells, drains, boundary walls, graves, etc.) on private land and government land of title, non-title HHs, title and non-title CPRs and other entities were found to be affected in Lot-1, 2 & 3 under the Sylhet-Charkhai-Sheola Highway Improvement Project area due to land acquisition. Lot wise detailed information about affected secondary structures of title, non-title HHs, tiled and non-tiled CPRs and other entities are presented in Table 4-14 and Annex-4 (Table 4-11).

2.10 IMPACTS ON TREES AND CROPS

Impacts on Trees

49. Trees of various species of title, non-title households, CPRs & other entities are affected in Lot-1, 2 & 3 under the Sylhet-Charkhai-Sheola Highway Improvement Project area due to land acquisition of the project. Lot

wise different species of affected trees on both private land and government land/RHD land are divided into six broader categories namely (i) Beautification, (ii) Medicinal, (iii) Timber, (iv) Fruits, (v) Bamboo, and (vi) Banana. Table 2-9 shows that 5,162 Beautification trees, 12 Medicinal trees, 1,776 Timber trees, 6,216 Fruits, 1,233 Bamboo, 549 Banana trees and 765 different immature trees under social forestry under department of Forest. Out of total 15,713 affected plants & trees, 2,217 large trees, 3,655 medium trees including 765 different immature trees, 2,234 small trees, and 7,607 saplings in the project area. A total of 15,713 trees of various species and sizes to be felled and removed. Details about Lot wise affected trees of households, CPRs and other entities are presented in Table 2-9 and Annex-4 (Table 2-5).

Type of Trees	Unit	Large	Medium	Small	Sapling	Total
Lot 1						
Beautification	No.	0	30	46	5,050	5,126
Medicinal	No.	0	0	1	0	1
Timber	No.	62	68	57	15	202
Fruits	No.	360	245	234	1,883	2,722
Bamboo	No.	50	120	130	0	300
Banana	No.	5	16	28	27	76
Sub-total (Lot-1)	No.	477	479	496	6,975	8,427
Lot 2						
Beautification	No.	0	4	2	4	10
Medicinal	No.	0	2	5	0	7
Timber	No.	87	160	177	10	434
Fruits	No.	165	208	257	79	709
Bamboo	No.	20	315	85	25	445
Banana	No.	84	216	68	17	385
Sub-total (Lot-2)	No.	356	905	594	135	1,990
Lot 3						
Beautification	No.	0	0	26	0	26
Medicinal	No.	2	2	0	0	4
Timber	No.	249	359	304	228	1,140
Fruits	No.	989	809	740	247	2,785
Bamboo	No.	126	308	54	0	488
Banana	No.	18	28	20	22	88
Sub-total (Lot-3)	No.	1,384	1,506	1,144	497	4,531
Total (Lot 1+2+3)						
Beautification	No.	0	34	74	5054	5,162
Medicinal	No.	2	4	6	0	12
Timber	No.	398	587	538	253	1,776
Fruits	No.	1,514	1,262	1,231	2,209	6,216
Bamboo	No.	196	743	269	25	1,233
Banana	No.	107	260	116	66	549
<i>Immature trees owned by Social Forestry under Forest Department under Lot-3</i>	No.		765*			765
Grand Total		2,217	3,655	2,234	7,607	15,713

Source: Census Survey conducted by BCL, July – December 2024

Impacts on Crops

50. Lot wise Distribution of Affected Crops of title, non-title and Encroachers' Households and CPRs and other Entities by Category is presented in Table 4-16.

2.11 IMPACTS ON BUSINESS

51. Table 2-10 shows that Lot wise affected businesses operating by title, non-title, and HHs with tenants in the project area. A Total of 1,359 businesses will be affected operating by title, non-title households, and tenants are 152, 428, and 779 respectively in the project area. Detailed information about Lot wise affected small and large businesses are presented in Table 2-10 and Annex-2 (Table 2-6 and 2-7).



Table 2-10: Lot Wise Impacts on THs, NTHs, & Tenants are Operated business in the Project Alignment

Size of Business	Unit/Quantity												Grand Total
	Lot-1			Lot-2			Lot-3			Total (Lot-1+2+3)			
	T	NT	Ten	T	NT	Ten	T	NT	Ten	T	NT	Ten	
Small Business	53	197	262	51	206	222	15	22	79	119	425	563	1,107
Large Business	19	0	131	9	2	69	5	1	16	33	3	216	252
Total	72	197	393	60	208	291	20	23	95	152	428	779	1,359

Note: T, NT, here they will lose their own business with own structure

T= Title holder, NT=Non-Title holder, and Ten=Tenant

Source: Census survey conducted by BCL, July - December 2024

2.12 IMPACTS ON EMPLOYMENT

52. Table 2-11 shows that a total of 293 Wage Earners/ Employees including 157, 117 and 19 in Lot-1, Lot-2 & Lot-3 respectively under the Sylhet-Charkhai-Sheola Highway Improvement Project area will lose income due to the project. Out of 293 Wage Earners/ Employees, 288 Wage Earners/ Employees are male while 5 Wage Earners/ Employees are female. Detailed information about lot wise Wage Earners/ Employees working six months and above are presented in Table 2-11 and Annex-2(Table 2-10).

Table 2-11: Lot Wise Number of Affected Wage Earner(s)/Employee(s) in Business/Industrial Institutions by Type of Employers in the Sylhet-Charkhai-Sheola Highway Improvement Project

SL. No.	Affected Wage Earners and Employees by Type of Works	Units	Lot-1	Lot-2	Lot-3	Total
0	1	2	3	4	5	6=(3+4+5)
1	Worker	No.	50	68	16	134
2	Salesman	No.	33	23	0	56
3	Engineer	No.	7	2	0	9
4	Mechanic/ Technician	No.	26	10	3	39
5	Driver	No.	3	1	0	4
6	Mason's Helper	No.	5	2	0	7
7	Carpenter	No.	15	2	0	17
8	Tailor	No.	1	0	0	1
9	Cook/Chef	No.	7	2	0	9
10	Waiter/Hotel Boy	No.	4	7	0	11
11	Maid Servant	No.	2	0	0	2
12	Barber	No.	2	0	0	2
13	Security Guard	No.	2	0	0	2
	Grand Total	No.	157	117	19	293
	Male	No.	155	114	19	288
	Female	No.	2	3	0	5

Source: Census Survey conducted by BCL, July - December 2024

2.13 IMPACTS ON HOUSE OWNERS' RENTAL INCOME

53. Table 2-12 shows that 475 HHs including title holder, non-title holder households have rented out residential, commercial, and residential-cum-commercial structures to tenants. These rented out structures in Lot-1, Lot-2 & Lot-3 will be affected under the Sylhet-Charkhai-Sheola Highway Improvement Project area due to the project. Consequently, these affected owners will lose rental income. Out of 475 renters, 387 structure owners who rented out commercial structures will lose monthly rental income followed by 57 owners will lose monthly rental income from residential-cum-commercial structures and 31 owners will lose monthly rental income from residential structures. Lot wise information of rented out structures are presented in Table 2-12 and Annex-2(Table 2-11).

Table 2-12: Lot Wise Affected Rented Out Structures under the Sylhet-Charkhai-Sheola Highway Improvement Project

SL. No.	Type of Rented Out Structure	No. & (%) of Affected Owners Losing Rental Income Loss									
		Lot-1		Lot-2		Lot-3		Grand Total (Lot-1+2+3)			
		T	NT	T	NT	T	NT	T	NT	Total	%
1	Residential	11	0	3	4	9	4	23	8	31	6.53
2	Commercial	118	81	48	103	25	11	192	195	387	81.47
3	Residential-cum-Commercial	29	5	9	6	7	1	45	12	57	12.00
Total		159	86	60	113	41	16	260	215	475	100

Source: Census Survey conducted by BCL, July - December 2024

Note: T= Title holder, NT=Non-Title holder



2.14 IMPACTS ON TENANTS

54. According to the **Table 2-13** total of 910 tenants, where 886 of whom are male and 24 of whom are female will be affected in Lot-1, 2 & 3 due to land acquisition in the project area. Out of 910 affected tenants, the highest 439(48.24%) tenants will be affected due to acquisition of commercial structures followed by 340 (37.36%) will be affected due to acquisition of residential structures while the lowest affected tenants 131 (14.40%) will be affected due to acquisition of residential-cum-commercial structures. Lot wise detailed information about affected tenants of residential, commercial and residential-cum-commercial structures is presented in **Table 2-13** and **Annex-2 (Table 2-8)**.

Type of Tenant	No. of Tenants											
	Tenant of residential structures			Tenant of commercial structures			Tenant of residential-cum-commercial structures			Grand Total (Residential & Commercial)		
	Male	Female	Sub-total	Male	Female	Sub-total	Male	Female	Sub-total	Male	Female	Total
Lot-1												
Tenant of THHs	58	10	68	202	6	208	133	2	140	398	18	416
Tenant of NTHHs	0	0	0	18	0	18	31	1	32	49	1	50
Sub-total (Lot-1)	58	10	68	220	6	226	169	3	172	447	19	466
Lot-2												
Tenant of THHs	20	1	21	58	0	58	100	2	102	178	3	181
Tenant of NTHHs	0	0	0	32	0	32	98	0	98	130	0	130
Sub-total (Lot-2)	20	1	21	90	0	90	198	2	200	308	3	311
Lot-3												
Tenant of THHs	40	2	42	15	0	15	52	0	52	107	2	109
Tenant of NTHHs	0	0	0	9	0	9	15	0	15	24	0	24
Sub-total (Lot-3)	40	2	42	24	0	24	67	0	67	131	2	133
Total (Lot-1+2+3)	118	13	131	334	6	340	434	5	439	886	24	910
Tenant of THHs	118	13	131	275	6	281	290	4	294	683	23	706
Tenant of NTHHs	1180	0	0	59	0	59	144	1	145	203	1	204
Grand Total	118	13	131	334	6	340	434	5	439	886	24	910
%			14.40			37.36			48.24			100

Source: Census Survey conducted by BCL, July – December 2024



2.14.1 SEVERELY AFFECTED AND VULNERABILITY STATUS OF AFFECTED HOUSEHOLDS

55. Table 2-14 shows that a total of 243 are identified as losing 10% of total income (Severely Affected) and vulnerable households by the census and IOL survey. Of the 243 households in Lot-1, Lot-2 and Lot-3, 153(62.96%), 76 (31.28%) and 14 (5.76%) were identified as vulnerable. The highest vulnerable households are 192 (79.01%) who are losing more than 10% of their total income from all sources, followed by 39 (16.05%) households (both man and woman-headed) under the poverty line (annual income BDT 1,44,000 and below³), 10 (4.12%) disabled man-headed households, 1 (0.41%) disabled woman-headed household and 1 (0.41%) very poor elderly man-headed household. Lot wise detailed information about as losing 10% of total income (Severely Affected) and vulnerable households is presented in Table 2-14 and Annex-2 (Table 2-9).

Category of Vulnerable Households	Lot-1						Lot-2						Lot-3						Total (Lot-1+2+3)					
	No.			%	No.			%	No.			%	No.			%	No.			%				
	Male	Female	NTHH		Male	Female	NTHH		Male	Female	NTHH		Male	Female	NTHH		Male	Female	NTHH					
Persons losing more than 10% of their total income from all sources of THNTH	123	9	115	17	132	54.32	48	0	30	18	48	19.75	11	1	7	5	12	4.94	182	10	152	40	192	79.01
Disabled woman headed households	0	1	1	0.41	1	0.41	0	0	0	0	0.00	0	0	0	0	0	0	0.00	0	1	1	0	1	0.41
Disabled man headed households	5	0	1	4	5	2.08	4	0	2	2	4	1.65	1	0	1	0	1	0.41	10	0	4	6	10	4.12
Very Poor Elderly (>64 years) woman headed households	0	0	0	0	0	0.00	0	0	0	0	0	0.00	0	0	0	0	0	0.00	0	0	0	0	0	0.00
Very Poor Elderly (>64 years) man headed households	0	0	0	0	0	0.00	1	0	0	1	1	0.41	0	0	0	0	0	0.00	1	0	0	1	1	0.41
Households (both man & woman headed) under poverty line (annual income BDT 1,44,000 and below)	15	0	8	7	15	6.17	19	4	5	18	23	9.47	1	0	0	1	1	0.41	35	4	13	28	39	16.05
Total	143	10	125	28	153	62.96	72	4	37	39	76	31.28	13	1	8	6	14	5.76	228	15	170	73	243	100

Source: Census Survey conducted by BCL, July - December 024

³ Based on Bangladesh Bureau of Statistics (BBS 2022) Household Income and Expenditure Survey (HIES) data, the national poverty level of the affected HHs has been considered up to BDT 144,000 per year (12,000 per month) for each HH following the calculation below.

(i) Average lower poverty line at the national level in 2022 = BDT 2755/person/month

(ii) Average household size at the national level in 2022 = 4.26

(iii) Monthly income for vulnerable household = BDT 2755*4.26= BDT 11,736 (Rounded up BDT 12,000 per month).

56. Considering the socioeconomic vulnerabilities of the affected households, specific provisions and special measures have been incorporated in the RAP to ensure that they are not marginalized in the process of project development.

vii. There is a total of 1,601 affected households (HHs), Common/Community Property Resources (CPRs), and other entities. A total of 1,457 HHs (including 771 THHs & 686 NTHHs) are affected by losing primary and secondary structures in the project area. A total of 67 CPRs (including title CPRs 52 and non-title CPRs 15) and 77 government and other entities (including 21 Title entities and 56 non-title entities) are affected along the road alignment. A total of 6,835 affected people (including 5,632 affected people belonging to 1,457 affected HHs and 1,203 individual affected persons who are tenants & wage earners). Mitigation measures are suggested as per the Resettlement Policy Framework (RPF) of the World Bank and the Entitlement Matrix (EM) of this Resettlement Action Plan (RAP).

57. Table 2-15 shows that a total of 1,601 affected households/entities (including 1,457 HHs, 67 CPRs, and 77 government offices/agencies & other entities) will be affected in the Sylhet-Charkhai-Sheola Highway Improvement Project area. A total of 6,835 affected people (including 5,632 affected people belonging to 1,457 affected HHs and 1,203 individual affected persons who are tenants & wage earners). Total 580 HHs (including 152 title holder HHs and 428 non-title HHs) will loss business income due to the project. A Total of 475 HHs including THHs and NTHHs will loss rental income due to the project. A total of 910 tenants under affected commercial and residential-cum-commercial structures will lose their businesses/shops. There are 67 affected Community/Common Property Resources (CPRs) on Private Land and/or on Govt. Land while there are 77 affected other entities in the project. Also 293 wage earners, 243 losing 10% of Total Income (Severely Affected) and Vulnerable Households and about 15,713 no. of trees are affected due to the project. Overall project impacts are summarized in the Table 2-15.

Table 2-15: Lot Wise Overall Project Impacts in the Sylhet-Charkhai-Sheola Highway Improvement Project							
Sl. No.	Project Impacts	Unit	Unit/Quantity				
			Lot-1	Lot-2	Lot-3	Total	
INVOLUNTARY LAND ACQUISITION (LA) FOR THE PROJECT							
A	Amount of Land to be acquired (acre)	Acre	70.9492	53.2103	44.2708	168.4303	
IMPACT OF HOUSEHOLDS, CPRs AND ENTITIES DUE TO LA							
B-1	1	Affected Households Losing Both Primary & Secondary Structure.	No.	89	49	37	175
	2	Affected Households Losing Only Primary Structure.	No.	588	490	105	1,183
	3	Affected Households Losing Only Secondary Structure.	No.	59	30	10	99
	Total Affected Households		No.	736	569	152	1,457
B-2	1	Affected Community Property Resources on Private Land	No.	23	18	11	52
		Affected Community Property Resources on Govt. Land	No.	10	3	2	15
		Affected Community Property Resources (CPRs)	No.	33	21	13	67
	2	Other Entities with Title to Land	No.	16	4	1	21
		Other Entities without Title to Land	No.	32	21	3	56
		Affected Govt. Offices/Agencies and other Entities	No.	48	25	4	77
Total Affected CPRs, Govt. Offices/Agencies and other Entities		No.	81	46	17	144	
B	Total Affected HHs, CPRs & Other Entities (Sum of B-1 & B-2)	No.	817	615	169	1,601	
C	C-1	Affected THHs Losing Residences	No.	112	60	53	225
	C-2	Affected THHs Losing Own Commercial Structures	No.	273	137	38	448
	C-3	Affected THHs Losing Own Residential-cum-Commercial Structures	No.	57	22	19	98
	Total THHs Losing Residential, Commercial and Residential-cum-Commercial Structures (Sum of C-1, C-2 & C-3)		No.	442	219	110	771
D	D-1	Affected NTHHs Losing Residences	No.	17	21	6	44
	D-2	Affected NTHHs Losing Own Commercial Structures	No.	274	323	34	631
	D-3	Affected NTHHs Losing Own Residential-cum-Commercial Structures	No.	3	6	2	11



Table 2-15: Lot Wise Overall Project Impacts in the Sylhet-Charkhai-Sheola Highway Improvement Project

SL. No.	Project Impacts	Unit	Unit/Quantity			
			Lot-1	Lot-2	Lot-3	Total
	Total NTHHs Losing Residential, Commercial and Residential-cum-Commercial Structures (Sum of D-1, D-2 & D-3)	No.	294	350	42	686
	Total THHs & NTHHs Losing Residential, Commercial and Residential-cum-Commercial Structures (Sum of C & D)	No.	736	569	152	1,457
	Affected Area of Primary Structures of THHs & NTHHs including CPRs & other Entities					
E	E-1 Affected Area of Pucca Primary Structures	Sft.	238,814	63,524	45,866	348,204
	E-2 Affected Area of Semi-pucca Primary Structures	Sft.	106,517	72,055	53,134	231,706
	E-3 Affected Area of Tin-made Primary Structures	Sft.	15,071	29,386	26,826	71,283
	E-4 Affected Area of Katcha Primary Structures	Sft.	12,408	17,410	4,578	34,396
	Affected Major Items under Secondary Structure of THHs & NTHHs including CPRs & other Entities					
F	F-1 Affected Graves	No.	144	5	100	249
	F-2 Affected Toilet	No.	55	39	24	118
	F-3 Affected Tubewell	No.	23	14	19	56
G	G-1 Total Affected Trees of Private & Other Agencies Land	No.	8,427	1,990	4,531	14,948
	G-2 Immature trees owned by Social Forestry under Forest Department	No.			765	765
	Total Affected Tree (Sum of G-1 & G-2)	No.	8,427	1,990	5,296	15,713
H-1	1 Affected THs are Operated Small Business	No.	53	51	15	119
	2 Affected NTHs are Operated Small Business	No.	197	206	22	425
	3 Affected Tenants are Operated Small Business	No.	262	222	79	563
	Affected THs, NTHs, & Tenants are Operated Small Business	No.	512	479	116	1,107
H-2	1 Affected THs are Operated Large Business	No.	19	9	5	33
	2 Affected NTHs are Operated Large Business	No.	0	2	1	3
	3 Affected Tenants are Operated Large Business	No.	131	69	16	216
	Affected THs, NTHs, & Tenants are Operated Large Business	No.	150	80	22	252
H	Total Affected THs, NTHs, & Tenants are operated Small & Large Business (Sum of H-1 & H-2)	No.	662	559	138	1,359
I	Affected loss of Rented-Out under THHs & NTHHs	No.	245	173	57	475
J	Affected loss of Rented in (Tenants) under THHs & NTHHs	No.	466	311	133	910
K	Affected Temporary Loss of Income as Wage Earners	No.	157	117	19	293
L	Losing 10% of Total Income (Severely Affected) and Vulnerable Households (Male-228 & Female-15) and (THs-170 and NTHs-73)	No.	153	76	14	243
M	Project Affected Population belongs to Affected HHs	No.	2,429	2,483	720	5,632

Source: Census Survey conducted by BCL, July - December 2024

Note: (i) Households have been considered based on the affected structures' owners.

(ii) The total impact may be changed after the joint survey by PAVC and Deputy Commissioner's award book as a result the RAP will be updated.



3 BASELINE SOCIOECONOMIC CHARACTERISTICS

58. Chapter 3 contains two sections including 3.1 Socio-economic Data and analysis and 3.2 Consultation, information disclosure and participation.

3.1 SOCIOECONOMIC DATA AND ANALYSIS

59. This chapter presents the socioeconomic profile of the affected households in the project areas. During the Census and IOL survey, no indigenous or ethnic communities were found in the Project Alignment. Because this area does not have any indigenous communities. Therefore, a separate RAP for indigenous people is not necessary for this project. Demographic characteristics, the status of income and expenditure and the poverty situation of the project-affected households are included in their socioeconomic profiles.

3.1.1 DEMOGRAPHIC CHARACTERISTICS IN THE PROJECT-AFFECTED AREA

60. Key demographic characteristics include lot-wise diverse heterogeneous dimensions/aspects (e.g., household heads by sex; population by sex; religion; age composition; marital status; etc.). For convenience of presenting both homogenous and heterogeneous dimensions of demographic characteristics the various Figures and/or Tables have been kept in the final RAP. Key demographic characteristics are presented below.

3.1.1.1 DISTRIBUTION OF HOUSEHOLD HEADS BY SEX

61. **Table 3-1** shows that a total of 1,457 affected households including 736 HHs, 569 HHs and 152HHs in Lot-1, Lot-2 and Lot-3 respectively under the Sylhet-Charkhai-Sheola Highway Improvement Project area are likely to be affected due to land acquisition for the proposed project. Out of 1,457 households, 1,406 (96.50%) households are male-headed while 51(3.50%) households are female-headed in the project areas. **Table 3-1** presents a Lot-wise distribution of male-headed and female-headed households. The highest (97.54%) number of male-headed HHs is found in Lot-2 and the highest female-headed HHs (7.24%) is found in Lot-3.

Category of Households	Lot-1		Lot-2		Lot-3		Total	
	No.	%	No.	%	No.	%	No.	%
Male Headed HHs	710	96.47	555	97.54	141	92.76	1,406	96.50
Female Headed HHs	26	3.53	14	2.46	11	7.24	51	3.50
Total	736	100	569	100	152	100	1,457	100
%	58.5		39.1		18.4		100	

Source: Census Survey conducted by BCL, July - December 2024

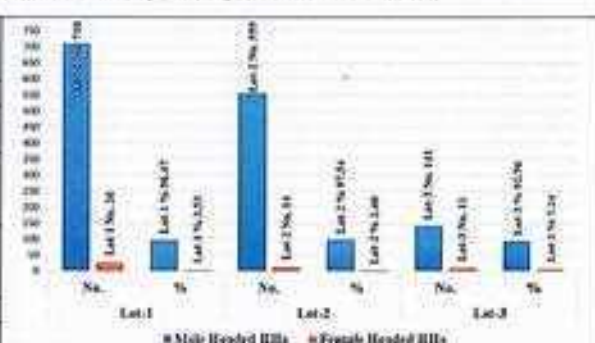


Figure 3-1: Households by Sex

3.1.2 DISTRIBUTION OF POPULATION BY HOUSEHOLD SIZE

62. **Table 3-2** shows that affected households with 4 to 6 members are the most common, totaling 713 households with an average household size of 4.7. 617 affected households belong to 1 to 3 members with the lowest average HH size of 2.0. Households with more than 6 members are the least common, with 127 affected households averaging 8.1 members per household. The average household size of the affected households is 3.9 which is slightly lower than the national average household size (3.98) [Population & Housing Census 2022, National Report (Volume 1), Bangladesh Bureau of Statistics (BBS), Published in November 2023]. Lot-wise distribution of affected households, population, and household size are presented in **Table 3-2**. (Calculated as Total No. of Population / Total No. of Household * 100).

HH Size Range	No. of Affected Population by Household Size								Average HH Size
	Lot-1		Lot-2		Lot-3		Total (Lot-1+2+3)		
	No. HHs	Popn.	No. HHs	Popn.	No. HHs	Popn.	No. HHs	Popn.	
1 to 3	414	832	162	342	41	83	617	1,257	2.0
4 to 6	293	1,343	335	1,590	85	418	713	3,351	4.7
> 6	29	254	72	551	26	219	127	1,024	8.1
Total	736	2,429	569	2,483	152	720	1,457	5,632	3.9

Source: Census survey conducted by BCL, July - December 2024
(Calculated as Total No. of Population / Total No. of Household * 100).

3.1.3 DISTRIBUTION OF POPULATION BY SEX

Population of Affected Households by Sex

63. Table 3-3 shows that the affected male population of 3,135 is higher than the affected female population of 2,495 in Lots 1, 2 and 3. The highest difference between the male (1,377) and female (1051) population is found in Lot 1. It is to be noted that there are 2 third-gender individuals to be affected in the Sylhet-Charkhai-Sheola Highway Improvement Project area. The average sex ratio excluding the third gender population is 79.59 (including 76.33, 83.98 and 79.30 in Lot 1, 2 & 3 respectively) in the project area i.e., there are 79.59 males per 100 females in the project area. This sex ratio is lower than the national sex ratio (98.07) [Population & Housing Census 2022, National Report (Volume 1), Bangladesh Bureau of Statistics (BBS), Published in November 2023]. (Calculated as Total No. of Female Population / Total No. of Male Population * 100).

SL. No.	Affected Population by Sex	Unit	Lot-1	Lot-2	Lot-3	Total (Lot-1+2+3)
0			3	4	5	6=(3+4+5)
1	Male Population	No.	1,377	1,357	401	3,135
		%	43.9	43.3	12.8	100
2	Female Population	No.	1,051	1,126	318	2,495
		%	42.1	45.1	12.7	100
3	Hijra (Third Gender)	No.	1	0	1	2
		%	50.0	0.0	50.0	100
4	Total (SL. No. 1+2+3)	No.	2,429	2,483	720	5,632
		%	45.1	44.1	12.8	100
5	Sex Ratio (SL. No. 2/1*100)	%	76.33	82.98	79.30	79.59

Source: Census survey conducted by BCL, July - December 2024
(Calculated as Total No. of Female Population / Total No. of Male Population * 100).

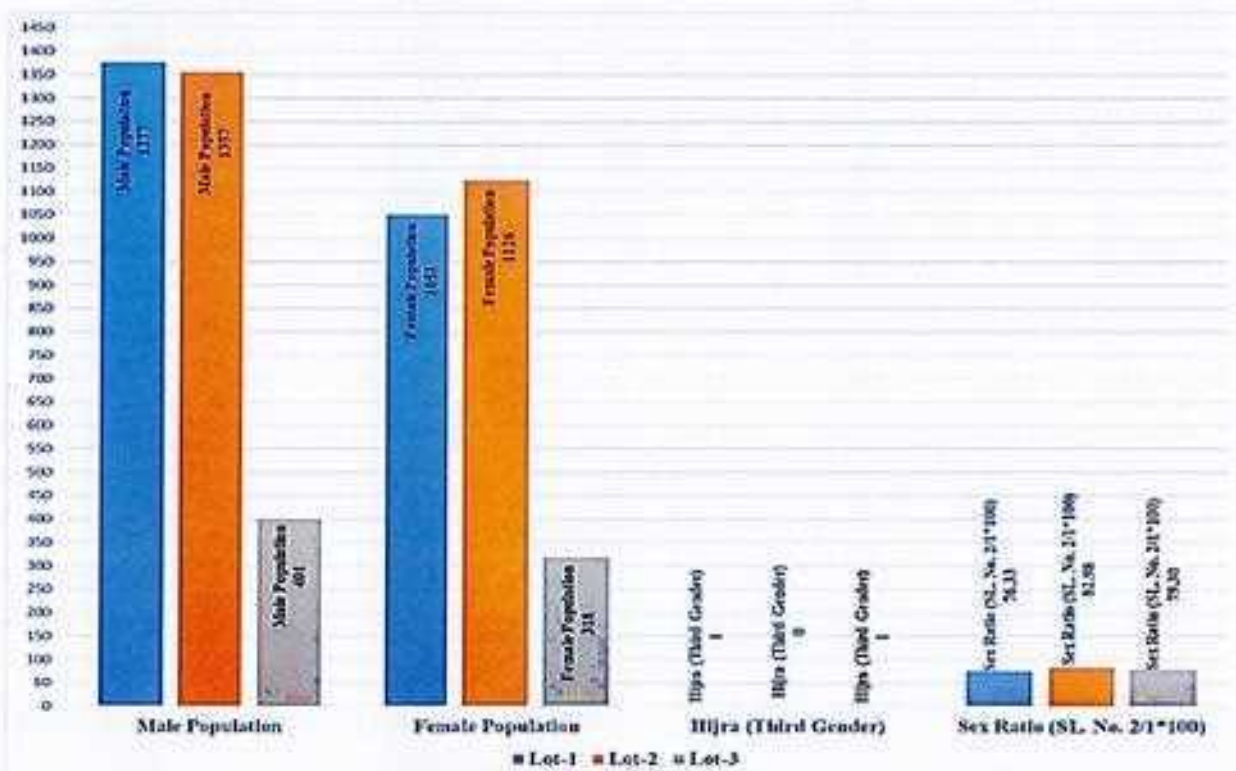


Figure 3-2: Affected Population, Household Size and Sex Ratio

Other Affected Individual Population (Tenant & Wage Earners)

64. Table 3-4 shows that the total number of other affected individual populations such as tenants 910 and wage earners are 293. Out of 910 individual tenants, 131 are residential tenants, 340 are commercial tenants and 439 are residential-cum-commercial tenants. Out of 293 wage earners, 288 are male and 5 are female. Detailed information on the distribution of other affected individual populations is presented in Table 3-4 and Annex-2 (Tables 2-8 and 2-10).



Table 3-4: Lot Wise Distribution of Other Affected Individual Population in Sylhet-Charkhai-Sheola Highway Improvement Project

Sl. No.	Category of Population	Affected Population																						
		Lot-1						Lot-2						Lot-3						Total Affected Male and Female Population in the Project Area				
		Residential		Commercial		Residential-cum-commercial		Residential		Commercial		Residential-cum-commercial		Residential		Commercial		Residential-cum-commercial		Total	Male		Female	
		Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female	Male	%		Popu.	%		
1.	Tenant	58	30	220	6	109	3	20	1	90	0	198	2	40	2	24	0	67	0	910	886	97.36	24	2.64
2.	Wage Earners/Worker			155	2					114	3					19	0			293	268	98.29	5	1.71

Source: Census Survey conducted by BCL, July – December 2024

3.1.4 RELIGION

65. Table 3-5 presents lot-wise affected population by religion under the Sylhet-Charkhai-Sheola Highway Improvement Project area. The majority of the affected population is Muslim, with 5,370 individuals, accounting for 95.35% of the total population. A small portion 262 (4.65%) of the affected population are Hinduism followers and there are no individuals of other religions affected population in the project area. Lot-wise detailed information is presented in Table 3-5.

Table 3-5: Lot Wise Affected Population by Religion in the Sylhet-Charkhai-Sheola Highway Improvement Project

Religion	Distribution of affected Population by Religion				
	Lot-1	Lot-2	Lot-3	Total (Lot-1+2+3)	%
Islam	2,340	2,400	630	5,370	95.35
Hinduism	89	83	90	262	4.65
Buddhist	0	0	0	0	0.00
Christian	0	0	0	0	0.00
Others	0	0	0	0	0.00
Total	2,429	2,483	720	5,632	100

Source: Census survey conducted by BCL, July-December 2024

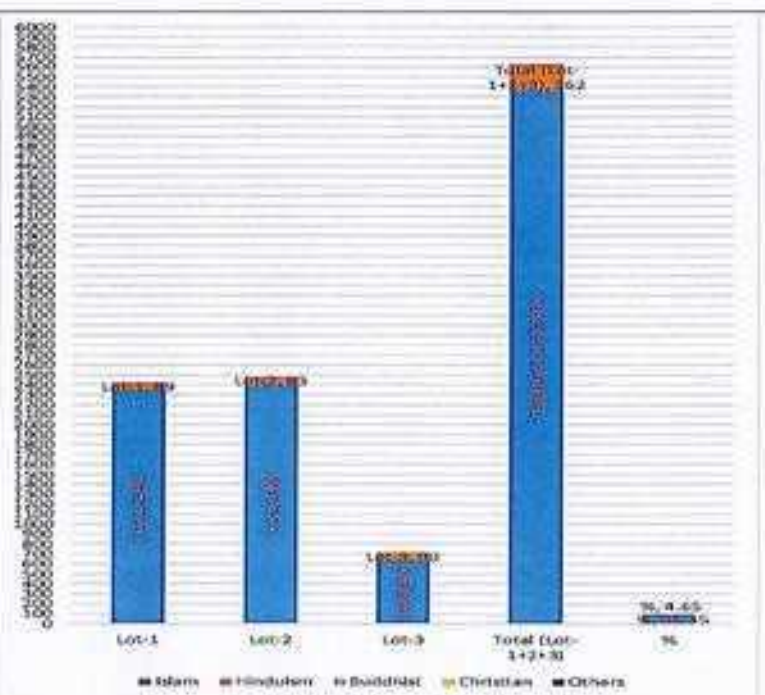
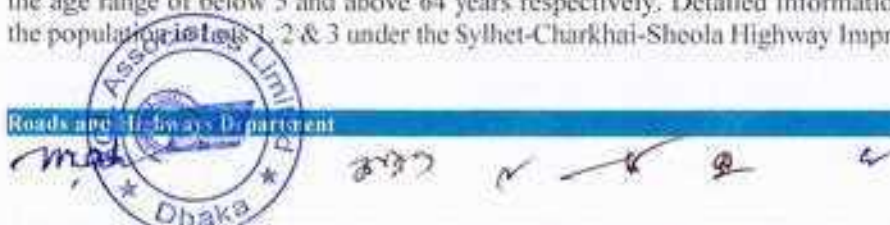


Figure 3-3: Affected Population by Religion

3.1.5 AGE COMPOSITION OF THE AFFECTED POPULATION

66. Table 3-6 presents the population pattern of the affected households in Lots 1, 2, & 3 under the project area. Out of the 5,632 affected population, the highest affected population is 2,765 (49.12%) which belongs to the age range 18-45 years followed by 1,019 (18.10%) of the population belonging to 46-64 years age range. The affected population belongs to the 5-14 years age range is 810 (14.39%). The affected population belongs to the 15-17 years age range is 568 (10.08%). A total of 258 (4.58%) and 212 (3.73%) affected populations belong to the age range of below 5 and above 64 years respectively. Detailed information on the age-wise distribution of the population in Lots 1, 2 & 3 under the Sylhet-Charkhai-Sheola Highway Improvement Project area is presented



in Table 3-6.

67. Table 3-6 shows that the dependent population is 1,846 including four age ranges (a) 0-4 years age range is 258 (4.58%), (b) 5-14 years age range is 810 (14.39%), (c) 568 (10.08%) and (f) 65 and above years age range is 210 (3.73%). On the other hand, the working (economically productive) population is 3,784 including two age ranges (d) 2,765(49.12%) affected population which belong to the 18-45 years and (e) 1,019 (18.10%) affected population which belongs to the 46-64 years-age range in the project area.

68. The dependency ratio at the national level is 52.63%, and it is 56.08% in rural areas and 45.63% in urban areas. The dependency ratio is 60.07% in Sylhet Division and separately 62.05% in rural areas and 52.02% in urban areas as per the Population & Housing Census 2022, National Report (Volume 1), Bangladesh Bureau of Statistics (BBS), Published in November 2023 under Statistics and Informatics Division, Ministry of Planning).

69. Total dependency ratio refers to the ratio of the dependent population and the active working-age population⁶ in the project area. The total dependency ratio is found 48.77% of the affected households in the project area which is near the national ratio. (Calculated as $100 * \text{dependent population} / \text{working population}$). It is to be noted that there are 2 persons (third gender) to be affected in the project area.

