

# Land Acquisition and Resettlement Due Diligence Report

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## **PUBLIC**

Document Stage: Draft for Consultation  
Project Number: 55201-001  
September 2023

Bangladesh: Coastal Towns Climate Resilience  
Project: Construction of 5 Roads in Swarupkathi  
*Pourashava*, Pirojpur District

Package No.: e-GP/CTCRP/2023-24/SWAP/RD/01

## **CURRENCY EQUIVALENTS**

(As of August 2023)

Currency unit	–	taka (Tk)
Tk1.00	=	\$0.009
\$1.00	=	Tk109.75

## **ABBREVIATIONS**

ADB	-	Asian Development Bank
AIDS	-	Acquired Immunodeficiency Syndrome
BAN	-	Bangladesh
CDTA	-	Capacity Development Technical Assistance
CTCRP	-	Coastal Towns Climate Resilience Project
DDS	-	Detailed Design services
DPHE	-	Department of Public Health Engineering
FGD	-	Focus Group Discussion
HIV	-	Human Immunodeficiency Virus Infection
IEE	-	Initial Environmental Examination
ILO	-	International Labor Organization
LGED	-	Local Government Engineering Department
PAM	-	Project Administrative Management
PAP	-	Project Affected Person
PAT	-	Patuakhali
PIU	-	Project Implementation Unit
PPTA	-	Project Preparatory Technical Assistance
SCF	-	Strategic Climate Fund
SIA	-	Social Impact Assessment
SPS	-	Safeguard Policy Statement
TMRESC	-	Tribes, Minor Races, Ethnic Sects and Communities

## **WEIGHTS AND MEASURES**

cm	–	centimeters
km	–	kilometer
m	–	meter
m <sup>2</sup>	–	square meter
mm	–	millimeter
m <sup>3</sup>	–	micrograms per cubic meter

## NOTES

- (i) The fiscal year (FY) of the Government of Bangladesh and its agencies ends on 30 June. "FY" before a calendar year denotes the year in which the fiscal year ends, e.g., FY2021 ends on 30 June2021.
- (ii) In this report, "\$" refers to United States dollars.

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## I. INTRODUCTION

### A. Background

1. The ADB supported Coastal Towns Infrastructure Environmental Infrastructure Project (CTEIP) in 10 coastal towns effectively commenced on September 2014 which will be completed on June 2022. As a continuity of the project ADB extended his support to Coastal Towns Climate Resilience Project (CTCRP) which will strengthen climate resilience and disaster preparedness in 22 (twenty-two) vulnerable coastal *pourashavas* (secondary towns) of Bangladesh. The towns were selected based on their vulnerability, population size, density, and level of past investments. The project takes a holistic and integrated approach to urban development and will (i) provide climate-resilient municipal infrastructure, and (ii) strengthen institutional capacity, local governance, and knowledge-based public awareness, for improved urban planning and service delivery considering climate change and disaster risks. Key infrastructure investments include (i) drainage, (ii) water supply, (iii) sanitation, (iv) cyclone shelters, and (v) other municipal infrastructure including emergency access roads and bridges, solid waste management, bus terminals, slum improvements, boat landings, and markets. Investments will benefit the poor and women. The Ministry of Local Government, Rural Development and Cooperatives (MLGRDC) acting through its Local Government Engineering Department (LGED) will be the Executing Agency. *Pourashavas* are the implementing agencies of the project.

2. Coastal towns are particularly at risk from the impacts of climate change due to high levels of poverty and limited capacity of *pourashavas* (urban local governments) to invest in resilience. The *pourashavas* lack resilient infrastructure, clubbed with haphazard urbanization, lack of storm water drains, poor solid waste management system further worsens the condition of these towns. Most of the coastal towns are situated on the riverbanks of low-lying tidal zones at an average elevation of 1.0–1.5 meters (m) from the sea level<sup>1</sup> and coastal flooding is a key hazard faced by these towns. Inadequate basic municipal infrastructure to respond to increasing climate risk threatens both quality of life and the economic growth of coastal towns. This calls for an integrated approach for coastal town development that promotes risk-informed planning and investment for building resilience.

### B. Project Description

3. The project will be aligned with the following impacts: higher and sustainable growth trajectories achieved in the face of the various weather-related natural hazards and risk and improved livability of coastal towns.<sup>2</sup> The outcome of the project will be climate and disaster resilience of coastal towns strengthened including benefiting the poor and women. The project directly supports to achieve project outcomes through three outputs.

4. **Output 1: Municipal infrastructure for resilience improved.** Municipal infrastructure will include (i) elderly people, women, children, and persons with disability friendly cyclone shelters; (ii) 240 kms emergency access roads including bridges and culverts which are critical for accessing emergency services; (iii) 272 kms of storm water drains constructed for improved flood control; (iv) water supply and sanitation services for unserved (or underserved) core urban areas and slum areas; (v) seven integrated solid waste management facilities; and (vi) slum improvement programs for basic service improvement implemented in each *pourashava* following poverty reduction action plan.

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<sup>1</sup> Sowmen Rahman and Mohammed Ataur Rahman. Climate Extremes and Challenges to Infrastructure Development in Coastal Cities in Bangladesh. Volume 7, March 2015, Pages 96–108

<sup>2</sup> Government of Bangladesh, General Economics Division, Bangladesh Planning Commission Ministry of Planning. 2020. Making Vision 2041 a Reality – Perspective Plan of Bangladesh, 2021–2041. Dhaka.



