



Department of Fisheries
Ministry of Fisheries and Livestock

Resettlement Policy Framework for Government Shrimp Estate Chakaria, Cox's Bazar; BFDC; BMC and Canals

Annex C



May 2025



Center for Environmental and
Geographic Information Services

Resettlement Policy Framework
for Government Shrimp Estate Chakaria, Cox's Bazar;
BFDC; BMC and Canals

Annex C

Acknowledgment

The Center for Environmental and Geographic Information Services (CEGIS), a Public Trust under the Ministry of Water Resources, gratefully acknowledges its indebtedness to the Department of Fisheries (DoF) for entrusting CEGIS to conduct the “EIA/SIA for Government Shrimp Estate Chakaria, Cox’s Bazar, BFDC, BMC and Canals”.

CEGIS greatly acknowledges the immense support of Mr. S. M. Moniruzzaman, the Project Director; Mr. Monish Kumar Mondal, Deputy Project Director (Procurement); Mohammad Mizanur Rahman Bhuiyan, Environmental & Social Safeguard Expert (E&SSE) under the Sustainable Coastal and Marine Fisheries Project (SCMFP), Department of Fisheries (DoF); and other officials from DoF for their valuable guidance and candid support in communicating the concerned officials of the local offices to obtain their assistance during the reconnaissance field visit. CEGIS is also thankful to Mr. Badruddoza, District Fisheries Officer, Cox’s Bazar; Mr. Mizanur Rahman, Project Manager (ADB); Mr. Saroj Kumar Mistry, Deputy Project Director, (Canal Re-excavation under Khulna, Bagerhat, and Satkhira Districts) SCMFP; Mr. Joydeb Pal, DFO, Khulna; Mr. Md. Alamgir Hossain, SUFO, Debhata, Satkhira; Mr. Sheikh Asadullah, SUFO, Chitalmari, Bagerhat; other officials of the PMU and local offices of the DoF; and some active members & cluster farmers of various clusters under Khulna, Bagerhat, and Satkhira Districts for their sincere cooperation during field visit. The DoF also assists CEGIS by providing the readily available Project related documents and information for preparing the Environmental and Social Screening Report.

In the end, CEGIS deeply appreciates and acknowledges the concerned stakeholders for their active participation and contribution in the study during the consultations.

Table of Contents

Acknowledgment	i
Table of Contents	ii
List of Tables	iv
List of Figures	iv
Abbreviations and Acronyms	v
1. Project Background and the Context	1
1.1 Introduction	1
1.2 Project Description	1
1.2.1 Chakaria Shrimp Estate	1
1.2.2 BFDC Harbor.....	2
1.2.3 Brood Management Center	3
1.2.4 Canal Rehabilitation for Cluster Farming.....	3
1.3 Potential Impacts of the Project	3
1.4 Project Principles for Impact Mitigation.....	11
1.5 Rationale of RPF	11
1.6 Presentation of the RPF.....	11
1.7 Approval, Disclosure and Updating of RPF.....	11
2. Legal and Policy Framework	12
2.1 Introduction	12
2.2 The Applicable National Law and Regulations of Bangladesh	12
2.3 World Bank OP 4.12 on Involuntary Resettlement	12
2.4 Social Safeguards Policy Compliance	13
2.5 Impact Mitigation Principles.....	14
2.6 Eligibility for Compensation and Assistance.....	14
2.7 Core Principles of the Project	14
2.8 Entitlement and Assistance	15
2.8.1 Eligibility Criteria	15
2.8.2 Compensation and Entitlement Policy.....	16
3. Grievance Redress Mechanism	18
3.1 Requirements of Grievance Redress Mechanism.....	18
3.2 Composition of GRC	18
3.3 Composition of Local GRC	18

3.4	Composition at PIU level GRC.....	19
3.5	Processes for Filing Grievance Cases and Documentation.....	19
3.6	Timeline of Resolution.....	20
3.7	Grievance Redress Monitoring.....	20
3.8	Monitoring and Reporting	21
4.	Institutional Arrangement for Implementation of RP	22
4.1	Introduction	22
4.2	Project Management for RAP Implementation	22
4.3	Formation and Responsibility of PIU	22
4.4	Role of Property Valuation Advisory Committee (PVAC).....	22
4.5	Roles and Responsibility of INGO/Consulting Firm.....	23

List of Tables

Table 1.1: Details of Chakaria Shrimp Estate	1
Table 2.1: Eligibility and Entitlement Matrix	16
Table 3.1: GRC membership at local level.....	19
Table 3.2: GRC membership at PIU level.....	19
Table 3.3: Reporting Arrangements	21
Table 4.1: PVAC Committee	23

List of Figures

Figure 1.1: Map Showing Location of Chakaria Shrimp Estate on Satellite Image	5
Figure 1.2: The Location of the Components Based on which Activities of BFDC has been Considered6	
Figure 1.3: Map of BFDC Study Area on Satellite Image	7
Figure 1.4: Locations of the Canals under Satkhira District.....	8
Figure 1.5: Locations of the Canals under Khulna District	9
Figure 1.6: Locations of the Canals under Bagerhat District	10

Abbreviations and Acronyms

ADB	Asian Development Bank
APs	Affected Persons
BFDC	Bangladesh Fisheries Development Corporation
BMC	Brood Management Center
CSE	Chakaria Shrimp Estate
DFTC	Demonstration Farm and Training Center
DoF	Department of Fisheries
DPD	Deputy Project Directors
ETP	Effluent Treatment Plant
GoB	Government of Bangladesh
GBV	Gender-Based Violence
GRC	Grievance Redress Committees
GRM	Grievance Redress Mechanism
IA	Implementing Agency
IDA	International Development Association
INGO	International Non-Governmental Organization
LGRC	Local Grievance Redress Committees
MoFL	Ministry of Fisheries and Livestock
NGO	Non-Government Organization
OP	Operation Policy
PD	Project Director
PIC	Project Implementation Committee
PIU	Project Implementation Unit
PSC	Project Steering Committee
PVAC	Property Valuation Advisory Committee
PWD	Public Works Department
RAP	Resettlement Action Plan
RCC	Reinforced Cement Concrete
RPF	Resettlement Policy Framework
RPIC	Resettlement Plan Implementation Consultant
RU	Resettlement Unit
SCMFP	Sustainable Coastal and Marine Fisheries Project
SUFO	Senior Upazila Fisheries Officer
WBG	World Bank Group
WTP	Water Treatment Plant

1. Project Background and the Context

1.1 Introduction

The ‘Sustainable Coastal and Marine Fisheries Project (SCMFP)’ is a two-phased proposed investment by the Government of Bangladesh (GoB) and the International Development Association (IDA) of the World Bank Group. The Project will be implemented in coastal and marine areas of Bangladesh by the Department of Fisheries (DoF) as the lead executing agency under the guidance of the Ministry of Fisheries and Livestock (MoFL). The Project aims to sustainably increase the contribution of coastal and marine fisheries and aquaculture to the national economy, poverty reduction and access of the fishing communities to alternative livelihood activities in an environment-friendly manner.

1.2 Project Description

The Project has four (04) broad components such as (i) enabling sustainable fisheries sector investments and growth; (ii) improving infrastructures and production practices; (iii) community empowerment and livelihoods transformation; and (iv) project management and monitoring.

Improving Infrastructures and Production Practices, Component-II has been designed to implement four (04) Sub-Projects, such as (a) Rehabilitation of Chakaria Shrimp Estate (CSE), (b) Implementation of a Brood Management Center (BMC) at Demonstration Farm and Training Center (DFTC), Teknaf, (c) Development Works for Sustainable Management of Bangladesh Fisheries Development Corporation (BFDC) Harbor in Chattogram, and (d) Rehabilitation of Canals in Khulna, Bagerhat and Satkhira Districts. The project area, however, will cover a geographic area located in the coastal belt spreading over five (05) districts such as, Khulna, Bagerhat, Satkhira, Chattogram and Cox’s Bazar. The Sub-Projects and their activities to be implemented are presented below.

