



Department of Fisheries
Ministry of Fisheries and Livestock

Small Ethnic Community Development Framework

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

Annex D



May 2025

CEGIS

Center for Environmental and
Geographic Information Services

**Small Ethnic Community
Development Framework**

**for Government Shrimp Estate Chakaria, Cox's Bazar;
BFDC; BMC and Canals**

Annex D

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
List of Tables	iv
List of Figures	iv
Abbreviations and Acronyms	v
1. Introduction	1
1.1 Background	1
1.2 Project Description and Components	1
1.3 Project Area.....	1
1.4 Rationale of the SECDF	2
1.5 Scopes and Objectives of the SECDF	2
2. Policy and Regulatory Framework	4
2.1 Constitutional Rights of Small Ethnic Communities	4
2.2 Legal and Regulatory Framework	4
2.3 World Bank Policy on Indigenous Peoples/Small Ethnic Peoples.....	4
2.4 International Treaties and Conventions	5
2.5 SECDF Compliance for the Project.....	5
3. Description of the Small Ethnic Population	7
3.1 Small Ethnic Communities	7
3.2 SEC at the National Context.....	7
3.3 SEC at Project Context.....	8
4. Development of a SECDP	9
4.1 SECDF Approach	9
4.2 Project SEC Development Policy	9
4.3 Issues To Be Considered To Prepare SECDP.....	10
4.4 Contents of SECDP	10
4.5 Socio-Economic Characteristics & Concerns.....	11
4.5.1 Social & Cultural Characteristics.....	11
4.5.2 Economic Characteristics.....	11
4.5.3 Settlement Pattern	12
4.6 Impact Mitigation & Development Measures	12
4.6.1 Measures for Mitigation of Impacts.....	12
4.6.2 Community and Social Enhancement	13

4.6.3	Linkages and Leverages.....	13
5.	Consultation and Participation	14
5.1	Stakeholders of the Project.....	14
5.2	Meaningful Consultation.....	14
5.3	SEC Participation and Consultation Plan.....	15
5.4	Free, Prior, and Informed Consent (FPIC).....	16
5.5	Grievance Redress Mechanism (GRM).....	16
5.5.1	GRM Structure.....	16
5.5.2	Field level GRM.....	17
5.5.3	Project Level GRM	17
5.6	Information Disclosure.....	18
6.	Implementation Arrangement.....	19
6.1	The Role of PIU of DoF	19
6.2	The Role of Social Specialist	20
6.3	Monitoring and Evaluation	20
Appendix 1: Preliminary Screening of Small Ethnic Communities.....		21

List of Tables

Table 1.1: Administrative Boundary of the Proposed Project	2
Table 2.1: Internatinal Treaties and Conventions.....	5
Table 4.1: Study Area Based on the Sub-Projects.....	9
Table 5.1: GRC membership at Field Level.....	17
Table 5.2: GRC Membership at Project Level.....	18

List of Figures

Figure 5.1: The structure of Grievance redress mechanism	17
--	----

Abbreviations and Acronyms

AMTs	Appraisal and Monitoring Teams
BFDC	Bangladesh Fisheries Development Corporation
BMC	Brood Management Center
BSCMFP	Bangladesh Sustainable Coastal and Marine Fisheries Project
BTS	Black Tiger Shrimp
CBOs	Community Based Organizations
CG	Credit Group
CHT	Chittagong Hill Tract
CSOs	Civil Society Organizations
DFTC	Demonstration Farm and Training Center
DLIs	Disbursement-Linked Indicators
DoF	Department of Fisheries
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESSE	Environmental and Social Safeguard Expert
FPIC	Free, Prior and Informed Consent
FPICon	Free, Prior and Informed Consultation
GoB	Government of Bangladesh
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
IDA	International Development Association
IPF	Investment Project Financing
MoFL	Ministry of Fisheries and Livestock
NGO	Non-Government Organization
OP	Operation Policy
PAPs	Project Affected People
PD	Project Director
PIU	Project Implementation Unit
PSC	Project Steering Committee

RPF	Resettlement Policy Framework
SCMFP	Sustainable Coastal and Marine Fisheries Project
SEA/SH	Sexual Exploitation and Abuse and Sexual Harassment
SEC	Small Ethnic Communities
SECDF	Small Ethnic Community Development Framework
SECDP	Small Ethnic Community Development Plan
SEP	Stakeholder Engagement Plan
SPF	Specific Pathogen-Free
ToR	Terms of Reference
UN	United Nation
UNO	Upazila Nirbahi Officer
VDC	Village Development Committee
WB- ESS	World Bank- Environmental and Social Safeguard

1. Introduction

1.1 Background

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 to the economy, poverty reduction through improving management of coastal and marine fisheries and aquaculture, and access of the fishing communities to alternative livelihood activities in an environment-friendly manner.

This document, titled "Small Ethnic Community Development Framework (SECDF), which will be prepared in accordance with World Bank adopted Environmental and Social Safeguard (ESS)-7 standard, gives a brief but comprehensive overview as to how Small Ethnic Communities (SEC) will be dealt with while implementing the SCMFP. The purpose of the framework is to ensure that small ethnic communities are sufficiently and meaningfully consulted allowing their Free, Prior and Informed Consultation (FPICon) to project interventions; that they have equal opportunity to share in project benefits; that any potential negative impacts to those communities are avoided and minimized; and that the residual impacts are properly mitigated.

The SECDF will assist the SCMFP project as an implementation guideline, which will help to realize the modalities to deal with the ethnic community if any like to be affected by the project.