Table 3-6: Lot Wise Age Composition of the Affected Population in Sylhet-Charkhai-Sheola Highway Improvement Project

SL. No.	Age Range (Years)	Affected Population						Total Affected Male and Female Population in the Project Area					
		Lot-1		Lot-2		Lot-3		Male		Female		Total (Male & Female)	
		Male	Female	Male	Female	Male	Female	Popu.	%	Popu.	%	Popu.	%
a	0 to 4	58	44	60	61	17	18	135	4.31	123	4.93	258	4.58
b	5 to 14	156	141	204	178	64	67	424	13.52	386	15.47	810	14.39
c	15 to 17	137	117	132	117	37	28	306	9.77	261	10.48	568	10.08
d	18 to 45	670	568	644	568	178	137	1,492	47.59	1,274	51.05	2,765	49.12
e	46 to 64	295	156	251	168	88	61	634	20.22	385	15.43	1,019	18.10
f	65 and above	61	25	66	34	17	7	144	4.59	66	2.65	210	3.73
Total =		1,377	1,051	1,357	1,126	401	318	3,135	100	2,495	100	5,630	100
i) Dependent Population (a+b+c+f)=		412	327	462	390	135	120	1,009	32.19	836	33.52	1,846	32.78
ii) Working Population (d+e)=		965	724	895	736	266	198	2,126	67.81	1,659	66.48	3,784	67.22
Dependency Ratio (100*ii/i)		42.76	45.10	51.65	52.92	50.53	60.69	47.47	100	50.43	100	48.77	100

Source: Census survey conducted by BCL, July- December, 2024

(Calculated as $100 * \text{dependent population} / \text{working population}$).

Note: The formula applied for calculating dependency ratio by Population and Housing Census as below

Dependency ratio is defined as the ratio of some of population aged 0-14 years and 65+ years to the population aged 15-64 years expressed as percentage.

⁶What Is Working-Age Population?

The working-age population is the total population in an area that is considered able and likely to work. It is based on the number of people in a predetermined age range. That age range can vary, but it usually begins with older teenagers and goes into retirement age, such as 18-64 or 15-64. <https://www.investopedia.com/terms/w/working-age-population.asp>



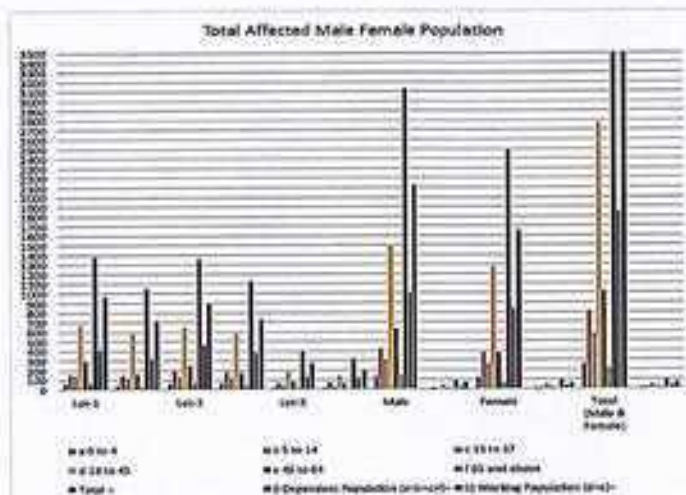


Figure 3-4: Total Affected Male and Female Population

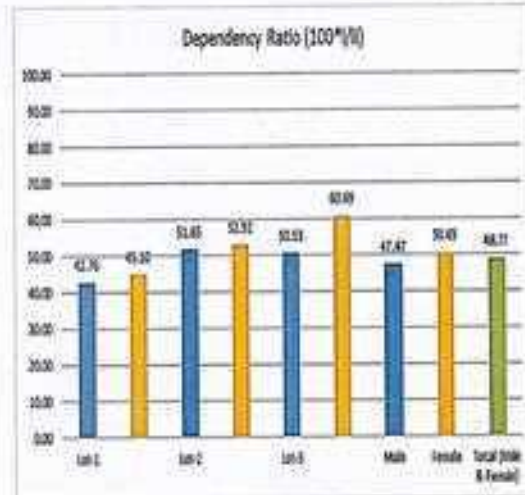


Figure 3-5: Dependency Ratio

3.1.6 MARITAL STATUS OF THE AFFECTED POPULATION

70. Table 3-7 shows Lot-wise marital status of the male and female population in Lot-1, 2 & 3 respectively under the Sylhet-Charkhai-Sheola Highway Improvement Project area. Legally marriageable ages for the first marriage are 21 years for the males and 18 years for the females in Bangladesh. However, the Child Marriage Act 2017 allows girls less than 18 years to marry with the consent of their parents. The marital status among the surveyed affected population in Lots 1, 2, and 3 shows that most of the marriages are solemnized within the marriageable age. Slightly above 1,593 (50.81%) males and 1,270 (50.90%) females are married while 503 (16.04%) males and 208(8.32%) females are unmarried in the project area. Child male and female below the first marriage ages among males and females are 865(27.60%) and 770(30.88%) respectively. Detailed information on marital status is presented in Table 3-7. It is to be noted that there are 2 persons (third gender) to be affected in the project area.

Table 3-7: Lot Wise Marital Status of the Affected Population in the Sylhet-Charkhai-Sheola Highway Improvement Project

Marital Status	Affected Population						Total Affected Male and Female Population in the Project Area					
	Lot-1		Lot-2		Lot-3		Male		Female		Total (Male & Female)	%
	Male	Female	Male	Female	Male	Female	Popn.	%	Popn.	%		
	1	2	1	2	1	2	7	8	9	10	11	12
Married	762	564	627	542	204	164	1,593	50.81	1,270	50.90	2,863	50.85
Unmarried	164	57	261	120	78	30	503	16.04	208	8.32	710	12.62
Widow	95	125	70	103	0	9	165	5.26	237	9.50	402	7.14
Widower	5	1	2	0	1	0	8	0.26	1	0.04	9	0.16
Abandoned by Husband	0	0	0	1	0	1	0	0.00	2	0.08	2	0.04
Abandoned by Wife	0	0	1	1	0	0	1	0.03	1	0.04	2	0.04
Divorced Woman	0	2	0	3	0	1	0	0.00	6	0.24	6	0.11
Divorced Man	0	0	0	0	0	0	0	0.00	0	0.00	0	0.00
Child	351	302	396	356	118	113	865	27.60	770	30.88	1,636	29.05
Total	1,377	1,051	1,357	1,126	401	318	3,135	100	2,495	100	5,630	100

Source: Census survey conducted by BCL, July- December 2024

3.1.7 EDUCATION

71. Table 3-8 shows the lot wise literacy rate of the population by sex. The literacy rate (7 years and Above) for both sexes (male and female) is 74.80% at the national level, while it is 71.68% in rural areas and 81.45% in urban areas. The rate for males is 76.56% and females 72.92%. The total literacy rate is (76.06%) in Sylhet district as per the Population & Housing Census 2022, National Report (Volume 1), Bangladesh Bureau of Statistics (BBS), Published in November 2023. Table 3-8 shows that the affected households in the project area had a literacy rate (7 years and Above) of 97.03%, which is much higher than the national literacy rate of 74.80% and the Sylhet district wide literacy rate of 76.06%.



72. Literate & illiterate of Affected HHs Population (7 Years and Above) by Education Level are literate 625 (11.10%) including male 330 (10.53%) & female 295 (11.82%) and illiterate 155 (2.74%) including male 67 (2.14%) & female 87 (3.49%) respectively. The literacy rate is marginally higher among the male population compared to the female population in Lots 1, 2, & 3 under the Sylhet-Charkhai-Sheola Highway Improvement Project area. The majority of the population has completed secondary education (SSC/Equivalent), with 908 (16.13%) individuals. This is followed by those with Junior School Certificate (JSC) at 544 (9.66%) individuals and Higher Secondary Certificate (HSC/Equivalent) at 623 (11.07%) individuals. Detailed information on education levels of affected population 7 years and above by Lot under the project area is presented in Table 3-8. It is to be noted that there are 2 persons (third gender) to be affected in the project area.

Table 3-8: Lot Wise Distribution of Affected HHs Population (7 Years and Above) by Education Level

Sl. No.	Education Level	Lot-1		Lot-2		Lot-3		Total Population in the Project Area				Total Population (Male & Female)	%
		Male Population	Female Population	Male Population	Female Population	Male Population	Female Population	Male		Female			
								Popu.	%	Popu.	%		
1	Child	118	95	110	98	20	19	248	7.91	212	8.50	460	8.17
4	Class 1	35	21	50	42	17	10	102	3.25	73	2.93	175	3.11
5	Class 2	22	33	33	37	14	10	69	2.20	80	3.21	149	2.65
6	Class 3	29	29	36	28	11	13	76	2.42	70	2.81	146	2.59
7	Class 4	20	10	35	35	9	14	64	2.04	59	2.36	123	2.18
8	Primary School Certificate (PSC)	62	53	80	62	39	28	181	5.77	143	5.73	324	5.75
9	Ehteday (Madrasa)	8	0	13	7	7	1	28	0.89	8	0.32	36	0.64
10	Class 6	69	43	70	43	13	10	152	4.85	96	3.85	248	4.40
11	Class 7	22	21	40	30	12	6	74	2.36	57	2.28	131	2.33
12	Junior School Certificate (JSC)	117	113	131	98	41	44	289	9.22	255	10.22	544	9.66
13	Class 9	185	73	136	98	46	35	367	11.71	206	8.26	573	10.18
14	SSC/ Equivalent	234	181	206	195	61	31	501	15.98	407	16.31	908	16.13
15	Dakhil (Madrasa)	2	0	9	5	3	5	14	0.45	10	0.40	24	0.43
16	HSC/ Equivalent	138	130	145	122	49	39	332	10.59	291	11.66	623	11.07
17	Alim (Madrasa)	13	3	8	6	1	3	22	0.70	12	0.48	34	0.60
18	BA/ Equivalent	57	37	40	34	19	11	116	3.70	82	3.29	198	3.52
19	Fajl (Madrasa)	25	17	13	9	0	0	38	1.21	26	1.04	64	1.14
20	MA/ Equivalent	13	3	10	6	2	2	25	0.80	11	0.44	36	0.64
21	Kamil (Madrasa)	1	0	3	2	4	1	8	0.26	3	0.12	11	0.20
22	Hafer	2	0	8	1	0	0	10	0.32	1	0.04	11	0.20
23	Dip. (Engg.)	5	2	2	0	1	1	8	0.26	3	0.12	11	0.20
24	BSc (Engg.)	3	1	0	0	0	1	3	0.10	2	0.08	5	0.09
25	MSc (Engg.)	0	0	0	1	0	0	0	0.00	1	0.04	1	0.02
26	Higher Education Degree (General)	3	1	3	3	0	0	6	0.19	4	0.16	10	0.18
27	Higher Education Degree (Engg.)	0	0	2	0	0	0	2	0.06	0	0.00	2	0.04
28	Other (Vocational Certificate, Certificate in Computer Application, etc.)	1	0	2	1	0	0	3	0.10	1	0.04	4	0.07
29	Literate (above 7 years)	172	158	133	116	25	21	330	10.53	295	11.82	625	11.10
30	Illiterate (above 7 years)	21	27	39	47	7	13	67	2.14	87	3.49	154	2.74
A. Total Literate Population (above 7 years)		1,258	944	1,215	982	360	274	2,833		2,200		5,033	
B. Total Population (above 7 years)		1,279	971	1,254	1,029	367	287	2,900	92.50	2,287	91.66	5,187	92.13
C. Total Population (below 7 years)		98	80	163	97	34	31	235	7.50	208	8.34	443	7.87
(B+C). Grand Total Population		1,377	1,051	1,357	1,126	401	318	3,135	100	2,495	100	5,630	100
Literacy Rate (%)		98.36	97.22	96.89	95.43	98.09	95.47	97.69		96.20		97.03	

Source: Census survey conducted by BCL, July- December 2024

3.1.8 OCCUPATION

Primary Occupation of Household Heads (HHHs)

73. According to the results of the census and IOL survey, household heads are engaged in diverse occupations by their primary occupations in the project area. Among the total 1,457 household heads, 1,406 are



males and 51 are females. Table 3-9 shows that the highest primary occupation of affected male household heads [912 household heads (62.59%)] is businesses followed by employed abroad/overseas of the 185 male household heads (12.70%) and further followed by agriculture of 60 male household heads (4.12%). Among the 51 female-headed households 32 (2.20%) are housewives. Detailed information about the primary occupations of affected household heads is presented in Table 3-9.

Table 3-9: Lot Wise Distribution of Affected Household Heads (HHHs) by Primary Occupation in the Sylhet-Charkhai-Sheola Highway Improvement Project

Primary Occupations	Lot-1		Lot-2		Lot-3		Total Affected Household Heads (HHHs) by Primary Occupation (Lot-1+2+3)					
	Male	Female	Male	Female	Male	Female	Male		Female		Total HHHs (Male & Female)	%
							HHHs	%	HHHs	%		
Farmer	12	0	26	0	22	0	60	4.27	0	0.00	60	4.12
Teacher	3	0	6	1	1	0	10	0.71	1	1.96	11	0.75
Employed Abroad/ Overseas	123	6	41	0	14	1	178	12.66	7	13.73	185	12.70
Employment	19	1	9	0	3	0	31	2.20	1	1.96	32	2.20
Housewife	0	14	0	9	0	9	0	0.00	32	62.75	32	2.20
Fisherman	0	0	1	0	0	0	1	0.07	0	0.00	1	0.07
Businessman	452	3	386	3	68	0	906	64.44	6	11.76	912	62.59
Daily Labor	15	0	6	0	5	0	26	1.85	0	0.00	26	1.78
Driver	10	0	23	0	10	0	43	3.06	0	0.00	43	2.95
Mason's Helper	0	0	1	0	0	0	1	0.07	0	0.00	1	0.07
Mason	0	0	1	0	1	0	2	0.14	0	0.00	2	0.14
Carpenter	0	0	1	0	1	0	2	0.14	0	0.00	2	0.14
Tailor	1	0	2	0	0	0	3	0.21	0	0.00	3	0.21
Doctor	4	0	0	0	0	0	4	0.28	0	0.00	4	0.27
Kabitaj	0	0	0	0	0	0	0	0.00	0	0.00	0	0.00
Boatsman	0	0	0	0	0	0	0	0.00	0	0.00	0	0.00
Student (male)	0	0	0	0	0	0	0	0.00	0	0.00	0	0.00
Student (female)	0	0	0	0	0	0	0	0.00	0	0.00	0	0.00
Rickshaw/ Van Puller	0	0	1	0	2	0	3	0.21	0	0.00	3	0.21
Old Man	27	0	21	0	5	0	53	3.77	0	0.00	53	3.64
Old Woman	0	2	0	1	0	1	0	0.00	4	7.84	4	0.27
Maid Servant	0	0	0	0	0	0	0	0.00	0	0.00	0	0.00
Barber	0	0	0	0	1	0	1	0.07	0	0.00	1	0.07
Renting House	6	0	8	0	1	0	15	1.07	0	0.00	15	1.03
Cobbler	0	0	0	0	0	0	0	0.00	0	0.00	0	0.00
Mechanic/ Technician	0	0	1	0	0	0	1	0.07	0	0.00	1	0.07
Unemployed	12	0	10	0	1	0	23	1.64	0	0.00	23	1.58
Child	0	0	0	0	0	0	0	0.00	0	0.00	0	0.00
Other (Imam, Blacksmith, Plant Seller, Cook, Shop Assistant, Food Processing Labor, Accountant, Nurse, Cleaner, Mechanic Assistant, etc.)	26	0	11	0	6	0	43	3.06	0	0.00	43	2.95
Total	710	26	555	14	141	11	1,406	100	51	100	1,457	100

Source: Census survey conducted by BCL, July- December 2024

*Notes: Skilled laborers include (i) carpenter, (ii) mason, (iii) barber, (iv) blacksmith, (v) driver, (vi) mechanic, (vii) rickshaw driver, (viii) tailor, (ix) imam, (x) cobbler, (xi) kabiraj, etc.

Primary Occupation of Other Members of Affected Households (HHs)

74. Table 3-10 shows that the highest primary occupations of other active members of affected households are students 1566 (37.53%). Housewives are the next largest group with 1,237 (29.64%) individuals. Employed abroad/overseas workers form a notable group, with 394 (9.44%) individuals. Detailed information about the primary occupations of other active members of affected households is presented in Table 3-10.



Table 3-10: Lot Wise Distribution of Members of Affected HHs by Primary Occupation in the Sylhet-Charkhai-Sheola Highway Improvement Project

Primary Occupations	Lot-1		Lot-2		Lot-3		Total Affected Members by Primary Occupation (Lot-1+2+3)					
	Male	Female	Male	Female	Male	Female	Male		Female		Total Members (Male & Female)	%
							Member	%	Members	%		
Farmer	2	1	12	2	5	0	19	1.10	3	0.12	22	0.53
Teacher	3	1	2	3	0	3	5	0.29	7	0.29	12	0.29
Employed Abroad/ Overseas	135	72	102	37	47	1	284	16.42	110	4.50	394	9.44
Employment	26	2	14	2	18	2	58	3.35	6	0.25	64	1.53
Housewife	0	563	0	525	0	149	0	0.00	1237	50.63	1,237	29.64
Fisherman	0	0	3	1	0	1	3	0.17	2	0.08	5	0.12
Businessman	63	2	74	3	27	0	164	9.48	5	0.20	169	4.05
Daily Labor	11	1	22	5	7	0	40	2.31	6	0.25	46	1.10
Driver	5	0	11	0	9	0	25	1.45	0	0.00	25	0.60
Mason's Helper	0	1	1	4	0	0	1	0.06	3	0.20	6	0.14
Mason	3	0	3	0	1	0	7	0.40	0	0.00	7	0.17
Carpenter	0	0	1	0	0	0	1	0.06	0	0.00	1	0.02
Tailor	0	1	2	3	0	0	2	0.12	4	0.16	6	0.14
Doctor	1	1	0	0	0	0	1	0.06	1	0.04	2	0.05
Kabiraj	0	1	0	0	0	0	0	0.00	1	0.04	1	0.02
Boatman	1	0	0	0	1	0	2	0.12	0	0.00	2	0.05
Student (male)	307	0	400	0	103	0	810	46.82	0	0.00	810	19.41
Student (female)	0	281	0	365	0	110	0	0.00	756	30.95	756	18.12
Rickshaw/ Van Puller	0	0	2	0	0	0	2	0.12	0	0.00	2	0.05
Old Man	16	0	13	0	3	0	32	1.85	0	0.00	32	0.77
Old Woman	0	19	0	53	0	14	0	0.00	86	3.52	86	2.06
Maid Servant	0	0	0	0	0	0	0	0.00	0	0.00	0	0.00
Barber	0	0	0	0	0	0	0	0.00	0	0.00	0	0.00
Renting House	1	1	0	0	0	0	1	0.06	1	0.04	2	0.05
Cobbler	0	0	0	0	0	0	0	0.00	0	0.00	0	0.00
Mechanic/ Technician	2	0	4	0	4	0	10	0.58	0	0.00	10	0.24
Unemployed	22	17	63	32	11	7	96	5.55	56	2.29	152	3.64
Child	67	60	71	75	20	19	158	9.13	154	6.30	312	7.48
Other (Plant Seller, Shop Assistant, Food Processing Labor, Cleaner, Mechanic Assistant, etc.)	4	0	1	2	4	1	9	0.52	3	0.12	12	0.29
Total	669	1,024	801	1,112	260	307	1,730	100	2,443	100	4,173	100

Source: Census Survey conducted by BCL, July - December 2024

Note: It is to be noted that there are 2 persons (third gender) to be affected in the project area.



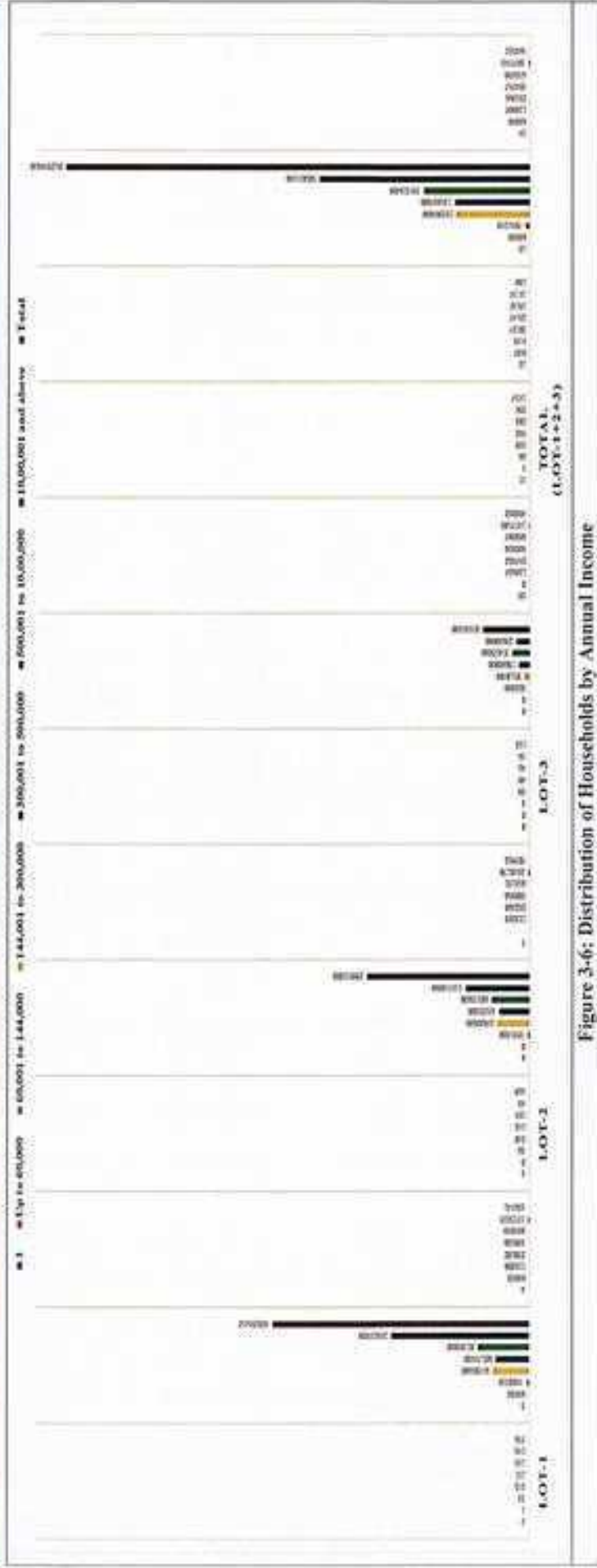


Figure 3-6: Distribution of Households by Annual Income

3.1.10.2 ANNUAL EXPENDITURE LEVEL.

77. Table 3-12 shows that in the project area, the highest households are 692 HHs (47.44%) whose annual expenditure range is BDT 144,001 to BDT 300,000. These HHs have an average annual expenditure BDT 227,273. The 2nd highest households are 331 HHs (22.72%) whose annual expenditure range is BDT 300,001 to BDT 600,000. These HHs have an average annual expenditure BDT 388,869. The lowest households are 20 HHs (1.37%) whose annual expenditure range is BDT Up to 60,000. These HHs have an average annual expenditure BDT 30,653. Overall, average annual expenditure of 1,457 affected households is BDT 399,557 only. Detailed information on households' monthly expenditure is presented in Table 3-12.

Table 3-12: Distribution of Households by Annual Expenditure in the Project Area

Sl. No.	Annual Expenditure Level (BDT)	Annual Expenditure (BDT) of Affected Households					Total (Lot-1+2+3)		
		Lot-1	Lot-2	Lot-3	Lot-4	Lot-5	Total Annual Expenditure	% of HHs	Average Annual Expenditure
0		2	6	8	9	11	13	12	14
(i)	Up to 60,000	8	11	1	1	20	40,200	1.37	30635
(ii)	60,001 to 144,000	75	48	3	3	126	131,200	8.65	127119
(iii)	144,001 to 300,000	319	310	63	63	692	226,603	47.49	227273

Table 3-12: Distribution of Households by Annual Expenditure in the Project Area

Sl. No.	Annual Expenditure Level (BDT)	Annual Expenditure (BDT) of Affected Households												
		Lot-1			Lot-2			Lot-3			Total (Lot-1+2+3)			
		No. of HHs	Total Annual Expenditure	Average Annual Expenditure	No. of HHs	Total Annual Expenditure	Average Annual Expenditure	No. of HHs	Total Annual Expenditure	Average Annual Expenditure	No. of HHs	Total Annual Expenditure	Average Annual Expenditure	
(i)	0 - 300,000	2	3	382750	5	6	390765	8	9	10	11	12	13	14
(ii)	300,001 to 500,000	145	55498820	382750	135	52753320	390765	51	20462600	401227	331	2277	128714740	388866
(iii)	500,001 to 10,00,000	112	83949160	749546	54	35484080	657113	31	19892400	641690	197	1352	139325640	707237
(iv)	10,00,001 and above	77	110634080	1436806	11	19897200	1808836	3	7500000	2500000	91	6.25	138031280	1516827
	Total	736	332161650	493225	569	184618180	537773	152	62564800	656820	1457	100	579344630	498826

Source: Census survey conducted by ICL, July - December 2024



3.1.11 POVERTY AND GENDER DYNAMICS

3.1.11.1 OVERVIEW

78. At present, the Sylhet-Charkhai-Sheola Highway Improvement Project area has been under investment infrastructure, including widening roads, constructing flyovers, ramps, and improving electricity access to enhance connectivity and improvement of living standards in the area and region as well. Meanwhile, there are opportunities for further improvements in agricultural practices, technology adoption, and access to necessary credit and market facilities, which will boost agricultural productivity and increase the incomes of the farmers in this region. Interventions such as extension services, providing access to high-yield seeds, and promoting climate-smart agriculture can lead to socio-economic gains in the agriculture sector. Rural areas in the Sylhet division are also experiencing a shift from agrarian economies to diversified economic activities. New industries and manufacturing units can create job opportunities and boost local economies. This transition may also cause environmental degradation and changes in traditional ways of life. Currently, despite Bangladesh's economic growth as a middle-income country, some disadvantaged and vulnerable households also encounter marginalization, landlessness, and impoverishment. It is evident that the consequences of this change may vary according to the socioeconomic class of the households and the state of gender aspects of the household members.

79. Access to education and skill development programs may bring socio-economic advancement. An increase in literacy rates, vocational training, and quality of education can significantly impact the earning potential and well-being of people in this locality. More specifically, the mitigation measures of this project, along with the GoB's initiatives for poverty alleviation, healthcare provision, and social safety nets, play an important role in improving socio-economic conditions for marginalized and vulnerable people.

80. It is found from the census, IOL and socio-economic survey, that total 2,495 female population, where 51 females (affected households' heads) and 2,444 females (affected households' members) including (a) 0-4 years age range is 123, (b) 5-14 years age range is 386, (c) 15-64 years age range is 1,920 and (d) 65+ years age range is 66 (see **Table 3-6**), who do household chores including preparing and cooking foods, looking after babies, minor children, and family members along with various activities at their houses. They have very limited access to economic activities outside their houses.

81. The census and socio-economic survey conducted in the Sylhet-Charkhai-Sheola Highway Improvement Project area found that 32 Female Household Heads who are member of affected households as housewife.

82. From the survey findings, it is easily understood that working-age females stay at home and do household chores and/or look after household chores and continue various activities as housewives. They have very limited access to economic activities outside their homesteads. The World Bank ESS5 and ESS7 set out requirements for income and livelihood restoration and rehabilitation of the poor and vulnerable groups due to the project. It is worth mentioning that among vulnerable groups, women can be disproportionately affected by relocation and resettlement due to their predominant responsibilities in maintaining a congenial atmosphere in households to the greatest extent and doing all household activities.

83. The Resettlement Action Plan (RAP) has provisions for the payment of resettlement benefits for Female-Headed Households and, more generally, women and girls affected by the project as per the Entitlement Matrix (EM).

84. According to calculation of "Poverty Line of HH Income Based on Bangladesh Bureau of Statistics (BBS 2022) Household Income and Expenditure Survey (HIES) data, the national poverty level of the affected HHs has been considered up to BDT 144,000 per year (12,000 per month) for each HH following the calculation below.

(i) Average lower poverty line at the national level in 2022 = BDT 2755/person/month

(ii) Average household size at the national level in 2022 = 4.26

(iii) Monthly income for vulnerable household = BDT 2755*4.26 = BDT 11,736 (Rounded up BDT 12,000 per month).

85. Among the 1,457 households, there are 243 identified losing 10% of Total Income (Severely Affected) and Vulnerable Households in Lot-1, Lot-2 and Lot-3. Out of 243, total 39 (16.05%) under the poverty line, only 1(0.41%) disabled female-headed and 1 (0.41%) very poor elderly (>65 yr.) male-headed HHs belong to Lot-1, 2 & 3. During the construction period, the project sponsor will appoint local people especially vulnerable groups including losing 10% of Total Income (Severely Affected) and women who are capable to work for avoiding Labor Influx.

86. Consultations were carried out with different stakeholders and local communities to share the GBV risk of the project with the relevant stakeholders by the E&S consultant who wanted to know about the potential risk



and mitigation measures of gender-based violence (GBV). It has been discussed that most gender-based violence occurs against women and girls by men. It is ensured that the GRM at each level will be available to receive, record, and investigate all GVB-related complaints.

87. The contractor will organize awareness-raising campaign and training on sexual exploitation abuse (SEA)/sexual harassment (SH) in the project area along with stakeholder consultations with project actors and community members to inform them properly about the potential GBV risks and project activities to address GBV related issues.

88. The project may potentially exacerbate the existing risks of Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) or create new risks (outlined in the SEA/SH mitigation plan) with activities under the project which may compound the broader contextual risks present at the community level. Project-related risks include potential labor influx for which the contractor(s) would need to set up labor camps. This will require assessing and putting necessary mitigation measures considering the extent to which the neighboring communities have the capacity to absorb labor influx. To reduce the potential risks associated with World Bank financed activities and to identify key interventions that may support effective SEA/SH mitigation, prevention, and response.

3.1.11.2 INFORMAL SETTLERS

89. Table 3-13 shows that Census and IOL Survey identified 686 non-title Holders (squatters) and including 294, 350 and 42 located on RHD land/Govt. land in Lot 1, 2, & 3 respectively. Out of 686 non-title Holders 631(91.98%) losing commercial structures including 274, 323 and 34 structures in Lot 1, 2 & 3 respectively. The 44 (6.41%) non-title Holders (squatters) will lose residential structures including 17, 21 and 6 structures in Lot-1, 2 & 3 respectively. A total of 11 (1.60%) non-title Holders (squatters) will lose residential-cum-commercial structures including 3, 6 and 2 structures in Lot-1, 2 & 3 respectively.

Utilization Type of Squatters' Structures	No. & % of Non-title Holders in the Project Area							
	Lot-1		Lot-2		Lot-3		Total (Lot-1+2+3)	
	No.	%	No.	%	No.	%	No.	%
Residential	17	5.78	21	6.00	6	14.29	44	6.41
Commercial	274	93.20	323	92.29	34	80.95	631	91.98
Residential-cum-Commercial	3	1.02	6	1.71	2	4.76	11	1.60
Total	294	100	350	100	42	100	686	100
%	42.86		51.02		6.12		100	

Source: Census survey conducted by BCL, July - December 2024

3.2 CONSULTATION, INFORMATION DISCLOSURE AND PARTICIPATION

90. This section presents project-related information disclosure and consultation with relevant stakeholders by facilitating their participation by informing, consulting, and collaborating through empowerment. Thus, Stakeholder Engagement and Information Disclosure (SEID) process provides an opportunity for the relevant stakeholders to participate in the project design, planning, and implementation through discussion, raising their concerns and giving suggestions. During the Feasibility Study and Detail Design Phase, in the period of preparation of Resettlement Policy Framework and the updating the Design and Safeguard Documents from July 2024 to December 2024, a wide range of relevant stakeholders were informed of details of the Sylhet-Charkhai-Sheola Highway Improvement Project, the requirement of acquisition of private and public land, and potential environmental and social impacts due to the project and involuntary resettlement and mitigation measures following the GoB law (the ARIPA, 2017) and the World Bank ESF and ESS5. ESS10 of WB stresses the importance of open and transparent engagement with the project stakeholders through SEID. This section discusses SEID.

91. The objective of SEID meetings is to identify and adopt a constructive discussion with the identified stakeholders and PAPs by adopting a systematic approach, and to assess the interest of the stakeholders/PAPs in the project. To identify the valued environment component (VEC) or social issues in the project area, and to ensure that the relevant environmental and social information has been disclosed, discussed and their views has been incorporated in the project suitably.

3.2.1 STAKEHOLDERS

92. The stakeholders of this project are local elites, local government representatives, project affected



persons (PAPs) and owners of affected land, owners of affected structures (title and non-titles), affected commercial and business enterprises, representatives of CPRs, wage earners, poor, pro-poor, squatters, vulnerable persons and groups, women, women's groups, disadvantaged, and underprivileged groups, transport drivers and worker groups. Details on classification of project stakeholders are attached in **Annex-3**.

3.2.2 APPROACH AND METHODS

93. The ARIPA, 2017 and the World Bank's ESS5 & ESS10 including RPF have been followed in carrying out consultation and participation process. The approach for discussion on the Sylhet-Charkhai-Sheola Highway Improvement Project, potential social impacts of land acquisition and consultations with gathered stakeholders through facilitating them for active participation to solicit their concerns, views, suggestions and relevant inputs for minimizing the adverse effects.

3.2.3 PUBLIC PARTICIPATION PROCESS

94. The Stakeholders' Consultation has been carried using different tools such as, Focus Group Discussions (FGDs), Key Informant Interviews (KIIs), and Spot Discussions during the census survey, holding Stakeholder Consultation Meetings with the stakeholders including the PAPs at selected locations. Two separate checklists (Attached in **Annex-3**) have been developed for conducting the Stakeholders' Consultation Meetings and Focus Group Discussions (FGDs) including gender dimensions and considerations.

95. The project affected persons were identified based on alignment proposed at project area by the Design Engineer. The location, venues, date, and time were informed to the stakeholders through one-to-one contact, announcement (loudspeaker/mike), newspaper publicity, etc. Despite the local practice of Pordah (seclusion of women) from public gatherings, the consultants' team encouraged the participation of women in the SCMs and FGDs. Details on consultations such as discussions and outcomes, attendance, pictures etc. are attached in **Annex3**.

3.2.4 IDENTIFICATION AND SELECTION OF LOCATION AND VENUES

96. During Feasibility Study and Detailed Design of the Sylhet-Charkhai-Sheola Highway Improvement Project, Consultations conducted along the road alignment are given in the **Table 3-14**.

Meeting Type	Group Identity	Meeting Venue	Meeting Date	No. of Participants
Public Consultation Meeting	General public of the locality	Jhalo-pura Govt. Primary School	29 th April, 2019	About 500
FGD-1	Transport Workers	Chadnighat Bazaar Motor Parts Business Multipurpose Office, Upazila: Golapganj, Zila: Sylhet	24 th April 2019	15.
FGD-2	Small and medium level businessmen	Hetingonj Bazaar Somobay Samity Office, Union: Fulbari, Upazila: Golapganj, Zila: Sylhet	28 th April 2019	12
FGD-3	Small and medium Businessmen	Ahmad Khan Road, Upazila: Golapganj, Zila: Sylhet	1 st May 2019	17
FGD-4	Businessmen and Transport Workers	Union Parishad Office, Union: Charkhai, Upazila: Beanibazar, Zila: Sylhet	4 th May 2019	13
Community Consultation	Affected land owners and the people of the entire community	Supreme Convention Hall, Union: Sheola, Upazila: Beanibazar, Zila: Sylhet	5 th May 2019	14

97. During RPF preparation, IAs conducted different consultation meetings with various stakeholders, which is given in **Table 3-15**.

