### Land Acquisition and Resettlement Due Diligence Report

#### **PUBLIC**

Document Stage: Draft for Consultation

Project Number: 55201-001

February 2024

Bangladesh: Coastal Towns Climate Resilience Project – Construction of Multipurpose Cyclone Shelter Under Swarupkathi *Pourashava*, District: Pirojpur

Package No.: e-GP/CTCRP/SWAP/CS-01

Prepared by Local Government Engineering Department, Government of Bangladesh for the Asian Development Bank (ADB).

#### **CURRENCY EQUIVALENTS**

(As of February 2022)

Currency unit – Bangladeshi taka (BDT)

BDT1.00 = \$0.0116 \$1.00 = BDT85.94

#### **ABBREVIATIONS**

ADB - Asian Development Bank

AIDS - Acquired Immunodeficiency Syndrome

BAN - Bangladesh

CDTA - Capacity Development Technical Assistance

CTEIP - Coastal Towns Environmental Infrastructure 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 FundSIA - Social Impact AssessmentSPS - Safeguard Policy Statement

#### **WEIGHTS AND MEASURES**

cm – centimeters km – kilometer

km<sup>2</sup> – square 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 June 2021.
- (ii) In this report, "\$" refers to United States dollars.

This Land Acquisition and Resettlement Due Diligence Report is a document of the borrower. The views expressed herein do not necessarily represent those of ADB's Board of Directors, Management, or Staff, and may be preliminary in nature. Your attention is directed to the "terms of use" section of ADB's website.

In preparing any country program or strategy, financing any project, or by making any designation of or reference to a particular territory or geographic area in this document, ADB does not intend to make any judgments as to the legal or other status of any territory or area.

#### **CONTENTS**

			Pages
I.	INTRO	DDUCTION	1
	A.	Background	1
	В.	Project Description	1
	C.	Scope of Due Diligence Report	3
II.		ECT DESCRIPTION	3
	Α.	About the Project Area	3
	В. С.	About Subproject Component Assessment of Alternatives for the Multipurpose Cyclone Shelter	5 6
III.	LAND	AVAILABILITY AND RESETTLEMENT IMPACTS	6
	A.	Land Acquisition and Involuntary Resettlement	6
IV.	FIELD	WORK AND PUBLIC CONSULTATION	8
	A.	Outline of Field Work	8
	B.	Public Consultations	8
V.	GRIE'	VANCE REDRESS MECHANISM	9
VI.	BUDG	GET TO IMPLEMENT SUBPROJECT COMPONENT	13
VII.	CONC	CLUSIONS	13
	Α.	Summary and Conclusion	13
	B.	Next Steps	14
LIST	OF TAE	BLES	
Table	e 1: Distr	rict wise <i>Pourashavas</i> where Project (CTCRP) will be implemented	2
		mary of the design and Subproject Components	. 4
lable		d Details of the Proposed Site (Selected Alternative at Swarupkathi Homal College and Hospital)	noeopathic 7
Table		getary Provision for Implementation of DDR	13
LIST	OF FIG	URES	
Figur	-a 1: Gro	und Floor Plan for the Cyclone Shelter	5
		ation for Proposed Cyclone Shelter at Swarupkathi Homoeopathic Medic	
		ospital	6
Figur	e 3: Grie	evance Redress Process	12
LIST	OF APF	PENDICES	
Appe	ndix 1: [	Details of Consultation	15
		No Objection Certificate issued by the College Committee	
Appe	ndix 3: l Colleç	Land Ownership Certificate for Selected Site (Swarupkathi Homoeopath ae)	ic Medical 26
Appe		Sample Grievance Registration Format	27

#### I. INTRODUCTION

#### A. Background

- 1. The ADB supported Coastal Towns 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 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 stormwater 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) 25 elderly, women, children, and persons with disability friendly cyclone shelters with early warning system; (ii) 247.7 kms roads with drainage, bridges, and culverts rehabilitated or constructed for improved connectivity and access to emergency services in the event of disasters caused by natural hazards including access to cyclone shelter; (iii) climate-resilient infrastructure including 201.0 stormwater drainages, at least 3 nature-based solutions, water bodies restoration, and 4 integrated waste management (IWM) developed rehabilitated or

<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>&</sup>lt;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.

constructed for improved urban flood risk management including; (iv) gender-responsive and socially inclusive urban public spaces improved; (vi) slum improvement program implemented; and (vi) EWCD-friendly sanitation facilities constructed for poor households. Output 1 will also support development of EWCD-friendly socio-economic infrastructures including (i) local markets; (ii) bus terminals; and (iii) other priority roads, bridges, culverts, and boat landing stations.

- 5. **Output 2: Resilient livelihood enhanced.** Output 2 includes: (i) climate vulnerable households covered in the graduation program in six project towns; (ii) women, including person with disabilities, reported increased skills for resilient livelihood; and (iii) inventory of productive assets of vulnerable households documented and insured. 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, behaviour 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* (local governments). District wise location of the CTCRP towns is summarized in Table 1.

Table 1: District wise Pourashavas where Project (CTCRP) will be implemented

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

8. The multipurpose cyclone shelter at Swarupkathi is one of the proposed subproject components for the coastal town under the project. The cyclone shelter will provide all essential facilities; these includes: (i) separate toilets for male, female and pregnant ladies; (ii) care room for pregnant-women; (iii) water supply with deep tube-well, (iv) furniture, (v) rainwater harvesting system, (vi) septic tank and soak pit for wastewater treatment and disposal; and (vii) internal pathway.