1.2 Project Description and Components

The Project is a two-phased proposed investment by the (GoB) and the International Development Association (IDA) of the World Bank Group. The project will be implemented in the coastal and marine areas of Bangladesh by the Department of Fisheries (DoF) under the guidance of the Ministry of Fisheries and Livestock (MoFL) in two phases which aims to increase coastal and marine fisheries' contribution to the economy, reduce poverty, and ensure environmental sustainability through enhanced management of coastal and marine fisheries and aquaculture. It also aims to create opportunities for the fishing communities' Small Ethnic Community Development Framework (SECDF) DoF 2 Bangladesh Sustainable Coastal and Marine Fisheries Project (BSCMFP) in accessing to alternative livelihood means. The Phase I of BSCMFP will have a preliminary budget envelope of around USD 256 million. Investment Project Financing (IPF), using a mixture of standard investment and Disbursement-Linked Indicators (DLIs) will be followed to support project implementation. Phase II will be considered and its budget envelopes defined based on successful implementation of the reform project put in place under Phase I. The duration of the proposed Phase I will be five (5) years. Project will cover 75 upazilas (Sub-Districts) covering 16 coastal districts.

1.3 Project Area

The project will cover a geographic area located in the coastal belt spreading over five (05) districts i.e., Khulna, Bagerhat, Satkhira, Chattogram and Cox's Bazar. The administrative boundary of the proposed sub-projects has been detailed out in the **Table 1.1** below.

Table 1.1: Administrative Boundary of the Proposed Project

Sl. No	Sub-Projects	District	Upazila
1	Rehabilitation of 10, and 11-acre Shrimp Estate and 48-acre Shrimp demonstration Farm,	Cox's Bazar	Chakaria
2	Development works for sustainable management of Bangladesh Fisheries Development Corporation (BFDC) harbor	Chattogram	Sadar
3	Establishment of Specific Pathogen-Free (SPF)-Black Tiger Shrimp (BTS) Brood Management Center (BMC) at Demonstration Farm and Training Center (DFTC), Teknaf	Cox's Bazar	Teknaf
4	Desilting and re-habilitation of existing canals of cluster shrimp farms	Khulna	Botiaghata, Paikgachha, Rupsa
		Satkhira	Debhata, Kolaroa, Tala, Shyamnagar,
		Bagerhat	Mollahat, Chitalmari, Bagerhat Sadar, Rampal, Kachua

1.4 Rationale of the SECDF

The World Bank's Operation Policy (OP) 4.10 ensures full respect for the human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods of Indigenous Peoples as well as of the local communities. The project may bring impacts in the project influenced area, which will necessarily affect local people, including small ethnic people. However, these effects may cause severe consequences for small ethnic groups because of their minority position, structural inequality, and socio-economic backwardness. Eventually, this small ethnic group requires special focus in the assessment. In this line, free, prior and informed consultation with this group is required according to the OP 4.10. The SECDP will focus on this small ethnic group, identify their present condition, project-driven consequences on them, and they will be meaningfully engaged in the consultation and planning process. This document will be used along with the Environmental and Social Management Plan (ESMP).

1.5 Scopes and Objectives of the SECDF

The primary objective of the SECDF is to identify affected Small Ethnic Communities (SECs) and assess project-driven impacts upon them aiming to include them in the management plan with a special focus.

Specific objectives include:

- Determine the presence of ethnic communities in all project interventions, and ensure that meaningful consultations are carried out to seek broad community support for the project and that the SECs are directly involved in the selection, design, and implementation of the project's activities, being culturally cognizant of the differences.
- Understand risks and impacts of the project activities on SEC and ensure that the activities do not lead to circumstances where Free, Prior and Informed Consultation (FPICon) is required.

- In addition to strategies for impact mitigation, taking additional steps to promote and reinforce any possible socioeconomic opportunities for ethnic communities located in the area.
- Selection of a facility site will be avoided if it falls under traditional ownership of ethnic communities, even if not legally recognized.

2. Policy and Regulatory Framework

2.1 Constitutional Rights of Small Ethnic Communities

In Article 27 of the Constitution of the Peoples Republic of Bangladesh states that all citizens are equal before law and are entitled to equal protection of law. The national Constitution also outlaw's discrimination on grounds of race, religion and place of birth (Article 28) and also stipulates scope for affirmative action (positive discrimination) in favor of the backward section of citizens (Articles 28, 29). Consequent upon these provisions, a small percentage of public sector jobs and seats in a number of government educational institutions are reserved for indigenous persons.

2.2 Legal and Regulatory Framework

In addition, there are some specific laws that refer to small ethnic communities specially focusing the tribal peoples in the Chittagong Hill Tract (CHT) area. In the plains, the only one of such laws is section 97 of the East Bengal State Acquisition and Tenancy Act, 1950 which forbids the transfer of lands owned by aboriginals to non-aboriginal persons without the express consent of the relevant Government's official, currently the Upazila Nirbahi Officer (UNO). The CHT in contrast has a far larger body of laws that refers directly to the region's indigenous ethnic minority peoples. Some of these laws recognize indigenous peoples' customs regarding the ownership and use of lands and other natural resources. The most important of such laws is the CHT Regulation of 1900. Other laws include the Hill District Council Acts of 1989 (separately for Bandarban, Rangamati and Khagrachari Hill Districts) and the CHT Regional Council Act of 1998. The last-mentioned laws were passed after the signing of the CHT Accord of 1997.

The government of Bangladesh has a special affairs division under the Prime Minister's Secretariat, which looks after the development of ethnic community populations outside CHT. The Special Affairs Division provide small development fund to the ethnic communities for their development including stipends for students.