Date	Name of the IA	Meeting & Place	Participants (Male)	Participants (Female)	Total
24 April 2019	RHD	FGD- Transport Workers- Golapganj, Sylhet	15	-	15
28 April 2019	RHD	FGD- Small/ Medium-level Businessperson- Phulbari, Golapganj, Sylhet	8	4	12
30 April 2019	RHD	FGD- Local people- Sylhet City Corporation	6	6	12
30 April 2019	RHD	FGD- Local people- Beanibazar, Sylhet	6	6	12
1 May 2019	RHD	FGD- Small/ Medium-level Businessperson	10	7	17
4 May 2019	RHD	FGD- Businessperson and Transport Workers- Beanibazar, Sylhet	10	3	13
5 May 2019	RHD	Community Consultation- PAPs and community people- Beanibazar, Sylhet	10	4	14



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98. Four (4) Stakeholders' Consultation Meetings, 18 (eighteen) FGDs and 39 (thirty-nine) KIIs were carried out during updating Design and Safeguard Documents including preparation of RAP and conduction of census from July 2024 to December 2024. The following venues, date and participants are furnished in the Table 3-16.

Table 3-16: Venues, date, time frame and participants of Stakeholders' Consultation Meetings, FGDs & KIIs					
Sl. No.	Venue	Date	Participants		
			Male	Female	Total
Participants of Consultation Meeting					
1.	Stakeholder Consultation Meeting at No. 2, Fulbari Union Parishad Conference Room, Fulbari, Golapganj, Sylhet	04/12/2024	51	5	56
2.	Stakeholder Consultation Meeting at Dubag Union Parishad Conference room, Dubag Union Parishad, Beanibazar, Sylhet	04/12/2024	34	8	42
3.	Stakeholder Consultation Meeting at No. -2, Charkhai Union Parishad Office, Charkhai Union Parishad, Charkhai, Beanibazar, Sylhet	26/11/2024	42	13	55
4.	Stakeholder Consultation Meeting at No. 2, Gopalganj Union Parishad Complex, Golapganj Union Parishad, Golapganj, Sylhet	14/11/2024	22	3	25
Subtotal			149	29	178
Participants of Focus Group Discussion (FGD)					
1.	Focus Group Discussion (FGD) with Businessmen at Zakiganj Road, Dokkhin Surma, Sylhet	21/08/2024	5	0	5
2.	Focus Group Discussion with Day Laborers and Wage Earners at Dubag Bazar, Beanibazar, Sylhet	22/10/2024	8	0	8
3.	Focus Group Discussion with Affected Landowners at Ramdha Trimahani, Ramdhabazar, Beanibazar, Sylhet	02/11/2024	8	0	8
4.	Focus Group Discussion with Small and Medium Businessmen at Chowmahani Bazar, Hetimganj, Golapganj, Sylhet	03/11/2024	5	0	5
5.	Focus Group Discussion with Tenants Group at Ramdha Trimahani, Ramdhabazar, Beanibazar, Sylhet	04/11/2024	10	0	10
6.	Focus Group Discussion with Market Committee at Khaironganj Bazar, Golapganj, Sylhet	23/11/2024	11	0	11
7.	Focus Group Discussion (FGD) with Businessmen at Nur Mansion, Fulbari, Golapganj, Sylhet	25/11/2024	5	0	5
8.	Focus Group Discussion (FGD) with Woman at No.-2, Charkhai Union Parishad Office, Charkhai Union Parishad, Charkhai, Beanibazar, Sylhet	26/11/2024	3	13	16
9.	Focus Group Discussion (FGD) with UP Chairman & Members at No.-3, Dubag Union Parishad Office, Dubag Union, Charkhai, Beanibazar, Sylhet	26/11/2024	11	3	14
10.	Focus Group Discussion (FGD) with Labour at Sheola Land Port Field, Sheola Land Port, Sutarkandi, Beanibazar, Sylhet	26/11/2024	12	3	15
11.	Focus Group Discussion (FGD) with Small Business Group at Fulbari Foods Shop, Boitikor Bazar, Golapganj, Sylhet	26/11/2024	16	1	17
12.	Focus Group Discussion (FGD) with Drivers & Helper Group at Sultanpur/West Bag, Sultanpur, Sylhet Sadar, Sylhet	26/11/2024	15	1	16
13.	Focus Group Discussion (FGD) with Transport Workers at Sylhet Bus Terminal, Kadamtali, Sylhet Sadar, Sylhet	27/11/2024	12	0	12
14.	Focus Group Discussion (FGD) with Female Group at Golapganj Union Parishad, Golapganj, Sylhet	27/11/2024	0	14	14
15.	Focus Group Discussion (FGD) with School Management Committee and Teachers at Kadamtali Government Primary School, Kadamtali, Sylhet Sadar, Sylhet	28/11/2024	0	6	6
16.	Focus Group Discussion (FGD) with Mosque & Madrasa Management Committee and Teachers	28/11/2024	7	0	7



Table 3-16: Venues, date, time frame and participants of Stakeholders' Consultation Meetings, FGDs & KIIs

Sl. No.	Venue	Date	Participants		
			Male	Female	Total
	at Jamia Majidia Islamia Mosque and Madrasa, Kuchai, 40 No Ward, Sylhet City Corporation, Sylhet				
17.	Focus Group Discussion (FGD) with Market Management Committee at Kuchai - Zakiganj Road, Kuchai, South Surma, Sylhet	28/11/2024	5	0	5
18.	Focus Group Discussion (FGD) with Bus Owners Association at Bus Owners Association Office, Kadamitali, Sylhet Sadar, Sylhet	29/11/2024	5	0	5
	Subtotal		138	41	179
Participants of Key Informant Interview (KII)					
1.	UNO, Sylhet Sadar Upzila, Sylhet	31/07/24, 21/08/24, 18/09/24	3	1	4
2.	UNO, South Surma Upazila, Sylhet	31/07/24, 22/08/24, 18/09/24	3	1	4
3.	UNO, Golapganj Upazila, Sylhet	31/07/24, 22/08/24, 18/09/24	4	0	4
4.	UNO, Beanibazar Upazila, Sylhet	31/07/24, 22/08/24, 18/09/24	4	0	4
5.	Assistant Commissioner (Land), Sylhet Sadar Upzila, Sylhet	31/07/24, 22/08/24, 18/09/24	4	0	4
6.	Assistant Commissioner (Land), South Surma Upazila, Sylhet	31/07/24, 22/08/24, 18/09/24	4	0	4
7.	Assistant Commissioner (Land), Golapganj Upazila, Sylhet	31/07/24, 22/08/24, 18/09/24	4	0	4
8.	Assistant Commissioner (Land), Beanibazar Upazila, Sylhet	31/07/24, 22/08/24, 18/09/24	4	0	4
9.	Sub-register, Sylhet Sadar Upazila, Sylhet	31/07/24, 22/08/24, 18/09/24	3	0	3
10.	Sub-register, South Surma Upazila, Sylhet	31/07/24, 22/08/24, 18/09/24	3	0	3
11.	Sub-register, Golapganj Upazila, Sylhet	31/07/24, 22/08/24, 18/09/24	4	0	4
12.	Sub-register, Beanibazar Upazila, Sylhet	31/07/24, 23/08/24, 18/09/24	3	0	3
13.	Upazila Agricultural Officer, Sylhet Sadar Upazila, Sylhet	31/07/24, 22/08/24, 18/09/24	4	0	4
14.	Upazila Agricultural Officer, South Surma Upazila, Sylhet	31/07/24, 22/08/24, 18/09/24	4	0	4
15.	Upazila Agricultural Officer, Golapganj, Sylhet	31/07/24, 22/08/24, 18/09/24	3	0	3
16.	Upazila Agricultural Officer, Beanibazar Upazila, Sylhet	31/07/24, 23/08/24, 18/09/24	4	0	4
17.	Divisional Forest Office, Forest Department, Sylhet	18/09/24	4	0	4
18.	Ranger, Forest Department, Beanibazar Upazila, Sylhet	18/09/24	3	0	3
19.	Officer in Charge (OC), Kotwali Model Police Station, Sylhet Sadar Thana, Sylhet	31/07/24	4	0	4
20.	Officer in Charge (OC), South Surma Thana, Sylhet	31/07/24	4	0	4
21.	Officer in Charge (OC), Golapganj Thana, Sylhet	31/07/24	4	0	4
22.	Officer in Charge (OC), Beanibazar Thana, Sylhet	01/08/24	4	0	4
23.	Executive Engineer, RHD, Sylhet Division, Sylhet	11/09/24, 23/10/24, 14/11/24, 03/12/24	7	1	8
24.	Executive Engineer, PWD, Sylhet Division, Sylhet	14/11/24	7	1	8
25.	Deputy Director, Department of Environment, Sylhet	03/12/2024	7	1	8
26.	Deputy Director, Department of Agriculture Extension, Sylhet	04/12/2024	7	1	8
27.	Chairman/Panel Chairman, Sheola Union, Beanibazar Upazila, Sylhet	31/07/24	4	2	6
28.	Chairman/Panel Chairman, Dubag Union, Beanibazar Upazila, Sylhet	31/07/24, 23/10/24, 14/11/24	4	2	6
29.	Chairman/Panel Chairman, Charkhai Union, Beanibazar Upazila, Sylhet	31/07/24, 23/10/24, 14/11/24	4	1	5
30.	Chairman/Panel Chairman, Fulbari Union, Golapganj Upazila, Sylhet	31/07/24	3	2	5
31.	Chairman/Panel Chairman, Golapganj Union, Golapganj Upazila, Sylhet	31/07/24, 23/10/24, 14/11/24	4	1	5
32.	Chairman/Panel Chairman, Alinagar Union, Beanibazar Upazila, Sylhet	31/07/24, 23/10/24, 14/11/24	3	2	5
33.	Chairman/Panel Chairman, Dhaka Dakshin Union, Golapganj Upazila, Sylhet	31/07/24	5	2	7



Handwritten signatures and initials: *ABD*, *←*, *→*, *g*, *z*

Sl. No.	Venue	Date	Participants		
			Male	Female	Total
34.	Deputy Commissioner, Sylhet District, Sylhet	30/07/24, 17/09/24 11/09/24, 23/10/24, 14/11/24, 03/12/24	7	1	8
35.	Additional Deputy Commissioner, Sylhet District, Sylhet	30/07/24, 17/09/24, 11/09/24, 23/10/24, 14/11/24, 03/12/24	7	1	8
36.	Land Acquisition Officer, Deputy Commissioner Office, Sylhet District, Sylhet	30/07/24, 17/09/24, 11/09/24, 23/10/24, 14/11/24, 03/12/24	4	1	5
37.	Commanding Officer (CO), 34, Bangladesh Infantry Regiment (BIR), Sylhet	18/09/24	4	0	4
38.	Chief Executive Officer, Sylhet City Corporation, Sylhet	31/07/24	7	1	8
39.	Administrator, Sylhet City Corporation, Sylhet	17/09/24	7	1	8
	Subtotal		172	23	195
	Total		459	93	552

3.2.4.1 INFORMATION DISCLOSURE, CONSULTATION AND PARTICIPATION

99. Total of seventy four (74) events have been organized in the consultations, public participation, and information disclosure process. Out of 74 events, seven (7) stakeholders' consultation meeting, twenty eight (28) FGDs and thirty nine (39) KIIs have been organized in the project area since feasibility and design. In total 1,218 people participated and discussed the consultation programs under Sylhet-Charkhai-Sheola Highway Improvement Project.

3.2.5 DISSEMINATION OF PROJECT RELATED INFORMATION IN THE STAKEHOLDER CONSULTATION MEETING AND OUTCOME DURING UPDATING OF DESIGN AND SAFEGUARD DOCUMENTS

100. Four (4) Stakeholder Consultation Meetings (SCMs) were organized in the project area from July 2024 to December 2024 with affected people focusing on pertinent project related information; project objectives and benefits; land acquisition (LA) and resettlement for the proposed development and LA process, requirement of relocation of Utilities, and CPR; gender-based violence issues; skill development requirement under livelihood restoration program for poor and vulnerable; labor influx during the construction phase; pollution arising from the movement of the construction equipment and vehicle movement in the project area. Total 178 people (149 males and 29 females) participated and discussed the SCMs. They participated in the discussions on different environmental and social issues such as associated with the construction of flyovers, underpass, pedestrian overpass, and foot over bridge for pedestrian are to be provided, road safety; drainage, tree removal and utility shifting, compensation and resettlement issues etc. of the project area. Details are presented at Annex-3 (Table 3-3).

101. The following information was disseminated in the consultation meeting:

- ▶ Importance of proposed development of the Sylhet-Charkhai-Sheola Highway Improvement Project Area;
- ▶ This highway is very important as it has been linked with Sutarkandi Land Port and Zokigonj road;
- ▶ Extensive road networks with different Districts and Upazilas under Sylhet Divisions as well;
- ▶ The ITS will provide the opportunity to authorities to take necessary action such as availability of ambulance within shorter time gap, police patrolling etc.;
- ▶ Last but not the least, number of accidents will decrease to big extent.

Land Acquisition Impacts and Issues:

102. It was discussed in these stakeholders' consultation meetings that there is a requirement of acquisition of 168,4303 acres of land as per the amount of land acquisition required for the construction of Sylhet-Charkhai-Sheola Highway Improvement project.

Social and Resettlement Impacts, Risks and Mitigation Measures:

103. Acquisition of land will affect persons, households, businesspersons and some other entities including Community/Common Property Resources (CPRs), such as mosques, madrasas, schools, colleges, etc. Compensation for affected land including homesteads, and commercial land, structures, trees, CPRs, etc., will be given as per the ARIPA, 2017, and the project's RPF which has been prepared and approved as per WB's ESF and ESS. The lead Consultant, RHD described the Regulatory Framework and Guidelines of the GoB and WB. As mentioned, that the affected persons, households and entities will be assisted and compensated for their



different losses due to land acquisition and implementation of the project (**Annex-3.1**).

Resettlement Specialist of Consultant Briefed about the Followings:

104. Project Displaced Persons (PDPs) and Project Displaced Entities (PSEs) will lose their assets such as land, buildings, structures, businesses, schools, mosques, madrasha, graveyards, trees, crops etc. A compensation and resettlement assistance in this RAP have been developed as per the ARIPA, 2017 and RPF Entitlement Matrix for all types of losses encountered by all the PDPs/PDHs/PDCPRs to get their compensation properly. Compensation and Resettlement assistance will be given as per Entitlement Matrix of this RAP.

105. **Outcome of Open discussion:** The participants' perceptions on land acquisition procedures, compensation payment mechanisms, relocation/replacement process, negative and positive social and environmental impacts on the affected households/persons, community/common property resources in the project area, and alternative solutions were recorded. Women and other vulnerable groups were also consulted regarding specific project impacts and issues related to their livelihoods. Major outcomes of the consultations are as follows:

- ▶ Land acquisition causes potential affected households to lose their homestead, and residential land and structures, and commercial plots and structures, but the insignificant amount of agriculture land;
- ▶ In the consultation meetings, the PDPs requested for fair compensation for their affected land, structures, loss of income, and affected other assets;
- ▶ A small-scale skill trainings program for income and livelihood restoration may arranged for vulnerable PDPs, for the vulnerable groups, and squatters;
- ▶ Participants highlighted that the construction of the Sylhet-Charkhai-Sheola Highway Improvement Project will affect some trees on the road in the project area. The project facilitators' team informed the participants that in this connection a mitigation plan will be developed;
- ▶ Participants expressed their concerns for land acquisition, physical displacement of residential and commercial structures due to the project, Entitlement Matrix (**Table 4-1**) clearly presents how different impacts of loss of land, residences and businesses will be mitigated;
- ▶ Compensation will be determined based on GoB Act ARIPA 2017 and WB-ESS-5 including RAP Entitlement Matrix;
- ▶ DC office and PAVC will determine and recommend the compensation;
- ▶ Necessity of drainage system will be reviewed by engineers and design team and information will be disclosed and informed to the all;
- ▶ The project team noted the concern and informed them of a potential mitigation strategy.

106. It is to be noted that to fill up the gap between the average sale rate of land and the current market value, the ARIPA 2017 has a provision of providing CCL at three times of sale rate (i.e., sale rate plus 200% additional).

- ▶ Expecting adequate compensation;
- ▶ Participants raised their concerns that there will be influx of workers during construction which may cause impacts on the community females as well as female workers;
- ▶ Safety of community women and female workers must be ensured while influx of labors will be happened during project construction;
- ▶ Participant requested to construct adequate numbers of flyovers, underpasses and foot over bridges at appropriate locations (e.g., in vicinities of schools, madrassas, areas of bazars and hats etc.);
- ▶ A proper drainage system should be there to stop water logging, which will save crop and stop land sliding.

107. The participants expressed their concerns that they will be deprived of fair and adequate compensation if compensation amount is determined based on recorded category of land by DC ignoring the actual category of land. A regular interaction was maintained with the design consultant team and PIU and informed them about the feedback received on project design from the stakeholders during stakeholder's consultation process. Accordingly, additional measures adopted in the project design, which are given below and details are presented in **Annex-3**.

- ▶ The proposed Sylhet-Charkhai-Sheola road have been designed;
- ▶ Necessary proposed RoW for the existing road have been designed to mitigate traffic jam completely;
- ▶ Road alignment has been designed such a way that will positively contribute to transportation and communication from Sylhet Sadar to Sheola Land Port;
- ▶ This subsection will be complete after conducting consultation meetings, focus group discussions (FGDs) and Key Informant interviews (KIIs).



3.2.6 FOCUS GROUP DISCUSSIONS (FGDS)

108. Eighteen (18) Focus Group Discussions (FGDs) were carried out with affected people focusing on environmental and social risks, impacts, and issues. The 179 participants (138 males and 41 females) of FGDs provided feedback/suggestions and their expectations to mitigate the impacts. Recommendations to mitigate impacts have been given based on analysis of the relevant data and information. Their views are as follows:

- ▶ The project activity must not create water logging in the low-lying places at adjacent area of the Sylhet-Charkhai-Sheola Highway Improvement Project areas;
- ▶ The safety and security of a female labor is to be ensured at the construction yard during the construction of the Sylhet-Charkhai-Sheola Highway, if female laborers will be engaged;
- ▶ Toilet for the males and females should be in the opposite directions;
- ▶ Skill training and credit support for the poor, vulnerable households and groups and restoration and improvement of their income and livelihoods;
- ▶ Adequate compensation for affected land, structures, trees and other assets were demanded by the participants of FGDs;
- ▶ Implementation of Income and Livelihood Restoration Plan;
- ▶ Adequate value of the affected structures of non-title holders on the government land demanded as compensation;
- ▶ The participants opined that advance notice for relocation of affected structures should be given or issued at least 60 days before relocation;
- ▶ Payment of compensation before displacement and relocation;
- ▶ Payment of Transfer Grant/Structure Reconstruction Grant;
- ▶ Employment opportunities for the eligible workers during implementation of the project demanded;
- ▶ Equal wage for woman laborers like male laborers during construction work demanded;
- ▶ Vulnerable HHs would have additional benefits;
- ▶ Maintain adequate safety signs and diversion mark during the construction of the Sylhet-Charkhai-Sheola Highway;
- ▶ Maintain dust free environment during the construction activities;
- ▶ Road side plantation and engagement of PAPs.

109. FGDs is presented in **Annex-3** and lists of FGDs' participants are given at **Annex-3**.

3.2.7 KEY INFORMANT INTERVIEWS (KIIS)

110. Thirty-Nine (39) Key Informant Interviews (KIIs) have been conducted with relevant land acquisition and government departments, PAPs, local government representatives, and local influential personality who will be playing an important role in the Sylhet-Charkhai-Sheola Highway Improvement Project. The 195 participants (172 males and 23 females) of KIIs provided feedback/suggestions and their expectations to mitigate the impacts. The KIIs is presented in **Annex-3** and lists of KIIs' participants are given in **Annex-3**. The followings are concerns, expectations, opinions were expressed by the stakeholders (KIIs):

Concerns:

- ▶ Land Acquisition and smooth implementation of LA;
- ▶ Continuous consultation on LA process;
- ▶ Assistance of Government Departments for LA and Resettlement;
- ▶ Valuation of affected assets;
- ▶ Loss of homestead and structures;
- ▶ Loss of businesses;
- ▶ Loss of restaurants;
- ▶ Loss of livelihoods;
- ▶ Having no remaining alternative income sources;
- ▶ Loss of rented out commercial structures built on own land;
- ▶ Displacement from land, which may cause landlessness; and
- ▶ The construction of the Sylhet-Charkhai-Sheola highway will affect the social and environmental impacts and risks.

Expectations:

- ▶ Adequate Compensation for affected land and structures;
- ▶ Quick Payment of Compensation without any hassle or harassment;



- ▶ Assistance to start businesses at alternative places; and
- ▶ Expectation of work/jobs under the project.

Opinions/suggestions:

- ▶ Suggests for a pollution free safe and secure road;
- ▶ Slow-moving vehicle (SMV) shall have to strictly prohibit from the highway, a separate lane on the both sides of the highways adjacent to the Sylhet-Charkhai-Sheola highway is required;
- ▶ Safe and secure transportation and communication passengers, pedestrians and freights using the Sylhet sadar to Sheola highway;
- ▶ Facility of Fly over, Foot over, adequate road safety signal and signs;
- ▶ Local people may suffer from water logging, if drainage system need to be planned effectively;

111. Suggestion for effective drainage system and necessary arrangements at and around the project area.

3.2.8 DISCUSSION ON RELOCATION OPTIONS

112. Results of consultation meetings on relocation options and strategies of affected residential households and businesses at the Sylhet-Charkhai-Sheola Highway Improvement Project area are presented in the Section 4.3 of the Chapter 4.

3.2.9 INFORMATION DISCLOSURE

113. For active involvement of Project Displaced Persons (PDPs), Project Displace Households (PDHs) and other stakeholders, the project information was disseminated through meetings and personal contacts. All the following important information has been disseminated based on RPF draft Entitlement Matrix of RAP,

- ▶ ARIPA 2017;
- ▶ Awareness and understanding of ESS5 of WB operations;
- ▶ Activities, policies, strategies, objectives, and results among general public;
- ▶ Participatory development, ensuring a greater two-way flow of information;
- ▶ Transparency and accountability in ESS5 of WB operations; and
- ▶ Resettlement Policy Framework (RPF) of WB 2022.

114. The Project design, benefits and adverse environmental and social impacts were discussed with the displaced persons and their community. Stakeholders were asked for their views on the Project's overall compensation process. Women and other vulnerable groups were also consulted concerning the specific project impacts and their livelihood aspects. The provisions of the WB policy ESS5 and Government Act ARIPA, 2017 on land acquisition were also disclosed.



4 IMPLEMENTATION ARRANGEMENTS

115. This chapter is divided contains 8 (eight) sections such as 4.1 legal policy framework, 4.2 entitlements, assistance and benefits, 4.3 relocation and resettlement, 4.4 income and livelihood restoration plan, 4.5 grievance redress mechanism, 4.6 tentative land acquisition and resettlement budget, 4.7 institutional arrangements for RAP implementation and 4.8 monitoring and evaluation.

4.1 LEGAL AND POLICY FRAMEWORK

116. The Acquisition and Requisition of Immovable Property Act (ARIPA), 2017 is the principal legal instrument governing land acquisition in Bangladesh. The RPF⁸ presents land acquisition and requisition processes, determination of value of acquired land and assets (structures, trees, crops and other damages, payment of compensation to tenants as per the agreement and the ARIPA, 2017. The Acquisition and Requisition of Immovable Property Act (ARIPA, 2017) (Act No. 21 of 2017) [21st September 2017] are presented in **Annex4-1**. Land Acquisition process is presented at **Annex-4 (Table4-1)**.

4.1.1 LAND REQUISITION POLICY OF BANGLADESH

117. The Resettlement Policy Framework (RPF)⁹ of World Bank presents land acquisition policy of Bangladesh as per the ARIPA, 2017. Contractor will arrange its own to procure the required land for engineering facilities, stockyards, labor camps, etc. as mentioned in the bid-documents.

4.1.2 THE WORLD BANK ENVIRONMENT AND SOCIAL STANDARDS

118. The RPF 2022¹⁰ presents objectives of ESS5, applicability of ESS5 and RHD requires to ensure ESS5 requirements and provisions due to involuntary land acquisition and resettlement in general and not resorting forced eviction of the affected households and businesses from the RoW for implementation of the project.

4.1.3 GAPS BETWEEN THE WORLD BANK'S ESS5 AND THE ARIPA, 2017 AND GAP FILLING MEASURES

119. The key gaps of the ARIPA, 2017 vis-à-vis the World Bank ESS5 are presented in Table-5 of RPF 2022 in **Annex4 (Table 4-2)**. All gaps have been incorporated in the Entitlement Matrix of the RAP.

4.1.4 ELIGIBILITY AND CUT-OFF-DATES

120. Eligibility to receive compensation and resettlement assistance will be limited by "cut-off" dates. There will be two cut-off-dates in the Sylhet-Charkhai-Sheola Highway Improvement Project. **The first cut-off-date** is for title owners only to be notified by the DC under Section 4 of the ARIPA, 2017 informing the landowners of the Project right-of-way. This will be done once Land Acquisition Plans (LAPs) are submitted by RHD to the Deputy Commissioner. The second cut-off-date is called the "**social cut-off-date**", based on the census for identification and eligibility for all "non-land" related entitlements. The social cut-off-dates were set during the survey and disclosed publicly in the consultation meetings, through miking (loudspeaker), posted on the public notice boards, concerned Union Parishad Offices, Municipalities Offices and also during household-level interviews in the affected villages and communities concerned. More specifically, notice on cut-off date was officially circulated to the respective offices¹¹. Social cut-off date for non-title affected households and persons is 31-07-2024. In this project, the household level census and IOL was conducted during the period from July to December 2024 for eligibility for any non-title persons such as squatters or other informal settlers. non-title holders affected persons will be given assistance, allowances, grants and resettlement benefits from the project as per entitlement matrix.

121. The census has identified and established the households living in the project area, including the NTHs/informal settlers on RHD land and will be affected by the project. It has also established a record of all

⁸RPF 2022, pages 21-24.

⁹ Subsection 3.1 Land Requisition Policy of Bangladesh describes land requisition policy in the RPF 2022, Page 21.

¹⁰RPF 2020, pages 25-26.

¹¹ (1) Chief Engineer, RHD, Sarak Bhaban, Tejgaon, Dhaka, (2) Additional Project Director, RHD, SCSHIP, (3) DC, Sylhet District, (4) Superintendent of Police, Sylhet District, (5) Mayor, Sylhet City Corporation, Sylhet (6) XEN, Road Division, Sylhet, (7) UNOs of Sylhet Sadar/South Surma/Golapganj/Beani Bazar Upazila, (8) Assistant Commissioners (Land) of Sylhet Sadar/South Surma/Golapganj/Beani Bazar Upazila, (9) Officers in Charge (OCs) of Sylhet Sadar/South Surma/Golapganj/Beani Bazar Upazila, and (10) Chairman, concerned Union Parishads.



losses at household level, including structures, trees and communal structure. Any persons moving into the project area after the cut-off dates will not be entitled for compensation from DCs or any assistance from RHD. Letter of social cut-off-date is attached in Annex4-3.

Video Filming and Still Photographs

122. After issuing the cut-off-date, videography of whole alignment and still photographs of all affected structures identified within the project Right of Way (RoW). This will prevent any further encroachment and unscrupulous practice by locals.

4.1.5 RHD WILL ENSURE IMPLEMENTATION OF THE FOLLOWINGS FOR DIFFERENT INTERVENTIONS

123. The RPF 2022 presents that RHD will ensure the followings for different interventions. The RPF should be reviewed and consulted by the RAP implementing NGO and social and resettlement team of the Project Implementation Consultant (PIC) as and when required for the interventions including (a. Project Design, b. Compensation and Resettlement assistance for Affected Persons, c. Public Services and Facilities, d. Vulnerable PAPs, e. Affected Women and Female Headed Households, f. Community Engagement, and g. Grievance Redress Mechanism). (Ref. RPF, 2022).

124. The RAP has been prepared based on the social impact assessment, meaningful consultation with the affected persons and RPF 2022. The RAP contains entitlements to restore losses, institutional mechanisms and schedules, budgets, assessment of feasible income restoration mechanisms, grievance redress mechanisms, and results monitoring mechanisms. RAP included measures to ensure that the displaced persons are:

- ▶ Informed about their options and entitlements pertaining to compensation, relocation, and rehabilitation;
- ▶ Consulted on resettlement options and choices; and
- ▶ Provided with resettlement alternatives.

4.1.6 GENDER ACTION PLAN (GAP)

125. Project impact on vulnerable female-headed households will be treated on a priority basis. Women's focus groups discussions have been conducted to address specific women's issues. A separate Gender Action Plan (GAP) will be prepared for the project as World Bank Guideline.

4.1.7 COMPENSATION PAYMENT PROCEDURE

126. RHD will ensure that the properties (land, structure and non-structure assets) to be displaced by the Project will be compensated at their full RV determined by the Property Assessment and Valuation Committee (PAVC) as per the RAP. The modalities for payment of compensation and other assistance for assets, incomes and livelihoods, resettlement assistance for substituting and restoration of loss of income and workdays by the relocated households are explained below.

4.1.8 PROCEDURE OF LAND ACQUISITION AND COMPENSATION PAYMENT TO TITLE HOLDERS

127. The RPF presents the procedure of land acquisition and compensation payment process to the title holders (Ref. the RPF, 2022, pages 21-24). In case of pending compensation of title EPs beyond project implementation-phase due to some dispute, RHD will consult with World Bank for financial support for disbursement of payment. An escrow account will be established as a Deposit Account of the Public of the Republic under the Deputy Commissioner to hold Compensation fund in cases where PAPs are absent, unreachable, or where disputes delay compensation beyond the project implementation phase. In addition, a Resettlement Fund Account will be operated during the whole project period for the disbursement of Resettlement benefits including compensation for affected NTHs of the Project under a schedule Bank as per decision of the PIU. After completion of the Project, this Account will be handed over to RHD operational/Field Division as per decision of the competent authority.

4.1.9 COMPENSATION PAYMENT PROCEDURE TO THE NON-TITLE PERSONS

128. Despite the Act, 2017 has no provision to compensate affected persons without title to land, but the World Bank prescribes to address relocation and resettlement issues of the non-title affected persons as per ESF, and ESS5. Steps to be followed in paying resettlement benefits to non-title EPs:

- ▶ As per the Property Assessment and Valuation Committee (PAVC) and with reference to census-data, a final list of verified non-title APs will be prepared by the INGO;



- ▶ Unique individual identity number will be devised and created against the name of each non-title holder EP;
- ▶ Photographs of the EPs with devised unique EP ID No. will be taken and ID cards will be prepared and issued by PM/DPM/any nominated representative of PIU, RHD;
- ▶ The INGO will prepare entitle person file (EP file) and entitlement card (EC) for each EP;
- ▶ The INGO will assist the non-title holder EPs in opening Bank Accounts in their names, especially in names of both husband and wife, in case of married couple, if they do not have any Bank accounts. If the EP is a woman, ensure that the Bank account is in her name.
- ▶ The tenants of the residential houses and commercial premises will have to collect necessary documents (such as, receipt of house rent payment, trade license, etc.) as per the prerequisites for payment of resettlement assistance.
- ▶ The tenants require to be certified by owner of residential/commercial structure to sanguine their tenancy and/or identification. Certificate provided to the tenants by the owner of the structure which will be attested by the concerned-UP Chairman/Ward Councilor/Mayor of the concerned municipality;
- ▶ Wage earners/workers will have to collect certificates from the employers which will be attested by the concerned-UP Chairman/Ward Councilor/Mayor;
- ▶ EP's photograph will be attested by the concerned-UP Chairman/Ward Councilor/Mayor. Issuance of the EP ID card will be done jointly by the RHD and INGO representative through signing on the EP ID card; and
- ▶ The INGO will assist the Project/PIU/PMU in preparing payment debit voucher as per EP file and EC and those will be disbursed in Account Payee Cheque in public place or office of the Mayor/UP Chairman issuing prior notice to the EPs.
- ▶ The schematic view of the process of compensation payment to the non-title EPs is presented in Figure 4-1.

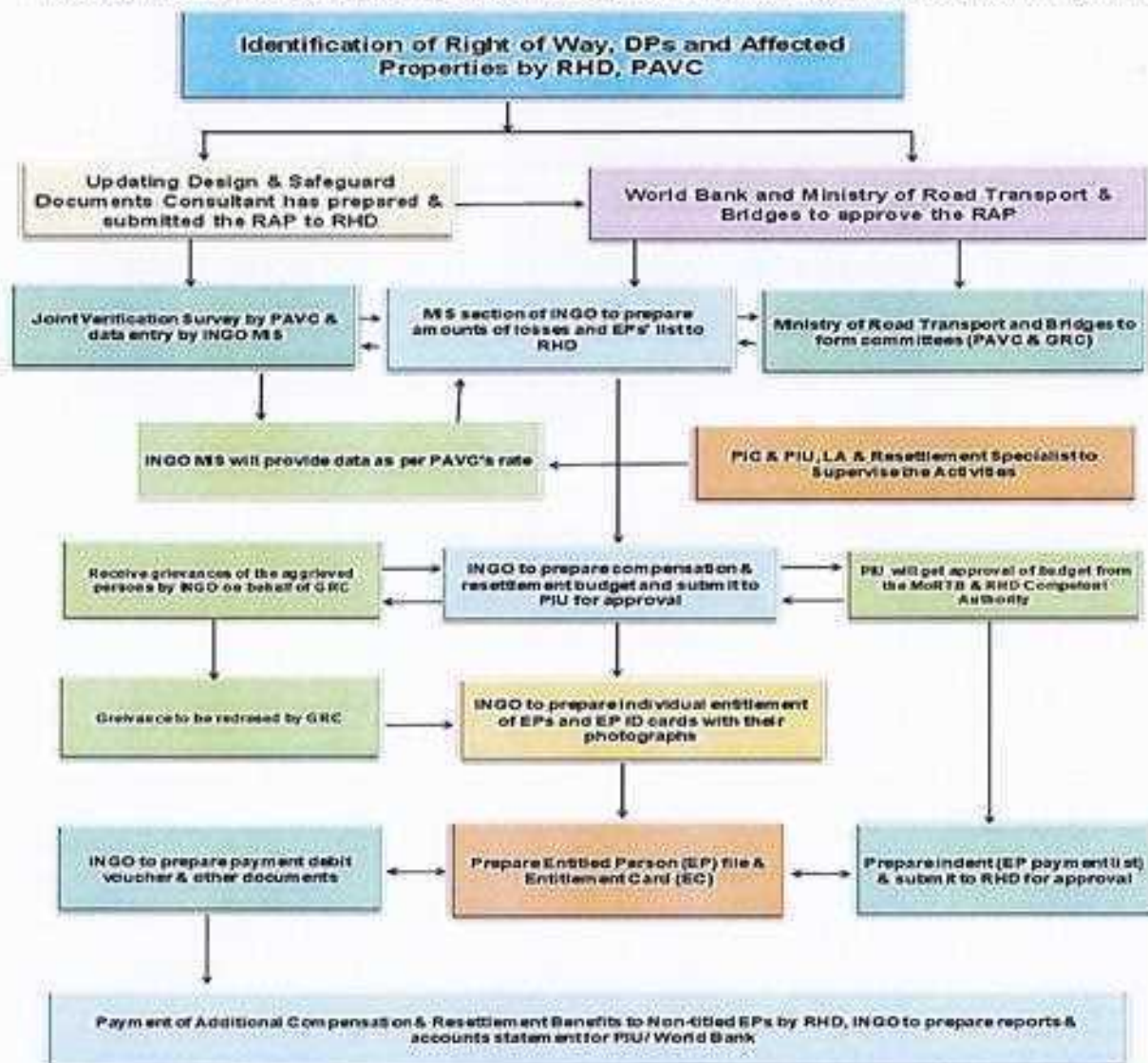


Figure 4-1: Compensation Mechanism for Non-Title Holder EPs

The Following Payment Procedure for the disbursement of Resettlement Assistance will be as:

Step-1	A Resettlement Fund Account will be opened as per decision of PIU
Step-2	INGO will prepare individual budget along with Indent, Individual EP File with necessary document and EP, EC and Debit Voucher. Then submit to the PD, RHD, Sylhet-Charkhai-Sheola Highway Improvement Project for necessary approval
Step-3	Fund will be allocated to the relevant Account as per approved Budget and Indent.
Step-4	INGO will prepare individual account payee cheques
Step-5	Cheques will be jointly signed by as per decision of PIU
Step-6	INGO will prepare a Payment Schedule in a public place along with respective PM for EP Payment
Step-7	Before starting payment, a Banner should be prepared and hang on the wall and photograph should be taken for every individual EP along with the banner.
Step-8	After payment INGO will inform the Bank to honor the disbursed cheques
Step-9	After successful payment all EP files including payment vouchers and supporting documents will be submitted to respective PM office with forwarding
Step-10	Bank Statement as per indent will be submitted to PM
Step-11	Report with accounts statement to be prepared by INGO and will be submitted to PIU
Step-12	PIU will submit necessary reports to the World Bank on regular basis

4.2 ENTITLEMENTS, ASSISTANCE AND BENEFITS

129. The entitlement, assistance and benefits have been developed in the form of an Entitlement Matrix (EM). According to the Entitlement Matrix the Assistance is non-compensation support and one-time support and Benefit is direct monetary compensation and indirect gains from infrastructure, services, or opportunities. This matrix is prepared considering GoB's policies related to the Land Acquisition and Requisition Policy (ARIPA, 2017), ESS5 of World Bank and Resettlement Policy Framework (RPF) for Access Program Bangladesh Phase 1 Project. This section is very important for the implementation of RAP. The entitlement, assistance and benefits sub-section has been shortened considering its practical requirements & usefulness for estimating the budget.