1.2.1 Chakaria Shrimp Estate

Considering the growing demand of shrimp globally, in 1978 the Government of Bangladesh (GoB) started leasing-out the area of the Estate for shrimp gher. In this context, in 1986, a total of 5,000 acres of landmass has been divided into 468 plots of 10 acres each to lease-out to interested shrimp farmers through the International Development Agency (IDA) supported “Shrimp Farming Project” to expand shrimp farming activities and to improve the economic status of people and the country as well. Similarly, with the help of Asian Development Bank (ADB), 2000 acres of landmass has been divided into plots of 11 acres each to lease-out to 119 shrimp farmers through the “Fisheries Development Project”; technical assistance under this Fisheries Development Project is being provided through technology demonstration and training programs to shrimp farmers and entrepreneurs by establishing a shrimp demonstration farm of 48 acres. Information of Chakaria Shrimp Estate are as follows:

Table 1.1: Details of Chakaria Shrimp Estate

Sl. No.	Features	Unit of Measurement	Measured Value	Measured Value
			10 Acres of Plot	11 Acres of Plot
01	Total Land Size	Acre	5,000	2,000
02	Shrimp Plots	No.	468	119
03	Plot Tenants/Lessees	No.	375	119
04	Peripheral Dyke/Bheri Bandh	km	58.3	15.53

Sl. No.	Features	Unit of Measurement	Measured Value	
			10 Acres of Plot	11 Acres of Plot
05	Sluice Gate	No.	20	07
06	Length of Canal	km	55.36	15.53
07	Water Supply Canal	km	30.05	35
08	Total Canal	km	85.41	35

The activities under this Sub-Project are as follows:

Rehabilitation of 10, and 11-acre Shrimp Estate

- Reconstruction of Embankment/ Peripheral Dyke;
- Rehabilitation of water supply and drainage canals;
- Repair & renovation of existing sluice gate;
- Construction of Guard Shed with sanitary and electrical facilities;
- Installation of on grid solar panels on embankment (peripheral dyke);
- Renovation of Fish Landing Center;
- Construction of herring bone road on embankment;
- Barbed wire fencing with Reinforced Cement Concrete (RCC) pillars;

Rehabilitation of 48-acre Shrimp Demonstration Area

- Land development, levelling and land preparation;
- Reconstruction of Embankment/ Peripheral Dyke with mechanical compaction and turfing;
- Rehabilitation of water supply canals, and re-excavation of drainage canal;
- Repair and renovation or reconstruction of existing sluice gate;
- Construction of 2 storied (with free ground floor) office building, guard shed cum store house including associated facilities;
- Construction of Police Fari;
- Construction of deep tube well and watch tower;
- Re-excavation of 4 nursery and 13 grow out ponds, pond inlet- outlet system aerator;
- Construction of herring bone road including soling, end-edging, road alignment from Rampur Bazar Chakaria;
- Barbed wire fencing with RCC pillars.

1.2.2 BFDC Harbor

The Bangladesh Fisheries Development Corporation (BFDC) is located just beside the Chattogram Fishing Port, on the left bank of the Karnaphuli River. The BFDC having landmass of about 43 acres accommodates a Fish Processing Plant, Dockyard, Marine Fisheries Academy, Auction Site and Cold Storage supported by two (02) jetties on the Karnaphuli River, two (02) Electrical Sub-stations with the capacity of 750kVA and 1600 kVA and four (04) deep tubewells through which around 1,000 MT of water is being withdrawn daily. This Sub-Project intends to implement the development works for sustainable management of BFDC harbor.

The development works are as follows:

- Construction of Marine fisheries office with internal road and all facilities;
- Installation of ETP and WTP for BFDC Harbor;
- Installation of deep tube well;
- Auction center cum training center;
- Construction of pre-processing zone with ICE Plant and chilled storage facilities;
- Construction of modern processing factory 500 MT capacity with 4-6 chambers including storage facilities;
- Construction of Fish Landing Center;
- Complete firefighting system of fish harbor (3 sets including necessary equipment & pipeline connection);
- Establishment of Fork Lifter (2-ton & 5-ton capacity);
- Electrical substation with distribution line & accessories (2 MW/ 2600 kVA) including alternative back up supply (2Generators of 750 kVA each).

1.2.3 Brood Management Center

DoF has proposed two alternative sites for the Brood Management Center (BMC); one is the Demonstration Ponds of 48 acres at Chakaria Shrimp Estate and another one is Demonstration Farm and Training Center (DFTC) at Teknaf. This Sub-Project intends to implement a shrimp hatchery. According to the results of alternative analysis as mentioned in **Section 3.20-** “Analysis of Alternatives” under **Chapter 3-** “Project Design and Description” of the **ESIA Report**, better potential site for BMC is DFTC, Teknaf.

1.2.4 Canal Rehabilitation for Cluster Farming

There are 18 canals planned to be rehabilitated under Khulna, Bagerhat and Satkhira Districts for supporting the cluster shrimp farms. In addition, repairing or constructing hydraulic structures will be implemented on those canals. Most of these canals are already silted up and the average depth is about 1.25m to 2m.

1.3 Potential Impacts of the Project

It is understood from the activities discussed above to be implemented under the Sub-Projects and from the field surveys that the Project will not affect any of the Sub-Project areas, except in the area of 48 acres of Shrimp Demonstration Area at Rampur, Chakaria, Cox’s Bazar, as (i) DoF has own land in the Sub-Project areas, hence there is no need of land acquisition and requisition, (ii) there is no private properties (land, structures, trees) of lessee shrimp farmers. As such there is no matter of physical and economic displacement. But exceptionally, Rehabilitation of Shrimp Demonstration Area of 48 acres at Rampur, Chakaria, Cox’s Bazar impacts minimally, although the Project will not acquire any land and will be implemented on the Government land (DoF’s land). Impacts due to Project interventions were assessed based on the field data. With limited communication and access to the site, it is assessed that there may be about 150 structures with a population size of 300-350. The site possesses some structures and plants (i.e., herbs and shrubs). These structures and plants will be affected for this rehabilitation works. The laborers and guards of the shrimp farms residing in the Sub-Project area on DoF’s land will be physically displaced. But their employment in the shrimp estate will remain as it is in the present days. This indicates that they will not be economically displaced.

Rehabilitation and construction of hydraulic structures in connection with 18 canals for supporting cluster farms would not require land acquisition and requisition. The Project in these districts will also impact minimally, as the canal re-excavation will be carried out by segmenting, ensuring bypass through each segment. A limited number of fishers catch fish in the proposed canals and most of them catch fish for family consumption mainly.

Only around 8-10 households beside the Nagkati Khal at Digholia Upazila of Khulna District, 3-4 households and 2-3 households respectively beside the Atshobigha Khal and Kalmegher Khal in Satkhira district are found living on the khas land. Besides, 7-8 households also live on the dyke of the Dakatia khal in Bagerhat district. In total, however, 25 households live on the khas land in the Project area. These households do not have to move from the Project area, as khal re-excavation will not impact the households. But the softwood and hardwood trees on the banks of the Khals may need to be felled down for khal re-excavation and disposal of excavated earth.

The local people suggested that the Khal dykes can be widened by disposing the excavated earth on the dyke to facilitate the mass people for using as rural roads so that people can transport crops, shrimps, and fishes from the fields/farms/homes to the homes/local markets/others.

Before implementation of the Project interventions if the implementing agency found any resettlement issues, the Proponent should resolve that on the basis of this Resettlement Policy Framework (RPF). All entitlements of the affected persons (APs) will be paid prior to the commencement of project implementation activities.

The Location Maps of each sub-projects are given in the following **Figure 1.1- Figure 1.6**.