2.3 World Bank Policy on Indigenous Peoples/Small Ethnic Peoples

The World Bank adopted OP 4.10 clearly demonstrates that the indigenous people require the development process will fully respect the dignity, human rights, economies, and cultures of indigenous peoples and also that the project activities do not threaten ethnic minorities' cultural identities and well-being. The Bank financed project activities will ensure, through site specific assessments that it (a) avoids potentially adverse effects on the ethnic communities; or (b) when avoidance is not feasible, minimize, mitigate, or compensate for such effects. Bank-financed projects are also designed to ensure that the indigenous peoples receive social and economic benefits that are culturally appropriate and gender and inter-generationally inclusive.

Bangladesh recognizes the right of SECs to cultural expressions, education, training, health, environment, land, agriculture, water resources, infrastructure, tourism and industry. The government also has a policy of affirmative action in support of the socio-economic and cultural development of the SECs. The SECDF, therefore, is prepared based on the OP 4.10 by taking into consideration relevant Bangladesh policies and regulations. A clear mechanism of consultation respecting the social and cultural traditions of the ethnic communities will be used in the entire cycle of the Project to seek broad support of the Project. A Grievance Redress Mechanism (GRM) will be also established (the Project GRM) before the implementation of the project so that every SEC member can bring his/her voice, complaint or provide feedback about the project.

2.4 International Treaties and Conventions

In addition to its domestic laws, Bangladesh is also signatory to most of the major international human rights instruments (**Table 2.1**) which are either directly or indirectly relevant to the rights of the ethnic communities.

Table 2.1: Internatinal Treaties and Conventions

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

2.5 SECDF Compliance for the Project

In accordance with the Bank's requirements, the project proposes the following principles, guidelines and procedure to prepare Small Ethnic Community Development Framework (SECDF), where Sub-Project activities and interventions are found to affect the small ethnic communities in positive or negative directions. To avoid or minimize adverse impacts and, at the same time, ensure culturally appropriate benefits, DoF will apply the following basic principles in selection, design and implementation of the projects.

- To ensure that the tribal/indigenous peoples gain full benefits from the project's interventions which is culturally appropriate to them and meaningful to their livelihoods.
- To ensure the broad community support of the indigenous/tribal communities for the project's interventions based on the principles of free, fair and informed consultation.
- Ensure that small ethnic communities in general and their organizations in particular are fully included in the project process including in the identification and selection of beneficiaries.
- To carefully screen the site-specific projects in participation with the small ethnic communities for a preliminary understanding of the nature and magnitude of potential adverse impacts, and explore alternatives to avoid or minimize them.

- Where alternatives are infeasible and adverse impacts are unavoidable, immediately assess the key impact issues in participation with small ethnic communities and others knowledgeable representatives of tribal culture.
- Undertake the necessary tasks to identify the detailed impacts and the most appropriate mitigation measures, through consultations with the affected tribal communities, tribal organizations, civil society organization like Non-Governmental Organizations (NGOs), Community Based Organizations (CBOs), professionals, and stakeholders.

3. Description of the Small Ethnic Population

3.1 Small Ethnic Communities

The SEC that will meet the criteria of Bank adopted OP 4.10 in varying degrees are as follows:

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

3.2 Small Ethnic Communities at the National Context

The overwhelming majority of the population in Bangladesh is ethnic Bengalis. However, across its territory, many minority groups inhabit most of whom continue to keep their distinct ethnic traits, social institutions and cultural traditions. Many of them could be taken as ‘indigenous peoples’ as defined in various United Nation (UN) human rights instruments and policies, including the World Bank’s OP 4.10 on indigenous peoples.

The small ethnic groups are scattered in different areas of the country. The exact number of them is undetermined. The 1991 census mentions 29 groups and according to the government’s Small Ethnic Groups Cultural Institutions Act, 2010, there are 27 such small ethnic communities. On the other hand, according to the Bangladesh Adivasi Forum, an apex advocacy body of the small ethnic communities in Bangladesh, there are 45 ethnic minority groups with approximately 2.5 million living side by side with the Bengali majority.

The location of the various ethnic minority groups by region is broadly as follows:

Sl. No.	Major Ethnic Communities	Regions/Districts
1	Santal, Uraon/Oraon, Munda, Mahato, Paharia, Malo, Pahan, Rajbongshi, Rajooar, Karmakar and Teli	North-west Region: Rajshahi, Naogaon, Chapai Nawabganj, Natore, Sirajganj, Pabna, Bogura, Joypurhat, Dinajpur, Thakurgaon, Rangpur, and Gaibandha Districts
2	Khasi, Patro, Monipuri, Garo, Tripura and tea garden communities	North-east Region: Sylhet, Sunamganj, Habiganj and Moulvibazar Districts
3	Garo, Hajong, Koch, Banai, Rajbangshi, Dalu, Barman and Hodi	Central Region: Gazipur, Tangail, Sherpur, Jamalpur, Netrakona, Mymensingh Districts
4	Rakhhaine, Tripura, Munda, Ranbangshi, Chakma, Marma, Tanchangya, Mro, Lushai, Khyang, Khumi, Chak, Pangkhua, Bawm, Santal, Asam/Asamese and Gorkha	Chattogram Hill Tracts: Bandarban, Rangamati and Khagrachari Districts Coastal Region: Khulna, Satkhira, Chattogram, Cox’s Bazar, Patuakhali, Barguna, and Chandpur Districts

3.3 Small Ethnic Communities at Project Context

The SCMFP Project will generate substantial direct short and longer-term benefits for the ethnic communities, poor, fishers, disadvantaged men and women. The project-districts located in the Coastal Region of Bangladesh (Chattogram, Cox's Bazar, Khulna, Bagerhat, Satkhira District). The project target groups of beneficiaries are the fishers and poor and extremely poor vulnerable fisheries-dependent households. Marine and coastal fisheries resource are immensely significant to the livelihoods of the coastal communities, which are quite varied and influenced by complex socio-economic and physical environment of the coastal area. There is a considerably low or no (Bagerhat District) presence of small ethnic communities (SECs) in the coastal areas covered under the project.