4.2.1 ELIGIBILITY POLICY AND ENTITLEMENT MATRIX**4.2.1.1 ELIGIBILITY CRITERIA**

130. All the Affected Persons (APs) irrespective of tenorial arrangements and status will be entitled to applicable compensation, assistance, allowance and resettlement benefits as per the ARIPA, 2017 and/or ESS5. An Entitlement Matrix (EM) has been prepared by bridging the gaps between GoB's law the ARIPA, 2017 and WB ESF & ESS5. Eligibility to receive compensation and assistance and resettlement benefits will be determined and limited by the cut-off date(s) including publication of notice under Section-4 of the ARIPA, 2017 for the title holders while the commencement date of census and IOL survey for the non-title holders as of July 2024 to December 2024. It is worth mentioning that the absence of legal title will not bar APs from compensation and assistance as concretely mentioned in the Eligibility and Entitlement Matrix.

4.2.1.2 COMPENSATION AND ENTITLEMENT POLICY

131. An Entitlement Matrix (EM) has been prepared based on RPF 2022 and presented in **Table 4-1**. The main contents of the EM include (i) impact category, (ii) definition of entitle persons, and (iii) proposed entitlements/compensation policy. The title-holder-affected persons and non-title-holder-affected persons under the project will be entitled to compensation, assistance, allowances, grants, etc., as per the Entitlement Matrix of the RAP.

132. The entitlement matrix for RPF was prepared in 2022 for the Sylhet-Charkhai-Sheola Highway Improvement Project under the Access Program Bangladesh Phase 1 Project. RPF EM presents entitlements for different losses at the RV. Transfer Grant (TG) includes labor & transportation cost and dismantling cost, Reconstruction Grant (RG) includes land development cost, labor & transportation cost, etc.

133. The RPF indicates that Land-for-land replacement will be offered to the affected Persons, in particular the vulnerable groups, whose livelihood depends mainly on farming/land, in near vicinity with RHD making their best efforts for it. The replacement land will similar or comparable value, of productive potential in case of agricultural land, locational advantages, and other relevant factors will be covered by the payment of full RV, Relocation Allowance, Stamp Duty of Registration cost for the purchase of alternative land, different Resettlement Benefits including vulnerable grants and livelihood restoration support. During consultation with the PAPs, the affected Persons expressed their interest in self-relocation options to maintain connectivity with the



25/03/24 K A Q C

community network. Moreover, new acquisition of land is very difficult for the Land-for-land replacement due to the scarcity of land.

134. The Entitlement Matrix is comprehensive and details the entitlement/compensation for different types of losses arising from the land acquisition for the development of this highway project. The tentative compensation estimates, and the RAP implementation budget have been worked out based on the EM. Compensation and entitlements have been identified based on impacts and losses, as described above and in other sections of this document, RPF, and other similar approved development projects in the same geographical area. The following **Table 4-1** represents the compensation and entitlement matrixes for various categories of impacts so far assessed as per census in the light of land acquisition act (ARIPA 2017), ESS5 of WB and RPF for the project.

Table 4-1: Entitlement Matrix for Sylhet-Charkhai-Sheola Highway Improvement Project	
Unit of Entitlement	Entitlements
Impact Category 1: Acquisition of Agricultural, homestead, commercial, water bodies [ponds] and other category of Land	
Legal owner(s) as identified by Deputy Commissioner (DC) in the process of CCL.	<ul style="list-style-type: none"> ▶ Cash Compensation under Law (CCL) which includes the price determined by the DC and additional 200% of DC's determined price as per the ARIPA, 2017 to be paid by DC; ▶ Replacement Value (RV) of the land as determined by Property Assessment and Valuation Committee (PAVC); ▶ If the RV is higher than the CCL, the difference i.e. top-up (RV-CCL) will be paid by RHD; ▶ The top-up will be determined in circumstance when CCL amount paid after advance income tax is lower than the Replacement Cost (RC)/Replacement Value (RV) of the acquired land, as applicable; ▶ Relocation Allowance @BDT 1000 per decimal of all categories of land to be paid by RHD; ▶ Stamp duty of Registration Cost to be reimbursed by RHD at actual for purchasing of alternative land (if any) but not exceeding the RV for the affected land; ▶ Scope to resettle project sponsored residential resettlement site for legal homestead losers. If the remaining land is unusable, compensation will be provided based on the total affected land (i.e. the actual affected land plus the remaining unusable land). The PIU in collaboration with the local government and INGO will make best efforts to identify alternative residential land instead of project sponsored residential resettlement site for the affected legal homestead losers in case of full replacement; ▶ Offering the Land-for-land replacement will be covered by the payment of full RV, Relocation Allowance, Stamp Duty of Registration cost for the purchase of alternative land, different Resettlement Benefits including vulnerable grants and livelihood restoration support.
Impact Category 2: Requisition of agricultural, homestead, commercial, water bodies (ponds) land and other categories of Land	
Legal owner(s) as identified by Deputy Commissioner (DC) in the process of CCL.	<ul style="list-style-type: none"> ▶ Rental price of land as determined by DC with consultation with the landowners and RHD following the guideline of ARIPA, 2017. ▶ Replacement Value (RV) of the land as determined by Property Assessment and Valuation Committee (PAVC); ▶ If the RV is higher than the CCL, the difference i.e. top-up (RV-CCL) will be paid by RHD; ▶ Relocation Allowance BDT 1000 per decimal of all categories of land to be paid by RHD; ▶ 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. ▶ If the land or assets are leased to a third party, in that case, income loss to the owners will be paid by RHD as recommended by PAVC. ▶ If the remaining land is unusable, compensation will be provided based on the total affected land (i.e. the actual affected land plus the remaining unusable land). ▶ Land has to be returned to the owner as original condition, and otherwise compensation has to be paid as decided by DC and landowner.
Impact Category 3: Loss of residential and commercial structures with title to land	
Legal owner(s) as identified by Deputy Commissioner (DC) in the process of CCL.	<ul style="list-style-type: none"> ▶ Cash compensation under law (CCL) which includes PWD's price and additional 100% as per the ARIPA, 2017 to be paid by DC. ▶ Replacement Value (RV) of the structures as determined by PAVC.



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Table 4-1: Entitlement Matrix for Sylhet-Charkhai-Sheola Highway Improvement Project

Unit of Entitlement	Entitlements
	<ul style="list-style-type: none"> ▶ If the RV is higher than the CCL, the difference i.e. top-up (RV-CCL) will be paid by RHD; ▶ The top-up will be determined in circumstance when CCL amount paid after advance income tax is lower than the Replacement Cost (RC)/Replacement Value (RV) of the acquired structure; ▶ Transfer Grant at actual of the affected structure including dismantling cost for non-shift able structure which to be determined by the PAVC. ▶ Reconstruction Grant at actual of the affected structure including land development, labor cost and transportation cost to be determined by PAVC. ▶ The PIU in collaboration with the local government and INGO will make best efforts to identify alternative residential or commercial site for the affected HHs in case of full replacement. ▶ The owner will be allowed to take away all salvageable materials free of cost and a notice will be issued by RHD
Impact Category 4: Loss of (squatters/vendors/encroachers etc.)	residential and commercial structures without title to land
Affected Non-title Persons, vendors and encroachers owned residential and commercial structures (shiftable and non-shiftable) built on GoB land as found during the census and identified by PAVC.	<ul style="list-style-type: none"> ▶ Replacement Value (RV) of the structures as determined by PAVC in consultation with affected HHs. ▶ The consultation process should ensure that women's perspectives are obtained and their interests factored into all aspects of resettlement planning and implementation. ▶ Replacement Value should enable the affected person to purchase or construction of housing that meets acceptable minimum community standards of quality and safety. ▶ Transaction costs should include administrative charges, reasonable moving expenses, and any similar costs imposed on affected persons will be included in RV. ▶ Transfer Grant and Development cost at actual of affected structure which will include labor cost, transportation cost, and dismantling cost for non-shiftable structure to be determined by PAVC. ▶ Special Allowance of BDT 20,000.00 (twenty thousand) for disabled, elderly headed and very poor household for male and female Tk. 30,000.00 (thirty thousand) have been prescribed in the Impact Category 14 of Entitlement Matrix for THs & NTHs according to the RPF Impact category 13. ▶ Three (3) months' income; for large-scale business 250,000.00 and small scale 150,000.00 has been prescribed in the Impact Category 9 of Entitlement Matrix for THs & NTHs according to the RPF Impact category 9 and Application Guidelines for Loss and Entitlements (Appendix 9). ▶ For wage earner 90 days' wage @ 500/= day and employee three (3) months' salary has been prescribed in the Impact Category 10 of Entitlement Matrix for THs & NTHs according to the RPF Impact category 10. ▶ Two (2) months' rent for owner and tenants; additional 25% tenants as moving allowance have been prescribed in the Impact Category 11 of Entitlement Matrix for THs & NTHs as per RPF Impact category 11. ▶ The PIU in collaboration with the local government and INGO will make best efforts to identify alternative residential or commercial site for the affected HHs in case of full replacement. ▶ The owner will be allowed to take away all salvageable materials free of cost and a notice will be issued by RHD.
Impact Category 5: Loss of Common/Community Property Resources (CPR) with or without Title to land.	
Impact Category 5 (a): Loss of Common/Community Property Resources (CPR) with Title to land.	
Legal owners (land, structures, trees or any other assets) identified by DC in the process of CCL,	<p>Entitlement A (under CCL):</p> <ul style="list-style-type: none"> ▶ A.1: Cash Compensation under Law (CCL) for land which includes the price determined by the DC and additional 200% as per the ARIPA, 2017 to be paid by DC; ▶ A.2: Cash compensation under law (CCL) including additional 100% for assets other than land as per the ARIPA, 2017 to be paid by DC; <p>Entitlement B (under Resettlement):</p> <ul style="list-style-type: none"> ▶ If the RV of land, structure, trees and other assets is higher than the CCL, the difference i.e. top-up (RV-CCL) will be determined by PAVC;



Table 4-1: Entitlement Matrix for Sylhet-Charkhai-Sheola Highway Improvement Project

Unit of Entitlement	Entitlements
	<ul style="list-style-type: none"> ▶ The top-up will be determined in circumstance when CCL amount paid after advance income tax is lower than the Replacement Cost (RC)/Replacement Value (RV) of the acquired structure; ▶ Transfer Grant at actual of the affected structure which will be included the labor cost, transportation cost and Dismantling cost to be determined by PAVC. ▶ Reconstruction Grant at actual of the affected structure which will include the land development, labor and transportation cost to be determined by PAVC. ▶ The owner/managing committee will be allowed to take away all salvageable materials free of cost and a notice will be issued by RHD. 'OR' instead of the above entitlements (A.2 and B): ▶ Project will construct a new Community Structure in consultation with the community and /or managing committee in addition to the CCL for Land (A.1 as per By-laws of ARIPA 2017) in case of full replacement. ▶ No Community Property can be demolished until a new one is constructed
Impact Category 5(b): Loss of Common/Community Property Resources (CPR) without title to land	
<p>Socially recognized owners/non-title (structures, trees or any other assets) affected on the ROW as identified by Census and verified by PAVC.</p>	<ul style="list-style-type: none"> ▶ Replacement Value (RV) of the structures, trees and other assets as determined by PAVC. ▶ Transfer Grant at actual of the affected structure which will include the labor cost, transportation cost and Dismantling cost to be determined by PAVC. ▶ Reconstruction Grant at actual of the affected structure which includes land development, labor and transportation cost to be determined by PAVC. ▶ The owner/managing committee will be allowed to take away all salvageable materials free of cost and a notice will be issued by RHD. ▶ No Community Property can be demolished until a new one is constructed.
Impact Category 6: Loss of timber and fruit trees, bamboo and banana groves	
<p>Legal owner(s) as identified by Deputy Commissioner (DC) in the process of CCL.</p>	<ul style="list-style-type: none"> ▶ Cash compensation under law (CCL) for trees including Bamboo and Banana which includes Department of Forest's price and additional 100% as per the ARIPA, 2017 to be paid by DC;
<p>Socially recognized owners of trees grown on public or other land, such as social Forestry with the department of Forest, society, leaseholder etc. as identified by census and verified by PAVC.</p>	<ul style="list-style-type: none"> ▶ Replacement Value (RV) of the trees including Bamboo and Banana as determined by PAVC; ▶ If the RV of trees including Bamboo and Banana is higher than the CCL, the difference i.e. top-up (RV-CCL) will be paid by RHD for the Title holders/Social Forestry. ▶ The top-up will be determined in circumstance when CCL amount paid after advance income tax is lower than the Replacement Cost (RC)/Replacement Value (RV) of the acquired trees; ▶ Fruit-bearing trees without timber: If the tree is at or near fruit-bearing stage, the estimated current market value of the fruit to be determined by PAVC. ▶ Fruit-bearing trees with timber: RV for the timber and estimated current market value of the fruit to be determined by PAVC. ▶ Banana groves: RV of Banana trees and estimated current value of one-time crop of each full-grown tree. ▶ Compensation for immature trees owned by Social Forestry under the Forest Department: The RV will be determined by PAVC and paid by RHD. ▶ The owner will be allowed to take away all salvageable materials free of cost and a notice will be issued by RHD.
Impact Category 7: Loss of standing crops/fish stock	
<p>Owner cultivators as identified in joint verification by DC and RHD</p>	<ul style="list-style-type: none"> ▶ Cash compensation under law (CCL), including an additional 100% to be paid by DC. ▶ 100% top-up payment on DC's CCL for legal owners and sharecroppers. ▶ The top-up will be determined in circumstance when CCL amount paid after advance income tax is lower than the Replacement Cost (RC)/Replacement Value (RV) of the acquired standing crops/fish stock. ▶ One-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. ▶ Owners will be allowed to harvest crops/fish stock.



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Table 4-1: Entitlement Matrix for Sylhet-Charkhai-Sheola Highway Improvement Project	
Unit of Entitlement	Entitlements
Socially recognized owners of crops/fish stock as identified by census and verified by PAVC	<ul style="list-style-type: none"> ▶ Replacement Value (RV) of the standing crops/fish stock cultivated on GoB land by non-titleholders as determined by PAVC; ▶ One-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. ▶ Owners will be allowed to harvest crops/fish stock.
Impact Category 8: Loss of leased/mortgaged in land/ponds	
Leaseholder with legal papers without title to land and socially recognized lessee or sharecropper, in case of customary informal tenancy arrangements, including socially recognized agreements verified by Census and PAVC.	<ul style="list-style-type: none"> ▶ Replacement Value (RV) of crops/fish stock as determined by PAVC; ▶ Outstanding lease money back to the lessee by the owner as per agreement. ▶ Dislocation Allowance @BDT 1000 per decimal of land/pond area to be finalized as per the recommendation of PAVC.
Impact Category 9: Loss of income from displaced commercial/industrial premises (Owner Operated)	
Any proprietor or businessmen or artisan operating in premises as identified by DC during joint survey & CCL and/or during census and verified by PAVC.	<ul style="list-style-type: none"> ▶ 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. ▶ If the One-time assistance for the Title holders is higher than the CCL, the difference i.e. top-up (One-time assistance - CCL).
Impact Category 10: Temporary Loss of Income (wage earners in agriculture, commerce & small business and industry) for title and non-title	
Regular wage earners must have an employment record for 06 months excluding owners or employer as identified during census and verified by PAVC under acquisition and NTH.	<ul style="list-style-type: none"> ▶ One-time Grant to cover temporary loss of regular wage income @ average wage/day prevalent at that point of time in the locality for 30 days for wage labor or as determined by PAVC. ▶ Income and livelihood restoration assistance if applicable under vulnerable category, to be created by the project.
Impact Category 11: Loss of income from rented out and access to rented-in residential /commercial premises.	
Owner of the rented-out premises as identified during Census and verified by PAVC Household/Person rented-in (tenant) any such structure as identified during Census and verified by PAVC	<ul style="list-style-type: none"> ▶ 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. Actual shifting assistance will be calculated and compensated to be determined by PAVC.
Impact category 12: Adverse impact on host population due to relocation of PAPs:	
12 (a): Loss of Toilet	
Owner with Legal Title as identified by DC/Socially recognized owner identified during census and verified by PAVC	<ul style="list-style-type: none"> ▶ Cash compensation under law (CCL) including an additional 100% to be paid by DC for TH. ▶ Replacement Value (RV) of the toilet as socially recognized secondary NTH structure will be paid by RHD as determined by PAVC. ▶ The owner will be allowed to take away all salvageable materials free of cost and a notice will be issued by RHD.
12 (b): Loss of Tube well	
Owner with Legal Title as identified by DC/Socially recognized owner identified during census and verified by PAVC	<ul style="list-style-type: none"> ▶ Cash compensation under law (CCL) including an additional 100% to be paid by DC for TH. ▶ Replacement Value (RV) of the tube well as socially recognized secondary NTH structure will be paid by RHD as determined by PAVC. ▶ The owner will be allowed to take away all salvageable materials free of cost and a notice will be issued by RHD. ▶ In case of new installation of the tube well, water will be tested in a laboratory for the quality analysis with the assistance of concerned Contractors.
12 (c): Disconnection of utilities (gas, electricity, telephone, water, sewerage, etc.)	
Owner with Legal Title as identified by DC	<ul style="list-style-type: none"> ▶ The cost for loss of utilities connection will be paid by DC. ▶ The owner will be allowed to take away all salvageable materials free of cost and a notice will be issued by RHD.
Impact category 13: Loss of graves/community graves/Tomb/cremation place on private or government land	
Owner with Legal Title/ Socially recognized hereditary right on the ROW as identified during census and verified by PAVC	<ul style="list-style-type: none"> ▶ One time grant BDT 40,000 for each grave of community graveyard/family grave/tomb/cremation place to be paid by RHD to cover the assistance of relocation, reburial for TH/NTH in addition to the compensation for land, structure, trees and other resettlement benefits.
Impact category 14: Severely affected and vulnerable HHs and livelihood assistance	



Table 4-1: Entitlement Matrix for Sylhet-Charkhai-Sheola Highway Improvement Project	
Unit of Entitlement	Entitlements
Persons losing more than 10% of their income from all sources and/or TH/NTH vulnerable households whose annual income is less than or equal to BDT 1,44,000 ¹⁷ and/or the households with disabled or handicapped and/or very poor elderly i.e. ≥ 65 years of age for both male & female headed as identified during census and verified by PAVC.	<ul style="list-style-type: none"> ▶ Income Restoration grants for the persons losing more than 10% of their income from all sources at least 6 (six) months based on 6 Man on the minimum wages prevalent at the point of time to be determined by PAVC. ▶ Arrangement of Skill Training Program for each household including vendors and squatters. ▶ Special Assistance of a one-time payment of BDT 50,000/- for vulnerable household as each female-headed, disabled-headed, elderly-headed and poor household as decided by PIU. ▶ Assisting credit support for the income generation of Persons losing more than 10% of their income from all sources, vendors and squatters from the local credit operating organizations with the assistance of implementing NGO.
Impact category 15: Unforeseen adverse impacts	
Households/persons affected by any unforeseen impact identified during RAP implementation as identified by PAVC & GRC	▶ Entitlement will be determined as per the Entitlement Matrix and PAVC price.
Impact category 16: Construction-Induced Impact	
Title and non-title holders or any type of asset owners during construction.	▶ Entitlement will be determined as per the Entitlement Matrix and PAVC price. The owner will be allowed to take away all salvageable materials free of cost and a notice will be issued by RHD.

4.3 RELOCATION AND RESETTLEMENT

135. This section discusses the relocation and resettlement plan for the affected PAPs. Acquisition of 168.4303 acres of land for the development of proposed highway has an impact on physical displacement, economic displacement and both physical and economic displacement.

4.3.1 AFFECTED PAPS REQUIRED RELOCATION

136. Table 4-2, Table 4-3 & Table 4-4 show that the project interventions will cause full/partial dislocations of 269 residential HHs, 1,079 commercial HHs, 109 residential-cum-commercial HHs, 67 CPRs, and 77 other entities losing primary and secondary structures are to be physically and/or economically displaced due to the project. Some partially affected residential households will be able to stay in their residual land while fully affected residential HHs require relocation in their residual and other available land. Only the entities losing more than 90% of their structures and having no residual land, squatters and tenants will be needed relocation elsewhere.

4.3.2 PHYSICAL DISPLACEMENT AND RELOCATION OF RESIDENTIAL HHs

137. Table 4-2 shows that a total of 269 residential households including 225 THHs, 44 NTHHs will be affected. Their structures will be displaced and relocated. Out of 269 affected HHs, where 127 HHs (including 90 THHs and 37 NTHHs) need relocation while 142 HHs (135 THHs and 7 NTHHs) do not require to relocate their structures due to the land acquisition in the project area. It is to be noted that these affected residential HHs will require minor repairs, renovate and shift their houses in their residual land only. Lot wise detailed information on displacement and relocation of residential HHs is presented in Table 4-2.

Category of Loss Due to Project Intervention	Units	Displacement of Affected HHs				Requirement of Relocation of Affected Residential HHs		
		Lot-1	Lot-2	Lot-3	Total	Not Required	Required	
Residential HHs	THHs	No	112	60	53	225	135	90
	NTHHs	No	17	21	6	44	7	37
	Total	No	129	81	59	269	142	127

Source: Census Survey conducted by BCL, July – December 2024

¹⁷Based on Bangladesh Bureau of Statistics (BBS 2022) Household Income and Expenditure Survey (HHES) data, the national poverty level of the affected

HHs has been considered up to BDT 144,000 per year (12,000 per month) for each HH following the calculation below.

(i) Average lower poverty line at the national level in 2022 = BDT 2755/person/month

(ii) Average household size at the national level in 2022 = 4.26

(iii) Monthly Revenue for vulnerable household = BDT 2755*4.26 = BDT 11,736 (Rounded up BDT 12,000 per month)

4.3.3 ECONOMIC DISPLACEMENT (RELOCATION OF HHS LOSING BUSINESS ENTITIES)

138. **Table 4-3** shows that total 1079HHs/ businesses, including 448 THHs and 631 NTHHs will be affected. Their structures will be displaced and relocated. Out of 1,079 affected HHs, where 856 affected business entities need relocation while 223 business entities do not require to relocate their structures due to the land acquisition in project area. Lot wise detailed information on displacement and relocation of businesses is presented in **Table 4-3**.

Category of Loss Due to Project Intervention		Units	Displacement of Affected Entities				Requirement of Relocation of Affected Commercial HHs /Businesses	
			Lot-1	Lot-2	Lot-3	Total	Not Required	Required
Commercial HHs /Business Entities	THHs	No.	273	137	38	448	197	251
	NTHHs	No.	274	323	34	631	26	605
	Total	No.	547	460	72	1,079	223	856

Source: Census Survey conducted by BCL, July - December 2024

4.3.4 COMBINATION OF PHYSICAL AND ECONOMIC DISPLACEMENT

139. **Table 4-4** shows that 109 HHs will lose both residences and businesses (residential-cum-commercial structures) due to the project. These structures will be displaced and relocated. Out of 109 HHs and businesses, 98 THHs and 11 NTHHs, 38 affected HHs losing residential-cum-commercial structures need relocation while 71 HHs do not require to relocate their structures due to the land acquisition in project area. Lot wise detailed information on displacement and relocation of residential HHs and businesses is presented in **Table 4-4**.

Category of Loss Due to Project Intervention		Units	Displacement of Affected Entities				Requirement of Relocation of Affected Residential-cum-commercial HHs	
			Lot-1	Lot-2	Lot-3	Total	Not Required	Required
Residential HHs & Businesses (Residential-cum-Shops)	THHs	No.	57	22	19	98	66	32
	NTHHs	No.	3	6	2	11	5	6
	Total	No.	60	28	21	109	71	38

Source: Census Survey conducted by BCL, July - December 2024

4.3.5 DISPLACEMENT OF COMMUNITY PROPERTY RESOURCES (CPRS) AND OTHER ENTITIES AFFECTED BY PRIMARY AND SECONDARY STRUCTURES

140. **Table 4-5** shows displacement of 67 CPRs and 77 other entities including mosques, schools, madrasah, graveyard, and other affected entities. Out of 67 CPRs (33, 21 and 13 in Lot-1, 2 & 3 respectively), where 8 affected CPRs losing primary and secondary structures need relocation while 59 CPRs do not require to relocate their primary and secondary structures due to the land acquisition in project area. Out of 77 other entities (48, 25 and 4 in Lot-1, 2 & 3 respectively), where 53 affected other entities losing primary and secondary structures need relocation while 24 other entities do not require to relocate their primary and secondary structures due to the land acquisition in the project area. Detailed information and list of CPRs and other entities have been attached as **Annex-2(Table 2-4)**.

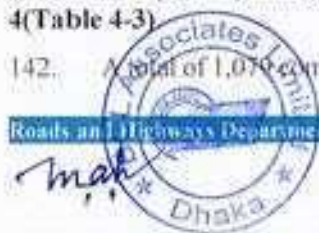
Category of Loss Due to Project Intervention		Units	Displacement of Affected CPRs and Other Entities				Requirement of Relocation of Affected Residential CPRs and Other Entities	
			Lot-1	Lot-2	Lot-3	Total	Not Required	Required
Community Property Properties (CPR)	No.		33	21	13	67	59	8
Other Entities	No.		48	25	4	77	24	53
Grand Total	No.		81	46	17	144	83	61

Source: Census Survey conducted by BCL, July - December 2024

4.3.6 RELOCATION OPTIONS

141. Relocation options were obtained and documented during census, IOL and Socioeconomic survey. Indirectly informed choice and explanation on relocation options were given. A total of 269 residential HHs will be affected, where 225 (83.64%) THHs and 44 (16.36%) NTHHs. They are losing residential land, and structures on private and RHD land due to the land acquisition and 216 (80.30%) residential HHs opted for self-relocation while only 25 (9.29%) HHs urged for project assistance to identify land or Government land (Khash land) for relocation, 20 (7.43%) HHs preference on self-relocation over project developed relocation site if any, and on the other hand 8 (2.97%) HHs agreed for self-rehabilitation together with neighbors. Details are presented in **Annex-4(Table 4-3)**.

142. A total of 1,079 Commercial HHs will be affected, where 448 (41.52%) THHs and 631 (58.48%) NTHHs.



Relocation options of affected 843 (78.1%) commercial HHs opted for self-relocation while only 89 (8.25%) HHs urged for project assistance to identify land or Government land (Khash land) for relocation, 125 (11.58%) HHs preference on self-relocation over project developed relocation site if any, and on the other hand 22 (2.04%) HHs agreed for self-rehabilitation together with neighbors for losing commercial land, structures and businesses on private and RHD land. Details are presented in Annex-4 (Table 4-4).

143. A total of 109 residential-cum-commercial HHs will be affected, where 98 (89.91%) THHs and 11 (10.09%) NTHHs on private and RHD land due to the land acquisition. On the other hand, 91 (83.49%) HHs opted for self-relocation while only 10 (9.17%) HHs urged for project assistance to find land for relocation their residential households and businesses, 6 (5.50%) HHs preference on self-relocation over project developed relocation site if any, and 2 (1.83%) HHs agreed for self-rehabilitation together with neighbors. Details on relocation options of affected THHs & NTHHs losing homestead & residences and/or businesses on private and RHD land are presented as Annex-4 (Table 4-5).

4.3.7 PROJECT RELOCATION STRATEGY

144. Resettlement options were obtained from market surveys, along with surveys of individual residential households, businesses, CPRs, etc., during the census, Inventory of Losses (IOL) and Socioeconomic Survey (SES). Subsequently, the feedback from the consultations have been also taken into account in designing the resettlement options that are practical and realistic in the context of the Sylhet-Charkhai-Sheola Highway Improvement Project in Bangladesh (one of the most densely populated countries in the world where vacant land is scarce, in general), that at the same time also comply with the GoB and the Bank's requirements. Besides, the relocation strategy/options also consider the feedback of the respondents from consultations; their choices, ideas and priorities. It is observed from these feedbacks that most of the affected residential households would prefer to stay at nearby places of their affected residences and/or businesses for mainly reasons, such as they would like to (i) sustain income earning from unaffected land & assets, and livelihoods, and (ii) remain close to their neighbors and relatives. Effectively, it was found that 216 of affected residential HHs, 843 of affected businesses and 91 of affected HHs losing both their residences and businesses have chosen self-relocation options [ref. Annex 4 (Tables 4-3, 4-4 & 4-5)] whereby they'd relocate at a nearby place or simply continue in the remaining unaffected land/structures by building their businesses and livelihood. Some affected households have looked for plots to purchase land in advance for their self-relocation whereby they can relocate their houses in their residual land/purchased land in the vicinity. It should be noted that in Bangladesh the linear projects do not have provision of resettlement sites considering that development of resettlement site might displace additional numbers of affected households given that existing reality due to scarcity of land as Bangladesh is densely populated. This reality is also very true to the proposed the Sylhet-Charkhai-Sheola Highway Improvement Project. Therefore, this project does not keep provision of resettlement sites considering the above-mentioned reality. However, the affected households/persons who prefer to relocate to nearby places, RHD will support them to find such location including on administrative/bureaucratic hassles, such as registering a new land plot, negotiating the price along with paying them grants or compensation as per the entitlement matrix. RHD, with assistance from INGO, will also support those affected residential households and businesses, who cannot manage relocation by themselves. INGO will search for suitable land so that these PAPs will be able to relocate through self-relocation process. INGO will also assist them in installing tube wells and slab latrines at their relocation places. More specifically, RHD with the assistance of INGO will liaise with respective offices of other government departments for these PAPs in getting utilities such as electricity, water, gas, etc., connection after their relocation.

145. Title households, squatters' settlement and markets had been developed in the Sylhet-Charkhai-Sheola Highway Improvement Project area over the decades considering convenience in maintaining their life and livelihoods. During census, IOL and socioeconomic survey and consultation meetings, the potential affected people were asked to mention their relocation options. It was found that partially affected residential structures and commercial premises will be useable through minor repair/renovation works. Most of the residential households and some owners of commercial structures have residual land for relocation in the Sylhet-Charkhai-Sheola Highway Improvement Project area described later. They want to maintain relationships with kinship groups, and with their existing communities. Thus, displaced households, businesses and management committees of Community/Common Property Resources (CPRs) preferred self-relocation using compensation money, assistance and grant. CPR authority will be responsible for reconstructing the affected CPRs. Technical advice will be provided to the CPR authority as per consultation.

146. During the census and IOL survey, four relocation options have been offered e.g., (i) Self-managed permanent relocation; (ii) Relocation in suitable places with project assistance for identification in collaboration with the local government and INGO; (iii) Relocation in urban areas with project assistance for identification in collaboration with the local government and INGO; and (iv) Relocation at nearby villages with project assistance



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for identification in collaboration with the local government and INGO. The relocation options were determined through census & IOL survey, consultation meetings and small group discussion during preparation of this RAP. Affected shops/business institutions will be relocated in the vicinity of their own in a cluster manner for continuing economic activities uninterrupted.

147. Project Manager (PM) of PIU will work along with Individual Consultants of the project, such as the Land Acquisition and Resettlement Specialist (LARS) and Social Development & Public Relations Expert to resolve relocation aspects of the displaced households and commercial premises. Necessary assistance if required will be taken during the consultation with the District and Upazila administration, will find alternative land (preferably Khash or any agency's land) in the project area for relocation of the displaced households and shops. They can also be temporarily relocated to nearby space with permission of the concerned competent authority for the time being until the new site for their self-relocation is ready. However, displaced households and shops are encouraged for self-relocation in group manner or individual.

4.3.8 SELF RELOCATION OF RESIDENTIAL AND COMMERCIAL ENTITIES

148. Land acquisition in the Sylhet-Charkhai-Sheola Highway Improvement Project area will cause displacement and major impacts of residential and commercial entities and community properties.

149. It is noted that existing developed land suitable for relocation at affected households and businesses are scarce, and plenty of vacant public land is also not available at suitable location for the said purpose. Further, the residential HHs are interested in being shifted in the vicinity of their present location by re-constructing/renovating their structure to avail themselves of the existing facilities which they were enjoying earlier, for example access to the road, mutual support from the kens and other civic facilities from their community. Since government sponsor relocation site is not feasible for the HHs affected in the Sylhet-Charkhai-Sheola Highway Improvement Project area, they are encouraged permanent "self-relocation". The affected households will purchase homestead land/suitable land for developing as homestead in the vicinity of their own for relocation and resettlement. This will also minimize social disruption in the resettlement process and allow people to remain together within kin groups for mutual support. It is further to be noted that both the title holders and the squatters/encroachers have expressed their willingness for self-relocation. About 216 of displaced residential HHs and 843 commercial premises have opted for self-relocation Annex-4 (Tables 4-3 & 4-4), which have been documented in their respective IOL forms and considered their informal declaration. The affected shops on private and government land along the project road are to be relocated in a cluster manner for restoring their business and livelihood as well. Again, cluster manner relocation by themselves is encouraged for continuing business and restoring livelihood. Shops affected by private lands (owner-operators and tenants) will be relocated mostly on the new structures to be constructed by the landowners while the NTHs/squatters will need assistance from the project through the INGO to find alternative land for relocation. According to the opinion of the displaced NTHs/squatters as affected businessmen, they will be relocated by themselves in the vicinity, if necessary, assistance is provided by the project. Considering of the magnitude of impacts on the squatters and tenant businessmen, the project can provide minimum civic amenities including internal road, drain, water supply and sanitation facilities under the contingency head of the resettlement budget, if they arrange and develop the land for self-managed relocation. Detailed information on the key factors for relocation of residential HHs and businesses are presented as Annex-4.