5. **Output 2: Resilient livelihood improved.** Output 2 includes (i) livelihood training programs for diversifying the skills of poor households including women, (ii) strengthening market linkages for local economic development, (iii) inventory of productive assets of each household maintained and insured, and (iv) the Graduation Approach and Program will be adopted to ensure livelihood resilience.<sup>3</sup>

6. **Output 3: Institutional capacity, governance, and climate-awareness strengthened.** Output 3 includes (i) capacity of LGED and *pourashavas* strengthened to undertake climate and disaster risk assessment to inform the formulation and update urban development plans; and enforcement of development control regulations that factor in natural hazards considerations; (ii) knowledge and capacity of LGED and *pourashavas* on NbS and green solution application developed; (iii) municipal governance, and sustainable service delivery improved; and (iv) public awareness, behavior change, and community mobilization enhanced in light of coronavirus disease (COVID-19) and recent severe cyclones.

7. The proposed CTCRP is to be implemented in 22 *pourashavas* or urban local bodies (ULBs). District-wise location of the towns is summarized in Table 1.

**Table 1: District-wise *Pourashavas* where Project will be implemented**

District	Town ( <i>Pourashava</i> )	District	Town ( <i>Pourashava</i> )
1. Barisal	1. Bakerganj	5. Bhola	1. Charfassion
	2. Mehendiganj		2. Lalmohan
	3. Banaripara		3. Borhanuddin
	4. Muladi	6. Jhalokathi	4. Jhalokathi
	5. Gouranadi		5. Nalchity
2. Bagerhat	6. Bagerhat	7. Satkhira	6. Kalaroa
	7. Morelganj	8. Khulna	7. Paikgacha
3. Patuakhali	8. Patuakhali		8. Chalna (Dacope)
	9. Kuakata	9. Pirojpur	9. Swarupkathi
4. Shariatpur	10. Zanjira	10. Barguna	10. Patharghata
	11. Bhedarganj		11. Betagi

8. Construction of 5 RCC road in Swraupkathi *Pourashava* is one of the proposed sub-project components of CTCRP. The RCC road will improve connectivity of project area and improve transportation facility.

### C. Scope of Due Diligence Report

9. This due diligence report (DDR) is prepared for the proposed construction work of 05 RCC road in Swarupkathi *Pourashava*. The report is prepared based on the available preliminary design and the Sub Project Appraisal Report (SPAR) prepared for this project and relevant sections of the Capacity Development Technical Assistance (CDTA) Report; discussions with related stakeholders and PIU/*Pourashava* authorities and consultation with the Department of Public Health Engineering (DPHE) personnel.

10. Social safeguards due diligence has been conducted to examine the land acquisition and resettlement issues in detail based on the preliminary design and information, aligned with Asian Development Bank's Safeguard Policy Statement (ADB SPS), 2009. All construction work will use *Pourashava* land, no land acquisition or involuntary resettlement impacts have been identified as the proposed land is free from any encumbrances.

<sup>3</sup> The graduation program originated in Bangladesh and has since been adopted in several countries as a holistic, time-bound interventions to lift households from poverty through: (i) social assistance to support immediate needs; (ii) livelihood promotion; (iii) financial inclusion; and (iv) social empowerment.



11. Any adverse impact in terms of permanent or temporary such as land acquisition, physical displacement, economic displacement, adverse impact on livelihood, community properties or any other impact is not anticipated due to the proposed project. This report describes the findings and provides copies of relevant documents, community consultations and photographs.

12. The DDR will be updated during design verification by the contractor, in case of any design or alignment change. The updated document will be submitted to ADB for clearance, prior to start of construction. The Executive Engineer of the concerned *Pourashava* will be the focal person for all social safeguard related issues. The draft DDR will be reviewed and disclosed on MLGRDC, LGED and ADB websites.

## II. PROJECT DESCRIPTION

### A. About the Project Area

13. Spread over 6.25 km<sup>2</sup>, the municipal town of Swarupkathi is in Barisal Division. Swarupkathi *Pourashava* is bounded by Pirojpur and Jhalokathi districts. The town has a total population of 20019.<sup>4</sup> The *Pourashava* was established in 1998 and it consists of 9 wards. Most of the areas of Barisal district are surrounded by rivers and being adjacent to the Bay of Bengal, natural disasters are rampant in the district every year, leading to increased suffering of the inhabitants. Adding to this, climate change effect has speed up the frequency natural disaster like, cyclone, tidal surge, excessive rainfall, rising temperature, increase salinity, land slide, erosion of riverbanks, thunderstorm etc. and these are the major disaster for Barisal district. The district is more susceptible to cyclonic surges and heavy rainfalls.

### B. Location of the Site

14. The proposed alignments for the roads under Swarupkathi *Pourashava*, District: Pirojpur are located within the *Pourashava* area, which are mostly within urban and semi urban areas. Selection of roads has followed the criteria included in Volume -4 of PPTA and Appendix 1 of Project Administration Manual Table 1 according to the scoring matrices for scheme prioritization.

15. The project consists of three components i) improved climate-resilient infrastructure, ii) strengthening institutional capacity, governance, and awareness, iii) project management and administrative support. The outcome of the project will be improved access to climate disaster resilience municipal services including; i) municipal infrastructure such as drainage, cyclone shelters, urban roads, bridges, culverts, solid waste management, bus terminals, slum improvement, boat landing and markets; ii) water supply and iii) sanitation.

16. Total length of RCC Pavement is 3500m. To mitigate the water logging problem, we also designed the drain along the road side with Footpath facilities as improve the urban facilities. We also designed the RCC drains, Cross culverts and protection work as precast RCC pile with cast in situ RCC vertical protection wall as per field requirements.

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<sup>4</sup> Source: Census, 2011

Figure 1: Location of Roads



Source: Detailed Project Report, September 2023.

### III. LAND AVAILABILITY AND RESETTLEMENT IMPACTS

#### A. Land Acquisition and Involuntary Resettlement

17. **Proposed Site for road.** The scope of land acquisition and involuntary resettlement is assessed during the field visits. The project will not result into any permanent or temporary land acquisition, and no involuntary resettlement impact is envisaged, as the proposed site and development activities are within the vacant land of existing roads. All the construction works will be undertaken for the implementation of the proposed roads within the existing roads.