It is expected that those small ethnic communities will be considered as beneficiaries under the project.

The possible major ethnic communities available in the study areas are: Rakhaine, Tripura, Munda, Chakma, etc. but there is no ethnic people in each of the sub-project sites.

4. Development of a SECDP

The baseline study reveals that there are no ethnic people living at the sub-project sites so, a Small Ethnic Community Development Framework (SECDF) is adequate to address the ethnic community issue under this purview. However, a Small Ethnic Community Development Plan (SECDP) if requires to apply, development of a SECDP may follow the steps and consider the issues are given below:

4.1 SECDP Approach

The study area for the discussed project has been considered based on the interventions that will be taken up for each of the sub-Projects. The detail of the component-based study area has been outlined in the **Table 4.1** below:

Table 4.1: Study Area Based on the Sub-Projects

Sl. No.	Sub-Projects	Study Area
1.	Rehabilitation of 10, and 11-acre Shrimp Estate Chakaria, Cox's Bazar	1 km buffer area from the boundary
2.	Development works for sustainable management of BFDC harbor at Chattogram	1 km radial area from the center of the BFDC harbor area
3.	SPF-Black Tiger Shrimp (BTS) Brood Management Center (BMC) at DFTC, Teknaf	1 km radial area from the center of the BMC
4.	Desilting and re-habilitation of existing canals of cluster shrimp farms at different locations of Khulna, Bagerhat and Satkhira Districts	Catchment area of the respective canals.

4.2 Project SEC Development Policy

In accordance with the Bank's requirements, the project proposes the following principles, guidelines and procedure to prepare Small Ethnic Community Development Plan (SECDP), where project activities and interventions are found to affect the small ethnic communities in positive or negative directions. To avoid or minimize adverse impacts and, at the same time, ensure culturally appropriate benefits, DoF will apply the following basic principles in selection, design and implementation of the projects.

- To ensure that the tribal/indigenous peoples gain full benefits from the project's interventions which is culturally appropriate to them and meaningful to their livelihoods.
- To ensure the broad community support of the indigenous/tribal communities for the project's interventions based on the principles of free, fair and informed consultations.
- Ensure that small ethnic communities in general and their organizations in particular are fully included in the project process including in the identification and selection of beneficiaries.
- To carefully screen the site-specific projects in participation with the small ethnic communities for a preliminary understanding of the nature and magnitude of potential adverse impacts, and explore alternatives to avoid or minimize them.
- Where alternatives are infeasible and adverse impacts are unavoidable, immediately assess the key impact issues in participation with small ethnic communities and others knowledgeable representatives of tribal culture.

- Undertake the necessary tasks to identify the detailed impacts and the most appropriate mitigation measures, through consultations with the affected tribal communities, tribal organizations, civil society organization like Non-Governmental Organizations (NGOs), Community Based Organizations (CBOs), professionals, and stakeholders.

4.3 Issues to be Considered to Prepare SECDP

Small Ethnic Community Development Plan (SECDP) will be prepared where site-specific project activities are likely to affect the tribal communities. DoF will consider the following for preparation of the SECDP:

- The ethnic and demographic characteristics of the affected population;
- The prevailing institutions such as family, religion, language and education and other SEC variables including socio-cultural traditions;
- Institutional structures of the IP communities will be considered and thus this Plan will accommodate the local traditional leadership (as Headman, Karbari), gender and inter-generational issues, civil society and NGOs in their implementation plan;
- Gender related issues and role of the IP women and youth in the project activities;
- The land ownership pattern including the issues and problems pertaining to customary tenure and livelihoods options, both agricultural and non-agricultural;
- Traditional dispute resolution mechanisms among the small ethnic communities which could be potentially utilized for grievance redress mechanism; and
- Impacts on the IP communities including an analysis on unanticipated consequences with relevant mitigation measures.

4.4 Contents of SECDP

The primarily objectives of the SECDP will aim at mitigating adverse impacts, and reinforcing and promoting any existing development opportunities in the project areas with emphasis on the SECs who would be directly affected. The contents of the SECDP will generally consist of the following:

- A summary of the information about (i) legal and institutional framework applicable to SECs and (2) baseline information on the demographic, social, cultural, and political characteristics of the affected SECs, the land and territories that they have traditionally owned or customarily used or occupied, and the natural resources on which they depend;
- A summary of the consultation with the affected SECs that were carried out and that led to broad community support for the project;
- Strategy for disclosure, indicating timing of disclosure and consultation to the relevant stakeholders so that they are able to provide useful feedback and suggestions/comments;
- When potential adverse effects on SECs are identified, an appropriate action plan of measures to avoid, minimizes, mitigate, or compensate for these adverse effects;
- A Grievance Redress Mechanism (GRM): The GRM will take into account the traditional grievance redress mechanisms of the SECs and will include the representatives of the SECs and their traditional leaders/elders in the Grievance Redress Committee (GRC);
- Implementation arrangement of the SECDP will elaborate in detail the implementation schedule, the role of the stakeholders in the implementation of activities and will take into consideration minimizing disruption to the livelihood and other activities of SECs;

- Institutional capacity of the stakeholders and where necessary, to prepare a capacity building plan for the SECs/relevant implementing organizations for smooth implementation of the site-specific project activities;
- Monitoring and evaluation: Mechanisms and benchmarks appropriate to the project for monitoring, evaluating, and reporting on the implementation of the SECDP. The monitoring and evaluation mechanisms should include arrangements for the consultation with the affected SECs;
- Budget/Financing the SECDP: Budgets and sources of funds needed to implement the SECDP agreed between the SECs and DoF/ Partners.