4.3.9 FULLY AND PARTIALLY AFFECTED RESIDENTIAL HHS (PRIMARY STRUCTURES)

150. According to findings of Census and IOL data presented in Table 2-4, Table 2-5 & Table 2-6 show that 97 residential THHs will be fully affected including 38, 24, and 35 residential THHs in Lot-1, 2 & 3 respectively under the Sylhet-Charkhai-Sheola Highway Improvement Project area. On the other hand, a total of 83 residential THHs will be partially affected including 44, 27 and 13 in Lot-1, 2 & 3 respectively. A total of 13 residential NTHHs will be fully affected including 3, 5 and 5 NTHHs in Lot-1, 2 & 3 respectively. On the other hand, only 3 residential NTHHs will be partially affected under Lot-3.

4.3.10 FULLY AND PARTIALLY AFFECTED BUSINESSES/SHOPS (PRIMARY STRUCTURES)

151. According to findings of Census and IOL data presented in Table 2-4, Table 2-5 & Table 2-6 show that 271 commercial THHs will be fully affected including 154, 86, and 31 commercial THHs in Lot-1, 2 & 3 respectively under the Sylhet-Charkhai-Sheola Highway Improvement Project area. On the other hand, a total of 168 commercial THHs will be partially affected including 112, 50 and 6 in Lot-1, 2 & 3 respectively. A total of 594 commercial NTHHs will be fully affected including 266, 298 and 30 NTHHs in Lot-1, 2 & 3 respectively. On the other hand, only 23 commercial NTHHs will be partially affected including 2, 19 and 2 NTHHs in Lot-1, 2 & 3 respectively.



4.3.11 FULLY AND PARTIALLY AFFECT RESIDENTIAL-CUM-COMMERCIAL HHS (PRIMARY STRUCTURES)

152. According to findings of Census and IOL data presented in Table 2-4, Table 2-5 & Table 2-6 total 46 residential and/or businesses/shops of THHs (in commercial and residential-cum-commercial structures) will be fully affected including 24, 9 and 13 in Lot-1, 2 & 3 respectively. On the other hand, a total of 94 residential and/or businesses/shops of THHs will be partially affected including 31, 12 and 6 residential and/or businesses/shops of THHs in Lot-1, 2 & 3 respectively under the Sylhet-Charkhai-Sheola Highway Improvement Project area. Total 7 residential and/or businesses/shops of NTHHs (in commercial and residential-cum-commercial structures) will be fully affected including 1, 5 and 1 in Lot-1, 2 & 3 respectively. On the other hand, a total of 3 residential and/or businesses/shops of NTHHs will be partially affected including 2, and 1 residential and/or businesses of NTHHs in Lot-1 & 2 respectively.

4.3.12 RESIDENTIAL HOUSES/BUSINESSES AND RELOCATION STRATEGIES AND PLAN

153. This section presents project impacts on residential houses/businesses and relocation strategies and plans. During reconnaissance visits and conducting census, IOL and socioeconomic survey, it was repeatedly reported by the Project Displaced Persons/Households that they are unwilling to relocate at distant places from their affected residences/commercial premises. They prefer to stay nearby considering their unaffected main sources (land & assets and livelihoods) of income earnings. The reasons behind this are as follows:

- i. In some cases, partially affected residential/commercial structures will be useable through minor repair/renovation works,
- ii. Most of the residential HHS & some owners of commercial structures have residual land for their relocation.
- iii. They want to stay near their kinship groups and their communities,
- iv. They deserve to sustain existing patterns of group and samaj organization (supra-kinship),
- v. They know better that they will have very limited scope of livelihoods opportunities and/or facilities and will also encounter a lack of locational advantages if they would have to relocate in distanced resettlement sites,
- vi. Losing easy access to their previous cultural property (such as places of worship [e.g., mosque/temple], pilgrimage centers, and graveyards/cemeteries), etc.

154. These multiple practical factors have profound impact on non-inclusion of provision of resettlement sites in the Sylhet-Charkhai-Sheola Highway Improvement Project.

155. The squatters and tenant business operators will need project assistance from RHD for self-managed group relocation. The RAP budget includes compensation for this purpose as per the entitlement matrix. The concerned PAPs will move to new location after receiving compensation, typically at a nearby site/location. Concentration of the squatters and tenant businessmen are identified in Lot1, Lot-2 & Lot-3 under the Sylhet-Charkhai-Sheola Highway Improvement Project area. Degree of impacts in Lot-1, Lot-2 & Lot-3 under the Sylhet-Charkhai-Sheola Highway Improvement Project area and potential relocation sites & options are given below:

Lot-1:

156. Total 736 HHs will be affected, of which 547 HHs will lose businesses/shops, 129 HHs will lose residential premises, and 60 HHs will lose residential-cum-commercial structures in Lot-1 under the Sylhet-Charkhai-Sheola Highway Improvement Project (Ref. Table 2-3). Most of (some of) the residential HHs has residual land owners of affected commercial structures have residual land in Sylhet Sadar, South Surma & Golapganj upazilas (Kadomtali Muktijudda Square to Golapganj Bazar), Chainage 0.000 Km to 18.900 km.

157. The findings show that 433 affected businesses require assistance for their relocation in Lot-1. The affected 547 businesses are being operated of which 273 premises are on private land, 274 structures are on the RHD land (Ref. Table 4-3). It was revealed during the study that despite the (273) highest no. of commercial structures was owned by THHs, but majority of them are not directly involved in businesses, rather they have rented out their commercial structures to tenants. Some squatters (businessmen) are operating their businesses and have also rented out part of the commercial structures built on government land. Tenants have been operating different businesses in rented in commercial structures. There are 33 CPRs and 48 other entities are also affected in Lot-1 under the Sylhet-Charkhai-Sheola Highway Improvement Project area (Ref. Table 2-7).

158. During reconnaissance visits and conducting the census, IOL, and socioeconomic survey, it was



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repeatedly reported by the Project Displaced Persons/Households that they would relocate to residual land/purchased land near their affected residences/commercial premises. Then they can utilize their unaffected land & assets, and livelihoods.

159. These factors profoundly impact the non-inclusion of the provision of resettlement sites in the Sylhet-Charkhai-Sheola Highway Improvement Project. Thus, it is planned that the RHD will assist the PAPs through INGO in group and cluster relocation, including their businesses. The assistance to such PDPs will be limited to liaison with respective offices in getting utility services, such as electricity, water, gas, etc., connections, and installing tube wells and slab latrines. Assistance to be given to them in looking for suitable land for their self-relocation by RHD through the assistance of INGO.

Relocation Plan:

- ✓ A few residential HHs will be relocated on residual land and other alternative land after getting compensation for their affected land and structures.
- ✓ Some owners of affected commercial structures are planning to relocate their commercial structures on purchased land after receiving compensation for commercial land structures from DC Office, Sylhet.
- ✓ Some owners of affected commercial land and structures rented out structures to businessmen for their livelihood at pre-project time. They do not have any residual land, and there is also no alternative land nearby where they can relocate their commercial structures. They are searching for suitable alternative land to relocate their commercial structures. They want to restore their age-old renting-out structures for their livelihoods.
- ✓ Some potential owners of private land adjacent to the Sylhet-Charkhai-Sheola Highway Improvement Project may construct buildings. They can rent out their buildings to the tenants to earn house rent as their livelihood (an income source). As a result, tenants of affected commercial buildings may shift their affected businesses to the rented in newly constructed buildings to restart their businesses.
- ✓ The squatter businessmen and tenants of commercial structures of NTHHs will need assistance from the project to find alternative land for relocation, since they have no scope to stay in the RHD right of way in the Sylhet-Charkhai-Sheola Highway Improvement Project area. They are searching for alternative land and/or commercial structures in the vicinity.
- ✓ Tenants of commercial structures will shift their affected businesses into new structures as tenants like pre-project time.
- ✓ The squatter businessmen and tenants of commercial structures will need assistance through INGO to find alternative land for relocation, since they have no scope to stay in the RHD right of way. They are searching for alternative land in the vicinity. Otherwise, they will rent in structures at other markets/newly constructed structures for restarting their businesses.
- ✓ There is adequate amount of private land available adjacent to the RoW. Those private landowners are interested in constructing new structures to meet increased demand for renting in.
- ✓ The owners of fully affected businesses/shops are looking for suitable nearby land for relocating their affected business/shops.
- ✓ The owners of partially affected businesses/shops will shift/relocate their businesses backward from the RoW to possible extent for taking advantage of the Sylhet-Charkhai-Sheola highway.
- ✓ Affected businesses will be relocated to newly constructed structures by themselves.
- ✓ There is a huge demand for commercial structures for shifting affected businesses of the tenants. Accordingly, potential owners of land are planning to construct new buildings in the land nearby the RoW to meet that demand. Thus, affected tenants will be able to relocate/shift their businesses in newly built structures for re-starting and continuing their businesses.
- ✓ The squatter-businessmen will get compensation for their affected structures. In addition, they will get a business grant for their business income loss. They are planning to rent in newly constructed structures for operating their businesses in this locality.
- ✓ A considerable number of affected businessmen are planning to self-relocate by spending and investing their received compensation, assistance, allowance, grants, etc.

Lot-2:

160. A total of 569 HHs will be affected in Golapganj & Beani Bazar Upazilas (after Golapganj Bazar before Sheola Bridge), Chainage 18.900 km to 36.900 km. Out of 569 HHs, where 460 HHs will lose businesses/shops, 81 HHs will lose residential premises, and 28 HHs will lose residential-cum-commercial structures due to the proposed widening of the highway in Lot-2 under the Sylhet-Charkhai-Sheola Highway Improvement Project (Ref. Table 2-3).



161. The findings show that 366 affected businesses require assistance with relocation in Lot-2. The affected 460 businesses are being operated of which 137 premises are on private land, 323 structures are on the RHD land (Ref. Table 4-3). It was revealed during the study that 137 numbers of commercial structures was owned by THHs, but majority of them are not directly involved in businesses, rather they have rented out their commercial structures to tenants. Some squatters (businessmen) are operating their businesses and have also rented out part of the commercial structures built on government land. Tenants have been operating different businesses in rented in commercial structures. There are 21 CPRs and 25 other entities are also affected in Lot-2 under the Sylhet-Charkhai-Sheola Highway Improvement Project area. (Ref. Table 2-7).

162. The affected people have demanded adequate compensation for affected businesses and structures as soon as possible. They have stated that they would invest compensation money to relocate their affected businesses and commercial structures as well for re-starting businesses. It was reported that they discussed with the owners of adjacent land to know whether they would construct buildings and structures on their land or not. They will construct new structures for earning income through renting out structures to the tenants who will use their newly constructed structures for restarting and operating businesses. Similarly, some owners of affected structures have adequate residual land who will also construct structures for renting out newly built structures in their residual and other adjacent land. RHD with assistance from INGO will assist them with resettlement benefits as per EM of the RAP for relocation at suitable places and not relocating again within the RoW.

Relocation Plan:

- ✓ Affected businesses and commercial structures will be relocated on their residual land adjacent to the proposed RoW after getting compensation.
- ✓ Owners of affected commercial land will look for suitable alternative land for relocating their businesses in newly constructed commercial structures after getting compensation.
- ✓ As stated by the affected tenants operating businesses in rented in commercial structures, they are planning to relocate their businesses in the new structures as tenants immediate after construction of new buildings.
- ✓ For Squatter-businessmen, two alternatives are proposed namely, (i) they will search alternative land in the vicinity, or (ii) they will become tenants in newly built commercial structures.
- ✓ The affected residential and commercial structure losing households will seek necessary cooperation of PRAC and Local Union Parishad Chairman for getting Government land (Khash land) in the vicinity for relocating their businesses.
- ✓ Affected owners of businesses and commercial structures are searching for suitable land for purchasing to relocate their own businesses in new constructed buildings.
- ✓ Some potential owners of private land adjacent to RoW of the project will construct buildings to rent out to tenants like pre-project time to ensure earning house rent as their income source. Consequently, tenants of affected commercial buildings will be able to shift their affected businesses in newly constructed buildings through renting arrangement. Thus, the potential tenants will use this opportunity for restarting affected businesses in rented in commercial structures.
- ✓ Owners of affected commercial structures will construct structures on residual land for relocating their affected businesses.
- ✓ Residential HHs will be relocated on residual land/other alternative land after getting compensation money for affected land and structures.
- ✓ Tenants of commercial structures will shift their affected businesses in the new structures as tenants like pre-project time.
- ✓ The squatter businessmen and tenants of commercial structures will need assistance from the project through INGO to find alternative land for relocation, since they have no scope to stay in the RHD right of way. They are searching for alternative land in the vicinity. Otherwise, they will rent in structures at other markets/newly constructed structures for restarting their businesses.
- ✓ There is adequate amount of private land available adjacent to the RoW. Those private landowners are interested in constructing new structures to meet increased demand of structures for renting in.
- ✓ The owners of fully affected businesses/shops are looking for suitable nearby land for relocating their affected business/shops.
- ✓ The owners of partially affected businesses/shops will shift/relocate their businesses backward from the RoW to possible extent for taking advantage of the Sylhet-Charkhai-Sheola highway.
- ✓ Affected businesses will be relocated to newly constructed structures by themselves.
- ✓ There is a huge demand for commercial structures for shifting affected businesses of the tenants. Accordingly, potential owners of land are planning to construct new buildings in the land nearby the RoW to meet that demand. Thus, affected tenants will be able to relocate/shift their businesses in newly built structures for restarting and continuing their businesses.



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- ✓ The squatter-businessmen will get compensation for their affected structures. In addition, they will get a business grant for their business income loss. They are planning to rent in newly constructed structures for operating their businesses in this locality.
- ✓ A considerable number of affected businessmen are planning to self-relocate by spending and investing their received compensation, assistance, allowance, grants, etc.

Lot-3:

163. A total of 152 HHs will be affected, of which 72 HHs will lose businesses/shops, 59HHs will lose residential premises, and 21 HHs will lose residential-cum-commercial structures in Lot-3 under the Sylhet-Charkhai-Sheola Highway Improvement Project (Ref. Table 2-3). Most of/ (some of) the residential HHs has residual landowners of affected commercial structures have residual land in Beani Bazar Upazila (after Sheola Bridge to Sutarkandi Land Port) Chainage 36.900 km to 43 km.

164. The findings show that 57 affected businesses require assistance for relocation in Lot-3. The affected 72 businesses are being operated of which 38 premises are on private land, 34 structures are on the RHD land (Ref. Table 4-3). It was revealed during the study that despite the (38) highest no. of commercial structures was owned by THHs, but majority of them are not directly involved in businesses, rather they have rented out their commercial structures to tenants. Some squatters (businessmen) are operating their businesses and have also rented out part of the commercial structures built on government land. Tenants have been operating different businesses in rented in commercial structures. There are 13 CPRs and 4 other entities are also affected in Lot-3 under the Sylhet-Charkhai-Sheola Highway Improvement Project area (Ref. Table 2-7).

165. During reconnaissance visits and conducting the census, IOL, and socioeconomic survey, it was repeatedly reported by the Project Displaced Persons/Households that they would relocate to residual land/purchased land near their affected residences/commercial premises. Then they can utilize their unaffected land & assets, and livelihoods.

166. These factors profoundly impact the non-inclusion of the provision of resettlement sites in the Sylhet-Charkhai-Sheola Highway Improvement Project. Thus, it is planned that the RHD will assist the PAPs through INGO in group and cluster relocation, including their businesses. The assistance to such PDPs will be limited to liaison with respective offices in getting utility services, such as electricity, water, gas, etc., connections, and installing tube wells and slab latrines. Assistance to be given to them in looking for suitable land for their self-relocation by RHD through the assistance of INGO.

Relocation Plan:

- ✓ A few residential HHs will be relocated on residual land and other alternative land after getting compensation for their affected land and structures.
- ✓ Some owners of affected commercial structures are planning to relocate their commercial structures on purchased land after receiving compensation for commercial land structures from DC Office, Sylhet.
- ✓ Some owners of affected commercial land and structures rented out structures to businessmen for their livelihood at pre-project time. They do not have any residual land, and there is also no alternative land nearby where they can relocate their commercial structures. They are searching for suitable alternative land to relocate their commercial structures. They want to restore their age-old renting-out structures for their livelihoods.
- ✓ Some potential owners of private land adjacent to the Sylhet-Charkhai-Sheola Highway Improvement Project may construct buildings. They can rent out their buildings to the tenants to earn house rent as their livelihood (an income source). As a result, tenants of affected commercial buildings may shift their affected businesses to the rented in newly constructed buildings to restart their businesses.
- ✓ The squatter businessmen and tenants of commercial structures of NTHHs will need assistance from the project to find alternative land for relocation, since they have no scope to stay in the RHD right of way in the Sylhet-Charkhai-Sheola Highway Improvement Project area. They are searching for alternative land and/or commercial structures in the vicinity.
- ✓ Tenants of commercial structures will shift their affected businesses in the new structures as tenants like pre-project time.
- ✓ The NTHs/squatter businessmen and tenants of commercial structures will need assistance from the project to find alternative land for relocation, since they have no scope to stay in the RHD right of way. They are searching for alternative land in the vicinity. Otherwise, they will rent in structures at other markets/newly constructed structures for restarting their businesses.



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- ✓ There is adequate amount of private land available adjacent to the RoW. Those private landowners are interested in constructing new structures to meet increased demand for renting in.
- ✓ The owners of fully affected businesses/shops are looking for suitable nearby land for relocating their affected business/shops.
- ✓ The owners of partially affected businesses/shops will shift/relocate their businesses backward from the RoW to possible extent for taking advantage of the Sylhet-Charkhai-Sheola highway.
- ✓ Affected businesses will be relocated to newly constructed structures by themselves.
- ✓ There is a huge demand for commercial structures for shifting affected businesses of the tenants. Accordingly, potential owners of land are planning to construct new buildings in the land nearby the RoW to meet that demand. Thus, affected tenants will be able to relocate/shift their businesses in newly built structures for re-starting and continuing their businesses.
- ✓ The squatter-businessmen will get compensation for their affected structures. In addition, they will get a business grant for their business income loss. They are planning to rent in newly constructed structures for operating their businesses in this locality.
- ✓ A considerable number of affected businessmen are planning to self-relocate by spending and investing their received compensation, assistance, allowance, grants, etc.

4.3.13 GROUP RELOCATION

167. Self-group relocation may be considered as self-relocation in a cluster manner. Group relocation has been discussed with the affected residential households and businesses/shops for their mutual support and cooperation. As discussed, title households (residence) have residual land, and they will be relocated by themselves individually. But the NTHs/squatter businessmen either relocate in cluster manner or rented in commercial spaces/structures for restoration of income and livelihood. Since the project is in the project area which is an urban area, where displaced HHs, and businesses are densely settled. Group relocation may be a feasible subject to procuring replacement land for relocation jointly. It may be noted that, if the physically displaced residential HHs can arrange self-managed group relocation, the project will provide minimum required civic amenities, such as, tube-well support and toilet facilities in the relocated place/locations. Necessary budget for such civic amenities may be charged from the contingency head of this RAP. Consultation meetings and group discussion specifically on relocation and livelihood restoration options will be further conducted by the INGO during implementation of the RAP. Based on the final option to be given by owners of the displaced businesses and residential HHs, the relocation strategy will be finalized.

4.3.14 RELOCATION OF COMMUNITY PROPERTY RESOURCES (CPRS) AND OTHER ENTITIES

168. A total of 67 Community Property Resources (CPRs) will be affected due to implementation of improvement of the Sylhet-Charkhai-Sheola Highway Improvement Project. Lot wise list of CPRs is attached to this RAP Annex-2(Table 2-4). Community Property Resources (CPRs) will be reconstructed by the respective CPR Management Committees as per Entitlement Matrix (EM) of this RAP. The PIU will take necessary measures to assist the CPR management committees to reconstruct new CPRs on the land to be selected by the CPR management committee. Location, design and other issues to reconstruct the CPRs may be the PIU to the Management Committees of CPRs. The Project Director may deploy engineers to assist the Management Committees with the reconstruction of a very few CPRs if it is found that the Management Committees really require such assistance regarding these matters. CPR Management Committee may utilize compensation money for purchasing alternative land and construction/installation of amenities of the new CPRs. All structure materials including fittings belonging to the CPR will be taken away by the Management Committee for the reconstruction.

4.3.15 CPR (MOSQUES, SCHOOLS AND GRAVEYARD) RELOCATION PLAN

169. Annex-4 (Table 4-6) shows that 67 Community Property Resources (CPRs) will be affected due to the project. The highest no. of affected CPRs are 33 mosques followed by 20 schools and college and further followed by 10 graveyard & crematory containing 249 graves. Out of 67 CPRs, 8 CPRs fully and 59 CPRs partially/only secondary structures will be impacted. The roles and responsibilities for reconstruction and identifying the land for the relocation for fully affected and coverage of full replacement costs will be paid with the guidelines & consultation with religious leaders and CPR representatives. Lot wise details list of CPRs is presented in Annex-2(Table 2-4).

- ▶ Management committees of the respective affected mosques are mentally prepared for relocating mosques:



- ▶ At first, some of committees have considered the residual land for relocating affected mosques while some other committees consider the requirement of purchasing land at suitable places and selected places for the said purpose,
- ▶ They will use compensation money and resettlement grants for affected land and mosque buildings/structures for relocating mosques on residual land/purchased land. Their mosque will be relocated at the opposite side of the road or to a nearby adjacent place.
- ▶ Some school and college management committees have stated that there are enough spaces within the school and college boundaries for relocation.

4.4 INCOME AND LIVELIHOOD RESTORATION PLAN

170. The Sylhet-Charkhai-Sheola Highway Improvement Project requires 168,4303 acres land acquisition, which leads to adverse impact on income opportunities, the assets and livelihood resources of the project affected persons (PAPs). Restoration of income and livelihoods of those affected people to pre-project level is one of the most important resettlement activities. This section of the RAP contains the Income and Livelihood Restoration Plan (ILRP); wherein recommended the requisite measures for restoring the economic status of displaced persons at least the level they were enjoying at pre-project time.

171. The RAP has provisions for alternative income generation/skill development and other enabling strategies and special measures for the affected PAPs, particularly vulnerable PAPs. They will be able to restore their previous occupations/livelihoods or can start a new venture or undertake the alternative occupations for complying the WB ESS5.

4.4.1 LIVELIHOOD IMPACTS AND RISKS

172. Affected persons will lose livelihood sources mainly due to loss of shops/commercial enterprises. In addition, wage earners of affected businesses such as employees in shops and businesses will lose their income and livelihood. A total of 475 owners will lose rental income from renting out residential and commercial structures to tenants; total 580 businessmen will lose business income and total 293 wage earners will lose their wage earning due to the project. More specifically, 243 Losing 10% of Total Income (Severely Affected) and Vulnerable Households will experience impact on their livelihood at various scale due to displacement from the project area. Table 4-6 presents the type of impacts on livelihood of the businessmen, tenants and wage earners.

Type of Loss		Quantity (No. / Person)
Affected Household		Number of HHs
A. Loss of Income from Own Business	Small	544
	Large	36
	Total	580
B. Loss of Rental Income	Residential	31
	Commercial	387
	Residential-cum-Commercial	57
	Total	475
Affected Wage Earning Person		Number of Person
C. Loss of Income of Wage Earners		293
Total (A+B+C) =		1348

Source: Census Survey conducted by BCL, July - December 2024

173. They will be advised/motivated to re-invest their received compensation money at replacement cost for the following productive purposes, the vulnerable PAPs need additional support for their survival. Thus, the additional measures will also be taken to provide appropriate support for livelihood restoration, especially for the vulnerable PAPs failing to cope with emerged situation associated with their relocation.

4.4.2 APPROACH TOWARDS INCOME AND LIVELIHOOD RESTORATION PLAN

174. The main objective of ILRP is to improve or at least restore, the livelihood of affected persons, especially vulnerable HHs. The plan recognizes diminishing income and dislocation disruption of livelihoods during and after relocation. As a result, compensation and resettlement benefits, and appropriate support measures have been included for Income and livelihood restoration of the PAPs. People engaged in commercial and business activities include traders and transporters. Those engaged in agricultural activities that includes farmers, sharecroppers and agriculture labors. Women are involved in poultry/cattle raising and nakshi(embroidery) work for cash income.



4.4.3 PROPOSED LIVELIHOOD RESTORATION PROVISION UNDER RAP

175. Affected business enterprises (Small and Large) will get compensation for their lost businesses and owners of residential structures rented out will get compensation for their lost rented out structures. The vulnerable PAPs will get training on IGA. In addition to this, they will get preference for employment in civil construction works. A provision will be in contract for engaging eligible PAPs. PIU will coordinate with the contractor through PIC and INGO.

176. There are three proposed livelihood restoration provisions under the ILRP as follows:

- ▶ Income Generating Training to the PAPs
- ▶ Creation of Employment in Civil Works
- ▶ Creation of opportunities for employment in roadside tree plantation and nursing

4.4.3.1 INCOME GENERATING TRAINING

4.4.3.1.1 LIVELIHOOD RESTORATION TRAINING STRATEGY

177. Income and short-term mitigation measures are suggested to be undertaken as per proposed ILRP. To ensure smooth and unhindered implementation of the ILRP training program INGO will take appropriate measures and following supporting activities as under:

- ▶ The list of trainees nominated by respective vulnerable HHs and squatters HH based on census and IOL survey,
- ▶ Motivate the trainees for regular participation in training sessions,
- ▶ Engage experienced and specialized facilitators from related GoB Department's Census offices/public/non-government sector organization as resources persons,
- ▶ Developed appropriate Training Modules and Schedules of each course considering TNA,
- ▶ Select training venue in appropriate places that trainees have better access to attend without any difficulty,
- ▶ The training venue should be confirmed in consultation with the trainees considering transport facilities and time,
- ▶ During training, subject wise handout and/or sheets with pictorial supplementary training materials to be developed and distributed among the trainees before each session in Bengali,
- ▶ Appropriate training materials should be used during training conduction,
- ▶ Banners with course titles are to be used during all course events in the training hall.

4.4.3.1.2 TRAINING NEED ASSESSMENT (TNA)

178. The INGO will carry out Training Need Assessment (TNA) among the vulnerable PAPs and squatters for determination of sectors/topics of training. One eligible person from each vulnerable household, and squatter HH will be nominated for the training. During Need Assessment the respective HHs and nominated trainees will be informed about the potential benefits of attending the IGA training. They would also be informed about the seed grants to be provided to support as primary capital for starting business. Specific Objectives of TNA are attached in Annex-4.5.

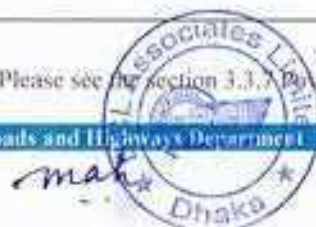
4.4.3.1.3 IDENTIFY ELIGIBLE TRAINING PARTICIPANTS

179. The target groups of IL RP will be finally selected among the PAPs considering the vulnerable group. The selected trainees will be head of household or, in case of her/his unavailability he/she will his /her nominee (eligible member of his/her family) will attend the training course.

180. The World Bank's ESF & ESS5 and good resettlement practices in similar projects in Bangladesh stress on the need for special attention to (i) vulnerable households and groups including. (Women headed vulnerable household, disable women headed households, disable man headed household, widow/divorced households head, very poor elderly (>65 years) man headed households, household under poverty line (Annual income BDT 144,000/household¹³) and (ii) severely affected households (losing 10% and above income) due to the project during implementation of RAP.

181. Thus, implementation of RAP will have positive impact on both 243 losing 10% of Total Income (Severely Affected) and Vulnerable Households to improving or, at least restore their socioeconomic status. Since these households are at risk of becoming particularly disadvantaged due to involuntary land acquisition and

¹³ Please see the section 3.3.7 Poverty and gender dynamics



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resettlement, special assistance would be provided to them to assist their rehabilitation.

182. A Total of 243 Losing 10% of Total Income (Severely Affected) and Vulnerable Households have been identified in the Lot-1, 2 & 3 of project area. During the census survey trade wise occupational skill development trainings have been assessed throughout the losing 10% of Total Income (Severely Affected) and Vulnerable Households who will receive ILRP training. As per assessment, total of 243 participants/nominated representatives of losing 10% of Total Income (Severely Affected) and Vulnerable Households will receive ILRP training as detailed in the **Table 4-7** and **Annex (Table 4-7)**.

4.4.3.1.4 PROPOSED TRADE FOR OCCUPATIONAL SKILL DEVELOPMENT (OSD) TRAININGS

183. The following training course has been proposed based on demand and willingness of the potential trainees to receive particular trainings and local market demand as well:

SL.	Name of TRG	Duration (Days)	Number of Participant (Trainees)	Batch	Remarks
01.	Poultry Rearing	05	52	2	
02.	Fish Farming	05	47	2	
03.	Cow Rearing & Beef Fattening	05	58	2	
04.	Kitchen Gardening	05	63	2	
05.	Motor Cycle Driving	05	23	1	
	Total		243		

Source: Census survey conducted by BCL, July - December 2024

4.4.3.1.5 TRAINING METHODOLOGY

184. Participatory training methodologies, interactive sessions and two ways of communication will be used in conducting training. To make the training session enjoyable and lively different types of games and funs will be used. At the end of each day, a course review and feedback session for the participants will be arranged.

185. INGO role during training and post training monitoring are presented in **Annex 4-5**.

4.4.3.1.6 DETAILS OF TRADE WISE PARTICIPANT DISTRIBUTION

186. Total 243 trainees from identified losing 10% of Total Income (Severely Affected) and Vulnerable Households will receive different categories ILRP training **Ref. Annex-2 (Table 2-9)**.

4.4.3.1.7 MONITORING AND EVALUATION OF ILRP TRAINING

187. INGO will prepare a detailed monitoring plan for the training program with the help of PMU-RHD and to undertake the following monitoring tasks. PIU/CSC will supervise the Monitoring and Evaluation Process:

- ▶ Keep records of all necessary documents of all the activities for monitoring and evaluation.
- ▶ Pre- and post-test of each training course with prepared questioner.
- ▶ Census level/House level monitoring about training learning/output.
- ▶ Modification training program if required during the implementation
- ▶ Monitor the learning process of the trainees.
- ▶ Prepare Case studies

188. In case of livelihood restoration activities female should be given priority considering gender equity. To address and ensure gender equity at least 10% participant should be the female.

4.4.3.1.8 INSTITUTIONAL ARRANGEMENT OF ILRP

189. RHD will be responsible for the implementation of Income and Livelihood Restoration Programmed (ILRP) through INGO. PMU will coordinate the entire process.

190. Project Implementation Consultant (PIC) will assist RHD in supervising and monitoring the activities of the INGO at the Census level. In addition, INGO will provide feedback to RHD on program implementation as well as the lapses and gaps of implementation for corrective measures on time. PIC should monitor the whole implementation circle.

4.4.3.1.9 EMPLOYMENT OF THE PAPS

191. Eligible PAPS will get priority in getting employment according to their competence in civil construction work and employment in roadside plantation and social forestation.



4.5 GRIEVANCE REDRESS MECHANISMS

192. This section presents Grievance Redress Mechanisms (GRMs). Landowners are allowed by the ARIPA, 2017 to lodge their objections to acquisition of land and assets at the beginning of the legal process under section 5. The Act does not recognize affected persons without the title to land and additional resettlement benefits under the project. There is no mechanism to hear and redress their grievances and complaints.

193. RHD has already established a strong public grievance redress and monitoring mechanism for Sylhet-Charkhai-Sheola highway. The link is: [https://rhd.portal.gov.bd/site/page/f21b6d05-b654-461b-97d1-0a9f3d19a0b6/GRM-\(Grievance-Redress-Mechanism\)](https://rhd.portal.gov.bd/site/page/f21b6d05-b654-461b-97d1-0a9f3d19a0b6/GRM-(Grievance-Redress-Mechanism)). The PIU will also establish the grievance redress mechanism at two tiers of GRCs for the whole project period. The GRCs will be as (i) Field Level GRC and (ii) Project Level GRC to resolve complaints or grievances related to social, resettlement, environmental issues, and issues of SEA/SH/GBV including LHS (labour Health and Safety)

194. The following complaints and grievances were raised by the complainants:

- ▶ Disputes over ownership and inheritance of the acquired land,
- ▶ Determined lower value of affected assets,
- ▶ Compensation/entitlements not paid as per Entitlement Matrix,
- ▶ Complaints regarding air pollution, noise pollution, accident-prone locations, Gender Based Violence (GBV), and
- ▶ Concerns and grievances concerning sexual exploitation and abuse/sexual harassment, labour health and safety.

195. RHD has already been established GRM. GRM adopted in this updated RAP will deal with and response to queries along with resolving/redressing complaints and grievances concerning any irregularities in the application of the guidelines for assessment and mitigation of social and environmental risks and impacts. GRM will save the aggrieved persons/parties from resorting to expensive and time-consuming legal actions. More specifically, GRM will not pre-empt any person's/party's right to go to the courts of law.

4.5.1 OBJECTIVES OF GRM

196. The fundamental objectives of the GRM are to resolve any resettlement related grievances locally and amicably in consultation with the aggrieved affected persons, parties, etc., to facilitate smooth implementation of the social and environmental action plans through implementing mitigation measures for identified social and environmental impacts and risks. GRM will be implemented through the Grievance Redress Committee (GRC) which can be considered as a para-legal body. GRC will not intervene in any matters which are lodged in the court of law. GRC facilitates conciliation and amicable resolution between the parties' involved/concerned for redressing grievances. Specific objectives of GRM are as follows:

- ▶ To resolve complaints of aggrieved persons including the PAPs at the Field Level Grievance Redress Committee (GRC) through a process of conciliation for amicable and congenial atmosphere as quickly as possible.
- ▶ To provide clear and transparent procedures for appeal at Project Level GRC, if grievances are not redressed at Field Level GRC.

4.5.2 INFORMATION CAMPAIGN

197. Intensive information campaign on Grievance Redress Mechanism (GRM) should be carried out among the PAPs, the poor and vulnerable households, their communities, beneficiaries and wider public in project affected Unions and Paurashava by the project implementation unit (PIU) and INGO. The affected people will be informed about (i) their rights and entitlements against different losses as per policy of the Resettlement Policy Framework (RPF)/RAP facilitated by the RAP implementing NGO's field level staff, (ii) the affected people can express their confusions, queries and concerns related to resettlement matters and issues in the Focus Group Discussions (FGDs), (iii) INGO will make necessary efforts to resolved their initial complaints in the FGDs.

198. The PAPs will be informed about GRM and scope of work of GRCs through public consultation and Focus Group Discussion (FGD) by INGO during implementation of the RAP. They will be informed about their right to have their complaints and grievances redressed by the Field Level GRC and the Project Level GRC. The Project Manager's Office(s) will act as the Secretariat to the Field Level GRCs with assistance of INGO. As a result, the records will be up-to-date and easily accessible on-site. Scope of Grievances/Complaints.

199. GRC will receive grievances involving all resettlement benefits, relocation and other assistance. However, the major grievances can include the following:



Handwritten signatures and initials: 'arbo', 'K', 'N', 'B', '2'.

- ▶ PAPs not enlisted during census and or JVS,
- ▶ Losses not identified correctly for the squatters/ unauthorized occupants,
- ▶ Compensation/assistance not calculated/determined as per entitlement matrix; losses can be documented undervalued way,
- ▶ Magnitude of losses is not measured accurately,
- ▶ Rate of assistance, allowance, grants and resettlement benefits are not determined as per Entitlement Matrix,
- ▶ Improper distribution of compensation/assistance in case of joint ownership in case of death of EPs (entitled persons) after receiving compensation from DC office,
- ▶ Delay in disbursement of compensation/assistance,
- ▶ Immigrant construction workers including child labor/forced labor may exposed to poor/unhygienic working condition, and
- ▶ Woman workers may face gender-based violence (GBV) and/or discrimination in wage rates, poor camp/worker accommodation.