**Table 2: Details of Proposed Roads**

Table 2: Details of Proposed Roads					
Name of Roads	Start and End Point (Wards covered)	Total length proposed (m)	Present width (m)	Proposed width (m)	Proposed width of the drain (Right/Left/Both side)
1.Construction of Road from ferry terminal to fire servise with arrow protection at ward no -01, with Road side drain Under Swarupkathi <i>Pourashava</i> .	ferry terminal to fire servise	1000.00m	3.00m	5.00m	Nil
2. Construction of Roads and Highways from proposed Cyclone Shelter and proposed new Bypasses to Municipal Cemeterise at ward no-01. with Road side drain Under Swarupkathi <i>Pourashava</i>	Highways from proposed Cyclone Shelter/Gravey ard	500.00m	2.44m	3.66m	Left
3. Construction of RCC Road from Dhakua Bari Bridge to Kazi Bari at ward no -05. with Road side drain. Under Swarupkathi <i>Pourashava</i>	Dhakua Bari Bridge to Kazi Bari	750.00m	2.44m	3.05m	Right
4. Construction of Various RCC Road Sarsina Darrbarb Sharif at ward no -08. with Road side drain Under Swarupkathi <i>Pourashava</i>	Sarsina Darrbarb Sharif	750.00m	3.00m	4.00m	Both
5. Construction of RCC Road from Shahid Sreeti College to C& B Road ththrough Fakir bari house at word no -03. Under Swarupkathi <i>Pourashava</i> .	Shahid Sreeti College to C& B Road	500.00m	2.00m	3.05m	Both
Total Length		3500 m			
Note: widening and improvement works will be done within the exiting ROW					

18. The contract is planned to be implemented over a period of 12 months. Detailed designs have been prepared; the DDR will be updated during design verification by the contractor, in case of any change in design or alignment. The package for the construction of the proposed road is to be implemented by post-qualified contractors under a single

envelope single stage bidding process through National Competitive Bidding (NCB) procedures.

19. The construction schedule of roads depends on the methodology adopted for construction. The stated time period will depend on the resources put in place by the contractor. Pre-construction activities include detailed design, bidding process (Notice inviting Bids, Bid submission, evaluation and award of work to the contractor). The pre-construction activities will be completed within a 6-month period. The summarized Construction Schedule is given as Table 6 (Section 3.8) in the Initial Environmental Examination (IEE) Report. The general arrangement drawings including typical details, plans, cross-sectional details and long sections are given in Subsection 5.

20. The project is not likely to have any adverse social impact on the project area, other than the short-term impacts during the construction phase. The baseline data for this Due Diligence Report was collected from primary and secondary sources. The primary sources include site visits and visual inspection. The secondary sources include reports, books, maps and legal documents from various government and non-government organizations on subject matter.

21. The impacts are assessed based on preliminary design and standard methodology for the review, field visit data collection and impact assessment. The Bangladesh National Acts, Legislation and Laws were consulted with a view to ensuring compliance with the relevant requirements.

22. The outcome of the CTCRP interventions will be to improve access to, and availability of, climate-disaster resilient municipal services, including (i) municipal infrastructure such as drainage, cyclone shelters, urban roads, bridges, culverts, solid waste management, bus terminals, slum improvements, boat landings, and markets, (ii) water supply, and (iii) sanitation.

23. Detailed designs were prepared; the DDR will be updated during design verification by the contractor, in case of any alignment or design change. The updated document will be submitted to ADB for clearance, prior to start of construction. The subprojects will avoid land acquisition. There are no anticipated adverse impacts in terms of Involuntary Resettlement or Indigenous People for the 5 selected road projects. In case of temporary physical or economic impacts are identified during construction, negotiated settlement or voluntary land donation can be also used as an alternate to land acquisition as guided in the Resettlement Framework. The project will ensure social safeguards mitigation measures according to the guidance of the Resettlement Framework of the project adhered to ADB SPS, 2009.

## **B. Impact on Indigenous Peoples**

24. According to ADB Safeguard Categories, Projects are classified into the following four categories in terms of indigenous people:

- (i) **Category A.** A proposed project is likely to have significant impacts on indigenous peoples. An indigenous peoples plan (IPP), including assessment of social impacts, is required.
- (ii) **Category B.** A proposed project is likely to have limited impacts on indigenous peoples. An IPP, including assessment of social impacts, is required.
- (iii) **Category C.** A proposed project is not expected to have impacts on indigenous peoples. No further action is required.
- (iv) **Category FI.** A proposed project involves the investment of ADB funds to or through a financial intermediary. The financial intermediary must apply and maintain an environmental and social management system, unless all of the financial intermediary's business activities unlikely to have impacts on

indigenous peoples.

25. There are no Tribes, Minor Races, Ethnic Sects and Communities' (TMRESC) present in the Swarupkathi *Pourashava*, hence no impact on Indigenous peoples (IPs) is assessed. All the proposed construction activities will be done within the right of way and along the existing road routes, on Government land. Therefore, no Indigenous Peoples Development Plan (IPDP) will be needed for this sub-project.

#### IV. FIELD WORK AND PUBLIC CONSULTATION

##### A. Outline of Field Work

26. The DDR was prepared in consultation with the stakeholders. Meetings and individual interviews were held by involving related stakeholders. Consultations have been made with the people of the locality along with the *Pourashava* personnel and related authorities. Public consultation with the stakeholders has been conducted to understand the local issues and public views including the possible impact of the project. The issues like, awareness and extent of the project and development components, benefits of project as well as community, labor availability in the project area or requirement of outside labour involvement, local disturbances due to project construction work, any drainage problem, drinking water problem, and any sensitive area nearby the project road sites.