4.5 Socio-Economic Characteristics & Concerns

Identification of social concerns upon sub-project screening will primarily focus on the cultural and socioeconomic characteristics of SECs and the potential vulnerability that might be caused by the proposed subproject activities. Data on the following socio-economic characteristics are expected to indicate the nature and scale of adverse impacts and provide the essential inputs for SECDP.

4.5.1 Social & Cultural Characteristics

- Relationships with areas where they live relating to religious/cultural affinity with the ancestral lands, existence and use of livelihood opportunities etc.;
- Use of any distinct languages for social interactions and their use in reading materials and instruction in formal/informal educational institutions in SEC localities;
- Food habits/items that may differ from non-indigenous peoples and the extent to which they are naturally available for free or can only be grown in the SEC territories, and which are considered important sources of protein and other health needs of SECs;
- Interactions and relationships with other small ethnic community groups in the same and other areas;
- Presence of customary social and political organizations – characteristics indicating internal organization and cohesion of the communities, and their interaction with those of the non-indigenous population in these areas;
- Presence of SEC organizations, like community-based organizations (CBOs)/NGOs working on SEC development issues, and their relationships with mainstream organizations engaged in community development activities;
- Other cultural aspects likely to be affected or made vulnerable by the proposed project.

4.5.2 Economic Characteristics

- Prevailing land tenure indicating legal ownership and other arrangements that allow them to reside in and cultivate or otherwise use lands in their areas;
- Access to natural resources, prevailing conditions under which SECs are using natural resources like forests, water bodies, and others that are considered important sources of livelihood;
- Occupational structure, indicating the relative importance of the households' present economic activities, and the extent to which they might be affected or benefited because of the proposed subproject activities;

- Level of market participation, engagement in activities that produce marketable goods and services, and how and to what extent market participants would be affected or enhanced by the project activities.

4.5.3 Settlement Pattern

- Physical organization of homesteads indicating organizational patterns with the existing community facilities, such as schools, places of worship, cremation/burial grounds and others, water supply and sanitation, etc.;
- The extent to which the indigenous settlements/neighborhoods are spatially separated from those of the non-indigenous peoples, indicating interactions and mutual tolerance of each other;
- Present distance between the SECs settlements/neighborhoods and the selected project.

4.6 Impact Mitigation & Development Measures

4.6.1 Measures for Mitigation of Impacts

While implementing the project in the SEC driven location, to avoid or minimize adverse impacts (if any) on SECs, DoF will apply the same guidelines proposed in the Project Environment and Social Management Framework (ESMF). In addition, particular attention will be paid to ensure that non-local workers do not intrude into the SEC localities, or resort to actions and behavior that could be construed as culturally insensitive and disrespectful by SECs.

However, the project may have certain positive impacts and may induce negative impacts on the SEC people during implementation stage. These are summarized as below:

- Unemployed or underemployed labor force from SEC groups will have the opportunity to enhance their skills and increase their employability. This will help in reducing poverty of SEC households and help the community on a greater extent.
- Reduction of poverty of the SEC people will help them to get rid of their marginal condition and make them able to contribute in the mainstream economy.
- Potential loss of property and livelihood by the SEC for proposed project interventions and other infrastructural development. However, possibility of such displacement is nominal as there is no land acquisition or large-scale infrastructure development component in the program.
- Conflict between SEC and project implementation authority due to land acquisition rumor that may cause physical displacement. IA should make this issue clear to them through PCM during project planning phase. Authority must have to confirm them about their safety and security and if happen such type of issue, authority should let them inform how to minimize this impact and how to compensate their loss.
- Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) issue may come in front as there will be deployed many non-local employees in the project area. They may tempt to the SEC for job advantage and other benefit in exchange of sexual activities. Ethnic women and girls may be harassed and teased by the project workers while they use to go to the school and colleges.
- Loss of Ecosystem services.

As a part of mitigation measures to minimize the negative impacts, Choice of appropriate and culturally compatible development measures will be preferred that largely depend on preferences and

priorities of the affected SECs. Identify key project stakeholders and elaborate a culturally appropriate and gender-sensitive process for meaningful consultation with Small Ethnic Communities at each stage of project preparation and implementation, taking the review and baseline information into account.

Such measures may include providing credits where SECs are found to engage in the production of marketable goods, such as handicrafts, handlooms, small-scale horticulture; employment in construction and maintenance activities; basic water supply and sanitation facilities; and those, such as schools, that could be used by the communities as a whole. If credit programs are found appropriate, DoF will call upon civil society organizations like NGOs to organize and administer them.

4.6.2 Community and Social Enhancement

A baseline survey would be conducted to generate baseline data. There are villages exclusively inhabited by SEC and villages which have both SEC and non-SECs. Therefore, distinct strategies would be adopted to address the needs of SEC in these different situations.

Exclusive SE villages: The project would consult SEC leaders, both men and women on the kind of groups that would be formed from among the SEC. Village Development Committee (VDC) will be formed that will include representatives from all SEC. It is likely that credit group (CG) would be formed separately for each SEC sub-group if required. Members of the CG shall belong to the same SEC group as they may have close relations with each other and they trust each other. They can be motivated to work together. All such CGs in a village would form into a Village Development Committee (VDC), since the different SECs traditionally extend mutual co-operation in times of need.