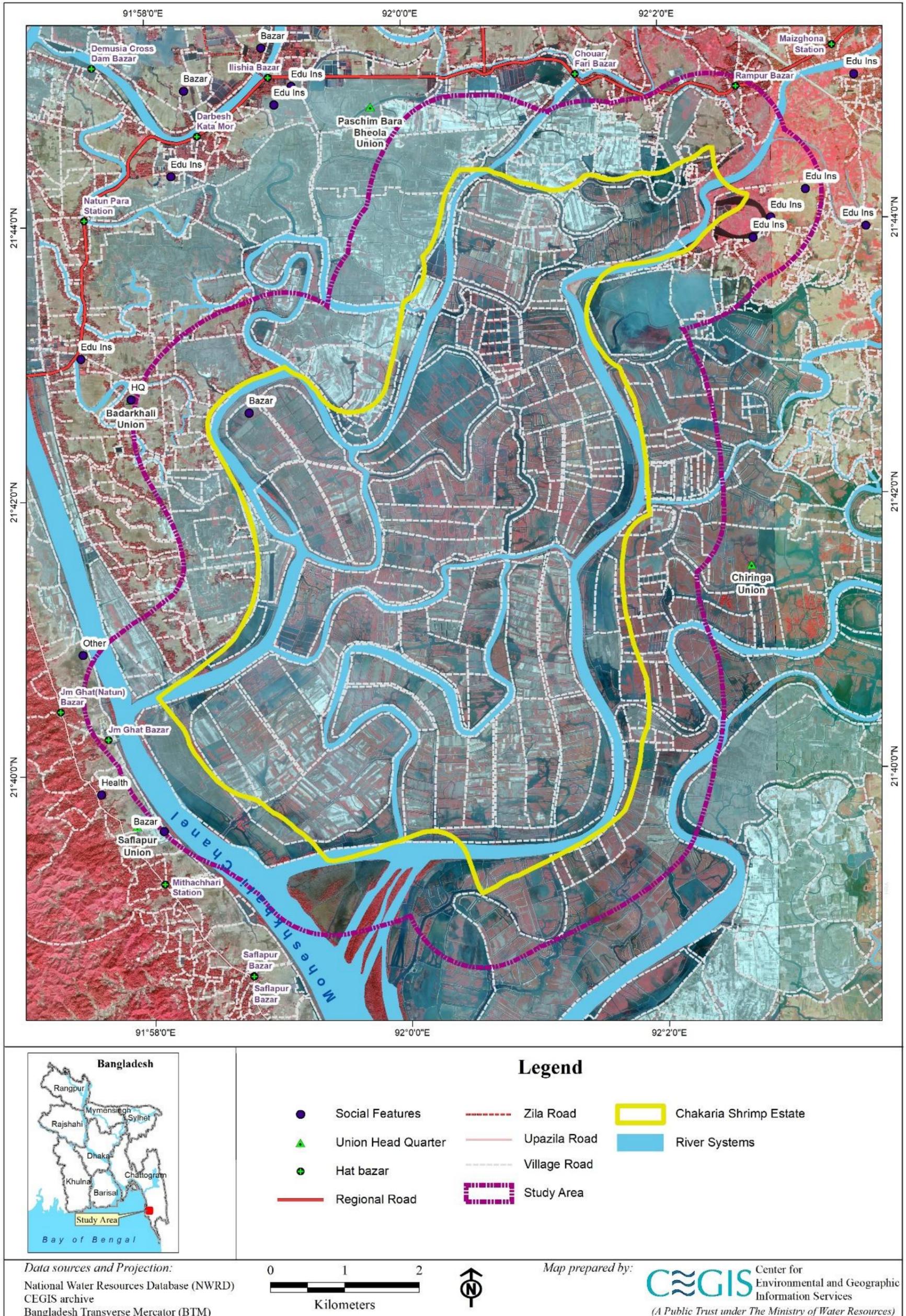
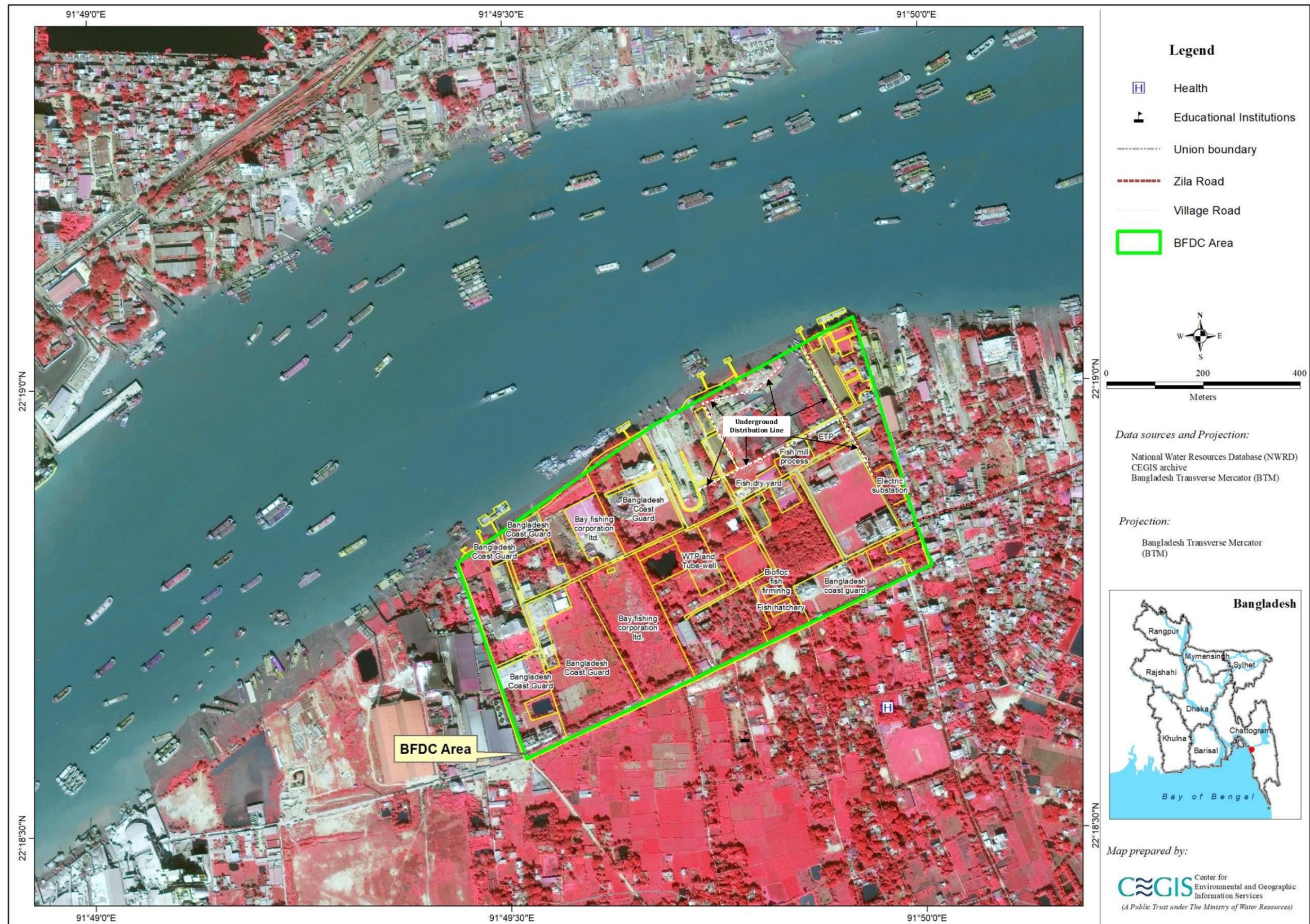


Figure 1.1: Map Showing Location of Chakaria Shrimp Estate on Satellite Image



February 2024

Figure 1.2: The Location of the Components Based on which Activities of BFDC has been Considered