27. During subproject preparation, consultations were held with the official representatives of the line agencies, and also the communities from the selected road sites and the nearby project areas. None of the community members opposed the sub-project.

##### B. Public Consultations

28. Public participation and community consultation has been taken up as an integral part of the social assessment process of the project. Consultation was used as a tool to inform and educate stakeholders about the proposed action both before and after the development decisions were made. It assisted in the identification of the impacts problems associated with the project as well as the needs of the Project Affected People (PAP).

29. This participatory process helped in reducing the public resistance to change and enabled the participation of the local people in the decision making process. Initial Public consultation has been carried out in the project areas with the objectives of minimizing probable adverse impacts of the project and to achieve speedy implementation of the project through bringing in awareness among the community on the benefits of the project.

30. As part of the project consultations, efforts were made to consult with the public as well as a number of local authorities, to determine their thoughts, opinions and feedback on the impact of the proposed construction/improvement of the selected roads. Information and comments collected from the public early in the study process were of use.

31. Different stakeholders were consulted to give them the opportunity to express their views and concerns. As part of the process, they were also provided with relevant and sufficient information on the project prior to its start - up. These stakeholders include the central and local authorities, as well as the population so as to determine their thoughts, opinions and feedback on the impact of the project.

32. The data obtained from public consultation and views as well as concerns from different stakeholders are given in details in **Table 3**.

**Table 3: Summary of Public Consultation**

01	<b>Question</b>	What is the construction plan of the proposed Roads?
	<b>Answer</b>	Proposed road will be 3500 m length RCC road and drain.
02	<b>Question</b>	What is role and responsibility for construction and operations
	<b>Answer</b>	<i>Pourashava</i> will play role as implementing agency in construction, operation and maintenance of the proposed roads in the <i>Pourashava</i> area
03	<b>Question</b>	How will <i>Pourashava</i> support cost for major maintenance
	<b>Answer</b>	This is the responsibility of the <i>Pourashava</i> to manage required fund for repair and maintenance, as well as logistics during disaster period for realizing development objective of this project
04	<b>Question</b>	What will be the criteria for labour recruitment during construction?
	<b>Answer</b>	This largely depends on the types of job and will be assessed on a case to case basis by the contractor according to needs.
05	<b>Question</b>	Priority for jobs should also consider women; women can do the same work.
	<b>Answer</b>	Priority will include women and there will not be any discrimination.
06	<b>Question</b>	Raised the issue of employment, he suggested that the local people should be the first ones to be employed in the project.
	<b>Answer</b>	The consultant team explained that local people will be employed accordingly to job requirement.
07	<b>Question</b>	Wishes to speed up the project.
	<b>Answer</b>	It was explained that implementation will take place immediately after the rainy season.
08	<b>Question</b>	The construction creates lot of dust and noise, is there any increase anticipated.
	<b>Answer</b>	The increase in dust and noise will be at construction site and all mitigation measures will be put in place by the contractor

### C. Focus Groups Discussions (FGD)

33. As part of the impact assessment, the consultants conducted three focus group discussions in wards no. 7, 8 and 9 with the local inhabitants. Focus groups are useful in obtaining a particular kind of information that would be difficult to obtain using other methodologies.

34. A focus group typically can be defined as a group of people who possess certain characteristics and provide information of a qualitative nature in a focused discussion. Focus group discussion provides the opportunity to stimulate discussions and interaction between small groups of people from a similar socio-cultural background. This enables the consultants to have a diversity of ideas related to the topic.

35. Further Public consultations and Focus Group Discussions (FGD) were conducted for the proposed roads on 30<sup>th</sup> July 2023 at the existing road with 50 local people (Male-47 and Female-3). The objective of the FGDs was to further appraise the stakeholders about the current progress of the subproject and to reiterate the environmental and social impacts of the proposed subproject and safeguards to mitigate the same. Comments or questions raised by the group were discussed until they were satisfied with the level of information provided.

36. Key issues discussed were similar to those already voiced during the community consultation meetings and included:

- (i) Community benefits realized as a result of the road schemes;
- (ii) Resettlement and social issues and mitigation measures according to Resettlement Framework prepared and approved by ADB and government Bangladesh for this project;
- (iii) Participation of local community during the construction phase;
- (iv) Roles and responsibilities of different stakeholders for realizing desired outcome;



- (v) Potential social and economic impacts of the proposed road construction/improvement.
- (vi) Awareness of the local community about the proposed roads;
- (vii) Opinion of the local people about its need;
- (viii) Community support and participation;
- (ix) Construction and maintenance of the roads;
- (x) Participation of local people for construction and maintenance

#### D. Summary of Discussions

37. Existing condition of the roads are poor and needs development for a smooth transport network. Local people expressed their deep interest for development of the selected roads under the Project. People requested *Pourashava* to improve their roads and also said that if any structures need to be moved or trees need to be cut for the improvement of the roads, they will do so voluntarily. The *Pourashava* officials assured the people that they will provide them with any help they need. The people appreciated ADB's Resettlement Policy for eligibility criteria, entitlement for compensation and resettlement assistance, as well as the provisions of the approved Resettlement Framework for the project.

38. The roads schemes will improve socioeconomic conditions of the local people through creating more opportunity of income and employment, as well as exploiting local resources for boosting local productions.

39. Refer to **Figure 2** for the Photograph Plates of the FGD held at the respective road sites, Refer to **Appendix 3** for the record of the consultation meeting.

**Figure 2 : Existing Condition of the Selected Roads and FGD**







## E. Future Consultations and Disclosure

40. This Due Diligence Report and other relevant documents will be made available at public locations in the *Pourashava* and posted on the websites of executing agencies and ADB. The consultation process will be continued and expanded during the project implementation, to ensure stakeholders participate fully in project execution, as well as to implement comprehensive information, education, and communication plan.