Mixed Villages: Mixed villages would be of two types – SEC majority villages and non-SEC majority villages. The institution building process will be different in each context. The project would address the concerns of the poor non-SEC in SEC villages. In a SEC majority village, the CGs of SEC and non-SEC would perhaps be formed separately and federate at the VDC level. In a non-SEC majority village, the SECs typically live in a separate settlement within the village or at the outskirts of the village. CGs would be formed for SEC exclusively and the CGs of the non-SEC would be formed separately. Representatives from each CG will form an inclusive VDC.

4.6.3 Linkages and Leverages

The project would ensure convergence and synergy with key line departments, such as health, social safety program, education, child welfare and nutrition, agriculture, horticulture, etc., to ensure effective services in the SEC areas. Additionally, the project will help establish connections with other initiatives aimed at reducing poverty, including microfinance, programs for disadvantaged populations, legal aid, legal literacy, and human rights initiatives.

5. Consultation and Participation

The extent to which SECs will be involved in the selection, design, and execution of the planned project activities will be contingent upon their physical presence within the project region, impacts and risks and the benefits that the ethnic minorities can obtain from interventions. When both favorable and unfavorable effects on SECs are anticipated, the Project will interact with impacted SECs in accordance with OP/BP 4.10. Those who work with SEC development issues and concerns, or who are informed about them, may also participate in these consultations. The main goals are to determine whether the project's activities have widespread support in the community, to get input and feedback from SECs in order to prevent or minimize negative effects, to identify impact mitigation strategies, and assess and adopt economic opportunities which the project could promote in order to supplement the necessary mitigation strategies.

As part of preparation of the SEC Development Plan (SECDP), consultation will be conducted under the PIU and other stakeholder/agencies of the SCMF Project participants may include representatives of small ethnic communities. The suggestions and recommendations raised in the consultation will be incorporated in the SEC Development Plan.

The main objectives of the consultation are:

- Evaluating the amount of broad community consensus in support of the project works and sites and looking for community feedback to minimize the multifaceted effects associated with the chosen activities
- Identifying the impact reductive initiatives and assessing and adopting economic facilities that can be promoted by DoF to complement the initiatives required to reduce the negative effects.

5.1 Stakeholders of the Project

The DoF, relevant implementing department and the SECs at individual project site are the primary beneficiary/stakeholders under the project. Informed participation of the local community, the concerned SECs and other stakeholders in the value chain and management process is crucially important for effective design and successful implementation of the project. Public-sector agencies and private entities, traders, investors, local government bodies, NGOs and Civil Society Organizations (CSOs) are the secondary stakeholders.

Selection of the target beneficiaries at a community will be carried out during project screening using the below criteria:

- Community that exhibits a strong commitment to the project concept and is willing to meet the project objectives and conditions; and
- Community is poor and vulnerably dependent on fishing and fisheries-dependent occupations.

5.2 Meaningful Consultation

Participation is a process through which stakeholders' influence and share control over development initiatives and the decisions and resources which affect them. The decision to participate is the start of the whole participatory process in the project cycle. National Policy on the development of the SECDF does not provide clear guidelines for public consultation. However, the OP/BP 4.10 provides clear guidance and direction to project proponents in both the public and private sectors, on the need for public consultation and participation and underscore the importance of consultation with the SECs

about the project and, more importantly, getting their actual and active involvement in the planning and implementation.

The Project will follow the meaningful consultation process in engaging with the SEC in the project, those are:

- Involve SEC representative bodies and CBOs (e.g., councils of elders or village councils, or chieftains, headman and Karbaris) and, where appropriate, other community members;
- Provide sufficient time for SECs in decision making processes;
- Allow for SECs effective participation in the design of sub-project activities or mitigation measures that could potentially affect them either positively or negatively.

All communications will be in language appropriate for the SECs concerned to enable the SEC to participate in the consultation process. Their views and voices expressed in the consultation process will be given due consideration to incorporate those in project design and implementation approaches.

5.3 SEC Participation and Consultation Plan

Participation of SECs in selection, design and implementation of project activities will largely determine the extent to which the SECDP objectives will be achieved. Where adverse impacts on SECs are likely, DoF and partners will undertake free, prior and informed consultations with the affected SECs and those who work with and/or are knowledgeable of SEC development issues and concerns. To facilitate effective participation, the project will follow a time-table to consult with affected SE communities at different stages of the project cycle.

Consultations will be broadly divided into two parts. Prior to selection of a project located in an area predominantly inhabited by SECs, DoF and partners will consult the SE communities about the need for, and the probable positive and negative impacts of the project interventions and other works. Prior to detailed assessment of the impacts at household and community levels, the main objectives of consultation at this stage would be to ascertain (i) how the SE communities in general perceive of the need for undertaking the project activities in question and any inputs/feedback they might offer for better outcomes; (ii) whether or not the communities broadly support the works proposed under the project; and (iii) any conditions based on which the SE communities may have provided broad support to the project, which are to be addressed in the SECDP and project design. To ensure free, prior and informed consultation (FPICon), DoF and partners will:

- Ensure broad participation of SE communities with adequate gender and generational representation; customary/traditional SEC organizations; community elders/leaders; and civil society organizations like NGOs and CBOs; and groups knowledgeable of SEC development issues and concerns.
- Provide them with all relevant information about the project, including those on potential adverse impacts, organize and conduct these consultations in a manner to ensure full coverage of SECs in the project areas and free expression of their views and preferences.
- Document and share with the Bank the details of all community consultation meetings, with SEC perceptions of the proposed works and the associated impacts, especially the adverse ones; any inputs/feedbacks offered by SECs; and the minutes stating the conditions that have been agreed during the consultations and provided the basis for broad-based community support for the project.