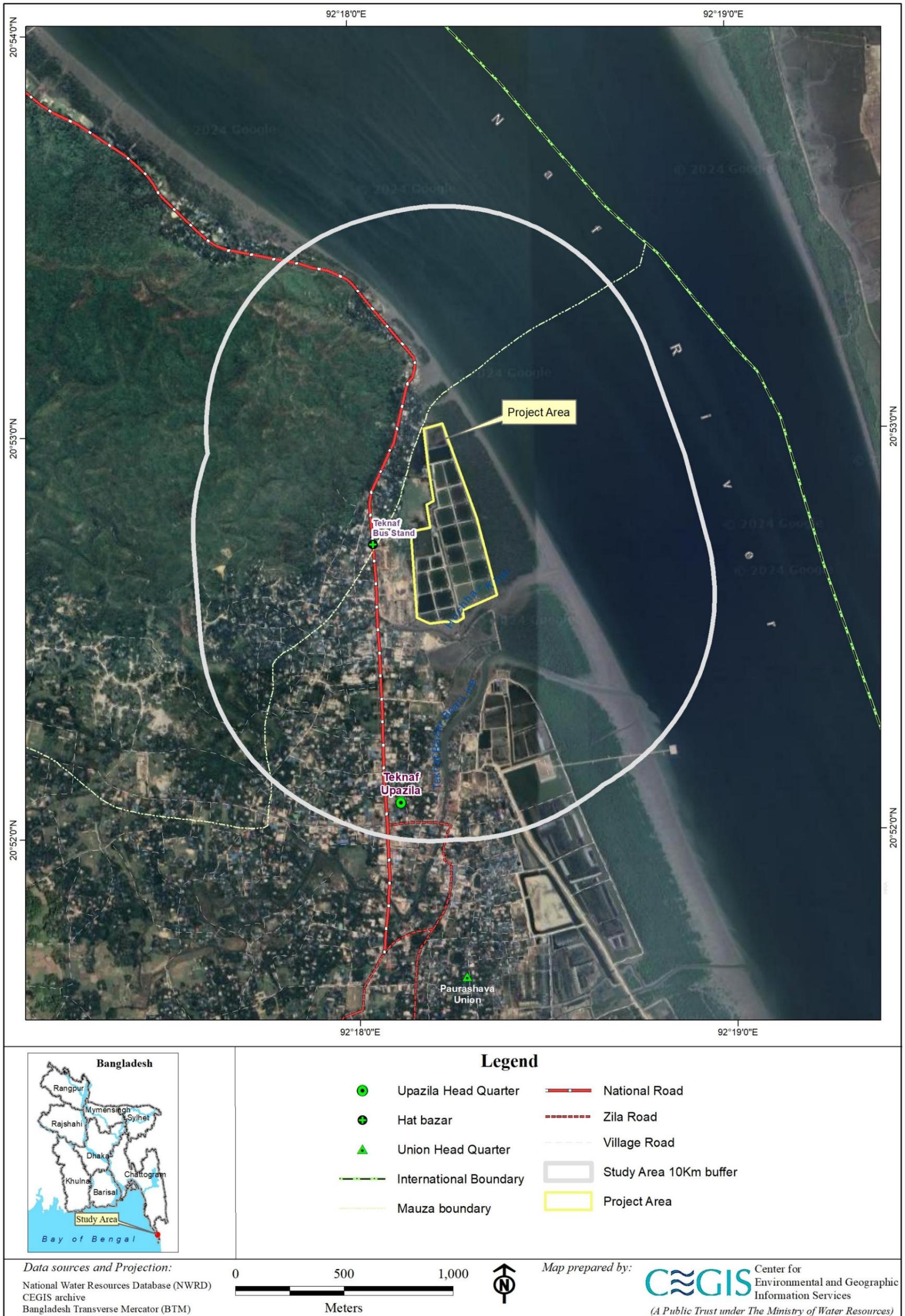


Figure 1.3: Map of BFDC Study Area on Satellite Image

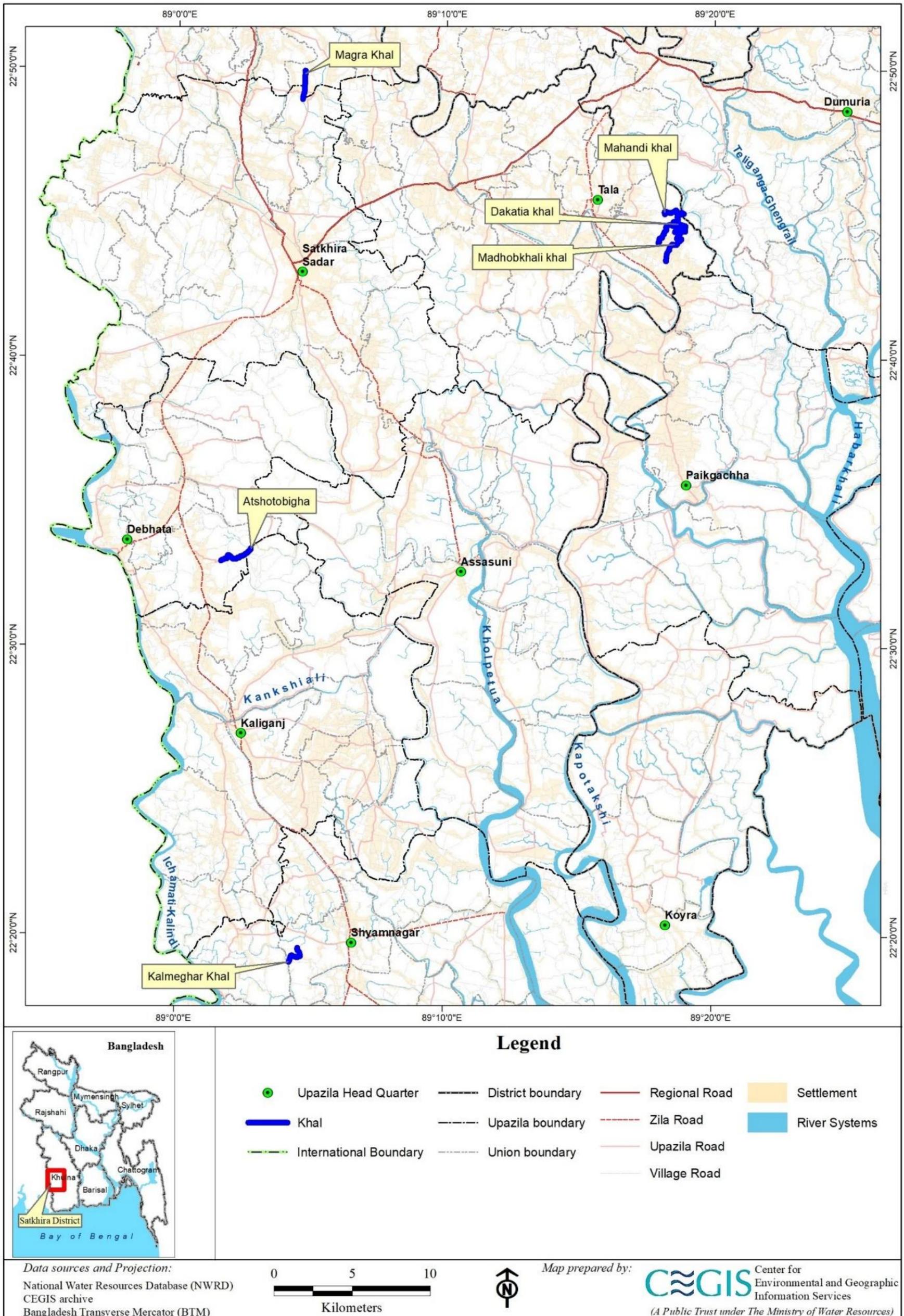


Figure 1.4: Locations of the Canals under Satkhira District

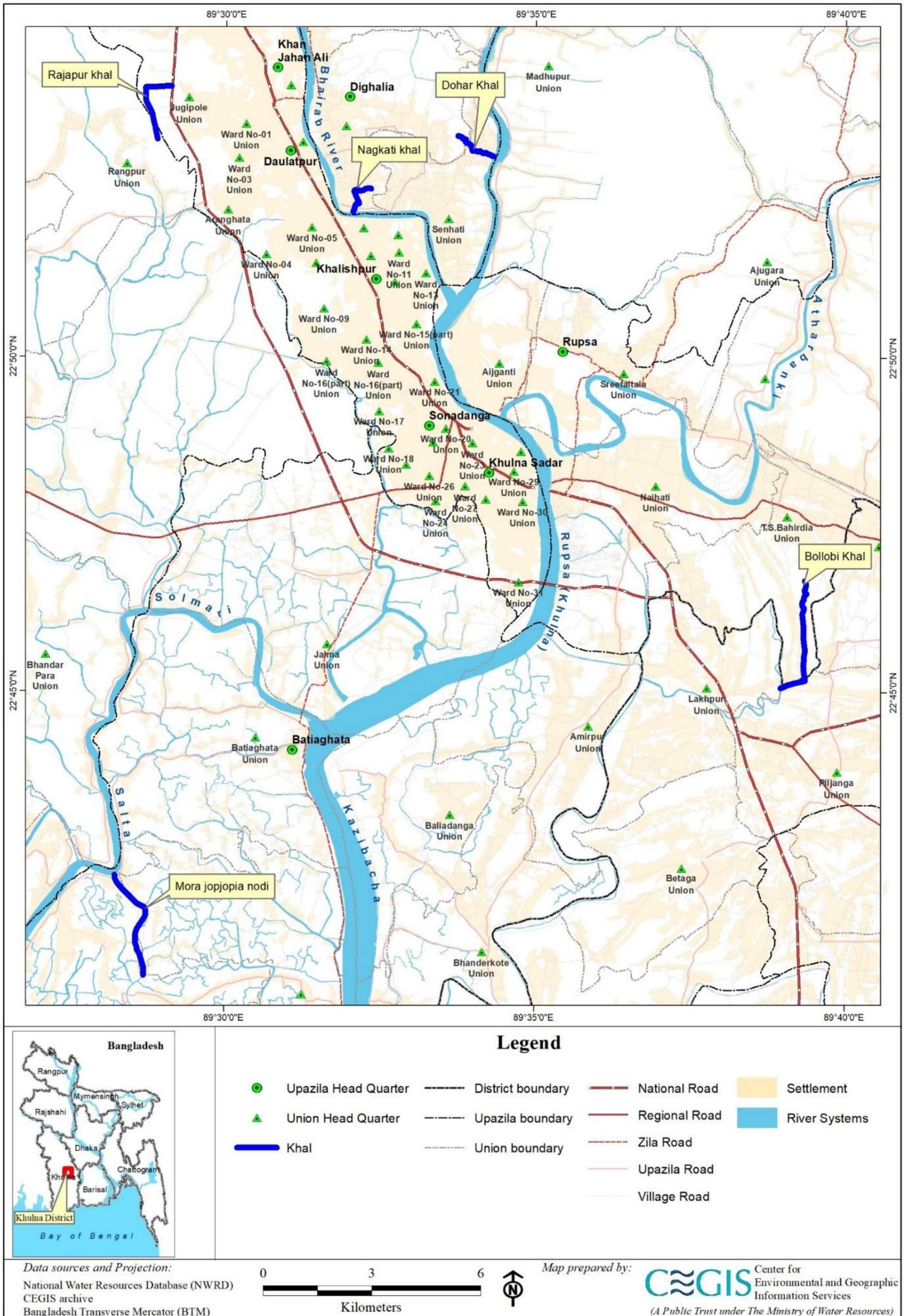


Figure 1.5: Locations of the Canals under Khulna District

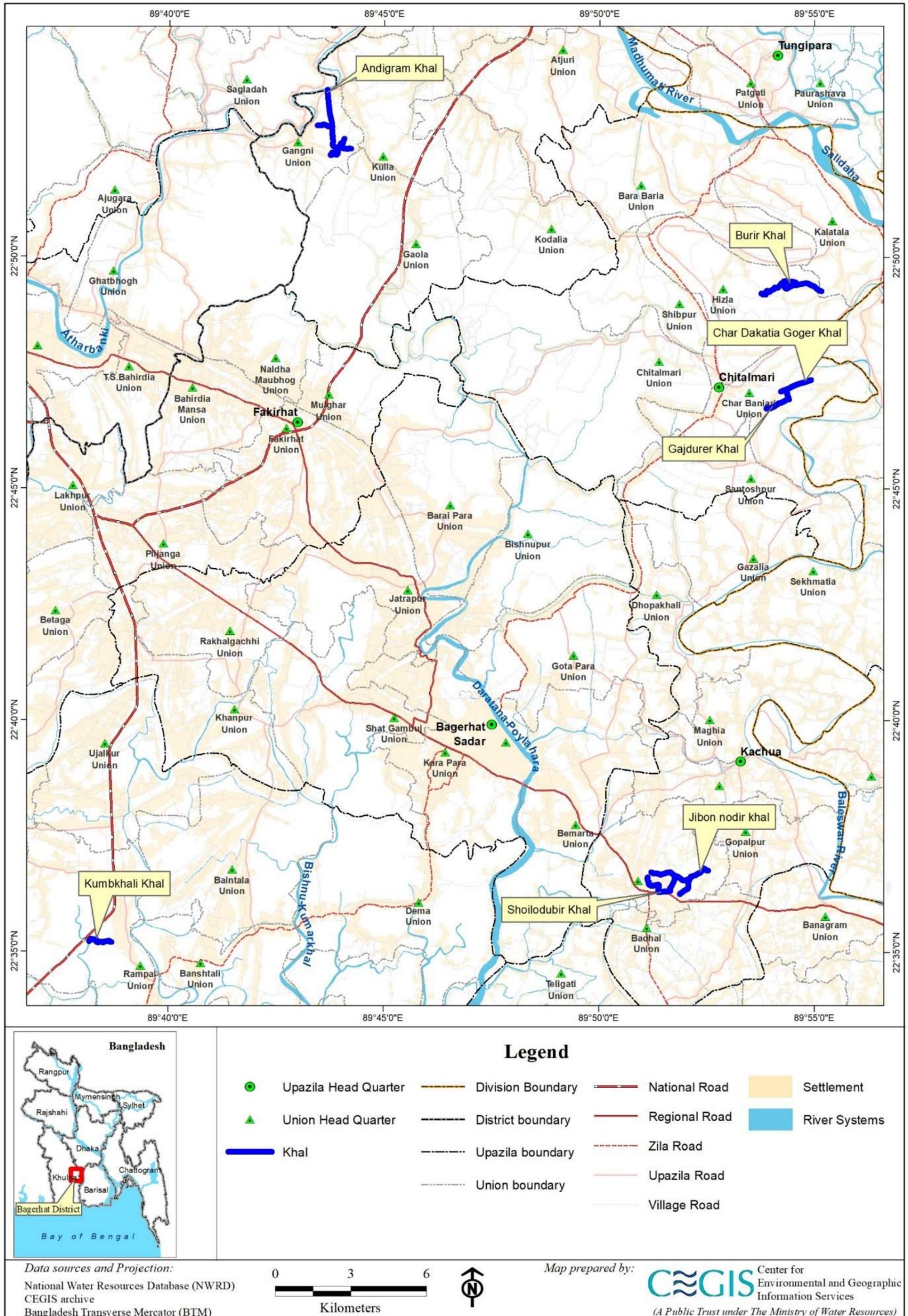


Figure 1.6: Locations of the Canals under Bagerhat District

1.4 Project Principles for Impact Mitigation

The following principles are suggested to be followed by the Implementing Agency (i.e., DoF) for the Project under respective areas for resettlement planning, implementation and monitoring.

- Affected households will be eligible for compensation and rehabilitation assistance, irrespective of tenure status, social or economic standing.
- There will be effective mechanisms for hearing and resolving grievances during the planning and implementation of the project.

1.5 Rationale of RPF

The Project does not need Land Acquisition. Unavailability of site-specific information at this initial stage, the Implementing Agency (IA) prepares this RPF as a guiding document for identification and management of potential social risks and impacts likely to arise during implementation. The RPF will guide the preparation of Resettlement Action Plan (RAP) for the selected interventions.

Prior to preparation of RAP the techniques to be used for data collection are (i) census and inventory of losses survey, (ii) property valuation survey, and (iii) stakeholder consultations.

1.6 Presentation of the RPF