4.5.3 GRIEVANCE REDRESS MECHANISM (GRM)

200. GRM will provide an accessible, easy to use and trustworthy platform for receiving and reviewing grievances and complaints cases, carrying out necessary investigation based on the nature and magnitude of grievances, then holding hearing on the cases by involving aggrieved persons and/or parties and finally facilitating overall resolution of submitted grievance/complaint cases related to the project. Major Functions of GRC. There will be various ways of submitting applications regarding grievances/complaints to GRC (Ref. **Annex4-6**). Detailed description of function of GRCs have been presented in ToR of Field Level GRC, and Project Level GRC.

4.5.4 DOCUMENTATION OF GRIEVANCES AND COMPLAINTS

201. Name of the complainant, date of receipt of the complaint, address/contact details of the aggrieved person, issues of the grievances and process of grievance/complaints redressal are carefully documented in the register. Maintaining registers properly for the received grievances and complaints, and (iii) reviewing grievances and complaints, (iv) investigation into the matters with grievances and complaints, (v) arrangement of hearing in presence of complainant, (vi) ensuring easy access of the aggrieved persons. Details on maintaining (i) intake register, (ii) resolution register, and (iii) closing register are attached as **Annex4-6**.

4.5.5 GRIEVANCE REDRESSAL

202. The Implementing NGO will assist the PIU under the guidance of PIU's Consultants for timely grievance redress on environmental, social, and resettlement issues. INGO will also assist the GRC for registration of grievances, related disclosure, and communication with the aggrieved party through the PIU designated focal person. Focal persons under GRC will communicate for grievances related to Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH) and Labor Health and Safety (LHS).

4.5.6 TWO-TIER GRM

203. Ministry of Road Transport and Bridges (MoRTB) will approve the two-tier GRCs through gazette notification. The composition of GRCs has been given in **Table 4-8**. The two-tier GRM for the project is outlined below, each tier having time-bound schedules and with responsible persons identified to address grievances of the PAPs and seek appropriate person's advice at each stage, as required.

4.5.7 FIELD LEVEL GRC FOR THE PAPs

204. Composition of the Field Level GRC for the PAPs has been presented below. The Field Level GRC will resolve grievances and complaints in a timely and satisfactory manner.

4.5.7.1 COMPOSITION OF THE FIELD LEVEL GRC

205. For resolving complaints and grievances of the PAPs, the Field Level GRC with representatives from (i) Project Manager (EE, RHD) of Sylhet-Charkhai-Sheola Highway Improvement Project; (ii) Deputy Project Manager (SDE, RHD) or as nominated by PD; (iii) Public Representative of Concerned Area (e.g. Administrator/Mayor/Councilor/UP Chairman); (iv) Representative of Project Affected Person (PAP); (v) Gender and SEA/SH Specialist in the PIU/PIC as nominated by the Project Director of Sylhet-Charkhai-Sheola Highway Improvement Project; (vi) Representative of the Contractor as nominated by the respective Contractor; (vii) Representative from Local Community Women's Group; and (viii) Area Manager of the Implementing NGO, RHD will form GRC at Field level and Project level to resolve complaints or grievances formally through



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community participation. The GRC at Field Level is presented in **Table 4-8**.

SL. No.	GRC Composition at the Field Level	Members of the GRC
(i)	Project Manager (EE, RHD) of Sylhet-Charkhai-Sheola Highway Improvement Project	Convener
(ii)	Deputy Project Manager (SDE, RHD) or as nominated by PD	Member
(iii)	Public Representative of Concerned Area (e.g. Administrator/Mayor/Councilor/UP Chairman)	Member
(iv)	Representative of Project Affected Person (PAP)	Member
(v)	Gender and SEA/SH Specialist in the PIU/PIC as nominated by the Project Director of Sylhet-Charkhai-Sheola Highway Improvement Project	Member & Focal Person of GRC related to GBV/SEA/SH
(vi)	Representative of the Contractor as nominated by the respective Contractor	Member & Focal Person of GRC related to labor health and safety
(vii)	Representative from Local Community Women's Group	Member
(viii)	Area Manager of the Implementing NGO	Member Secretary

4.5.7.2 THE SCOPE OF WORK AND THE TERMS OF REFERENCE (TOR) FOR THE FIELD LEVEL GRC

- ▶ The Field Level GRC shall review, consider and resolve grievances related to social, resettlement, environmental issues received from the various stakeholders of Sylhet-Charkhai-Sheola Highway Improvement Project (SCSHIP).
- ▶ Any grievances presented to the Field level GRC should ideally be resolved on the first day of hearing but not more than a period of 15 days. For this project this will be two (2) weeks. In case of complicated issues and requiring additional investigations, the grievances may be resolved by second hearing.
- ▶ GRC will receive, review and deliberate on all Grievances from any person or stakeholders. Grievances that are not related to the project will not be considered for deliberations but the person who submitted the grievances will be notified by writing the justification of the GRC.
- ▶ GRC decisions should ideally be arrived at through consensus, failing which resolution will be based on majority vote. Any decision made by the GRC must be within the purview of Sylhet-Charkhai-Sheola Highway Improvement Project's resettlement policy framework, ESF and entitlements of RAP.
- ▶ The SEA/SH/GBV focal person will receive all related grievances. The focal person will (i) verify and investigate the matter, (ii) provide support to the survivor, if necessary, by drawing support from external sources such as, police, qualified NGOs for psycho-social counseling, specialized health experts/establishments for treatment of SEA/SH victims, etc, (iii) investigate the genuine of the allegation (iv) implement sanction to the perpetrator (v) And finally solve the matter through the GRC.
- ▶ The GRC shall review, consider, and resolve grievances related to SEA/SH/GBV issues received from the various stakeholders of Sylhet-Charkhai-Sheola Highway Improvement Project and ensure confidentiality.
 - Pay attention to the grievance of the victim,
 - Register his/her allegation,
 - Ensure the victim that GRC is the right place to get remedy,
- ▶ The GRC will attend those cases where the perpetrator and the victim both are associated with the project work. In other cases, they will be advised/assist to lodge complaints with the concerned competent authority.
- ▶ Labor Health Safety focal person will receive all related grievances. The focal person will (i) verify and investigate the matter, (ii) investigate the Filed status as per submitted grievances and prepare a report for the GRC, and (iii) finally solve the matter through the GRC.
- ▶ The GRC will not deal with any matters related to the Acquisition and Requisition of movable and immovable property act 2017 pending in the court of law.
- ▶ All unresolved grievances, at Field level, should be forwarded to the Project level GRC.
- ▶ GRC meetings will be held in the respective Office of the Project Manager, SCSHIP or other location(s) as agreed by the Committee.

4.5.7.3 COMPOSITION OF PROJECT-LEVEL GRC

206. The Project-Level GRC will review all unresolved cases forwarded by the Field level GRCs or aggrieved persons may appeal to the Project Level GRC for review of the decision of Field Level GRC. The Additional Project Director and Chief Resettlement Officer will head it. The Deputy Project Director (DPD) will perform as the member secretary. The Composition of the Project Level GRC is presented in the **Table 4-9**.



Table 4-9: Members of the Project-Level GRC

Sl. No.	GRC Composition at the Project Level	Members of the GRC
(i)	Additional Project Director, SE, RHD (Chief Resettlement Officer)	Convener
(ii)	Deputy Project Director, EE, RHD	Member Secretary
(iii)	Project Manager -1 & 2, EE, RHD for concerned Lot	Member
(iv)	Team Leader of Implementing NGO	Member
(v)	Gender and SEA/SH Specialist in the PIU/PIC as nominated by the Project Director of Sylhet-Charkhai-Sheola Highway Improvement Project	Member
(vi)	Representative of Consultant (PIC) or Individual Consultant as nominated by PD	Member

207. The provision of the Project-Level GRC will further establish fairness and transparency in the resolution of grievances of Project affected persons. Project Level GRC may seek technical advice from the INGO or any external legal expert, if required. Project Level GRC may visit the Field if required for resolution of complaints.

4.5.7.4 THE SCOPE OF WORK AND THE TERMS OF REFERENCE (TOR) FOR THE PROJECT LEVEL GRC:

- ▶ Project level GRC will Review, consider, and settle unresolved grievances forwarded by Field level GRC.
- ▶ Any grievances presented to the Project Level GRC should ideally be resolved within one month from the date of receiving the complaints.
- ▶ In case of complicated issues/grievances, the GRC members can request additional information from the Field level GRCs or carry out Field level verifications.
- ▶ Resolutions should be based on consensus among members, failing which decision may be taken on majority vote.
- ▶ Any decision made by the GRC must be within the purview of resettlement policy framework, Environmental and Social framework, and entitlements of RAP; and
- ▶ The GRC will not deal with any matters pending in the court of law.

4.5.7.5 SCOPE OF WORK OF THE GRC

208. The GRCs will receive grievance cases from the affected persons through a complaint box at the Project Manager's office or email, SMS, written application to Convener of GRC. The INGO will assist the PIU vis-vis the PAPs or other stakeholders in lodging their complaints in a proper format acceptable to the GRC after they are informed about the project policy and entitlements for various losses. GRCs will be established from the date of approval from the MoRTB. GRCs will be activated to allow PAPs to lodge complaints and safeguard their recognized interests regarding land acquisition and resettlement process. Where land acquisition will not be involved but relocation of structures or vacating land from unauthorized occupants will be required, the GRCs will facilitate resolution of complaints of the aggrieved persons regarding categorization of vulnerable affected persons, types of structures and eligibility for compensation and assistance, measurement of structures, missing of loss information, etc., within the set guidelines and provisions of the Resettlement Policy Framework (RPF) and Resettlement Action Plan (RAP).

4.5.7.6 PAP'S PETITION TO GRC

209. PAPs will be able to submit their grievances/complaints about any aspects of Resettlement Action Plan implementation and compensation. Grievances can be shared with the INGO or Project Manager's office verbally or in written form. In case it is in verbal form, the INGO representatives at the GRC will write it down in the first instance. The PAPs will sign on the written grievances/complaints and formally submit the same to the GRC at the respective Project Manager's offices with necessary assistance from the INGO. The Field level GRC will settle down the matter within 15 days of receiving the grievance/complaint from the PAP(s). Resolution of the GRC will be final.

210. The appeal procedure for solving the grievances will be as follows:

- ▶ All complaints from the PAPs will be received at the concerned Project Manager's office of the Sylhet-Charkhai-Sheola Highway Improvement Project;
- ▶ Upon receipt of the complaint, the Area Manager of the Implementing NGO, Sylhet-Charkhai-Sheola Highway Improvement Project (the member secretary of the GRC) will inform the convener (Project Manager) about received complaints. The convener will organize a hearing session for the complainant at the concerned Project Manager's office.
- ▶ The decision of GRC will be conveyed to the concerned PAPs with assistance from the INGO; and
- ▶ The Convener of the Field Level GRC will forward unresolved cases to the Convener of the Project Level GRC.



4.5.7.7 PROCESSES FOR FILING GRC CASES AND DOCUMENTATION

211. Scope of works and ToR for the Field Level GRC and Project Level GR Care presented in Table 4-10. Processes for Filing GRC Cases at Different Levels of GRCs present process for filing GRC cases and documentation of investigation and resolve grievances. In addition, one flowchart demonstrates GRM process for PAPs Annex-4.6(Figure 4-1, 4-2, 4-3).

The following steps will be followed in responding to grievances raised and lodged in relation to implementation of the RAP process.

212. The procedural steps of resolving grievances and the grievance redress mechanism will be disseminated to the PAPs through RHD's website, social media, public hearing/meetings, and information brochures so that PAPs will be aware of their rights and obligations, and procedure of grievance redress. Generally, the staff of INGO are supposed to listen to and redress of affected aggrieved persons' confusions, queries complaints, grievances, etc., related to resettlement. Any aggrieved PAPs can approach to the assigned staff of the INGO to seek clarification for their queries. If aggrieved person's complaint is not within the purview of GRC (e.g., cases under arbitration) they will refer the said complaint to the DC office for further action as per the ARIPA, 2017 (presented in Annex-4.6(Figure 4-1, 4-2, 4-3). Thus, their confusions can be removed. Then INGO staff will provide clarification to the aggrieved affected person where applicable. The INGO and PIU will make necessary efforts to address grievances and complaints locally and resolve grievances before these are formally submitted to the GRC. If the aggrieved persons are not satisfied, then they shall be assisted by the INGO Field level staff in lodging their complaints and grievances to respective Field Level Grievance Redress Committee (GRC). The Project Manager's Office(s) will act as the Secretariat to the Field Level GRC. At this stage their complaints and grievances can be resolved through the effective function and operation of Grievance Redress Committee (GRC). The following procedures and timeline will be followed to resolve the submitted grievances and complaints:

Step 1:	<p>If verbally and/or any other forms of reported/submitted grievances are not resolved through the above-mentioned efforts, the aggrieved persons will be informed that they can submit any formal grievances and complaints to GRC directly.</p> <p>The GRC will ensure accessibility and transparency through multiple uptake channels, enabling Project Affected Persons (PAPs) and other stakeholders to submit grievances conveniently. These channels will include:</p> <ul style="list-style-type: none"> • Dedicated information such as focal person including his/her designation, e-mail and phone number will be placed in the populated areas of the project alignment for direct and verbal reporting of grievances; • Complaint boxes will be placed at key locations along the project alignment; • INGO will be responsible for any grievances submitted at local offices, Union Parishad premises; or field sites; • Online platforms (The link is: https://rhd.portal.gov.bd/site/page/f21b6d05-b654-461b-97d1-0a9f3d19a0b6/GRM-(Grievance-Redress-Mechanism)) for lodging complaints and filling GRC cases. <p>These options will be advertised through community meetings, leaflets, information brochures, and public notice boards, ensuring that PAPs are fully informed of their rights and the procedures to access the GRC. The RAP implementing NGO staff informs the PAPs of their losses and entitlements in writing and through individual contact.</p> <p>If aggrieved persons are confused, then try to resolve the problem at local level with the involvement of the PIU resettlement representative. If this is not resolved within a maximum of 7 days, then Step 2 will be exerted.</p>
Step 2:	<p>The aggrieved PAPs will approach the INGO staff for clarification on the provisions, losses, and entitlements as per Entitlement Matrix of the RAP of the Sylhet-Charkhai-Sheola Highway Improvement Project. If resolved & satisfied, the PAPs will claim compensation, assistance, and resettlement benefits from the project authority.</p> <p>If not resolved, the INGO will recommend that the PAPs will have to submit their complaints to the Field Level GRC. The concerned INGO staff assists the PAPs in filing the complaints within maximum 3 days and then step 3 will be exerted.</p>
Step 3:	<p>The aggrieved PAPs will approach the GRC. GRC will review and evaluate applications of grievance and complaint cases to determine whether the submitted cases are within GRC's mandate or not.</p> <p>If within GRC's mandate, the INGO staff assists the concern GRC and the PAPs to arrange a hearing at Field Level GRC within 15 days from the date of complaints being lodged.</p> <p>Cases related to compensation under the ARIPA, 2017 will be referred to the DC through RHD for further review and action. A decision has to be made by the DC and the complainant will be informed within 14 days of the start of the Step 3.</p>
Step 4:	<p>If the complaint is within the GRC mandate, the Field Level GRC will hold a session with the aggrieved person and minutes have to be recorded. A proposed action/decision will have to be made, and the complaints will be inform verbally and/or in writing within 14 days of starting step 4. If a complainant accepts the decision and is</p>



Table 4-10: Processes for Filing GRC Cases at Different Levels of GRCs are Given Below:

	satisfied with the decision made by Field Level GRC, then the decision will be considered as final decision from Project side. If the complainant does not accept action/decision made by the Field Level GRC, then Step 5 will be exerted.
Step 5:	The aggrieved PAPs may want to submit the grievance/complaint to the Project Level GRC. The INGO will assist the complainant in filing the grievances/complaints within maximum 3 days and arrange hearing at Project Level GRC within 30 days from the date of complaints being lodged and then Step 6 will be exerted.
Step 6:	The Project Level GRC will hold a session with the aggrieved PAPs for redressing the filed grievance/complaint. Minutes of the above-mentioned session is recorded and duly considered and approved. The approved verdict will be communicated to the complainant by PD in writing. If the complainant accepts the decision and is satisfied with the decision made by Project Level GRC, then the decision will be considered as the final decision from Project side. The minutes of the GRC sessions will be sent to the Project Manager's office for necessary action.
Step 7	If the complainant (PAP) does not accept the Project Level GRC decision, he/she may want to submit grievance/complaint to the court of law. The INGO may inform the complainant that he/she may go to court of law for judgment.

4.5.7.8 STEPS TO BE FOLLOWED TO RESOLVE THE GRIEVANCE

- ▶ Allegations may be received from the survivor/Kin/others orally, over the phone or in a written form.
- ▶ Follow the "survivor centric approach" giving priority to the opinions of the victims.
- ▶ Maintain strict confidentiality of the identity and other related information of the victims
- ▶ Register the allegation/case with detailed information.
- ▶ Ranking the case as major or minor.
- ▶ Depending on the nature of the case, sending the victim to a nearby medical center or to a law enforcing agency as soon as possible.
- ▶ Assistance should be reached to the victim/s within 24 hours.
- ▶ The decision should be taken within 7 days, through an internal committee meeting.
- ▶ Collection of necessary evidence within 10 days.
- ▶ Legal assistance if required.
- ▶ Final settlement of the case within 15 days.

4.6 INDICATIVE LAND ACQUISITION AND RESETTLEMENT BUDGET

213. This section presents the indicative LA and Resettlement Budget of the Sylhet-Charkhai-Sheola Highway Improvement Project. It is to be noted that the Ministry of Road Transport and Bridges (MoRTB) will approve RAP including the indicative budget of the project that is being prepared by the RHD after getting concurrence from the World Bank. Indicative LA and Resettlement Budget for the Sylhet-Charkhai-Sheola Highway Improvement Project encompasses costs for (i) land acquisition and (ii) assistance, allowance, grants, and resettlement benefits for implementation of Resettlement Action Plan (RAP). In the event of permanent acquisition of private land, cash compensation at full replacement value to purchase an equally productive plot of land in the vicinities of the affected villages is included in the budget. In addition, any associated costs of purchasing the land i.e., stamp duty, taxes, value added tax, registration fees, etc. are included in Resettlement Cost. The eligible PAPs will be compensated for any permanent improvements made to the land (e.g., irrigation structures) within RoW under the Sylhet-Charkhai-Sheola Highway Improvement Project.

214. The unit cost and valuation of acquired land and assets have been determined at the Current Market Price (CMP) including land, structures, trees, crops, fish, etc. in this RAP as per the ARIPA, 2017. Govt. market price for 2023 to 2024 and CMP of land were collected.

215. DC will pay Cash Compensation under Law (CCL) includes market price based on deed value and 200% additional for land, while market price and 100% additional for structures, trees, crops, fish stock, etc., after placement of fund by the RHD as per the ARIPA, 2017. The additional benefits/resettlement benefits include assistance, allowances, and grants as per Entitlement Matrix (EM) prepared following the policy and Entitlement Matrix of the RPF 2022.

216. Resettlement benefits have been determined as per the RAP Entitlement Matrix. It is to be noted that in most of the cases entitlements benefit/assistance against different losses have not been presented clearly in the Entitlement Matrix. However, the Property Assessment and Valuation Committee (PAVC) will determine Replacement Value (RV) of land, structures, Structure transfer grant, structure reconstruction grant etc., during implementation of the RAP for the Sylhet-Charkhai-Sheola Highway Improvement Project.

217. Resettlement benefits/assistance will be paid directly by the RHD with assistance from the INGO. The

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INGO will re-assess the quantity of losses and assist the PAVC for checking, verifying, and validating the eligibility of persons listed in the census and conduct joint survey for payment of resettlement benefits as per the RAP budget for the Sylhet-Charkhai-Sheola Highway Improvement Project after approval by the Ministry of Road Transport and Bridges (MoRTB) and the RHD competent authority. This is an indicative budget.

4.6.1 METHODOLOGY OF DETERMINING THE RATES

218. The methodology used to work out the RAP budgetary cost estimates is discussed as follows:

219. The consultant collected transacted/recorded price¹⁴ and current market price¹⁵ of land from relevant sources including (a) sellers, buyers, witness, deed writers, and Sub-Registrar's Office (b) local knowledgeable persons- e.g., local elected members, land brokers/mediators, teachers, imams, religious leaders, community leaders, and (c) plot owners, and potential land sellers/land buyers respectively.

220. It is observed from the data that the reported market prices of land are overstated/over reported by the respondents. On the contrary, mouza rates, which are established and recognized price rates of land are indeed under reported price rates of land. To fill the gap between the transacted price and mouza rate and considering it for determining the land price for CCL in the budgetary cost estimates, a 200% additional on the mouza rates have been applied after adding as per the ARIPA, 2017. It is observed that considering all these, the land price is representing the current market price of land in the Sylhet-Charkhai-Sheola Highway Improvement Project area. The current market price will be determined by the PAVC.

221. The current market price (CMP) of land by category has been determined by averaging the reported price, recorded price, and transacted price. Thus, CCL of land by category has also been worked out based on the CMP. It is to be noted that the Sylhet-Charkhai-Sheola Highway Improvement Project area is an urban area, therefore, the CCL based on CMP will be higher. As a result, a provision of Top-Up has been considered in the land acquisition budget.

222. Price of different categories of primary structures, such as (i) pucca, (ii) semi-pucca, (iii) tin made, &(iv) katcha structure, have been calculated as per latest Public Works Department (PWD), and similar RHD projects. The data on rates of secondary structures by type were collected from knowledgeable persons such as teachers, imams, and businessmen of construction materials, masons, carpenters, the PWD, etc. The actual costs of construction of primary structures (e.g., pucca, semi-pucca, tin-made, and katcha structures) and secondary structures (such as boundary walls, toilets, verandahs, stairs, tube wells, etc.) were collected based on relevant detailed information on the costs of construction materials used for the construction of different types of structures. The RC of structures is calculated based on measured floor areas (in sft.) of different types of structures and construction costs. In addition, costs for transportation and delivery of the construction materials and items to the places or sites where structures were built and costs for labor for constructing structures are also counted and considered. Thus, the average replacement costs of different types of structures are calculated and determined. It is to be noted that the rates of the affected primary and secondary structures under recent projects of the RHD have also been analyzed and considered to get relevant insights for assessing the rates and prices of the structures. Thus, the rates of structures adopted in the similar Project of RHD (under implementation) have been studied and considered for the Sylhet-Charkhai-Sheola Highway Improvement Project.

223. The data on rates of trees on private land and RHD land/any government land owned by local people and CPRs in the Project was collected from Key Informants including sawmill workers, timber businessmen, owners of trees, etc. through market survey conducted from July 2024 to December 2024. Besides, the Forest Department has also been consulted to collect the rates based on species and girth size. Rates of trees applied in other similar projects have also been studied.

224. The current prices for standing crops have been determined considering the rate adopted for standing crops in other similar projects. An amount of compensation will be made for the resettlement benefits for the standing crops of the farmers. PAVC will determine the current market price with the assistance from the Department of Agricultural Marketing (DAM).

225. An indicative budget of land acquisition and resettlement which entails necessary costs for involuntary resettlement for keeping adequate provision of payment of compensation, and other resettlement benefits

¹⁴ Transacted price of land is actual price of land during a year preceding the market survey of land as reported by sellers, buyers & witness, and deed writers.

¹⁵ Current Market Prices of land are present market rates as quoted by local knowledgeable persons- e.g., local elected members, land brokers, religious leaders, community leaders, etc.).



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(assistance, allowance, grants, etc.) against different losses such as land, structures, trees, crops, fish stock, wage losses, etc., of the affected persons due to interventions under the Sylhet-Charkhai-Sheola Highway Improvement Project. Item wise costs for other resettlement benefits are calculated based on the Entitlement Matrix given in the RPF and reproduced in this RAP. The total estimated budget is amounting to BDT 7,235,359,991.69 (Seven Billion Two Hundred Thirty Five Million Three Hundred Fifty Nine Thousand Nine Hundred Ninety One Taka and Sixty-Nine Poisha Only) including LA Budget BDT 6,867,926,634.51 (Six Billion Eight Hundred Sixty Seven Million Nine Hundred Twenty Six Thousand Six Hundred Thirty Four Taka and Fifty-One Poisha Only) and Resettlement Budget BDT 367,433,357.18 (Three Hundred Sixty Seven Million Four Hundred Thirty Three Thousand Three Hundred Fifty Seven Taka and Eighteen Poisha Only) (Ref. Table 4-11). This indicative budget for compensation and resettlement for implementation of the project interventions will be paid by GoB. The eligible PAPs (EPs) will be provided compensation BDT 6,733,261,406.38 (Six Billion Seven Hundred Thirty Three Million Two Hundred Sixty One Thousand Four Hundred Six Taka and Thirty-Eight Poisha Only) for land including structures, trees, and standing crops/fish-stock for the title holders PAPs and CPRs by the Deputy Commissioner, Sylhet. Additional compensation (as applicable) and other resettlement benefits such as assistance, allowances, grants, etc., will be paid through RHD PIU. The provisions in the RAP budget include amount of top up BDT 69,346,618.41 (Sixty-Nine Million Three Hundred Forty-Six Thousand Six Hundred Eighteen Taka and Forty-One Poisha Only) for land, the RV BDT 74,987,288.00 (Seventy-Four Million Nine Hundred Eighty-Seven Thousand Two Hundred Eighty-Eight Taka Only) for primary and secondary structures of non-title HHs and BDT 18,112,005.00 (Eighteen Million One Hundred Twelve Thousand Five Taka Only) for non-title CPRs under the RHD. These are presented in Table 4-11 and Annex-4.7. The Amount of indicative budget for resettlement benefits and assistance has been worked out based on the entitlement matrix and RPF to be BDT 193,969,407.00 (One Hundred Ninety-Three Million Nine Hundred Sixty-Nine Thousand Four Hundred Seven Taka Only) which will be paid by RHD/PIU. This makes a total resettlement budget BDT 367,433,357.18 (Three Hundred Sixty-Seven Million Four Hundred Thirty-Three Thousand Three Hundred Fifty-Seven Taka and Eighteen Poisha Only) for RHD that includes additional benefits for the legal owners (title holders) and CPRs (such as Top Up, Assistance and Resettlement Benefits only), and as well as informal occupants or non-title holders. A provision of contingency at 2% in the LAP for Deputy Commissioner and 2% for resettlement budget has been kept which will cover the costs for DC's administrative budget, GRM, monitoring to verify internal reporting on and monitoring of RAP implementation and consultations including aware campaigns, along with operationalization of PAVC, JVS and as well as other unanticipated expenses while implementing the RAP. Indicative budget includes the following breakdown into several relevant sub-categories shown in Table 4-11. Item wise total estimate is presented in BDT. Based on RPF requirement, budgetary cost estimates for resettlement benefits have been worked out and presented in the and Annex-4.7.



Table 4-11: Summary of LA and Resettlement Budget (Indicative)

Sl. No	Ref. Table	Ref. Entitlement Matrix	Category of Loss	LA Estimate to be paid by DC (BDT)	Resettlement Budget by RHD (BDT)	Total of LA Estimate and Resettlement (BDT)
	2	3	4	5	6	7
1	Table 4-12 and Annex-4.7 (Table 4-8 & 4-9)	Impact Category 1	Compensation for land (DC's Estimate) Top Up (RV/RC-CCL) will be determined by PAVC in circumstance when CCL amount paid after advance income tax is lower than the Replacement Cost/Replacement Value of the acquired land, as applicable as per RPF Guidelines for Loss and Entitlements.	4,664,537,909.38	69,346,618.41	4,664,537,909.38 69,346,618.41
2	Table 4-13 & Table 4-14 and Annex-4.7 (Table 4-10 & Table 4-11)	Impact Category 3: Impact Category 12(a,b,c)	Compensation for Titled Primary & Secondary Structures of Affected THHs	1,826,950,581.00		1,826,950,581.00
3	Table 4-13 & Table 4-14 and Annex-4.7 (Table 4-10 & Table 4-11)	Impact Category 4: Impact Category 13;	Compensation for Non-titled Primary & Secondary Structures of Affected THHs		74,987,288.00	74,987,288.00
4	Table 4-13 & Table 4-14 and Annex-4.7 (Table 4-10 & Table 4-11)	Impact Category 5(a); Impact Category 12(a,b,c)	Compensation for Titled Primary and Secondary Structures of Affected Titled CPRs & Other Entities	218,325,735.00		218,325,735.00
5	Table 4-13 & Table 4-14 and Annex-4.7 (Table 4-10 & Table 4-11)	Impact Category 5(b); Impact Category 13;	Compensation for Non-titled Primary and Secondary Structures of Affected Non-Title-CPRs, graves & Other Entities		18,112,005.00	18,112,005.00
6	Table 4-15 & Annex-4.7 (Table 4-12)	Impact Category 6;	Loss of Trees: Cash Compensation under Law (DC's Estimate)	17,276,307.00		17,276,307.00
7	Table 4-16 and Annex-4.7 (Table 4-13)	Impact Category 7;	Loss of Fruits for fruit bearing trees (L.S)		345,526.14	345,526.14
8	Table 4-17	Impact Category 1, 3, 4, 5(a), 5(b), 9, 10, 11, 14;	Compensation for immatures trees owned by Social Forestry under the Forest Department (No. of Trees 765 x BDT 500 = BDT 382,500) (BTD 500 as per rate of betelnut, bigbamboo, & benty tree)		382,500.00	382,500.00
9			Compensation for Standing Crops/Fish stock		3,085,437.00	9,256,311.00
10			Resettlement Benefits and Assistance		193,969,407.00	193,969,407.00
			Sub-total of Sl.No.1-6 (A)	6,733,261,406.38	360,228,781.55	7,093,490,187.93
			Administrative Cost of DC-2% on Column 5 of A, (B)	134,665,228.13		134,665,228.13
			Contingency (7% on Column 6 of A) to cover GRC & other unforeseen adverse impact, construction-induced impact;		7,204,575.63	7,204,575.63
			(C)			
			Total Budget (A+B+C)	6,867,926,634.51	367,433,357.18	7,235,359,991.69

Note: 1. During implementation of the Budget, against one category of loss can be adjusted with another (if necessary) provided that the total approved Resettlement Budget ceiling shall not be exceeded.

2. There will be no adjustments in payments of Compensation, Resettlement Benefits and Assistance by PIL/RHD as per RPF Program Principles (Chapter 1.3).



2.26. The costs for different items worked in the above summary Replacement Value has been determined based on property valuation including transaction costs for stamp duty of registration cost and advance income tax to be deducted from CCL. RV will be re-confirmed by PAVC during implementation of RAP. Government of Bangladesh (GoB) will provide LAP and Land Budget from GoB's Source. Ministry of Road, Transport and Bridges (MoRTB) will approve the indicative budget including the RAP.

4.6.2 REPLACEMENT COST OF LAND AND ASSETS

4.6.2.1 REPLACEMENT VALUE OF LAND

2.27. The replacement value for each category of affected lands has been estimated as the average price rate of the transacted or recorded price, the current market price of each category. Compensation of land to be paid by Deputy Commissioner (DC) has been estimated based on "Mouza Rate" which was determined and adopted in 2023-2024 for Lot 1, 2 & 3 under the Sylhet-Charkhai-Sheola Highway Improvement Project area for Sylhet Sadar, South Surma, Golaganj and Beani Bazar Upazilas by the GoB (ref. govt. mouza rate of land collected from Sub-Registrar's Offices, Sylhet- Annex -4.8). Govt. Mouza Rate (2023-2024) under Sylhet Sadar Upazila as preserved at Land Acquisition Office, Sylhet has been used to determine CCL. Accordingly, the project added on mouza rates after taking 200% additional. That is, compensation for land to be paid by DC includes market price and 200% additional as per ARIPA, 2017. The total estimated cost for acquisition of land is BDT 4,664,537,909.38 to be paid by DC. The amount of additional compensation on top up of DC's payment has been worked out to be BDT 69,346,618.41 for acquisition of land Table 4-12 and Annex-4.7 (Table 4-8 & 4.9).

Table 4-12: Lot wise Indicative Budget for Land

LOT	Private Land		Govt. Land		Total Affected Land (Acre)	Total Affected Land (Decimal) (1=100)	Total Cost of Land as per Mouza Rate or Transacted Price (BDT)		Cash Compensation under Law (CCL) (Mouza Rate + Adnl. 200%) (BDT) to be paid by DC		Replacement Value (RV) for Private Land including Advance Income Tax before CCL (BDT)	Top-up including advance income tax to be deducted by DC when CCL amount paid after advance income tax is lower than the RV/BC of the acquired land to be determined by PAVC if applicable for Private Land (BDT)
	Acre	Decimal	Acre	Decimal			Private Land	Govt. Land	Private Land	Govt. Land		
LOT-1	63.7021	6370.21	7.2470	724.70	70.9492	7094.92	1,076,276,103.23	96,576,914.54	3,228,828,309.09	271,730,743.63	3,236,761,714.60	43,046,750.59
LOT-2	47.3736	4737.36	5.8368	583.68	53.2103	5321.03	248,474,971.02	25,801,387.90	745,424,913.05	77,404,363.71	761,198,872.68	24,483,350.83
LOT-3	37.2890	3728.90	6.9817	698.17	44.2708	4427.08	90,568,901.87	23,147,691.23	271,706,705.62	69,443,073.70	269,511,216.77	1,816,526.00
Total (LOT-1-2-3)	148.3647	14836.47	20.0655	2006.55	168.4303	16843.03	1,415,319,976.12	139,525,991.68	4,245,959,928.36	418,577,981.03	4,267,471,804.05	69,346,618.41
Cash Compensation under Law (CCL) of Private & Govt. Land (BDT) to be paid by DC										4,664,537,909.38		

Source: Census and IOL Field survey conducted by BCL July - December 2024 and LAP of the Project

4.6.2.2 ESTIMATED COST OF STRUCTURES

2.28. Primary and secondary structures of title HHs, non-title HHs, title and non-title CPRs are affected in the Sylhet-Charkhai-Sheola Highway Improvement Project. The census and IOL survey conducted in the Sylhet-Charkhai-Sheola Highway Improvement Project from July 2024 to December 2024 have covered different types of structures which will be affected within the RoW. The costs of structures have been assessed and determined considering the PWD and approved rate of recent project (ref. Annex 4-9). It may be mentioned that DC will determine price for structures based on assessment and determination of price by the Public Works Department and adding 100% additional as per the ARIPA, 2017. The affected HHs, CPRs and other entities will be allowed to take away salvageable materials free of cost even after payment of compensation. As a result, additional compensation on top of DC's payment will not be required. The CCL will be higher than/almost equal to the Replacement



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Cost (RC). The RC stands at BDT 1,826,950,581.00 for both primary and secondary structures affected on private land. Therefore, BDT 1,826,950,581.00 will be paid by DC while BDT 74,987,288.00 for primary and secondary structures of NTHHs (on government land) will be paid by RHD with assistance from INGO. DC will pay the amount of CCL money BDT 218,325,735.00 for primary and secondary structures of title CPRs while amount of the RC money BDT 18,112,005.00 for primary and secondary structures of non-title CPRs will be paid by RHD. Breakdown of estimated budgets for primary and secondary structures of THHs, NTHHs, and title & non-title CPRs and other entities are presented in Table 4-13 and Annex-4-7 (Table 4-10).