41. The public consultation and disclosure program, with all interested stakeholders and affected parties, will remain a continuous process throughout the project implementation, and shall include the following:

- (i) **Consultations during construction phase:** (a) public meetings with affected communities to discuss and plan work programs and allow issues to be raised and addressed once construction has started; and (b) smaller-scale meetings to discuss and plan construction work with individual communities to reduce disturbance and other impacts, and to provide a mechanism through which stakeholders can participate in project monitoring and evaluation.
- (ii) **Project information disclosure:** (a) public information campaigns (via newspaper, flyers, and media) to explain the project to the wider city population and prepare them for disruptions they may experience once construction is underway; (b) public disclosure meetings at key project stages to inform the public of progress and future plans, and to provide copies of summary documents in local language; (c) formal disclosure of completed project reports by making copies available at convenient locations in the study areas, and informing the public of their



availability; and (d) providing a mechanism through which comments can be made.

## F. Findings

42. In this subproject intervention, no impacts whether full or partial, permanent or temporary, physical and economic displacements are assessed.

43. The construction will be done in systematic manner according to the set Work Plan of the Contractor and employees would not be removed from the site during whole implementation period.

44. The proposed project does not have any adverse impact on the status of women and/or girls or to widen gender inequality.

## V. GRIEVANCE REDRESS MECHANISM

45. A project-specific grievance redress mechanism (GRM) will be established to receive, evaluate, and facilitate the resolution of AP's concerns, complaints, and grievances about the social and environmental performance at the level of the project. The GRM will aim to provide a time-bound and transparent mechanism to voice and resolve social and environmental concerns linked to the project. Assessment of the GRM designed and implemented for Coastal Towns Climate Resilience Project (CTCRP) shows that the system is effective in timely resolution of grievances in a transparent manner. The arrangements under CTCRP is appropriately adjusted to accommodate the change in institutional arrangements under CTCRP.

46. **Common GRM.** A common GRM will be in place for social, environmental, or any other grievances related to the project; the resettlement plans (RPs), RSECPs and IEEs will follow the GRM described below, which is developed in consultation with key stakeholders. The GRM will provide an accessible and trusted platform for receiving and facilitating resolution of affected persons' grievances related to the project. The multi-tier GRM for the project is outlined below, each tier having time-bound schedules and with responsible persons identified to address grievances and seek appropriate persons' advice at each stage, as required.

47. Across the *Pourashava*, public awareness campaigns will ensure that awareness on grievance redress procedures is generated through the campaign. The project implementation unit (PIU) under the guidance of Assistant Director RPMU will conduct *pourashava*-wide awareness campaigns to ensure that poor and vulnerable households are made aware of grievance redress procedures and entitlements and will work with the PIU safeguards assistant to help ensure that their grievances are addressed.

48. Affected persons (APs) will have the flexibility of conveying grievances/suggestions by dropping grievance redress/suggestion forms in complaints/suggestion boxes that will be installed by project *pourashavas* or through telephone hotlines at accessible locations, by e-mail, by post, WhatsApp or by writing in a complaints register that will be kept in *pourashava* offices. **Appendix 4** has the sample grievance registration form. Careful documentation of the name of the complainant, date of receipt of the complaint, address/contact details of the person, location of the problem area, and how the problem was resolved will be undertaken. The Assistant Directors from project management unit (PMU), RPMU and Project Implementation Unit (PIU) will have the overall responsibility for timely grievance redressed on environmental and social safeguards issues and for registration of grievances, related disclosure, and communication with the aggrieved party.

49. **Grievance redress process.** In case of grievances that are immediate and urgent in the perception of the complainant, the Social Coordinator, Contractor and Social Safeguard and Environment Specialist from the project management and supervision consultants (PMSC) on-site will provide the most easily accessible or first level of contact for quick resolution of grievances. Contact phone numbers and names of the concerned PIU safeguards assistant, contractors, PMU safeguards officer, PMSC environmental and social safeguards specialists will be posted at all construction sites at visible locations.

50. **1st Level Grievance, Pourashava Level PIU.** The contractors, PIU Safeguard and Gender Focal person can immediately resolve issues on-site or at *pourashava* level in consultation with each other with the support of Administrative Officer of *Pourashava*, designated municipal ward councillor and will be required to do so within 7 days of receipt of a complaint/grievance. Assistance of ward level coordination committees (WLCC) will be sought if required for resolution of the issue, by any one or all of them jointly. The first level grievance redress team will comprise of the following members:

- (i) Chief Executive Officer or in his absence *Pourashava* Secretary
- (ii) Executive Engineer, *Pourashava* (Safeguard and Gender Focal person)
- (iii) Administrative Officer, *Pourashava*
- (iv) Municipal Ward Councilor (designated)
- (v) EHS Supervisor/Social Coordinator, Contractor

51. The town-level grievance redress team shall have at least one women member. In addition, for project-related grievances, representatives of affected persons, community-based organizations (CBOs), and eminent citizens must be invited as observers in GRC meetings. In case of any impacts on Tribes, Minor Races, Ethnic Sects and Communities' (TMRESC)), in subproject towns (example: Kuakata), the grievance redress team must have representation of the affected MRESC, the chief of the TMRESC group as traditional arbitrator (to ensure that traditional grievance redress systems are integrated) and/or an NGO working with TMRESC.