This RPF document contains four chapters, including this chapter (**Chapter 1**). **Chapter 2** deals with the resettlement policy and legal framework, eligibility for compensation and entitlement while grievance redress mechanism, Grievance Redress Mechanism (GRM) monitoring are presented in **Chapter 3**. **Chapter 4** contains the implementation arrangements. The RPF will guide DoF in design and implementation of the Project.

1.7 Approval, Disclosure and Updating of RPF

This RPF will be adopted by implementing agency (DoF) after it is approved by the ministry of the Government. The English version of the RPF will also be disclosed in the web site of DoF along with the Bangla translation of the executive summary. For unanticipated impacts identified during project implementation and not covered under the eligibility and entitlement, the additional measures will be proposed in the RAP in accordance with the provisions of this RPF.

2. Legal and Policy Framework

2.1 Introduction

The proposed Project (Government Shrimp Estate Chakaria, Cox's Bazar, BFDC, BMC and Canals, Package No: SD 57) has no scope of land acquisition and requisition, as the Project/the implementing agency (DoF) will use its own land and khas land mainly; in some cases, in Khulna, Bagerhat and Satkhira Districts, private land may be used temporarily for dredged spoil disposal; people are interested to have the dredged spoil. There is no adverse impact also due to dredged spoil disposal of 18 canals, as the spoil will be disposed mainly on the dyke of canals i.e., on the khas land. The Project, therefore, does not involve resettlement in terms of relocation/ preparation of new residential sites, or require to shift to alternative forms of livelihoods.