Table 4-13: Affected Primary Structures of the Title & Non-title HHs, CPRs & other Entities in the Sylhet-Charkhai-Sheola Highway Improvement Project

Sl. No.	Type of HHs, CPRs & Other Entities	Unit	Non-title Primary Structure						Title Primary Structure						RG at actual including land development, labor & Transportation cost to be determined by PAVC			
			Area of Pucca Structure (BDT 1200/SH)	Area of Semi-pucca Structure (BDT 600/SH)	Area of Tin-made Structure (BDT 300/SH)	Area of Karba Structure (BDT 200/SH)	Total Amount (BDT) of Primary Structure (Actual Cost)	Area of Pucca Structure (BDT 240/SH)	Area of Semi-pucca Structure (BDT 120/SH)	Area of Tin-made Structure (BDT 300/SH)	Area of Karba Structure (BDT 200/SH)	Total Amount (BDT) of Primary Structure (Actual Cost)	Total Amount (BDT) of Primary Structure with 100% Additional	TG at actual including dismantling Cost to be determined by PAVC				
0			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Affected HHs Losing Primary Structures in Lot-1																		
1.	THHs	SH	-	-	-	-	-	-	-	-	198,716	86,561	8,041	6,723	602,804,733	1,205,609,467	12,054,890	30,137,225
2.	NTHHs	SH	13,481	11,564	6,720	5,685	6,720	5,685	26,268,300	-	-	-	-	-	-	-	406,446	-
	A. Sub-total	SH	13,481	11,564	6,720	5,685	6,720	5,685	26,268,300	198,716	86,561	8,041	6,723	602,804,733	1,205,609,467	12,054,890	30,137,225	
Affected HHs Losing Primary Structures in Lot-2																		
1.	THHs	SH	-	-	-	-	-	-	-	28,822	48,040	15,621	6,121	6,121	135,450,182	270,900,364	2,520,002	6,300,006
2.	NTHHs	SH	18,306	19,865	12,930	11,289	12,930	11,289	40,022,760	-	-	-	-	-	135,450,182	270,900,364	509,550	-
	B. Sub-total	SH	18,306	19,865	12,930	11,289	12,930	11,289	40,022,760	28,822	48,040	15,621	6,121	6,121	135,450,182	270,900,364	3,029,552	6,300,006
Affected HHs Losing Primary Structures in Lot-3																		
1.	THHs	SH	-	-	-	-	-	-	-	41,803	44,509	16,511	6,48	6,48	162,713,991	325,427,982	3,212,607	7,969,516
2.	NTHHs	SH	540	4,519	10,315	730	730	730	6,599,900	-	-	-	-	-	162,713,991	325,427,982	157,107	-
	C. Sub-total	SH	540	4,519	10,315	730	730	730	6,599,900	41,803	44,509	16,511	6,48	6,48	162,713,991	325,427,982	3,369,714	7,969,516
Affected HHs Losing Primary Structures in Lot-1, 2, & 3																		
1.	THHs	SH	-	-	-	-	-	-	-	269,341	179,110	40,173	13,492	13,492	900,968,906	1,801,937,813	17,287,498.83	44,406,747.07
2.	NTHHs	SH	32,327	35,948	29,965	17,704	29,965	17,704	72,890,960	-	-	-	-	-	900,968,906	1,801,937,813	1,073,103.28	-
	(i) Total (A+B+C)	SH	32,327	35,948	29,965	17,704	29,965	17,704	72,890,960	269,341	179,110	40,173	13,492	13,492	900,968,906	1,801,937,813	18,860,602	44,406,747
Affected CPRs and Other Entity Losing Primary Structures in Lot-1																		
1.	Title CPRs & Other Entities	SH	-	-	-	-	-	-	-	17,249	6,808	280	280	-	51,234,475	102,468,950	900,254	2,250,635
2.	Non-title CPRs & Other Entities	SH	9,368	1,584	30	-	30	-	12,201,000	-	-	-	-	-	-	-	114,036	285,090
	D. Sub-total	SH	9,368	1,584	30	-	30	-	12,201,000	17,249	6,808	280	280	-	51,234,475	102,468,950	1,014,290	2,535,725
Affected CPRs and Other Entity Losing Primary Structures in Lot-2																		
1.	Title CPRs & Other Entities	SH	-	-	-	-	-	-	-	13,942	3,070	544	544	-	38,582,862	77,165,724	687,153	1,717,883
2.	Non-title CPRs & Other Entities	SH	2,454	1,080	291	-	291	-	3,680,100	-	-	-	-	-	-	-	73,602	184,005
	E. Sub-total	SH	2,454	1,080	291	-	291	-	3,680,100	13,942	3,070	544	544	-	38,582,862	77,165,724	760,755	1,901,888
Affected CPRs and Other Entity Losing Primary Structures in Lot-3																		



Title Primary Structures on Private Land or Affected THHs

229. Table 4-13 and Annex-4.7(Table 4-10) show that total estimated amount of compensation for affected primary structures of THHs is BDT 1,801,937,813. Detailed information on estimated budget for primary structures of THHs is presented in Table 4-13 and Annex-4.7(Table 4-10).

Title Secondary Structures on Private Land or Affected THHs

230. Table 4-14 and Annex-4.7(Table 4-11) show that the rate of secondary structures on private land has been determined by adopting the rate of secondary structures applied as per similar project of RHD. The estimated budget for secondary structures on private land is BDT 25,012,768.00. Detailed information on quantities of secondary structures (sft./rft./cft./no.), the rates of secondary structures and estimated budget are presented in Table 4-14 and Annex-4.7(Table 4-11).

Non-title Primary Structures of Affected NTHHs

231. Table 4-13 and Annex-4.7(Table 4-10) show that total estimated amount of compensation for primary structures of non-title HHs is BDT 72,890,960.00. The Replacement Cost (RC) of primary structures has been determined based on the EM. Detailed information on estimated budget for primary structures of non-title HHs is presented in Table 4-13 and Annex-4.7(Table 4-10).

Non-title Secondary Structures of Affected NTHH

232. Table 4-14 and Annex-4.7(Table 4-11) show that the rate of secondary structures on government land (for NTHHs) is determined based on the rate of secondary structures applied as per similar project of RHD. The cost of affected secondary structures of NTHHs (secondary structures on government land) is BDT 13,196,107. Detailed information on estimated budget for secondary structures of NTHHs (secondary structures on government land) is presented Annex-4.7(Table 4-11) according to the ESS5, necessary mitigation measures such as resettlement benefits to reduce the impacts on displaced persons have been suggested in the RAP of the Sylhet-Charkhai-Sheola Highway Improvement Project.

Table 4-14: Affected Secondary Structures of the Title & Non-title HHs, CPRs & other Entities in the Sylhet-Charkhai-Sheola Highway Improvement Project

SL No.	Types of Secondary Structures	Sft./Cft./Rft./ No.	Lot-1	Lot-2	Lot-3	Total (Lot-1+2+3)	Rate (BDT)	Total Amount (BDT) of Secondary Structure (Actual Cost)
1	Boundary Wall	Rft	16169.5	2922	2025	21116.5	250	5,279,125
2	Katcha Toilet	No.	0	2	1	3	1700	5,100
3	Slab Toilet	No.	7	3	6	16	3700	59,200
4	Sanitary Toilet	No.	48	34	17	99	6000	594,000
5	Submersible Pump/Deep	No.	10	10	10	30	55000	1,650,000
6	Shallow	No.	13	4	9	26	15000	390,000
7	Irrigation works	No.	0	0	0	0	65000	-
8	Water Pump/Motor	No.	16	10	4	30	4500	135,000
9	Steel Gate	Rft	2045	149	10	2204	1000	2,204,000
10	Concrete Gate	Rft	455	228	67	750	150	112,500
11	Garage	Sft	2013	1694	392	4099	600	2,459,400
12	Godown	Sft	1541	1275	297	3113	600	1,867,800
13	Guardroom	Sft	265	526.5	220	1011.5	600	606,900
14	Store Room	Sft	746	210	567	1523	600	913,800

Table 4-14: Affected Secondary Structures of the Title & Non-title HHs, CPRs & other Entities in the Sylhet-Charkhat-Sheola Highway Improvement Project

SL. No.	Types of Secondary Structures	Sft./Cft./Rft./ No.	Lot-1	Lot-2	Lot-3	Total (Lot-1+2+3)	Rate (BDT)	Total Amount (BDT) of Secondary Structure (Actual Cost)
15	Machine House	Sft	200	0	0	200	600	120,000
16	Stair House	Sft	680	90	220	990	600	594,000
17	Ozokhana	Sft	2110	0	250	2360	600	1,416,000
18	Oil Tank	No.	0	0	70	70	216	15,120
19	Septic Tank	Cft	45002	3616	2555	51173	188	9,620,524
20	Toilet Tank	Cft	3450	960	0	4410	306	1,349,460
21	Water Tank (CFT)	Cft	1912	1224	0	3136	404	1,266,944
22	Water Tank (Plastic)	No.	16	8	11	35	10000	350,000
23	Drain	Rft	108	0	0	108	165	17,820
24	Chatal	Sft	1550	0	0	1550	200	310,000
25	Pillar (RCC)	No.	27	93	30	150	1000	150,000
26	Pillar (Normal)	No.	13	8	6	27	350	9,450
27	Flag Stand	No.	1	0	0	1	5000	5,000
28	Gumboj	No.	5	0	0	5	1533	7,665
29	Minar	No.	3	1	2	6	350	2,100
30	Graveyard (CPR/ Family)	No.	144	5	100	249	40000	9,960,000
31	False Ceiling & False Roof (Sqf)	Sft	401	0	0	401	600	240,600
32	Steel Stair (Rft)	Rft	0	20	0	20	250	5,000
33	Lamp Post (Number)	No.	0	7	0	7	6000	42,000
	Grand Total =							41,758,508
a(1)	Compensation for Secondary Structures of Affected Title HHs							25,012,768
a(2)	Compensation for Secondary Structures of Affected Title CPRs & Other Entities							2,096,328
b(1)	Compensation for Secondary Structures of Affected Non-title HHs							13,196,107
b(2)	Compensation for Secondary Structures of Affected Non-title CPRs & Other Entities							1,453,305

Source: Census survey conducted by RCL, July - December 2024

4.6.2.3 REPLACEMENT COST FOR CPR AND OTHER ENTITIES STRUCTURES**Primary Structures of Affected CPRs and Other Entities**

The total estimated amount of the RV for affected primary structures of CPRs and other entities is BDT 221,788,328.00 including BDT 205,129,628.00 for title CPRs and other entities while BDT 16,658,700.00 for non-title CPRs and other entities. Detailed information on budget for primary and secondary structures of the tiled and non-title CPRs and other entities is given in Table 4-13 and Annex-4.7 (Table 4-10).

Secondary Structures of Affected CPRs and Other Entities

Table 4-14 and Annex-4.7 (Table 4-11) show that the rates of secondary structures are determined based on adopting the rate of secondary structures of title & non-title CPRs, and other entities from similar project of RHD. The total estimated cost of the budget for secondary structures of title & non-title CPRs, and other entities



is BDT 3,549,633.00 including BDT 2,096,328.00 and BDT 1,453,305.00 for title & non-title CPRs, and other entities respectively. Detailed information of the cost of secondary structures of title and non-title CPRs are presented in Annex-4.7 (Table 4-11).

4.6.2.4 REPLACEMENT COST FOR TREES

234. The compensation for trees (different species and size) on private land and RHD land/any government land has been assessed based on the scheduled rate of the Department of Forest (Annex-4-10). Price rate of trees of various species and sizes assessed, determined, and recommended in recent development projects. Prices of trees have been assessed based on the market survey conducted from July 2024 to December 2024. The rates of trees which were applied as per similar Project has been adopted as the price rates of trees in this project. The compensation for trees on private land and RHD land/any government land owned by local people (residential HHs and owners of businesses) and title & non-title CPRs in the Project is presented in Table 4-15. The estimated amount for compensation for trees is BDT 17,276,307.00 will be paid by DC and BDT 382,500.00 including plantation cost @ 2% at BDT 345,526.00 will be paid by RHD (Ref. Table 4-15). Detailed information on replacement costs for trees are given in Table 4-15 and Annex-4.7 (Table 4-12).

Table 4-15: Estimated Amount of Compensation for Trees in the Sylhet-Charkhais-Sheola Highway Improvement Project.

Sl. No.	Particulars	Large Tree		Medium Tree		Small Tree		Sapling Tree		Total No. of Trees	Total Amount (BDT) of Private Trees with 100% Addl. & Actual Cost of Govt. Trees
		No.	Amount (BDT) of Private Trees with 100% Addl. & Actual Cost of Govt. Trees	No.	Amount (BDT) of Private Trees with 100% Addl. & Actual Cost of Govt. Trees	No.	Amount (BDT) of Private Trees with 100% Addl. & Actual Cost of Govt. Trees	No.	Amount (BDT) of Private Trees with 100% Addl. & Actual Cost of Govt. Trees		
A	Total Tree on Private Land	1553	9,090,738	1735	3,717,110	1634	650,018	6623	661,800	11545	14,119,666.00
B	Total Tree on Govt. Land	664	1,687,469	1155	907,717	600	153,255	984	408,200	3403	3,156,641.00
C	Total Trees on Private and Govt. Land	2217	10,778,208	2890	4,624,827	2234	803,273	7607	1,070,000	14948	17,276,307.00
D	Loss of Fruits for fruit bearing trees (LS)										345,526.14
E	Compensation for immature trees owned by Social Forestry under the Forest Department (No. of Trees 765 x BDT 500 = BDT 382,500) (BTD 500 as per rate of betelnut, Big bamboo, & bany tree)										382,500.00

Source: Census and ICF, survey conducted by BCL, July - December 2024



4.6.2.5 REPLACEMENT COST FOR CROPS/FISHES

235. The current prices for crops and fish stock have been determined adopting the rate by taking into account of rate for crops applied as per another similar project of RHD. PAPs will be encouraged to harvest their affected crops and fish stock if possible. The budget for compensation of standing crops and fish stocks has been estimated based on a fixed rate for total affected cropped land and pond/low lying area. Crop and fish stock compensation BDT 60,000.00 per acre & BDT 60,000.00 per acre has been adopted based on applied rate of crop & fish stock compensation in similar project of RHD. It is to be noted that similar projects of RHD determined rates of crops and fish-stock based their market survey and relevant data from the Department of Agricultural Extension (DAE) and Department of Livestock and Fisheries. The total estimated amount for crop and fish compensation is BDT 6,170,874.00 to be estimated by Deputy Commissioner and BDT 3,085,437 for 100% top-up payment on DC's CCL for legal owners and sharecroppers to be determined by PAVC. The standing crops and fish stock values of the Project areas are presented in Table 4-16 and Annex-4.7 (Table 4-13).

SL. No.	Category of Loss	Quantity (acre)	Rate per acre (BDT)	Estimated Amount (BDT)
1	Compensation for standing crops title to land and without title to land (Sile 51.0525+Amon 35.0467+Auush 0.0910+Boro 11.4373= 109.5521 acres) to be determined under LA estimate	97.6275	60,000	5,857,650.00
2	Compensation for fish stock title to land and without title to land (Pond 1.3326+Nala 0.1066+Duba 3.7812 = 5.2204 acres) to be determined under LA estimate	5.2204	60,000	313,224.00
	Total			6,170,874.00
	100% top-up payment on DC's CCL for legal owners and sharecroppers to be determined by PAVC			3,085,437.00
	Grand Total			9,256,311.00

Source: Census Survey conducted by BCL, July - December 2024



4.6.3 RESETTLEMENT BENEFITS AND ASSISTANCE

236. The resettlement benefits budgetary cost estimates have been determined based on RPF and RAP Entitlement Matrix (EM) (ref. Section 4.2 in Chapter 4). RPF & RAP (EM) contains entitlements such as relocation allowance, transfer grant, reconstruction grant, rental assistance, grant to cover temporary loss of wage, income restoration grant, one-time special assistance for vulnerable HHs, etc., for different losses. These entitlements presented in the RPF & RAP (EM) at actual/intangible/not worked out concretely, which will be determined and recommended by PAVC during implementation of RAP. As a result, corresponding entitlement rates for particular losses in the EM have been adopted if the rate is found reasonable and justified. Budget for resettlement benefits and assistance stands at BDT 193,969,406.35 as given in Table 4-17 below.

Table 4-17: Breakup of Indicative Budget for Resettlement Benefits and Assistance

SL. No.	Ref. Entitlement Matrix	Ref. Tables	Entitlements	Description of Items	Quantity	Rate	Amount (BDT)
1	Impact Category 1: Acquisition of agricultural, homestead, commercial, water bodies (Ponds) and other category	Annex Table 4-11	Relocation allowance for all types of affected land as per RPF	Budget for Private land	Private Land 14,836.47 decimals - CPR Land 413.87 decimals = 14,422.61 decimals	1000 as per RPF	14,422,610.00
				Govt. land	1,703.21 decimals	-	-
			Stamp Duty of Registration cost as per RPF	Stamp Duty of Registration cost	L.S.	L.S.	5,000,000.00
2	Impact Category 3: Loss of residential, commercial, structures with title to land.	Table 4-13 & Annex-4.7 (Table 4-10)	Transfer Grant (TG) at actual of the affected structure including dismantling cost for non-shiftable structures to be determined by PAVC	Transfer Grant (TG) at actual of the affected structure including dismantling cost for non-shiftable structures	Table 4-13	As per RPF	17,787,498.83
3	Impact Category 4: Loss of residential, commercial, structures without title to land (squatters/ encroachers).	Table 4-13 & Annex-4.7 (Table 4-10)	Reconstruction Grant (RG) at actual of the affected structure including land development, labor cost and transportation cost to be determined by PAVC	Reconstruction Grant (RG) at actual of the affected structure including land development, labor cost and transportation cost	Table 4-13	As per RPF	44,406,747.07
4	Impact Category 5(a): Loss of Community Property Resources (CPR) with title to land	Table 4-13 & Annex-4.7 (Table 4-10)	Transfer Grant (TG) and Development cost at actual of the affected structure which include labor cost, transportation cost, and dismantling cost for non-shiftable structure to be determined by PAVC	Transfer Grant (TG) and Development cost at actual of the affected structure which include labor cost, transportation cost, and dismantling cost for non-shiftable structure	Table 4-13	As per RPF	1,073,103.28
	Impact Category 5(a): Loss of Community Property Resources (CPR) with title to land	Annex Table 4-11	Relocation allowance for land of community property resources as per RPF	CPRs' Private land	413.87 decimal	1000 as per RPF	413,870.00
				CPRs' Govt. land	303..5 decimals	-	-

Table 4-17: Breakup of Indicative Budget for Resettlement Benefits and Assistance

SL No.	Ref. Entitlement Matrix	Ref. Tables	Entitlements	Description of Items	Quantity	Rate	Amount (BDT)
		Table 4-13 & Annex-4.7 (Table 4-10)	Transfer Grant (TG) at actual of the affected structure including labor cost, transportation cost, and dismantling cost for non-shiftable structures to be determined by PAVC	Transfer Grant (TG) at actual of the affected structure including labor cost, transportation cost, and dismantling cost for non-shiftable structures	Table 2-8	As per RPF	1,738,332.62
		Table 4-13 & Annex-4.7 (Table 4-10)	Reconstruction Grant (RG) at actual of the affected structure including land development, labor cost and transportation cost to be determined by PAVC	Reconstruction Grant (RG) at actual of the affected structure including land development, labor cost and transportation cost	Table 4-13	As per RPF	4,345,831.55
5	Impact Category 5(b): Loss of Community Property Resources (CPR) without title to land	Table 4-13 & Annex-4.7 (Table 4-10)	Transfer Grant (TG) at actual of the affected structure including labor cost, transportation cost, and dismantling cost for non-shiftable structures to be determined by PAVC	Transfer Grant (TG) at actual of the affected structure including labor cost, transportation cost, and dismantling cost for non-shiftable structures	Table 4-13	As per RPF	190,518.00
		Table 4-13 & Annex-4.7 (Table 4-10)	Reconstruction Grant (RG) at actual of the affected structure including land development, labor cost and transportation cost to be determined by PAVC	Reconstruction Grant (RG) at actual of the affected structure including land development, labor cost and transportation cost	Table 4-13	As per RPF	476,295.00
6	Impact Category 9: Loss of Income from displaced commercial/industrial premises (owner operated)	Table 2-10 & Annex-4 (Table 2-6 & 2-7)	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	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 for Small Business	119 THHs as Proprietor, or Businessmen, or Artisan; 425 NTHHs as Proprietor, or Businessmen, or Artisan;	As per RPF	3,570,000.00
		Table 2-10 & Annex-4 (Table 2-6 & 2-7)	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	One-time assistance for alternate rental based on the average rental rate as Large Business to be determined by PAVC	563 Tenants as Proprietor, or Businessmen, or Artisan; 33 THHs as Proprietor, or Businessmen, or Artisan;	AS per RPF	16,890,000.00
		Table 2-10 & Annex-4 (Table 2-6 & 2-7)	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	One-time assistance for alternate rental based on the average rental rate as Large Business to be determined by PAVC	33 THHs as Proprietor, or Businessmen, or Artisan;	AS per RPF	2,970,000.00



Table 4-17: Breakup of Indicative Budget for Resettlement Benefits and Assistance

SL. No.	Ref. Entitlement Matrix	Ref. Tables	Entitlements	Description of Items	Quantity	Rate	Amount (BDT)
7	Impact Category 10: Temporary loss of Income (wage earners in agriculture, commerce and small business and industry) under title and non-title	Table 2-11 & Annex-2 (Table 2-10)	One time grant to cover temporary loss of regular wage income @ average wage/day prevalent at that point of time in the locality for 30 days for wage labor or as determined by PAVC.	293 affected wage earners	293 affected wage earners	30 days as per RPF	5,274,000.00
8	Impact Category 11: Loss of income from rented out and access to rented in residential and commercial premises.	Table 2-12 & Annex-2 (Table 2-11) Table 2-13 & Annex-2 (Table 2-8) Table 2-13 & Annex-2 (Table 2-8)	Owner of the rented-out premises as identified by Census and verified by PAVC Household/person rented-in any such structure as identified by Census and verified by PAVC Actual shifting assistance for Rented-in to be determined by PAVC	One Time assistance for Rented out structures to be determined by PAVC. One Time assistance for Rented in to be determined by PAVC. Shifting Assistance for rented-in	260 THHs 910 Tenants 910 Tenants	LS LS LS	3,900,000.00 13,650,000.00 4,550,000.00
9	Impact Category 14: Severely affected HHs and Vulnerable HHs and livelihood assistance.	Table 2-14 & Annex Table 2-9 Table 4-7 & Annex Table 2-9	Income Restoration Grant for the Persons losing more than 10% of their income from all sources to be determined by PAVC Special assistance of a one-time payment for Vulnerable HHs Training for persons of affected HHs losing more than 10% of their income from sources/TH/NTH vulnerable HHs	Income Restoration Grant for the Persons losing more than 10% of their income from all sources to be determined by PAVC Income Restoration Grant for the TH/NTH/Nominated/selected trainees	192 HHs 51 243	As per RPF Guideline 50,000 as per RPF LS	17,280,000.00 2,550,000.00 1,020,600
Total BDT							193,969,406.35



M&A *CSIR* *1-1-2024* *4*

4.7 INSTITUTIONAL ARRANGEMENTS FOR RAP IMPLEMENTATION

237. Roads and Highways Department (RHD) is representing the Government of Bangladesh as the Executing Agency (EA) of the Sylhet-Charkhai-Sheola Highway Improvement Project under the Ministry of Road Transport and Bridges (MoRTB). Institutional arrangements for the Sylhet-Charkhai-Sheola Highway Improvement Project consist of Project Steering Committee (PSC), Project Implementation Unit (PIU), Social and Environmental Circle of RHD (RSEC) to ensure efficient and smooth implementation of the project and to manage and implement the RAP as well. It is worth mentioning that the above-mentioned institutional arrangements for RAP implementation will be replicated in the Sylhet-Charkhai-Sheola Highway Improvement Project.

238. Institutional arrangements required for implementation of Resettlement Action Plan (RAP) for Sylhet-Charkhai-Sheola Highway Improvement Project include capacity augmentation of RHD head office, RHD Field offices, respective Deputy Commissioner's office at Sylhet, appointment of INGO/consulting firm, formation of various committees like: GRC, PAVC, etc. The Additional Project Director at Head Office will have overall responsibilities related to resettlement and rehabilitation policy guidance, coordination, planning, monitoring and reporting on progress of land acquisition and implementation of RAP.

239. Secretarial Staff at Head Office will assist the APD. At the Field level, the APD will be assisted by PIU. Besides, an NGO has already been appointed for the implementation of RAP. The LA & Resettlement Specialist of the Project Implementation Consultant (PIC) would be engaged to carry out internal monitoring and evaluation of the project.

240. RHD has already established a Project Implementation Unit (PIU), headed by a Project Director in Dhaka and one Additional Project Director (APD) who will be overseeing the work of two(2) Project Managers (PMs), based in the Field and supervising the RAP implementation activities. The APD will act as Chief Resettlement Officer and supervise the Land Acquisition and Resettlement (LAR) activities under their supervision. The APD will be assisted by the Project Managers, LA & Resettlement Specialist (Individual Consultant), Implementing NGO (INGO) specifically recruited to implement the day-to-day LAR activities and by the PIC resettlement experts. Details of the implementation arrangements are provided in **Table 4-18**.

Table 4-18: Implementation Arrangements

Agency	HR Resources	Roles and Responsibilities
PIU	Project Director, RHD	<ul style="list-style-type: none"> ▶ Overall implementation of the project. ▶ Coordination among the high-level committees to obtain regulatory clearance/permissions. ▶ Participate in high level meetings. ▶ Appoint INGO for the implementation of RAP; ▶ Review of progress of project and RAP; and ▶ Approved to release the funds.
	Additional Project Director, RHD/Chief Resettlement Officer (CRO)	<p>Overall responsibility for implementation of the project and of RAP as well. Key activities include:</p> <ul style="list-style-type: none"> ▶ Keep good coordination with Social and Environmental Circle of RHD (RSEC); ▶ Ensure that implementation of the RAP follows both Government and Bank rules and regulations; ▶ Assisting the PD to appoint INGO for implementation of RAP; ▶ Supervise and review the INGO activities and with assistance from RSEC providing necessary pragmatic advice to the INGO staff; ▶ Support the survey verification and update of affected persons and prepare identification and entitlement cards; ▶ Ensure conducting resettlement training programs for EA staff for capacity building as well as Field level NGOs and partner agencies capacities; ▶ Provide assistance and logistical support to the District Commissioner's office for land acquisition activities; ▶ Provide support to the affected persons in gathering their documentation to collect their award payment at the District's office; ▶ Distribute resettlement benefits; ▶ Support the Census data gathering for the preparation of RAP addendums and updates as and when require; ▶ Conduct and document regular and meaningful consultations with affected persons – including the dissemination of entitlement benefits; ▶ Monitor monthly progress and Conduct internal monitoring of RAP activities and prepare monthly progress reports;



Table 4-18: Implementation Arrangements

Agency	HR Resources	Roles and Responsibilities
		<ul style="list-style-type: none"> ▶ Guide staff of RHD, INGO and M&E consultant on policy related issues during implementation; ▶ Ensure timely release of fund for R&R activities; ▶ Convene grievance redress committee; ▶ Liaise with other Government and non-Government agencies, on matters of mutual interest, related to resettlement; and ▶ Place budget to DC's offices.
	Project Manager (PM) PIU	<ul style="list-style-type: none"> ▶ Overall implementation of the project RAP; ▶ Liaison with District administration (DC) to support land acquisition and RAP implementation activities; ▶ Assist the PMU on RAP implementing INGO; in setting up a baseline and monitoring system; ▶ Review and finalize RAP additions when necessary and Monitor activities of the NGO (INGO); ▶ Conduct internal monitoring of the resettlement process to ensure smooth implementation; ▶ Ensure the timely payments of compensation and other entitlements as per the RAP are made before physical relocation or the commencement of civil works occurs; ▶ Participate, record and address grievances at project level; ▶ Coordinate with the project cell to ensure availability of funds for all R&R activities; ▶ Monitor the effectiveness of entitlement Contracts and payment modality; ▶ Promote improved social and environmental performance through the effective use of management systems; ▶ Ensure that proper implementation of Livelihood restoration plan and gender action plan including; ▶ Grievance Redressal; and ▶ Liaison with relevant government authorities for protecting archeological and cultural heritage sites.
INGO	Team of professional staff (Team Leader, Area Managers, Data Manager) and Field and Support Staff	<ul style="list-style-type: none"> ▶ Day-to-day implementation of the land acquisition process and resettlement activities. ▶ Support the survey verification and update of affected persons and prepare identification and entitlement cards; ▶ Provide assistance and logistical support to the District Commissioner's office for land acquisition activities; ▶ Provide support to the affected persons in gathering their documentation to collect their award payment at the District's office; ▶ Support the PIU in the distribution of resettlement benefits; ▶ Support the Census data gathering for the preparation of RAP addendums and updates; ▶ Conduct and document regular and meaningful consultations with affected persons – including the dissemination of entitlement benefits; ▶ Conduct internal monitoring of RAP activities and prepare monthly progress reports; ▶ Address grievances at local level; ▶ Act as secretary in grievance redress mechanism; ▶ Support affected persons in filing grievances; and ▶ Conduct livelihood and skills enhancement training program.
Deputy Commissioner Office, Sylhet	Deputy Commissioner of Sylhet	<ul style="list-style-type: none"> ▶ Participate in the joint verification survey; ▶ Finalization of all land acquisition and LA estimates; ▶ Issues all notices related to the land acquisition process; ▶ Conduct payment of CCL to the affected persons; ▶ Allocate khas land and assist in identifying alternative land for relocation of sensitive groups and community structures; and ▶ Maintain all official records and legal and administrative authority for land titles.
PIU& PIC	Social Development & Public Relations Expert, and Land	<ul style="list-style-type: none"> ▶ Guide the land acquisition process and resettlement activities. ▶ Help the PIU an RAP implementing NGO in setting up a baseline and monitoring system. ▶ Review and finalize RAP addendums when necessary;



Table 4-18: Implementation Arrangements

Agency	HR Resources	Roles and Responsibilities
	Acquisition Resettlement Specialist (Individual Consultant)	<ul style="list-style-type: none"> ▶ Monitor activities of the NGO; ▶ Conduct internal monitoring of the resettlement process to ensure smooth implementation. ▶ Ensure that timely payments of compensation and other entitlements as per the RAP are made before physical relocation or commencement of civil work occurs. ▶ Consolidate monthly resettlement monitoring reports prepared by resettlement NGO into semiannual monitoring reports to be submitted. ▶ Participate, record and address grievances at project level. ▶ Identify areas of non-conformity with the RAP and propose corrective actions; and ensure proper documentation of the ongoing consultation process. ▶ Provide assistance and logistical support to the District Commissioner's office and INGO for land acquisition activities. ▶ Maintain all official records and legal and administrative authority for land titles. ▶ Supervise the INGO activities; and ▶ Ensure proper documentation of the ongoing consultation process.
	Gender Specialist	<ul style="list-style-type: none"> ▶ Review and prepare the project Gender Action Plan (GAP) & support PIU for its implementation. ▶ Coordination with WB task team and PIU. ▶ Organize/facilitate initial training of PIU staff on GBV & support the PIU with the development of GBV action plan. ▶ Develop or adapt standard operating procedures for GRM; ▶ Assess the need & support the implementation of community consultations & stakeholders' engagement to take place during upcoming implementation support missions. ▶ Support the adaptation of code of conduct (CoC) for workers; and ▶ Carrying out advocacy for promoting equal rights for women as skill and unskilled labor force, day-care centers at worksite etc.

241. Land acquisition and implementation of RAP are depended on role and responsibilities of Deputy Commissioner's office, PIC and RAP Implementing NGO (INGO), which are presented in the **Figure 4-2** details at **Annex-4.11**.

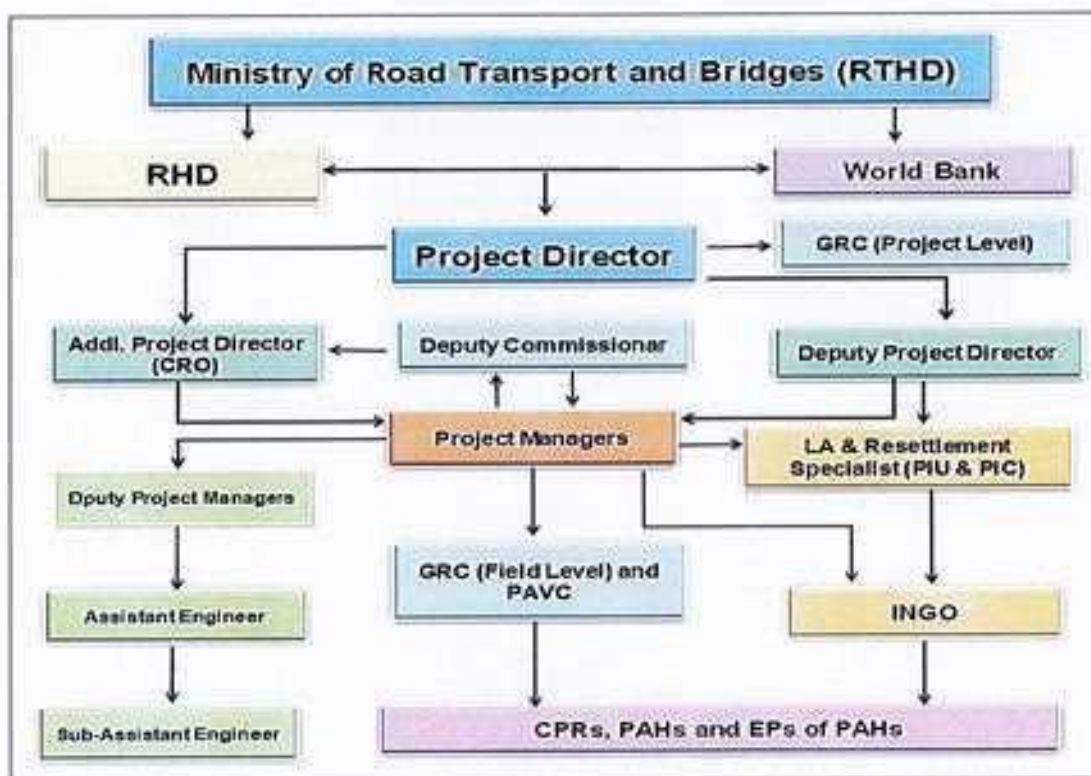


Figure 4-2: Institutional Arrangement for RAP Implementation



4.7.1 PROPERTY ASSESSMENT AND VALUATION COMMITTEE (PAVC)

242. The main task of a Property Assessment and Valuation Committee (PAVC) is to undertake a plot to plot survey in the affected areas, using a set questionnaire, for determining/assessing the actual quantum and Replacement Value (RV) of affected properties/losses/entitlements as per approved Resettlement Action Plan (RAP) of all category of the Displaced Persons (DPs), compare these data with the assessment made by the DC office and establish the loss of livelihood and resettlement. The MoRTB will form the PAVC for the project through a Gazette Notification. Composition of the PAVC is presented in **Table 4-19**.

The PAVC will be constituted of:

Sl. No.	PAVC Members	Members of the PAVC
1.	Concerned Project Manager (PM) of PIU as nominated by PD	Convener
2.	Concerned Field Official of the PIU as nominated by PD	Member
3.	Representative of Deputy Commissioner as nominated by DC	Member
4.	Area Manager of Implementing NGO	Member Secretary

243. The committee can co-opt any person considered indispensable (PWD, LGED, Department of the Forest etc.) to be approved by the Project Director, RHD.

4.7.1.1 THE SCOPE OF WORK AND THE TERMS OF REFERENCE (TOR) FOR THE PAVC

- ▶ The PAVC will undertake a plot-to-plot survey in the affected areas, using a structured questionnaire, for determining the actual quantum of losses suffered by the DPs (Title holders and non-title holders), compare these data with the assessment made by the DC, Census and IOL with the assistance of INGO;
- ▶ The PAVC will identify all Entitle Persons (EPs);
- ▶ The PAVC will sign the filled joint survey Forms by INGO as per RAP Entitlement Matrix and shall submit it to the Project Director, RHD;
- ▶ The PAVC determines RV for all types of losses with the assistance of INGO and relevant government departments/agencies like PWD, DAE, DOF including other similar Projects.
- ▶ The PAVC will recommend the per unit RV including other Resettlement Assistance/Grant as per RAP Entitlement Matrix and shall submit it to the Project Director for necessary approval.
- ▶ They will take decisions in the PAVC meeting and the decisions will be taken on a two-thirds majority basis;
- ▶ For any controversy/inadequacy/complexity in the ToR or its operation, the decision of the Project Director, RHD shall be considered as final; and
- ▶ The Project Director is empowered by making required modifications/changes in the ToR for better functioning of the committee.