To ensure continuing informed participation and more focused discussions, DoF and partner organizations will provide the SECs with the impact details, both positive and adverse, of the proposed

project activities. The disclosure of SECDP will be done in language that the SECs understand. In addition, where relevant further face to face meetings with the SECs and their representatives will be held involving inter-generational representations.

Times for disclosure and consultation will be set in line with the available time of the SECs. Beginning with those for broad-based support for the project activities, community consultations will continue throughout the preparation and implementation period, with increasing focus on the households which would be directly affected (Consultation timing, probable participants, methods, and expected outcomes will be finalized after getting the primary data).

Project staff and implementing agencies working in the SEC areas would be oriented towards SEC culture and development issues to enable them to appreciate the importance of SEC culture while working among them.

5.4 Free, Prior, and Informed Consultation (FPICon)

The project will not involve any activities that may require Free, Prior and Informed Consultation (FPICon). FPICon of the affected SECs will only be required where the project may:

- Have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation;
- Cause relocation of SECs from land and natural resources subject to traditional ownership or under customary use or occupation; or
- Have significant impacts on SECs cultural heritage that is material to the identity and/or cultural, ceremonial, or spiritual aspects of the affected SECs lives.

However, activities that will arise any negative impact on SECs, will automatically be screened out if FPICon becomes a necessity.

5.5 Grievance Redress Mechanism (GRM)

The Grievance Redress Mechanism (GRM) for SCMFPP Project will be established by the Implementing Agency (DoF) addressing grievances and complaints received from the project affected persons due to project interventions including SECs. Grievance Redress Mechanism (GRM) is a valuable tool which will allow affected people to voice concerns regarding environmental and social impacts for project activities. The Stakeholder Engagement Plan (SEP) of SCMFPP Project should be prepared that includes grievance redress procedures to ensure that grievances are logged, analyzed and handled properly. The Project GRM will assist and demonstrate a procedure to resolve issues/conflicts amicably related queries and address complaints, disputes, and grievances about any aspect of the project interventions, including disagreements regarding the assessment and mitigation of environmental and social impacts. The GRM will however not pre-empt a complainant's right to seek resolution in the courts of law. The Project GRM will establish SEC related GRC under DoF.

5.5.1 GRM Structure

The purpose of the GRM is to record and address any issue that may arise during the life cycle of the project period effectively and efficiently. Two tier GRM is designed to address concerns and complaints promptly and transparently with no impacts (cost, discrimination) for any reports made by project affected people (PAPs) specially SECs and the complainants. The GRM will provide opportunity to resolve grievances at the local and project level. Necessary sign posting/billboard would be placed at the central places/places where people gather for sharing detailed information of the GRCs at every level. The structure of Grievance redress mechanism is presented in **Figure 5.1**.



Figure 5.1: The structure of Grievance redress mechanism

5.5.2 Field level GRM

The objective of the field level GRM is to resolve issues at the first instance. However, issues that are not resolved at field level will be referred to the project level GRC. The field level GRC shall carry out the following as regard to redressing grievances: a) Hear the grievances, and provide an early and mutually satisfactory solution to those; b) Immediately bring to the notice of the Project unit c) Inform the aggrieved parties about the progress of actions of their grievances and decisions. The field level Grievance Redress Committee (GRC) shall have the following members:

Table 5.2: GRC membership at Field Level

Sl. No.	Name/Person	Designation
1	Representatives from DoF	Convener
2	Environmental and Social Safeguard Expert from Project Implementation Unit (PIU)	Member Secretary
4	A representative from the Local Government	Member
5	2 Members of the SEC community (1 male and 1 female)	Member
6	A CBO representative (preferably tribal in the plains)	Member

The field level GRC shall resolve or reach a decision fifteen (15) days from the date the complaint is received. The chairperson of the GRC shall communicate the committee's decision to the aggrieved from the SECs in writing and maintain a record of all decisions related to each case. In addition, SECs have existing traditional and cultural GRMs. It is expected that some disputes at the field level may be resolved using these mechanisms, without the involvement of the contractor(s), and or Government representatives at the local level.

5.5.3 Project Level GRM

If the resolution attempt at the local level fails, the GRC will refer the complaint with the minutes of the hearings of the local GRC to the project level for further review. With active assistance from the Social Specialist of the PIU, the committee will decide and communicate it to the concerned GRC. The project level GRC will make a periodic visit to the subproject sites, interact with the communities and affected persons, and pick up issues of concerns, complaints and suggestions to register with the GRM books. The decisions on unresolved cases will be communicated to the Project Level GRC after 15 days of complaint registration, if not solved. The Project Director (PD) will be the convener, and the Social Specialist will be the member secretary of the Project level GRC. The project level GRM shall have the following Grievance Redress Committee (GRC) members: -

Table 5.3: GRC Membership at Project Level

Sl. No.	Name/Person	Designation
1	Project Director	Convener
2	A member from PIU (Environmental and Social Safeguard Expert)	Member Secretary
3	An Elected Member of the Respective Local Government	Member
4	A Representative of the SEC	Member
5	One female representative from PIU	Member

The members of the GRCs will be responsible for ensuring that complaints and grievances are presented in an appropriate manner, ensuring impartial hearings and investigations are conducted, and also transparent decisions are made. Where grievances are among the affected persons, the membership composition of the GRCs will take into account any traditional conflict resolution arrangements that communities may practice. If the aggrieved person is a female, PIU will ask the concerned female UP Member or Municipal Ward Councilor to participate in the hearings. All cases at the project level will be heard within four weeks of their receipt.