52. **2nd Level Grievance, RPMU, Division Level.** All grievances that cannot be redressed within 7 days at PIU level will be brought up to the RPMU level. Second level grievance redress team headed by the Deputy Project Director, RPMU supported by the Assistant Directors (environment, social safeguard and gender) and Construction Supervision and Safeguards Engineers /Asst. Supervision and Safeguards Engineers, PMSC will attempt to resolve the grievance /complaint within 7 days. At the RPMU level, the composition of 2nd level grievance redress team will be as follows:

- (i) Deputy Project Director
- (ii) Assistant Director (Environmental Safeguards)
- (iii) Assistant Director (Social Safeguards)
- (iv) Assistant Director (Gender) *supported by* Construction Supervision and Safeguards Engineers /Asst. Supervision and Safeguards Engineers, PMSC

53. **3rd Level Grievance, PMU Level.** All grievances that cannot be redressed within 7 days at RPMU level will be brought up to the PMU level. The RPMU safeguards team will refer any unresolved or major issues to the PMU level grievance redress team, that will be headed by the Project Director and will have Deputy Project Director, social safeguard, environment safeguards and gender Assistant Directors and PMSC, who will resolve the complaints/grievances within 15 days. The PMU level grievance team will comprise of:

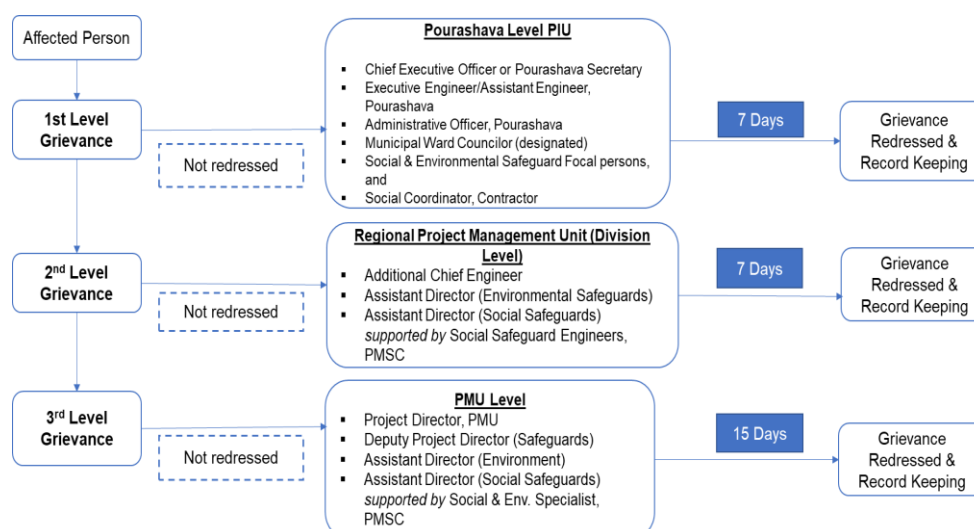
- (i) Project Director, PMU
- (ii) Deputy Project Director (Safeguards)
- (iii) Assistant Director (Environment)
- (iv) Assistant Director (Social Safeguards)
- (v) Assistant Director (Gender) *supported by* Social, Environment and Gender Specialist, PMSC

The grievance redress process is represented in Figure 3.

54. Despite the project GRM, an aggrieved person shall have access to the country's legal system at any stage and accessing the country's legal system can run parallel to accessing the GRM and is not dependent on the negative outcome of the GRM.

55. In the event that the established GRM is not in a position to resolve the issue, the affected person also can use the ADB Accountability Mechanism (AM) through directly contacting (in writing) the Complaint Receiving Officer (CRO) at ADB headquarters or the ADB Bangladesh Resident Mission (BRM). Before submitting a complaint to the Accountability Mechanism, it is necessary that an affected person makes a good faith effort to solve the problem by working with the concerned ADB operations department and/or BRM. Only after doing that, and if they are still dissatisfied, will the Accountability Mechanism consider the complaint eligible for review. The complaint can be submitted in any of the official languages of ADB's developing member countries. The ADB Accountability Mechanism information will be included in the project-relevant information to be distributed to the affected communities, as part of the project GRM.

**Figure 3: Grievance Redress Process**



GRC = grievance redressal committee; PIU = project implementation unit; PMSC = project management and supervision consultants; PMU = project management unit

Note: In case of project towns where impacts to TMRESC are assessed, the PIU-level grievance redress committee/team will have representation of the affected TMRESC.

56. **Record keeping.** Records will be kept by PIU of all grievances received, including contact details of complainant, date the complaint was received, nature of grievance, agreed corrective actions and the date of the incident and final outcome. The number of grievances recorded and resolved and the outcomes will be displayed/disclosed in the PMU office, municipal office, and on the web, as well as reported in the safeguards monitoring reports submitted to ADB on a semi-annual basis.

57. **Periodic review and documentation of lessons learned.** The PMU safeguard officer will periodically review the functioning of the GRM in each town and record information on the effectiveness of the mechanism, especially on the project's ability to prevent and address grievances.

58. **Costs.** All costs involved in resolving the complaints (meetings, consultations, communication and reporting/information dissemination) will be borne by the concerned PIU at town-level; while costs related to escalated grievances will be met by the PMU. Any

transportation costs incurred by affected persons or their representatives (e.g., CBOs, TMRESC representative/NGOs) to attend GRC meetings will be reimbursed by the concerned PIU. Cost estimates for grievance redress are included in resettlement cost estimates.

## VI. BUDGET TO IMPLEMENT SUBPROJECT COMPONENT

59. A budget is included in this due diligence for implementation of the subproject component, 'Construction of roads' under Swarupkathi *pourashava*. The budget will include (i) conducting detailed measurement survey in case of design or alignment changes at design verification stage, (ii) consultation and grievance redress cost, and (iii) contingency provision. The budget is outlined in Table 4.