2.2 The Applicable National Law and Regulations of Bangladesh

The law of eminent domain is applied for the acquisition of land for infrastructure projects of public interest. The Acquisition and Requisition of Immovable Property Act 2017 (Act 2017) is used for the legal and policy framework for land acquisition and requisition (temporary purpose). The Act 2017 is not useful for the proposed Project, as the Project will not acquire land. The legal and policy framework of the Project, therefore, will be based on: (i) the Project policies and (ii) The Operation Policy (OP) 4.12 of the World Bank Group (WBG), which is applied to all World Bank's financed and/or administered projects initiated before October 1, 2018, regardless of the country of where the project is located or the financing modality (i.e., loan, a grant, or other means), as the proposed Project has been initiated before October 1, 2018.

2.3 World Bank OP 4.12 on Involuntary Resettlement

The Project triggers the World Bank's OP 4.12 on Involuntary Resettlement that requires that the economic, social, and environmental risks out of involuntary resettlement are mitigated and livelihoods of the displaced persons are restored. Involuntary resettlement may cause severe long-term hardship, impoverishment, and damage unless appropriate measures are carefully planned and carried out. For these reasons, the overall objectives of the policy of involuntary resettlement are the following:

- Involuntary resettlement should be avoided where feasible, or minimized, exploring all viable alternative project designs.
- Where it is not feasible to avoid resettlement, resettlement activities should be conceived and executed as sustainable development programs, providing sufficient investment resources to enable the persons displaced by the project to share in project benefits.
- Displaced persons should be meaningfully consulted and should have opportunities to participate in planning and implementing resettlement programs.
- Displaced persons should be assisted in their efforts to improve their livelihoods and standards of living or at least to restore them, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.

The policy requires that the following measures are taken to achieve the above objectives:

- The resettlement action plan includes measures to ensure that the displaced persons are
 - i. informed about their options and rights pertaining to resettlement;
 - ii. consulted on, offered choices among, and provided with technically and economically feasible resettlement alternatives; and
 - iii. provided prompt and effective compensation at full replacement cost for losses of assets attributable directly to the project.
- If the impacts include physical relocation, the resettlement action plan or resettlement policy framework includes measures to ensure that the displaced persons are
 - i. provided assistance (such as moving allowances) during relocation; and
 - ii. provided with residential housing, or housing sites, or, as required, agricultural sites for which a combination of productive potential, convenient relocation sites, and other factors is at least equivalent to the advantages of the old site.
- Where necessary to achieve the objectives of the policy, the resettlement action plan also includes measures to ensure that displaced persons are
 - i. offered support after displacement, for a transition period, based on a reasonable estimate of the time likely to be needed to restore their livelihood and standards of living; and
 - ii. provided with development assistance in addition to compensation measures such as land preparation, credit facilities, training, or job opportunities.

The policy links implementation of resettlement action plan to the implementation of the investment component of the project to ensure that displacement or restriction of access does not occur before necessary measures for resettlement are in place. Resettlement measures include the provision of compensation and of other assistance required for relocation, prior to displacement, and preparation and provision of resettlement sites with adequate facilities, where required. In particular, taking of land and related assets may take place only after compensation has been paid and, where applicable, resettlement sites and moving allowances have been provided to the displaced persons.

The Bank policy does not bar compensation and assistance to the displaced persons under the resettlement action plan in absence of their legal title to land.

2.4 Social Safeguards Policy Compliance

The legal framework in Bangladesh is only compensatory on land acquisition and lacks any measures for livelihood restoration and social inclusion of the affected persons. It covers only the legal title holders and does not recognize the non-titled persons like squatters/encroachers, informal tenants of acquired lands and lease-holders without legally constituted agreement. It is already mentioned earlier that there is no scope of land acquisition in this project. In this context, the compensation strategies are considered based on the Project policies and the WB OP 4.12.

2.5 Impact Mitigation Principles

Where impacts are found unavoidable, DoF will plan to mitigate them in accordance with the following principles:

- Compensation and other benefits for the affected trees will be assessed at current market price and paid directly by DoF with assistance from RAP Implementing Agency.
- The absence of legal titles in cases of public land users will not be considered a bar to resettlement and rehabilitation assistance, especially for the socio-economically vulnerable groups.
- Vulnerability, in terms of socio-economic characteristics of the APs/ households, will be identified and mitigated according to the provisions in the RPF.
- Trees owners will be allowed to fell and take away the trees free of cost.

2.6 Eligibility for Compensation and Assistance

Regardless of their title and tenure status to the lands to be used for the Project implementation, the APs/households will be eligible for compensation and assistance. DoF will mitigate impacts on the following:

- *Owners of Structures:* DoF will pay compensation at replacement cost and along with transfer and reconstruction grants.
- *Owners of Trees:* Compensation for trees to be affected will be paid at current market price to be assessed by Property Valuation Advisory Committee (PVAC). Trees owners will be allowed to fell and take away the trees free of cost. Compensation for fruits will also be paid @ 30% of timber value of fruit bearing trees.
- *Women headed and other Vulnerable households:* Women heading the households and the households having income level up to BDT 171,201 and 186,741¹year¹, elderly members, and similar others will be eligible for a special assistance of one-time cash grants.

2.7 Core Principles of the Project

DoF in compliance with the provision stated in the World Bank's OP 4.12 will be the basis to implement impact mitigation measures. The Project policy and the World Bank's OP 4.12 requirements and as well as past experience from Project implementation, confirm the following principles for this Project:

- Project related information including entitlements to affected persons will be disclosed in a timely manner and will be made available in places easily accessible to them and in local languages.
- Consultations will be carried out with the affected persons and their communities to elicit their views and suggestions on project design and implementation procedures, and to ensure their participation in project planning, implementation and monitoring.

¹According to Household Income and Expenditure Survey 2022 (HIES 2022) of Bangladesh Bureau of Statistics (published on 14 December 2023) the household (HH) size at national level is 4.26 and accordingly the poor income per HH per month are BDT 14,267.00 and 15,562.00 in Chattogram and Khulna Divisions, respectively. Therefore, HHs with average income up to BDT 14,267.00 and 15,562.00 per month or BDT 171,201 and 186,741 per year is considered to be living under the poverty line in Chattogram and Khulna Divisions, respectively.

- Permanent and temporary loss of crops, and trees due to project will be compensated at replacement cost as determined by the PVAC to be established by the executing agency (DoF).
- All entitlements and compensation will be paid to the affected persons prior to the commencement of the Project implementation activities.
- Affected households will be eligible for compensation, irrespective of tenure status, social or economic standing, and any such factors that discriminate against achievement of the resettlement objectives. Lack of legal rights to lost assets, tenure, social or economic status will not bar the affected households from entitlement to compensation and assistance.
- A grievance redress mechanism will be established at different levels from Project local sites to the executing agency level to receive and resolve any grievances from affected persons, and to be resolved within a reasonable time frame.
- Contractual agreements with companies (related to construction, reconstruction, excavation, etc.) will ensure that contractors adopt adequate safety measures, and avoid accidents and disturbances causing from noise, dust, access restrictions, etc.
- A resettlement plan will be developed incorporating affected persons' entitlements, compensation procedures, plans for livelihood and income restoration and improvement, grievance redress mechanisms, etc. will be disclosed in an accessible place and in a form and language(s) understandable to the affected persons and other stakeholders.
- Compliance with the safeguards policies and principles by the executing agency and the outcomes and impacts of resettlement will be monitored both internally and externally (if required).

2.8 Entitlement and Assistance

2.8.1 Eligibility Criteria

The Project activities at shrimp estate will affect a number of persons who reside on Project's/DoF's land as informal settlers working for shrimp estate as laborers, guards/care takers, etc. They have to vacate the land for the Project implementation. They need to relocate anywhere else. This will not affect their livelihoods and incomes, as their employment in the shrimp estate will remain as usual. It is noted that most of the affected land is fallow land; the lessees of the shrimp estate reside far away from the Project area. Therefore, it is tough to identify all the affected households during conducting the census or inventory of losses survey. The DoF has the list of lessees of the shrimp estate. In this regard, list of affected persons/households needs to be updated and revised considering the eligibility criteria through the recommendation of the GRC during pre-construction and construction phases.