4.7.2 RAP IMPLEMENTATION SCHEDULE

244. The RAP implementation schedule is based on the principle that people affected by land acquisition and displacement due to vacating the RHD and acquired land are paid their legal compensation and due resettlement benefits prior to relocation and resettlement. In terms of compensation and relocation, the implementation will be synchronized with the construction plan with particular attention to make available land for the award of the contract under the Sylhet-Charkhai-Sheola Highway Improvement Project. Therefore, implementation of the RAP will begin prior to the commencement of construction/engineering works in the Sylhet-Charkhai-Sheola Highway Improvement Project.

245. The key activities in the critical path for a timely implementation of the RAP are:

- (a) Securing the RAP budget for the Sylhet-Charkhai-Sheola Highway Improvement Project by RHD.
- (b) Recruitment of the INGO has already been done. They are already in the field from December 2024. Other important activities are the publication of the notice for land acquisition for the Sylhet-Charkhai-Sheola Highway Improvement Project to launch the process of acquisition. It is important to mention that the PAVC will be formed to undertake the joint survey of affected properties, validate the valuation methodology for preparing the budget for the Sylhet-Charkhai-Sheola Highway Improvement Project, which will be replicated in the Sylhet-Charkhai-Sheola area.

246. It is to be noted that RHD initiated and continued some advance actions such as the placement of Resettlement Unit (RU) staff for the headquarters and the field offices and hiring of INGO for RAP implementation etc. In the Sylhet-Charkhai-Sheola Highway Improvement Project, the PIU will provide adequate advance notification (30 days) to the APs and will pay their due resettlement benefits, after payment of CCL by DC, including relocation and income restoration/assistance prior to start of construction work. Payment of



compensation will be made prior to the actual possession of the acquired lands and removal of the structures from the RoW in the Sylhet-Charkhai-Sheola Highway Improvement Project area so that APs have sufficient time to dismantle and remove all salvageable material for rebuilding of houses and reestablishment of businesses.

247. As per the implementation schedule, efforts will be made to complete the RAP implementation process of the Sylhet-Charkhai-Sheola Highway Improvement Project in about 30 months' time including a margin of 6 months to redress any unforeseen situations or circumstances that may arise during the RAP implementation. Step wise activities have been done for implementation of RAP of the Sylhet-Charkhai-Sheola Highway Improvement Project. However, the activities to be undertaken for implementing land acquisition and resettlement under the Sylhet-Charkhai-Sheola Highway Improvement Project are presented in the implementation schedule. A tentative Implementation Schedule has been included in **Table 4-20**.

4.7.3 IMPLEMENTATION TIME TABLE

248. The implementation of the RAP of Sylhet-Charkhai-Sheola Highway Improvement Project is planned as per the updated engineering design. RAP has a separate time-bound implementation schedule and it is commenced on December 2024 in the last month of the fourth quarter of 2024. The number of activities under sub-heading LAP and RAP implementation schedule has been reduced in the RAP. However, the major activities under the LAP and RAP implementation have been scheduled in the below **Table 4-20**.

4.8 MONITORING AND EVALUATION

249. Main objective of RAP implementation is to facilitate affected households to restore their pre-project socioeconomic status and living standards. The monitoring process has been designed to cover RAP implementation and delivery of institutional and financial assistance to the project affected households, CPRs and other entities. It is to be noted that RHD has already established a monitoring and evaluation (M&E) system as a systematic and continuous process of collecting, collating and analyzing the monitoring data and information about the progress as per monitoring indicators for the Sylhet-Charkhai-Sheola Highway Improvement Project (Presented in **Table 4-21**) and a tool for identifying strengths and weaknesses of the RAP implementation process. This system will be replicated in the Sylhet-Charkhai-Sheola Highway Improvement Project. Besides, a periodic evaluation of process and outcome of RAP implementation will enable the RHD to identify lapses, procedural weakness, policy inadequacies, and institutional drawbacks to devise and implement corrective/remedial measures to achieve desired goals and objectives of the RAP of the Sylhet-Charkhai-Sheola Highway Improvement Project.

250. The RAP database has been prepared based on relevant data on land acquisition plans, census, IOL survey and socioeconomic survey, land market survey, and relevant stakeholders' consultations. In addition to this, information on CCL payment and resettlement benefit payment will become an essential input of the MIS. A comprehensive and relevant database and management information system (MIS) will be established and updated periodically for monitoring various activities of RAP implementation. RHD will develop a monitoring program that covers all essential stages of resettlement including relocation and rehabilitation through progress monitoring and evaluation of intended outcomes of RAP implementation. Data to be generated through Focus Group Discussions will be an internal part of the monitoring process.

4.8.1 OBJECTIVES OF MONITORING AND EVALUATION

251. The M&E system will serve as a tool for monitoring and evaluation of resettlement program as per set monitoring indicators ensuring timely and fair delivery of entitlements. The M&E will enable the RHD to get feedback from target population to devise corrective measures to ensure achievement of targets within schedule. The objectives of M&E will enhance the delivery capacity of the RHD and maximize the benefits of RAP Contracts to the affected households and the host communities.

252. Evaluation involves the assessment of the project towards the achievement of results, milestones, and impact of the outcomes based on the use of performance indicators. Dedicated funds, trained personnel, monitoring and evaluation tools, effective data collection and storage facilities, and adequate time for effective inspection visits to the Census are the prerequisites for carrying out effective monitoring and evaluation. The effective M&E system is considered as management tools to inform decision-making and demonstrate accountability.

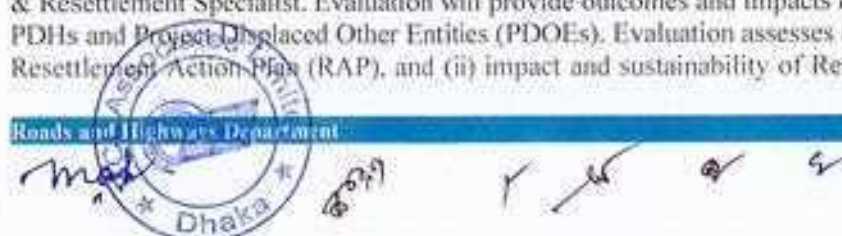
4.8.2 INTERNAL MONITORING SYSTEM

253. An internal monitoring system will be established by the Project Implementation Unit (PIU) of RHD and INGO with the support of the PIC Resettlement Specialists. A set of processes, outcome and baseline indicators will be developed & set, and the baseline data will be gathered at the onset of RAP implementation. Indicative monitoring issues, indicators, and monitoring questions for the Sylhet-Charkhai-Sheola Highway Improvement Project are presented in **Table 4-21**. Monitoring provides mid-line status on inputs (finance), and outputs (implemented activities); whether progress of resettlement activities achieved as per tentative set targets for certain period or not. If progress of resettlement activities is lagged behind compared to targeted activities, then reasons behind lagging in resettlement activities should be specifically mentioned with pragmatic remedial measures and methods.

254. Moreover, the INGO will develop a resettlement-related Computerized Management Information System (CMIS) to manage land acquisition and resettlement data (records of compensation disbursements) as well as maintaining records of consultations and registering and redressing of grievances/complaints of the Project Displaced Persons (PDPs), Project Displaced Households (PDHs) and Project Displaced Entities (PDEs). Semi-Annual Monitoring Reports [Social Monitoring Reports (SMR)] will be submitted to the World Bank.

4.8.3 INTERNAL EVALUATION SYSTEM

255. An internal evaluation system will be established by the PIU (RHD) and INGO with support of the PICLA & Resettlement Specialist. Evaluation will provide outcomes and impacts of resettlement activities on the PDPs, PDHs and Project Displaced Other Entities (PDOEs). Evaluation assesses (i) effectiveness of implementation of Resettlement Action Plan (RAP), and (ii) impact and sustainability of Resettlement & Rehabilitation program.



Evaluation aims at assessing whether implementation of the resettlement and rehabilitation activities have achieved their intended goals and purposes or not. Thus, the evaluation of the implementation of the RAP is a significant process to measure project performance and fulfillment of project objectives.

4.8.4 CARRYING OUT INTERNAL MONITORING

256. The RAP will be implemented by the Additional Project Director (APD) with assistance from Implementing NGO. Individual Land Acquisition and Resettlement Specialist (LARS) will work as representative of PIU, RHD. Monitoring of RAP and ILRP implementation will continue until completion of RAP implementation. Monitoring of RAP implementation covers (i) allocation and disbursement of budget, (ii) delivery of entitlements to the Project Affected Persons (PAPs), (iii) relocation assistance, (iv) consultation with relevant stakeholders throughout the project life cycle, (v) grievance redress mechanism, and any special issues regarding implementation of RAP, and (vi) payment of resettlement benefits, and (vii) utilization of received compensation, assistance, allowance, grants, and resettlement benefits for productive purposes by the PAPs.

Monitoring Issues	Monitoring Indicators	Monitoring questions
Budget and timeframe	Allocation of fund	<ul style="list-style-type: none"> ▶ Status of fund allocation to (i) executing agency, and (ii) implementing agency for the pre-determined purposes ▶ Funds allocation for resettlement to implementing agencies on time.
	Recruitment and training	<ul style="list-style-type: none"> ▶ Resettlement Specialist to be mobilized on schedule for the Field and office work. ▶ Target versus achievement of appointment and mobilization of staff required for land acquisition activities (for the Field and office level activities related to land acquisition) as per the planned plan ▶ What is target versus achievement of appointment and mobilization of staff required for RAP implementation (for the Field and Project level resettlement activities) as per envisaged plan? ▶ What is the achievement of imparting capacity building training to the targeted staff? (Number of staff trained). That is, capacity building and training activities completed on schedule. ▶ How many trained staff has/have been demobilized? (Number of staff; if demobilized). ▶ How many replaced staff has/have been mobilized? (Number of staff replaced, if mobilized). ▶ Whether staff mobilized as replacement has been trained or not? (If yes; Number of staff). ▶ Achieving resettlement implementation activities against the agreed implementation plan. ▶ Receipt of scheduled funds by resettlement offices ▶ Funds disbursement according to the resettlement action plan. ▶ Social preparation phase as per schedule.
	Handover of encumbrance free land to Contractor(s)	<ul style="list-style-type: none"> ▶ Whether encumbrance free land can be handed over to the contractor in time or not? ▶ What is the amount of acquired land (in acre) handed over covering length (Km) of RoW?
Delivery of Entitlements to PAPs	Delivery of Entitlements	<ul style="list-style-type: none"> ▶ Entitlements disbursed, compared with the number and category of losses set out in the entitlement Matrix; ▶ Disbursements against timelines. ▶ Identification of the displaced persons losing land temporarily, e.g. through soil disposal, borrow pits, contractors' camps, been included. ▶ Timely disbursements of the agreed transport costs, relocation cost, income substitution support, and any resettlement allowances, according to schedule. ▶ Documented evidence of land acquisition completed with transfer of title; ▶ Documented evidence of land requisition / rented; ▶ Percentage of compensation paid for land acquisition /requisition or rented; ▶ Percentage of compensation paid for the affected land, structures (residential/commercial/CPR)/assets/crops/trees; ▶ Restoration of social infrastructure and services; and

Table 4-21: Monitoring Issues and Indicators

Monitoring Issues	Monitoring Indicators	Monitoring questions
		<ul style="list-style-type: none"> ▶ Affected businesses receiving entitlements, including transfer and payments for net losses resulting from lost business.
	Relocation of PDPs, PDHs, PDEs, etc.,	What is target versus achievement of Project Displaced Persons/Households/Entities (PDPs/PDHs/PDEs) by category of losses to relocate and reconstruct structures at new locations?
	Costs for relocation	How many relocated PDPs/PDHs/PDEs received different entitlements for relocation as per Entitlement Matrix (EM)?
	Income and livelihood restoration substitution support	<ul style="list-style-type: none"> ▶ What are target versus achievement of economically displaced persons/households/entities to receive all the admissible assistance, allowance, grants, and resettlement benefits as per Entitlement Matrix? ▶ Types of training and number of participants in each. ▶ Number of displaced persons who have restored their income and livelihood patterns by gender (women, and men) and by vulnerability (vulnerable groups); ▶ Number of new employments activities; ▶ Extent of participation in rehabilitation programs. ▶ Degree of satisfaction with support received for livelihood programs /activities; ▶ Percentage of displaced persons who improved their income by gender (women, and men), and by vulnerability (vulnerable groups); ▶ Percentage of displaced persons who improved their standard of living by gender (women, and men), and by vulnerability (vulnerable groups); ▶ Number of displaced persons with replacement agriculture land by gender (women, and men) and by vulnerability (vulnerable groups); and ▶ Quantity of land owned/contracted by displaced persons (women, Men, and vulnerable groups),
Resettlement Benefit; Impacts	Occupational changes	What changes have occurred in patterns of occupation compared to the pre-project situation?
	Changing income, expenditure and livelihood	What changes have occurred in income, expenditure and livelihood patterns compared to pre-project situation?
	Relocation	How many physically displaced households have relocated? Where are they relocated (i.e. on their residual land, newly purchased plot, and rented plot/structure)
	Utilization of resettlement benefits including purchasing land	How many households have purchased plot? What were compensation/resettlement benefits spent on?
	Livelihood improvement training program	Have the participants of the livelihood-training program used their new skills? What was the seed grant spent on?
"Private – private disputes"		<ul style="list-style-type: none"> ▶ Clear and adequate rules for the recognition of relevant land tenure rights are provided. ▶ Fair criteria and functioning, transparent and participatory processes for resolving competing tenure claims are established; and ▶ Efforts are made to inform affected people about their rights and access to impartial advice is provided.
Consultation	Resettlement Information Brochure/ leaflet	<ul style="list-style-type: none"> ▶ Have resettlement information brochures/leaflets been prepared and distributed? ▶ Have consultations taken place as scheduled, including meetings, groups, and community activities? and ▶ Is project information disclosed?
	Stakeholders' consultations	<ul style="list-style-type: none"> ▶ Strategy for consultation and information disclosure is prepared. ▶ Consultations organized as scheduled; ▶ Affected, interested, disadvantage and vulnerable groups are identified; views of disadvantage and vulnerable groups are considered during designing the entitlement and special measures are taken.



Table 4-21: Monitoring Issues and Indicators

Monitoring Issues	Monitoring Indicators	Monitoring questions
		<ul style="list-style-type: none"> ▶ Schedules are planned for the various stakeholder engagement activities; ▶ Knowledge of entitlements by the relevant stakeholders including project affected people; and ▶ If tribal people are affected, separate consultation has to be conducted with them.
	Informing about GRM	Have all affected persons been informed about the provision and scope of the grievance redress procedures?
Grievance Redress Mechanism	Operationalization of GRM	<ul style="list-style-type: none"> ▶ Operationalization of the grievance redress mechanism proposed in the RPF; ▶ Operationalization of the GRM for labor health safety, and Gender Based Violence (GBV); ▶ Information on the resolution of the grievances. ▶ Process by which people affected by the project can voice their grievances and concerns. ▶ Process to document complaints and concerns; ▶ Grievance recording (e.g., MIS, and grievance logbook); ▶ Stipulated time frames for acknowledgement and resolution of complaints. ▶ Awareness raising, or communications efforts to inform stakeholders about the GRM and appeals process to analyze complaints and share feedback with management; and ▶ Grievance reports published and frequency.
	Outcome of GRM	What were the outcomes? Have conflicts been resolved?
	Documentation of grievance redressing	Have grievances and resolutions been documented?
	Grievances referred to court	Have any cases been taken to court?
Communications and Participation	Participation of PAPs	<ul style="list-style-type: none"> ▶ Number of general meetings (for both men and women); ▶ Percentage of women out of total participants. ▶ Number of meetings exclusively with women; ▶ Number of meetings exclusively with vulnerable groups; ▶ Number of meetings at new sites. ▶ Number of meetings between the hosts and the displaced persons; ▶ Level of participation in meetings (of women, men and vulnerable groups); ▶ Level of information communicated- adequate or inadequate. ▶ Information disclosure; and ▶ Translation of information disclosure in the local languages.
Third Party Monitoring	Verifying internal monitoring of RAP implementation	RHD's Resettlement Division, IMED of Govt. of Bangladesh, MoRTB, FAPAD, the World Bank's safeguard team including periodic mission, PIC and Individual consultant will be involved in the monitoring to ensure proper implementation of RAP and assess the effectiveness of RAP policy. In addition to that a third-party independent monitoring will review all the social standard Due-Diligence Reports prepared for this project. The extent of monitoring activities will be proportionate to the project's risks and impacts. Affected persons will be consulted during the monitoring process. Periodic monitoring reports will be prepared and disclosed, and affected persons will be informed about monitoring results on time.

4.8.5 INSTITUTIONAL ARRANGEMENTS FOR M&E

257. The RHD Field office, with support from Individual Land Acquisition and Resettlement Specialist from PIU and with assistance from INGO, will conduct Monitoring and Evaluation (M&E) of RAP implementation. The INGO will prepare Monthly Progress Report (MPR) highlighting progress of RAP implementation, issues, and constraints in RAP implementation, targets of resettlement activities for the coming month, etc. The PIC will monitor the progress of RAP implementation and submit quarterly/semi-annual monitoring report (whichever is acceptable) to the PD. These reports will closely follow the resettlement monitoring indicators as mentioned in Table 4-22. PIU/INGO will review the MPRs, quarterly and semi-annual resettlement reports and take appropriate



actions, if needed, for improvement of the resettlement operations. **Table 4-22** provides details on the contents and timing of various progress monitoring reports.

Type of Report	Content	Frequency	Responsibility
Monthly Progress Report (MPR)	Progress on land acquisition and resettlement activities as per set/determined indicators, results of monitoring will include problems and issues related to land acquisition and resettlement, affecting performance, constraints, if any variation/deviation occurred from the approved RAP (if any) and reason for the same and corrective measures recommended in the MPR.	Monthly	INGO
Quarterly/Semi-annual Resettlement Monitoring report (Social Monitoring Report [SMR])	Progress on land acquisition and resettlement activities, monitoring land acquisition and resettlement as per set/determined indicators, and if any variations/deviation occurred from the approved RAP, necessary rationale and explanation should be given and outcome, corrective measures and actions will be recommended in the Quarterly/Semi-Annual Resettlement Monitoring Report.	Semi-annually	RHD/PIC
Third Party Independent monitoring report and PIC & PIU Resettlement Specialist/ WB Representative/RHD Resettlement Division, IMED, FAPAD	Progress on land acquisition and resettlement activities, monitoring of execution of land acquisition and implementation of resettlement plan as per set/determined indicators, if any variations/deviation occurred in implementation of RAP, providing explanation regarding variations and outputs and outcomes of implementation of resettlement plan, assessing affected person's satisfaction with process, compliance with WB ESF, especially ESS5, remedial, and corrective measures and actions recommended.	Semi-annually/ Annually	Third Party Independent Monitor as decided by PIU
Resettlement Completion Report	Overall narrative of the land acquisition and resettlement process, outputs and outcomes of land acquisition and resettlement as per set/determined indicators from baseline data, key variations or changes in implementation of the RAP, if occurred, lessons learned will be presented in the Resettlement Completion Report.	Once	RHD/INGO/PIC
Resettlement Evaluation Report	Overall assessment of achievement or progress of the land acquisition and resettlement process, compliance with WB ESF, especially ESS5, achievement of previously determined targets of land acquisition and implementation of the RAP over the period of implementation of the RAP, and monitoring progress of implementation of the RAP comparing the baseline data, documenting lessons learned which will offer the best practices of implementation of the RAP for replicating learnt lessons in implementing the RAPs of the future projects of Bangladesh.	Once	Third Party Independent Monitor as decided by PIU

GLOSSARY

Affected Persons (APs)- include any persons, Project Affected Households (PAHs), firms or private institutions who/which, on account of changes that result due to the project will have their (i) standard of living adversely affected; (ii) right, title, or interest in any house, land (including residential, commercial, agricultural, forest, and/or grazing land), water resources, or any other moveable or fixed assets acquired, possessed, restricted, or otherwise adversely affected, in full or in part, permanently or temporarily; and/or (iii) business, occupation, place of work or residence, or habitat adversely affected, with physical or economic displacement.

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.

Assistance- means support, rehabilitation and restoration measures to be extended in cash and/or kind over and above the compensation for lost assets, income and livelihoods.

Awardee- refers to person with interests in land to be acquired by the project after their ownership of said land has been confirmed by the respective Deputy Commissioner's office as well as persons with interests in other assets to be acquired by the project. Compensation for acquired assets is provided to 'awardees' through notification under Section 8 of the Acquisition and Requisition of Immovable Property Act, ARIPA, 2017.

Compensation- means payment in cash or kind for an asset to be acquired or affected by a project at Replacement Cost (RC) at current market value.

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 when 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 before the cut-off date can be demonstrated remain eligible for assistance, regardless of their identification in the census. The census details will be notified and disseminated among the PAPs and other related stakeholders.

Dependency Ratio- Dependency ratio is defined as the ratio of some of population aged 0-14 years and 65+ years to the population aged 15-64 years expressed as percentage Population & Housing Census 2022, National Report (Volume 1), Bangladesh Bureau of Statistics (BBS), Published in November 2023. It is also referred to as the "total dependency ratio."

Displaced Persons (DP) - As per contemporary donors' policy like the WB's ESF and ESS1, ESS5, ESS7 and ESS10, displaced persons are those who are physically displaced (relocation, loss of residential land, or loss of shelter) and or economically displaced (loss of land, assets, access to assets, income sources, or means of livelihoods) as a result of (i) involuntary acquisition of land, or (ii) involuntary restrictions on land use or on access to legally designated parks and protected areas.

Encroacher: Person who has taken over (encroached) government land adjacent to his/her homestead and/or any other type of land over the years through cautious and surreptitious action for misappropriation and established adequate control upon utilization of the encroached land without any protest. That is, his/her utilization of the encroached land is socially recognized. Practically if encroacher's own land and encroached land are acquired then he/she is considered as encroacher. On the other hand, if only encroached land is acquired then he/she is not considered as an encroacher, rather as a squatter. Eligibility of encroachers will not be acceptable to those who have encroached government land after cut-off date (22nd March 2022).

Entitlements- include the range of measures comprising cash or kind compensation, relocation cost, income restoration assistance, transfer assistance, income substitution, and business restoration which are due to PAHs/PAEs, depending on the type and degree /nature of their losses, to restore their social and economic bases.

Eminent Domain- refers to the regulatory authority of the Government to obtain land for public purpose/interest or use as described in the Acquisition and Requisition of Immovable Property Act, ARIPA, 2017.

Forced Eviction - defined as the permanent or temporary removal, against the will of individuals, families and/or communities, from homes or land (or both) which they occupy, without the provision of, or access to, appropriate forms of legal or other protection. The exercise of eminent domain, compulsory acquisition or similar powers, is not considered to be forced eviction, providing it complies with the requirements of national law, and is conducted in a manner consistent with basic principles of due process (including provision of adequate advance notice, meaningful opportunities to lodge grievances and appeal, and avoidance of the use of unnecessary, disproportionate or excessive force).

Household- a household includes all persons living and eating together (sharing the same kitchen and cooking food together as a single-family unit).

Inventory of Losses (IOL) - includes the inventory of the affected properties during census survey for record of affected or lost assets. Compiled IOL data are used for preparation of the Resettlement Action Plan (RAP).

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.

Involuntary Resettlement -covers physical displacement (relocation, loss of residential land or loss of shelter) and economic displacement (loss of land or access to land loss of assets or access to assets, or loss of income sources or means of livelihood) as a result of: (a) involuntary acquisition of land; or (b) involuntary restrictions on land use or on access to legally designated parks and protected areas. It covers whether such losses and involuntary restrictions are full or partial, permanent, or temporary. It 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.

Katcha Structure -Katcha Structure built of mud, straw, bamboo and thatch/leaves and other non-durable materials.

Land acquisition -refers to all methods of obtaining land for project purposes, including 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.

Mouza: Mouza is composed of a single village or several villages. It is officially called as Revenue Village with specific boundary at ground and Mouza Map (*Naksha*) with plots and benchmarks.

Non-title Holder Persons - means those who have no recognizable rights or claims to the land that they are occupying and includes people using private or public land without permission, permit or grant i.e. those people without legal title to land and/or structures occupied or used by them.

Negotiated Settlements - refers to situations where the Borrower needs to acquire specific land or restrict its use for project purposes. Rather than doing so through an expropriation proceeding, the Borrower first tries to arrive at a mutually agreeable negotiated settlement with the landowner/user. The minimum negotiated amount will be 25% above the eminent domain compensation.

Project- refers to Sylhet-Charkhai-Sheola Highway Improvement Project.



Handwritten signatures and initials in blue ink.

Project Displaced Business (PDB)-any shop, store or commercial establishment negatively affected by Sylhet-Charkhai-Sheola Highway Improvement Project.

Project Displaced Entities (PDEs) - collectively indicate residential households (HHs), Commercial and Business Enterprises (CBEs), Community Property Resources (CPRs) and other affected entities as a whole.

Project Affected Households (PAHs) - means persons impacted by involuntary resettlement as defined below, includes any person or entity or organization affected by the Project, who, on account of the involuntary acquisition of private land or repossession of public land from formal or private information uses, in support of the implementation of the Project, would have their (i) standard of living adversely affected; (ii) right, title or interest in all or any part of a house and buildings, land (including residential, commercial, agricultural, plantations, forest and grazing land) water resources, fish ponds, communal fishing grounds, annual or perennial crops and trees, or any other moveable or fixed assets acquired or possessed, in full or in part, permanently or temporarily; and (iii) business, profession, work or source of income and livelihood lost partly or totally, permanently or temporarily. PDEs are categorized as (a) who have formal legal rights to land or assets; (b) 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 (c) who have no recognizable legal right or claim to the land or assets they occupy or use.

Project Displaced Households (PDHs) - includes displaced households losing residential structures and structures utilizing for commercial and business enterprises except CPRs.

Project Affected Persons (PAPs)-all people enumerated during the census and IOL survey conducted in the project's impact corridor and identified as negatively affected by Sylhet-Charkhai-Sheola Highway Improvement Project.

Project Displaced Person (PDP)-all displaced people enumerated during the census conducted in the project's impact corridor and identified as displaced people by Sylhet-Charkhai-Sheola Highway Improvement Project.

Pucca Structure -Structure built with bricks concrete and solid concreted/tile roof.

Relocation- means physical displacement or physical moving of the PDHs/PDEs/PDCPRs from the affected area to the new areas and rebuilding homes, infrastructure, etc., through self-initiative by spending received compensation at Replacement Cost (including Cash Compensation under Law (CCL) will be paid by DC and Top-Up will be paid by the Project, if RC is higher than CCL), provision of Transfer Grant (TG) and Reconstruction Grant (RG) against affected structures, including replacement of productive land/employment and re-establishing income, livelihoods, living under livelihood restoration program in applicable cases and social systems.

Replacement Value/ Cost (RV/RC) - is a valuation method yielding compensation sufficient to replace assets, plus necessary transaction costs associated with asset replacement. Replacement cost is the market value as established through independent and competent real estate valuation, 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, more than a year.

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 implementing the project activities causing adverse impact.

Resettlement Assistance (RA) - 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.

Semi Pucca Structure- structure built with a combination of durable walls of brick or concrete and roof of corrugate metal sheets (e.g. iron, steel, galvanized tin, etc.).



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Significant Impact- refers to severity of impact with regard to loss of housing and productive assets of the affected persons/households.

Squatters- refers to non-title holders including households, business and common establishments on public land (including those acquired earlier). Under the project this includes land on part of the crest and slopes of flood control embankments, and similar areas of the drainage channels.

Structures- refers to all buildings including primary and secondary structures including houses and ancillary buildings, commercial enterprises, living quarters, community facilities and infrastructures, shops, businesses, fences, and walls, tube wells, latrines, etc.

Tin-made Structure -structure made of corrugated metal sheets (e.g., iron, steel, galvanized tin, etc.), considered flimsy and unstable.

Vulnerable Households- include households that are (i) headed by single woman or woman with dependents and low incomes; (ii) headed by disable woman/man headed households, (iii) headed by elderly/disabled men without means of support; (iv) households that fall on or below the poverty line annual income BDT 144,000 and below, (v) households of Indigenous Peoples or ethnic minority; and (vi) persons without title to land.

Definition of Trees - (a) woody perennial plant having a single usually elongate main stem generally with few or no branches on its lower part, (b) a shrub or herb of arbore scent form rose trees a banana tree, (c) something in the form of or resembling a tree. The size of trees is categorized as large, medium, small, and saplings based on height and circumference, which is presented below,

Large Trees - Height and circumference of large tree are >16 feet and circumference is 30-40 inches respectively as per Inventory of Losses (IOL) survey format.

Medium Trees - Height and circumference of medium tree are between 11 feet and 15 feet and circumference is 20-30 inches respectively as per IOL survey format.

Small Trees - Height and circumference of small tree are between 6 feet and 10 feet circumference is 10-20 inches respectively as per IOL survey format.

Sapling- Height of sapling is between 1 and 5 feet and circumference is between 01 and 10 inches as per IOL survey format.



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ANNEXES
ENCLOSED IN THE SEPARATE VOLUME



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Contents of Annexes

1. ANNEX-1: PROJECT DESCRIPTION AND TOR FOR CONSULTANCY SERVICES FOR UPGRADING AND SAFEGUARD DOCUMENTS FOR SYLHET-CHARKHAL-SHEOLA HIGHWAY IMPROVEMENT PROJECT	1
2. ANNEX-2: LAND ACQUISITION AND RESETTLEMENT	34
Annex-2.1: Lot wise Land Acquisition for Implementation of the Sylhet-Charkhal-Sheola Highway Improvement Project	34
3. ANNEX-3: CONSULTATION, INFORMATION DISCLOSURE AND PARTICIPATION	261
Annex-3.1: Key Stakeholders	261
Annex-3.2: Consultation Process	261
Annex-3.3: Stakeholder Identification and Analysis	262
Annex-3.4: Dissemination of Project related information in the Stakeholders' Consultation Meeting and Outcome	263
Annex-3.5: Key Informant Interview (KII) with Key Stakeholders	299
Annex-3.6: Focus Group Discussions (FGDs)	313
4. ANNEX-4: IMPLEMENTATION ARRANGEMENTS	341
Annex-4.1: Legal and Policy Framework	341
Annex-4.1.1: Resettlement Policy Framework (RPF) for Accelerating Transport and Trade Connectivity in Eastern South Asia (ACCESS) – Bangladesh Phase I Project	341
Annex-4.1.2: Legal Framework for Land Acquisitions in Bangladesh	465
Annex-4.2: Gaps between ESS5 and ARIPA 2017 and Gap Filling Measures	471
Annex-4.3: Letter of Social Cut-Off-Date and Dissemination	472
Annex-4.4: Relocation and Resettlement	498
Annex-4.5: Income and Livelihood Restoration Plan	501
Annex-4.5.1: Specific Objectives of TNA	501
Annex-4.5.2: Training Methodology	501
Annex-4.5.3: INGO Role	501
Annex-4.5.4: Post Training Monitoring	501
Annex-4.5.5: Employment in Civil Construction Work	502
Annex-4.5.6: Employment in Road Side Plantation and Social Forestation	502
Annex-4.6: Grievance Redress Mechanisms	503
Annex-4.7: LA and Resettlement Budget	506
Annex-4.8: Recorded Mouza Rate (Govt. Market Rate) for Land	621
Annex-4.9: Rate of PWD and Approved Other Projects for Structures	661
Annex-4.10: Rate of Trees (Forest Department, Sylhet)	667
Annex-4.11: Institutional Arrangements for RAP Implementation	671
Annex-4.12: Survey Questionnaires	672
Annex-4.13: Comments of World Bank and Responses as finalized in the Meeting with World Bank	694

List of Annex Tables

Table 2-1: Project's Impact on Primary Structure of Title HHHs, Title CPRs & Title Other Entities	37
Table 2-2: Project's Impact on Primary Structure of Non-title HHHs, Non-title CPRs & Non-titled Other Entities	38
Table 2-3: List of Affected Households (HHs)	39
Table 2-4: List of Affected CPRs and Other Entities/Institutions	96
Table 2-5: List of Affected Tress of HHHs, CPRs & Other Entities in Lots 1, 2, & 3	129
Table 2-6: List of Affected Business Owners from Own Structure	148
Table 2-7: List of Affected Tenant's Business as Proprietor	164
Table 2-8: List of Affected Tenants (Rented in)	187
Table 2-9: List of Losing 10% of Total Income (Severely Affected) and Vulnerable Households in Lot 1, 2, & 3 under the Project	214
Table 2-10: List of Affected Wage Earner(s)/Employee(s) in Business/Industrial Institutions by Type of Employers in Lot 1, 2, & 3 under the Project	231
Table 2-11: List of Rental Income Loss of Owners (Rented Out) of Residential, Commercial and Residential-cum-Commercial Structures	241
Table 3-1: Classification of the Project Stakeholders	261
Table 3-2: Consultation and Participation Process	261
Table 3-3: Participants' Covered in the following Stakeholders' Meetings	262
Table 3-4: Additional Project Design has been incorporated in the RAP according to PAPs Demand	265
Table 3-5: Description of Stakeholders' Consultation Meetings including Photographs	266
Table 3-6: List / Attendance of Participants of Stakeholder's Consultation Meetings (SCMs)	286
Table 3-7: Description of Key Informant Interviews (KIIs) including Photographs	299
Table 3-8: Particulars of Focus Group Discussions (FGDs)	313
Table 3-9: Description of Focus Group Discussions (FGDs) including Photographs	315
Table 3-10: List / Attendance of Participants of Focus Group Discussions (FGDs)	323
Table 4-1: Land Acquisition Process under ARIPA, 2017	469
Table 4-2: Gaps between GOB policies/act and ESS5	471
Table 4-3: Relocation Options of the Displaced THHs & NTHHs Losing Residential Land &/or Structures	498
Table 4-4: Relocation Options of the Displaced THHs & NTHHs Losing Commercial Land &/or Structures	498
Table 4-5: Relocation Options of the Displaced THHs & NTHHs Losing Residential-cum-Commercial Land &/or Structures	498
Table 4-6: Lot Wise No. of Affected Community Property Resources (CPRs) and Degree of Impacts	500
Table 4-7: Category wise Distribution of Losing 10% of Total Income (Severely Affected) and Vulnerable Households for Skill Development Training	501



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Table 4-8: Summary of Land Acquisition Budget.....	506
Table 4-9: Mouza wise Land Acquisition Budget on Segregated Data.....	510
Table 4-10: Impact of Primary and Secondary Structures including Resettlement Budget (All Households (HHs), CPRs &) Other Entities).....	526
Table 4-11: Lot Wise Affected Secondary Structures by Ownership Type (HHs, CPRs & Other Entities) in the Sylhet-Charkhal-Sheola Highway Improvement Project.....	615
Table 4-12: Estimated Amount of Compensation for Trees in the Sylhet-Charkhal-Sheola Highway Improvement Project.....	616
Table 4-13: Estimated Amount of Compensation for Standing Crops/Fish Stock.....	620

List of Annex Figures

Figure 2-1: Project Impacts within RoW in Lot-1.....	34
Figure 2-2: Project Impacts within RoW in Lot-2.....	35
Figure 2-3: Project Impacts within RoW in Lot-3.....	36
Figure 4-1: Grievance Redress Flowchart for the Project Affected Persons (PAPs).....	504
Figure 4-2: Grievance Redress Flowchart for the Victim (Survivor) at GRC Related to SEA/SH.....	505
Figure 4-3: Grievance Redress Flowchart for Labor Health Safety (LHS).....	505