**Table 4: Budgetary Provision for Implementation of DDR**

Item Description	Unit	Rate (BDT)	Total Amount (BDT)
DMS Survey for DDR updating	LS		1,50,000.00
Consultation	LS		1,50,000.00
Grievance Redress			1,50,000.00
<b>Sub-total</b>			<b>4,50,000.00</b>
Contingency (20%)	LS		90,000.00
<b>Grand total</b>			<b>5,40,000.00</b>

## VII. CONCLUSIONS

### A. Summary and Conclusion

60. It is concluded from the due diligence exercise that the proposed infrastructure improvements which include construction/improvement of the five roads, totalling 3,500 m, in Swarupkathi *Pourashava*, Pirojpur District will not incur resettlement impacts. No person will incur loss of income because of the project intervention. However, in case any claims or complaints are submitted during the construction period, an effective and efficient Grievance Redress Mechanism has been established, and mitigation measures will be adopted as per the approved EMP. This will enhance the provision of timely and sensible hearings and facilitate solutions.

61. This information has been disseminated during the public consultations with stakeholders including local personnel who have attended the Public Consultation sessions. During public consultation, recommendations were drawn including: i) involve local communities in all stages of project planning and development, ii) establish permanent communication between project initiators and local authorities, iii) setup a grievance redress mechanism which will publicized through *Pourashava* level co-ordination committee and monitoring register and iv) during construction, local people including women shall be given first priority in the employment of skilled and unskilled labour.

62. There is no involuntary resettlement involved in this sub-project, therefore preparation of a Resettlement Plan is not required with respect to the involuntary resettlement impact. Hence, this due diligence report has been prepared for documentation and official record. This report summarizes the assessment of project impact and outcome with reference to the relevant maps, drawings and related documents. Hence, the screening checklist is prepared and submitted in **Appendix 1**.

## **B. Next Steps**

63. The DDR will be updated during design verification by the contractor; in case of any design or alignment change. Any change in site or design at design verification stage will be assessed afresh for land acquisition, involuntary resettlement impacts. The following information will be included in the updated social safeguards document:

- (i) During design verification, if there is any design or alignment change and any involuntary resettlement impact is identified for such change, a resettlement plan will be prepared in accordance with the project Resettlement Framework and submitted to ADB for approval prior to contract award.
- (ii) Formal and informal consultations will be carried out including, but not limited to: focus group discussions (FGDs), public meetings, community discussions, and in-depth and key informant interviews. An intensive information dissemination campaign will be conducted. Emphasis should be given to more consultations with female members of the community and appraise them about the proposed roads including the road linking to the cyclone shelter. The updated DDR will include details of such consultations.

## Appendix 1: Involuntary Resettlement Screening Form

Date: 09 / 11 / 2020

A. Project Data			
Country/Project No./Project Title	:	Country: Bangladesh	
		ADB No.: (No. to be designated)	
		Coastal Towns Climate Resilience Project (CTCRP)	
		Subproject: e-GP/CTCRP/SWAP/RD/01	
B. Involuntary Resettlement Category			
<input type="checkbox"/> New <input type="checkbox"/> Recategorization — Previous Category <input type="checkbox"/>			
<input type="checkbox"/> Category A	<input type="checkbox"/> Category B	<input checked="" type="checkbox"/> Category C	<input type="checkbox"/> Category FI
C. Comments			
<p>There is no involuntary resettlement involved in this sub-project. Therefore preparation of a Resettlement Plan is not required with respect to the involuntary resettlement impact for the construction/improvement of the following selected road schemes of Swarupkathi <i>Pourashava</i>, District: Pirojpur:</p> <p style="text-align: center;"><b>Road No.:</b></p> <p>RD-01. Construction of Road from ferry terminal to fire service with arrow protection at Ward No 01, with Road side Drain.</p> <p>RD-02. Construction of road from Roads and Highways from proposed Cyclone Shelter and Proposed new bypasses to municipal Cemeteries at Ward No 01 with road side Drain.</p> <p>RD-03. Construction of RCC Road from Dhakua ari Bridge to kazi Bari at Ward No -05 with Road Side Drain.</p> <p>RD-04. Construction of Various RCC road from Sarsina Darbar Sharif at ward No 08 Under Swarupkathi <i>Pourashava</i> with Road side Drain.</p> <p>RD-05. Construction of RCC road from Shaheed Smiti College to C&amp;B Road through Fakirs House at Ward No 03 with road side Drain.</p> <p>Refer to Involuntary Resettlement Impact Screening Checklist below.</p>			

## Appendix 2: Involuntary Resettlement Impact Screening

Probable Involuntary Resettlement Effects	Yes	No	Not Known	Remarks
<b>Involuntary Acquisition of Land</b>				
1. Will there be land acquisition?		No		
2. Is the site for land acquisition known?				<b>Not applicable</b>
3. Is the ownership status and current usage of land to be acquired known?				<b>Not applicable</b>
4. Will easement be utilized within an existing Right of Way (ROW)?				<b>Not applicable</b>
5. Will there be loss of shelter and residential land due to land acquisition?				<b>Not applicable</b>
6. Will there be loss of agricultural and other productive assets due to land acquisition?				<b>Not applicable</b>
7. Will there be losses of crops, trees, and fixed assets due to land acquisition?				<b>Not applicable</b>
8. Will there be loss of businesses or enterprises due to land acquisition?				<b>Not applicable</b>
9. Will there be loss of income sources and means of livelihoods due to land acquisition?				<b>Not applicable</b>
<b>Involuntary restrictions on land use or on access to legally designated parks and protected areas</b>				
10. Will people lose access to natural resources, communal facilities and services?		No		
11. If land use is changed, will it have an adverse impact on social and economic activities?		No		
12. Will access to land and resources owned communally or by the state be restricted?		No		
<b>Information on Displaced Persons:</b>				<b>Not Applicable</b>
Any estimate of the likely number of persons that will be displaced by the Project? If yes, approximately how many? _____				[--] No    [--] Yes
Are any of them poor, female-heads of households, or vulnerable to poverty risks?				[--] No    [--] Yes
Are any displaced persons from indigenous or ethnic minority groups?				[--] No    [--] Yes

Note: The project team may attach additional information on the project, as necessary.