The guiding principles in chalking out the entitlement of APs due to eviction of APs from the land to be used for Project purpose and fixing their eligibility criteria for compensation are as follows:

- Ensuring compensation for loss of assets;
- Enhancing the standard and quality of life of the APs;
- Establishing eligibility criteria for affected persons; and
- Finding out the APs for proper and transparent distribution of compensation

All APs are entitled to compensation for their affected assets. Meaningful consultations with the affected persons, local authorities and DoF officials concerned will allow for establishment of criteria by which displaced persons will be deemed eligible for compensation and other resettlement assistance. Affected persons for this Project will be the persons who have no legal right or claim to the

land they occupy or use; they would get resettlement assistance in lieu of compensation for the land they occupy in accordance with this RPF.

This RPF advocates compensation and/or resettlement assistance to all persons affected by the project in order to offset such losses and enabling restoration of living conditions to a state better or equal to the pre-project situation. Hence, the entitlements of APs are considered in this RPF and eligibility to receive compensation will be limited by “cut-off” date. The starting date of census is the “cut-off” date in this Project. The census survey will identify the affected households with their affected assets in the Project area.

2.8.2 Compensation and Entitlement Policy

This section presents an entitlement matrix that provides for compensation and other assistance for different losses of the affected persons. The types of losses include trees and structures, for which the APs will be entitled for compensation. The absence of legal title will not bar APs from compensation and assistance, as specified in the entitlement matrix. All APs will be compensated for lost assets (structures and trees) and will receive other resettlement assistance such as shifting allowance, assistance with rebuilding structures. The Entitlement Matrix (**Table 2.1**) is prepared on the basis of information collected about the entities affected due to the proposed Project.

The executing agency will establish independent PVAC in Project areas to assess all losses to the affected persons and advise on the replacement cost for all such losses. All entitlements of compensation will be paid to the affected persons prior to vacant the land and commencement of excavation, construction work. The categories of impacts are identified and showed in the Entitlement Matrix. The matrix describes the units of entitlements for compensating the loss of structures and trees. The Project affected persons will be entitled:

- Compensation for loss of structures to the owners at Current Market Price (CMP);
- Compensation for loss of trees to the owners at CMP; and
- Assistancess/benefits are considered for vulnerable groups.

Table 2.1: Eligibility and Entitlement Matrix

Unit of Entitlement/Entitled Person	Entitlement	Application Guidelines	Responsibility
Impact category 1: Loss of Trees			
Owners of trees; People with valid lease agreement; Groups sponsored by public agencies/ NGOs.	Timber value and fuel wood value of trees at CMP. Trees grown under public/Non-Government Organization (NGO) sponsored program.	Estimated CMP of different species of trees as per GoB law, based on categorization as per Bangladesh Forest Department. Where ownership is in group, compensation will not be paid to any individual or the sponsoring agency.	PVAC will determine the market rate. PIU/IA will inform APs about the RAP policies with the updates.

Unit of Entitlement/Entitled Person	Entitlement	Application Guidelines	Responsibility
Impact category 2: Loss of residential, non-residential structures without title to land (laborers, care takers, squatters)			
Non-titled owners those own residential and non-residential structures (movable and non-movable) found on DoF/GoB land during census.	Replacement value of the structure (if applicable) as determined by PVAC and Project Implementation Unit (PIU). Transfer Grant at actual cost including maximum labor cost and transportation cost. Reconstruction Grant in actual cost which will include land development, labor cost and transportation cost. Owner will be allowed to take away all salvageable materials free of cost. Dismantling cost for non-shiftable structure will be determined by the PVAC and PIU based on the actual price.	Estimated market value to be determined by conducting PVS and getting assistance from Public Works Department (PWD) at district level.	PVAC determines market price of structures.
Impact category 3: Other Assistance/Benefit			
Disabled/elderly, women headed households, income vulnerable and ethnic/minority households.	One-time cash grant will be paid per vulnerable household.	One-time cash grant (not less than BDT 20,000) will be paid to each vulnerable household.	PIU/IA to inform APs and handed over the grants.

3. Grievance Redress Mechanism

3.1 Requirements of Grievance Redress Mechanism

Grievance redressing is the management of aggrieved person's dissatisfaction or complaints. By establishing formal grievance redress mechanism, a safeguard mechanism is established to protect the rights of the aggrieved person for his betterment. Grievance Redress Mechanism (GRM) is an institution, a method, and a process by which a resolution to a grievance is sought and provided. In this point of view, DoF, the Project Proponent will establish a procedure to deal with and resolve any queries as well as address complaints and grievances about any irregularities. In this regard, a policy and/or guideline will be prepared and adopted for assessing and mitigating potential complaints/impacts through GRM.

DoF will establish a procedure to deal with and resolve the complaint and grievance. Complaints and grievances about any irregularities in the application of the guidelines adopted in this RPF will be queries and well addressed through GRM. Grievance redress committees (GRC) will be formed to receive and resolve complaints as well as grievances from the local aggrieved persons. As a result, the procedure will help to resolve conflicting issues with amicably and quickly approach by saving time and expenses of the aggrieved persons. The procedure will, however, not restrict a person's legal right to go to the courts of law for any complaint. The project policy, however, will lead to form GRC for serving legal issues transparently to resolve any locally raised environmental, social and resettlement-related grievances for the sake of smooth implementation of project activity.

3.2 Composition of GRC

The GRCs will be established locally at project sites and centrally at the PIU level to receive as well as settle grievances from the affected persons and other local stakeholders. There will be two-tier grievance redress mechanism: 1st at local level (project site/upazila) and 2nd at PIU level. All the local level complaints will be received at the Project Site Office through application form, email or phone. In this regard, the INGO/consulting firm assists the aggrieved person for preparing and submission of the grievance form. The grievances will be resolved at the local level GRC, but those cases cannot be resolved at the local level that will be forwarded to PIU level. In PIU level the complaint/grievance will directly be received by website or by postal or by physical presence at Project Director (PD) office. The composition of GRCs is presented below.

3.3 Composition of Local GRC

First tier GRC will be formed in the local level at the project site office. It would be convenient for the community people to place their complaint / raise grievances directly to the project site office to the DoF officer or social safeguard officer of International NGO (INGO)/consulting firm assigned. INGO /consulting firm with Project Implementation Committee (PIC) together will prior inform the APs and local community about the project Grievance Redress Mechanism in local language. The local GRC (LGRC) will ensure easy accessibility of the APs local communities and interested stakeholders, so that any grievances can be solved directly or within a very short period of time. The project site office will first try to resolve the complaint/grievance by the LGRC. The LGRC will be formed headed by Senior Upazila Fisheries Officer (SUFO) of DoF as convener, social safeguard official of the assigned INGO/consulting firm as member secretary and additional three local level representatives from different sectors as members. Detail of members of the LGRC is given in **Table 3.1**.

Table 3.1: GRC membership at local level

Sl. No.	Concerned officials/members	Position
1	Senior Upazila Fisheries Officer (SUFO) (DoF)	Convener
2	Safeguard Specialist of the INGO/consulting firm	Member Secretary
3	UP Chairman or member	Member
4	Representative from local women's group	Member
5	Representative from the AP group	Member

All received complaints/grievances will be received with registration in a registered book and a notification of receipt with assurance of necessary review and resolution will be given to aggrieved persons in written form or through virtual mode of communication i.e. SMS or email.

3.4 Composition at PIU level GRC

If the aggrieved person does not accept the decision of LGRC, then the case would be referred to the PIU with the minutes of the hearings at local and district levels. The PD will be the convener and the senior social safeguard specialist will be the member secretary at PIU level GRC (PGRC). At the PIU level, decisions on unresolved cases, if any, will be made in no more than four weeks. A decision agreed with the aggrieved person at any level of hearing will be filing upon DoF.