5.6 Information Disclosure

This SECDP will be disclosed in local language together with its English version. Both versions will be made available on DoF's website for public perusal and comment. Alongside, copies of both versions will be made available at the DoF's field offices and other relevant premises (such as, local government, NGO, traditional organizations of the SECs, etc.) under the project's coverage.

An SECDP shall be prepared as soon as the site-specific projects are started to be implemented and adverse impact on SE community and submitted to the Bank as part of the implementation plan. Prior to the commencement of the implementation, the SECDP shall be disclosed on DoF and partner's organization's websites and the World Bank portal. A copy of SECDP with local language, usually in Bangla which overwhelming majority of the ethnic communities understand and are able to read and write, shall be placed in local project offices, Union Parishad offices, Upazila and District Administration offices so that the small ethnic community peoples can have access to it to provide their comments and suggestions.

6. Implementation Arrangement

6.1 The Role of PIU of DoF

Department of Fisheries (DoF) will be the lead executing agency for the project and will house the Project Implementation Unit (PIU) responsible for day-to-day implementation and M&E. A number of institutional actors will be involved which are defined in this section, for implementation arrangement, roles and responsibilities for the planning, implementation and supervision of SEC within the project influence area,

For efficient and smooth implementation of the project, suitable institutional arrangements are necessary to manage and implement the SECDF and other relevant safeguard document. 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. An external monitor will be also hired for the program to ensure proper monitoring of safeguard implementation.

While a capacity building team at the national level has the responsibility to design and plan capacity building programs that reflect issues emerging through the implementation process, Appraisal and Monitoring Teams (AMTs) are responsible for independently appraising the SECDF application. An internal audit team will conduct audits at the SEC community and report to the proponent regularly. A copy of the report shall also be shared to the World Bank authority.

A Project Steering Committee (PSC) will be established by an MoFL that will be chaired by the Secretary and will ensure inclusion of other relevant line Ministries for providing supervision and policy guidance and facilitating inter-ministerial partnership on reform agenda. Based on the agreed Terms of Reference (ToR), the PSC will supervise project implementation and will take initiatives on project-related issues

The responsibility of the Project Implementation Unit (PIU) will be to implement the SECDF and SECDF besides other social management plans (ESMF, RPF, SEP, etc.) where the ESSE will play the lead role.

The outlines of the role and responsibility of the Environmental and Social Safeguard Expert (ESSE) will be as below:

- Review relevant legal and policy framework and social development and safeguards planning frameworks;
- Review design and conduct subproject level social screening, social impact assessment and preparation of social management plans.
- Coordinate and facilitate all activities contained in SECDF and any social management plans with the help of the Consultant.
- Assist in the process of supervision and monitoring of the implementation of SMF and the subsequent social management plans;
- Help affected persons and communities in the grievance resolution process involving the project GRM;
- Collect data, consult the communities and targeted beneficiaries and prepare monthly progress reports and participate in monthly review meetings;
- Participate in the training program for capacity building; and
- Carry out other responsibilities as required from time to time.

6.2 The Role of Social Specialist

The Project will designate the Environmental and Social Safeguard Expert (ESSE) who will be responsible for the implementation of the SECDF including preparation of SECDP. The designated Social Specialist could be recruited and his/her responsibility will include ensuring that the provisions of the SECDF/SECDP are implemented as and when the SECs are found to be impacted by the project.

The Project will also involve the representatives of the traditional institutions and community elders in the implementation of the SECDP. Special focus will be made to include the women and youth of the ethnic communities.

Roles and responsibility of the Social Specialist to SECs are:

- Review relevant legal and policy framework and social standards planning frameworks;
- Review design and conduct subproject level screening for presence of SECs, impact assessment and preparation of SEC Development Plan (SECDP).
- Coordinate and facilitate all activities contained in SECDP including consultation.
- Assist in the process of supervision and monitoring of the implementation of SECDF and the subsequent social management plans;
- Help affected SECs in the grievance resolution process involving the project GRM;
- Collect data, consult the SECs and prepare monthly progress reports and participate in monthly review meetings;
- Participate in the training program for capacity building.

6.3 Monitoring and Evaluation

The DoF is responsible for monitoring of the SECDP. Below is a tentative list of indicators for social monitoring of the SECDP implementation:

- Presence of small ethnic communities in the influence areas of project interventions;
- Number of small ethnic communities by gender and age affected;
- Number of small ethnic communities participate in project beneficiary groups;
- Partial impact of livelihoods by small ethnic communities due to the project interventions;
- Number of small ethnic community persons losing livelihoods;
- Changes in livelihoods and level of income at pre- and post-project situations;
- Level of satisfaction expressed by the small ethnic communities on the project process, input, output and outcomes;
- Participation of the small ethnic communities in project processes using FPICon (Free, Prior and Informed Consultation).

Appendix 1: Preliminary Screening of Small Ethnic Communities

Date: _____

When to do the Screening?	At the time of the first consultation with a community
What information to be collected?	Demographic data of SEC who live within the project intervention area
How to collect the information?	It can be obtained from ethnic leaders (Headman/Karbari), village leaders and community chief.
Who will do the screening?	Environmental and Social Safeguard Expert (ESSE) of PIU

District: _____

Upazila: _____

Union: _____

Village: _____

Name of the village withing the project area	Name of the ethnic group (meeting the criteria of ESS7)	Number of Ethnic Households	Total Population of the village (nos)	Number of Ethnic People	
				Male	Female



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



DOF00501202406