### Appendix 3: Minutes of Focus Group Discussion

**FGD for: Contract Package No. e-GP/CTCRP/2021-22/KUAK/RD/02**

**Date:** 1-9-23

**Place:** Swarupkathi *Pourashava*, District: Pirojpur

Number of Participants=20

**Time:** 9.30 a.m

**Conducted by:** Mamun Ar Rashid

**Designation:** Resettlement Expert

**Discussion Made on FGD:** CTCRP Social Safeguard Expert and Resettlement Expert conducted a Focus Group Discussion Meeting on 1-9-23. The FGD meeting was attended by a group of community people including local elites. The respective Ward Councillor presided over the meeting and the Environmental Expert recorded the minutes including participants' attendance. The Surveyor of the *Pourashava* also attended the meeting.

The CTCRP Consultant discussed on the following Points of FGDs and invited the opinions of the participants.

#### **A. Social Safeguard Issues:**

1. Position of land and trees and its ownership
2. Construction of road and roadside drainage system, cyclone shelter, water supply, sanitation, and other municipal infrastructures includes: access roads, bridges, solid waste management plant, bus terminal, slum improvements, boat landing/ ferry ghats, markets/growth centres, etc.
3. Community Support for constructing these schemes.
4. Benefits from these infrastructures establishments by the Community Workers Health and Safety.
5. Disseminate information about project implementation.

#### **B. Emergency and Gender Development Issues:**

1. Instructions for the Contractors to employ women workers with same wage scale and safeguard facilities (gloves, apron, sanitation, tube well, workers' shed equal and separate facility for men and women at work site).
2. Orientation/Training Program for women groups/ workers/ women headed family heads to promote understanding of women about interrelationship between environment, sanitation, solid waste management, health and hygiene (facility) and its use.
3. Advance Emergency Warning System
4. Comm. Mobilization Facilitator must monitor contractors assignments for Gender development issues. Proper documentation as per LGED reporting format.
5. CMF must arrange gender awareness-raising meetings with the TLCCs members at project /Ward level (a minimum 2 such meetings in a week)- as per LGED guideline/manual.



A total number of 59 local persons attended the short-time meeting. During question and answer session, the local people hoped that the entitled persons would not be harassed unnecessarily during compensation payment.

**The recommendation and suggestions of affected persons are as follows: Road Schemes:**

- They will be happy to have improved road communication.
- Affected persons will be provided with compensation if found to be eligible during project implementation. If necessary they will provide undertaking
- The participants opined to be happy to have improved road communication in the near future by the *Pourashava*.
- Engage local people to construction works by their capacity.
- Construction works should be completed in the dry season.

The photo on FGD conduction and attendance are attached separately.

**2.14 FGD Session Pictures:**







## Attached Attendance Sheet of FGD

SL-9

Second Costrel Town Environmental Infrastructure Improvement Project  
(SCTEIP)

## Focus Group Discussion

Name of Pourashava:

Place:

Ward No: ৭৮৪৭

Date:

SL No	Name	Mobile No	Signature
1.	মো: কজিম	০১২৩৭০৬১৬	কজিম
2.	আফতাব		আফতাব
3.	বাহেন	০১২৪৭০৬৫১৫	মো: বাহেন
4.	বাহেন		মো: বাহেন
5.	বাহেন	০১৭৫৭৭২২৫১	বাহেন
6.	মো: জামান	০১৭৭৭০৭০	মো: জামান
7.	বাহেন	০১২৪৭০৬৫১৫	বাহেন
8.	১	০১৭৩৩৩৩৬২৪	জামান
9.	মো: জামান	০১৭৪৪৮১২৯১৬	জামান
10.		০১৭৬২৭৭৭৬৫	জামান
11.	মো: জামান	০১৭৫৬০৫৬০৫	জামান
12.		০১৭৭৫৬১১১০	জামান
13.	আফি	০১৩১৪০০৪০৪২	আফি
14.	মো: জামান	০১৭৫৩৪০৩৭৩৭	জামান
15.	জামান	০১৭০৭৪০৪৫৩৭	জামান
16.	মো: জামান	০১৩০৪২০০৫২	জামান
17.	জামান	০১৭২৬২৭১১১৭	জামান
18.	মো: জামান	০১৭১৬৬১৬৭৩৪	জামান
19.	জামান	০১৭০৫৫২২৫	জামান
20.	জামান	০১৭১৭১৬০৭৭০	জামান

### Appendix 4: Sample Grievance Registration Format

The \_\_\_\_\_ Project welcomes complaints, suggestions, queries and comments regarding project implementation. We encourage persons with grievance to provide their name and contact information to enable us to get in touch with you for clarification and feedback. Should you choose to include your personal details but want that information to remain confidential, please inform us by writing/typing \*(CONFIDENTIAL)\* above your name. Thank you.

<b>Date</b>		<b>Place of registration</b>			
<b>Contact Information/Personal Details</b>					
<b>Name</b>		<b>Gender</b>	* Male * Female	<b>Age</b>	
<b>Home Address</b>					
<b>Place</b>					
<b>Phone no.</b>					
<b>E-mail</b>					
<b>Complaint/Suggestion/Comment/Question</b> Please provide the details (who, what, where and how) of your grievance below:					
If included as attachment/note/letter, please tick here:					
<b>How do you want us to reach you for feedback or update on your comment/grievance?</b>					

#### FOR OFFICIAL USE ONLY

<b>Registered by:</b> (Name of Official registering grievance)	
<b>Mode of communication:</b> Note/Letter E-mail Verbal/Telephonic	
<b>Reviewed by:</b> (Names/Positions of Official(s) reviewing grievance)	
<b>Action Taken:</b>	
<b>Whether Action Taken Disclosed:</b>	Yes No
<b>Means of Disclosure:</b>	
<b>Grievance Related to Project Component / Modalities of Financing:</b>	