Table 3.2: GRC membership at PIU level

SL	Concerned officials/members	Position
1	Project Director	Convener
2	Senior Social Safeguard Specialist	Member-Secretary
3	Representative of Local MP	Member
4	Gender Specialist	Member
5	Lawyer	Member

The aggrieved person may directly complaint/grievance to the PGRC. These complains will be accumulated with the reviewed unresolved cases of previous tier and process accordingly for further review. In record keeping or easiest way of tracking, these complaints/grievances will be recorded sequentially as per the date of submission and underneath of the previous recorded complaint/grievances of previous tiers.

3.5 Processes for Filing Grievance Cases and Documentation

The affected persons and their communities will be informed the project's grievance redress mechanism in the open meetings holding at different important locations and in other group meetings with APs. Bangla translations of the entitlement and grievance policy will be printed as brochures and will be distributed among the affected persons. Information of GRM will also be disclosed by hanging poster and banner at different important locations and also in the website of DoF. The APs will also be briefed the scope of GRCs, the procedure for filling the grievances and the procedure of grievance resolution at different levels.

The overall process of the GRM will include six steps and those are described below:

- **Step 1: Uptake** (3 days). Project stakeholders will be able to provide feedback and report complaints through several channels: in person at project site office, and by telephone, email.
- **Step 2: Sorting and processing** (within 7 days of complaint submission). Complaints and feedback will be recorded in a register and compiled by sorting different categories i.e. environmental, resettlement, gender-based violence (GBV), child abuse, employment and wage, etc.
- **Step 3: Acknowledgement and follow-up** (within 10 days of complaint submission). Within three (3) working days from the date of complaint submission, the responsible person will communicate with the appellant and provide information on the likely course of action and the anticipated timeframe for resolution of the complaint.
- **Step 4: Verification, investigation and action** (within 20 days of complaint submission). This step involves gathering information about the grievance to determine the facts surrounding the issue and verifying the complaint's validity, and then developing a proposed resolution, which could include changes of decisions concerning eligibility for compensation, additional assistance/grant, changes in the program itself, other actions, or no actions. All activities taken during this and the other steps will be fully documented, and any resolution logged in the register.
- **Step 5: Monitoring and evaluation** (within 25 days of complaint submission). Monitoring refers to the process of tracking grievances and assessing the progress that has been toward resolution. This is a continuous process from complaint submission to the reporting after investigation. The Planning Department will be responsible for consolidating, monitoring, and reporting on complaints, enquiries and other feedback that have been received, resolved and pending.
- **Step 6: Providing Feedback** (within 30 days of complaint submission). This step involves informing those to submit complaints, feedback, and questions about how issues were resolved, or providing answers to questions. Whenever possible, complainants should be informed of the proposed resolution in person. If the complainant is not satisfied with the resolution, he or she will be informed of further options, which would include pursuing remedies through the courts of law in Bangladesh legal system.

Throughout the entire process, DoF will maintain detail record of all discussion, investigation, findings and action and will maintain a summary log for easily tracking. It is noted that, the days are counted as working days.

3.6 Timeline of Resolution

- LGRC will resolve the case within six (6) weeks from the date of complaints/grievances received.
- PGRC will resolve the case within four (4) weeks of receiving the previously unresolved cases by this committee.

All these timelines may need to be revised if any unavoidable circumstances are happened i.e., strike, curfew and so on.

3.7 Grievance Redress Monitoring

Monitoring is necessary for tracking grievances and assessing progress being made to resolve grievances. There are indicators to measure grievance monitoring and resolution. In connection with

this data need to be collected and the collected data would be used to make policy and/or process changes to minimize similar grievances in future. The common grievance redress indicators are as follows:

- Number of complaints/ grievances registered;
- Percentage of grievances resolved;
- Percentage of grievances redressed within stipulated time period; or time required to resolve complaints;
- Percentage of complainants satisfied with response and grievance redress process; and
- Percentage of project beneficiaries that have access to GRM.

In the process of monitoring and tracking complaints the following activities need to be done:

- Designing of a simple, easy to use, excel-based or log-book based complaint registration and monitoring database;
- Regularly review feedback received, cases resolved and complaints trends in resettlement review meetings.

3.8 Monitoring and Reporting

Grievance monitoring and reporting framework should provide a routine flow of information from the field level to the PIU, based on the selected indicators (mentioned above), together with periodic supervision and verification by the Resettlement Unit (RU) of PIU, or those in charge of resettlement operations. The RU will prepare a monthly monitoring reports to be submitted to the PIU.

Table 3.3: Reporting Arrangements

Report	Content	Timeline	Responsibility
Monthly Grievance Monitoring Report	Narrative in detail as per the monitoring indicators set, performance and variance if any and reasons for variation and corrections recommended.	To be submitted within 10 days of the next month.	RU

4. Institutional Arrangement for Implementation of RP

4.1 Introduction

The implementation arrangement, and roles and responsibilities for the planning, implementation and supervision of resettlement functions, described in this RPF, involve a number of institutional actors, which are defined in this Chapter.

For efficient and smooth implementation of the project, suitable institutional arrangements are necessary to manage and implement the RAP. Institutional arrangement consists of Project Steering Committee (PSC) at ministry level; Project Implementation Unit (PIU) at project level; and project Implementation unit (PIU) at field level.

4.2 Project Management for RAP Implementation

The Government would have overall responsibility for project management and coordination through planning division of implementing agency under the Ministry. A Project Steering Committee (PSC) will provide the forum for overall guidance, policy advice and coordination of the project activities. DoF will be responsible for the implementation of the Project through a Project Implementation Unit (PIU). PIU will engage an NGO or consulting firm as Resettlement Plan Implementation Consultant (RPIC) for monitoring and supervision of RAP implementation.

4.3 Formation and Responsibility of PIU

There will be a Project Implementation Unit in the implementing agency (IA) headed by Project Director (PD). PIU will consist of PD, Deputy Project Directors (DPD), Resettlement Specialist, Environment Specialist, gender specialist, and communication/consultation specialist while the resettlement specialist and communication specialist will play main role in RAP implementation. The PIU will ensure that implementation follows both IA's project implementation policy and World Bank rules and regulations. The PIU will also be responsible for:

- Synchronization of resettlement activities with the Project construction schedule;
- Ensure that all eligible affected persons are identified, provided with their respective entitlements according to the resettlement policy and are relocated / compensated as per the implementation schedule;
- Supervising and reviewing preparation, implementation and providing necessary advice for timely delivery;
- Monitoring implementation progress and suggesting necessary course corrections;
- Resolving issues and conflicts that may emerge during implementation; and
- Keeping the PSC apprised on overall performance and key issues relating to the project.

The PIU will have ultimate responsibility for overall project management. Social safeguard team will follow project policy framework and the WB's OP 4.12. The PIU can take necessary advice of individual experts on legal and policy requirements including those of this RPF.

4.4 Role of Property Valuation Advisory Committee (PVAC)

DoF will form PVAC through a gazette notification from the Ministry of Fisheries and Livestock for implementation of the RAP at field level. The PD at the PIU, DoF in Dhaka will approve the nomination of PVAC. PVAC will be constituted for determining the market price as replacement cost of affected

properties (structures, trees) and determine the valuation of overall compensation amount to the APs. The committee shall consist of following members:

Table 4.1: PVAC Committee

Deputy Project Director (DPD-District Level Officers)	Convener
Representative of INGO/consulting firm	Member- Secretary
Senior Upazila Fisheries Officer (Field Coordinator)	Member

4.5 Roles and Responsibility of INGO/Consulting Firm

INGO/Consulting Firm may/will support the PIU when and where required. INGO/Consulting Firm will work closely with PIU. The role of INGO/Consulting Firm will be to facilitate sound implementation of the project. The INGO/Consulting Firm will work as a link between the Project Authority and the affected persons. PIU will ensure implementation of the RAP with the support of the INGO/consulting firm. The INGO/consulting firm will collect, collate, computerize and process data for correct identification of eligible persons for compensation payment through assessment of the entitlement policy framed in this RPF. Some of the key roles and responsibilities of the INGO/consulting firm will comprise of the following:

- Closely work with affected community and disseminate information to ensure correct and complete information is available to APs;
- Assist the Assistant Safeguard Manager (Resettlement) in disbursement of compensation (making of ID cards, etc.);
- Take lead responsibility in planning and implementing the resettlement activities following the entitlement package; and
- Ensure safeguard interest of the APs.



Center for Environmental and Geographic Information Services
<http://www.cegisbd.com>



DOF00501202405