<sup>&</sup>lt;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.

#### C. Scope of Due Diligence Report

- 9. This due diligence report (DDR) is prepared for the proposed construction work of one multipurpose Cyclone Shelter at Swarupkathi Homoeopathic Medical College and Hospital, Ward No. 01 under Swarupkathi *Pourashava*. The report is prepared based on the available preliminary design and the Subproject 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. The Swarupkathi Homoeopathic Medical College and Hospital was established in 1984 and got approval by the Ministry of Health and Family Welfare in 2013 Government of Bangladesh.
- 11. A due diligence process was 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. The Swarupkathi Homoeopathic Medical College and Hospital has agreed to provide the land for the construction of the cyclone shelter hence, no land acquisition or involuntary resettlement impacts have been identified as the proposed land is free from any encumbrances.
- 12. 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.
- 13. The DDR will be updated and reconfirmed for final impacts following detailed design and based on detailed measurement survey (DMS). The draft and/or updated/final DDR will be reviewed and disclosed on MLGRDC, LGED and ADB websites.

#### II. PROJECT DESCRIPTION

#### A. About the Project Area

14. Spread over 6.25 km², 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 20,019. 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. There are no existing cyclone shelters in Swarupkathi *Pourashava* that would provide refuge to the affected vulnerable population during the hazard situation.

#### B. About Subproject Component

15. The subproject proposes construction of one cyclone shelter. The proposed site for construction of the Cyclone Shelter is located within the compound of Swarupkathi Homoeopathic Medical College and Hospital, in Ward No. 01, under Swarupkathi *Pourashava*; the area is mostly

semi-urban in nature. The Cyclone Shelter is located about 300 meters from shondha River, which is a highland.

- 16. The multipurpose Cyclone Shelter is proposed for multi-functional purpose within the Swarupkathi Homoeopathic Medical College and Hospital compound. The Homoeopathic Medical College and Hospital authority has agreed to provide the land for the proposed subproject. The buildings will accommodate about 540 persons of the nearby area during storm/ cyclonic events. The proposed cyclone shelter follows the tentative design of the LGED prototype cyclone shelter cum College. However, some design aspects have been adopted to make it area-specific.
- 17. Cyclone shelters follows 3-storey building prototype with a ground floor will be an open floor which can be used for public gathering, functions and refuge for cattle (if any) during times of excessive storm events. The first floor will be accessible from the ground floor through a staircase. A ramp from the ground will be included for access to person with disabilities. The second floor is designed to be used for classrooms, teacher's room and separate male female toilets with spaces for pregnant women. The proposed cyclone shelters will have a designated roof plan for serving as a rainwater harvesting system and will be the location for two water storage tanks, and solar panels. The main staircase connects to the roof and the roof is bounded with a wall. The entire cyclone shelter cum Homoeopathic Medical College and Hospital will be plastered with anti-salinity and dam proofing admixture. These spaces are used as shelter during cyclonic storm events.
- 18. The existing access to Homoeopathic Medical College and Hospital is the main road of Ward No. 01 area. This existing access road is bituminous concrete (BC) paved and the current condition is good; no road improvement work is required from the main road to Homoeopathic Medical College and Hospital. This Homoeopathic Medical College and Hospital proposed cyclone shelter located at *Pourashava* ward number 01. The area is mostly inhabited by medium and low-income people.
- 19. The scopes of work for the proposed cyclone shelter and access road are shown in Table 2.

Table 2: Summary of the design and Subproject Components

Component	Description/Provisions	Total Area/ Usable Area Capacity
Ground Floor	Open space with columns Multiple entries with large ramp at the front entry Staircase to access first floor Raised platform (2.2 m from existing ground) 2000-L water storage tanks (2 units)	Total area: 291.86 square meters
First Floor	Staircase to the second floor Classrooms (3 classrooms and 1 teacher's room) Wide veranda Toilets (2 toilets and one washroom on one side for male, and 3 toilets (with one isolated toilet for pregnant women) and	Total area: 291.86 square meters Usable space: 232.84 square meters Capacity: 274 people

Component	Description/Provisions	Total Area/ Usable Area Capacity
	one washroom for women on the other side. Room for pregnant women First aid room.	
Second floor	Four rooms (4 classrooms) Wide veranda Staircase to rooftop Toilets (3 toilets and one washroom on one side for male, and three toilets and one washroom for women on the other side)	Total area: 291.86 square meters Usable space: 231.95 square meters Capacity: 266 people
Rooftop	Rainwater harvesting system (including 2000-L water storage tanks, 2 units)	Total area: 291.86 square meters
Water supply	Deep tube wells including pumping system (3 units)	
Sewerage System	Two-chambered septic tank	Total volume: 24 cubic meters
Power Supply	From rural electrification network Solar panels	Solar panel, total generating capacity: 4 kilowatts

<sup>&</sup>lt;sup>a</sup> Tubewells will be installed within the vicinity of the cyclone shelter lot. Per design, the tubewells will be installed or drilled to a depth where ground water quality is free from or at least in compliance with the standard for arsenic parameter.

20. The drawing of the ground floor plan of the multipurpose cyclone shelter is given in Figure 1 and 2.

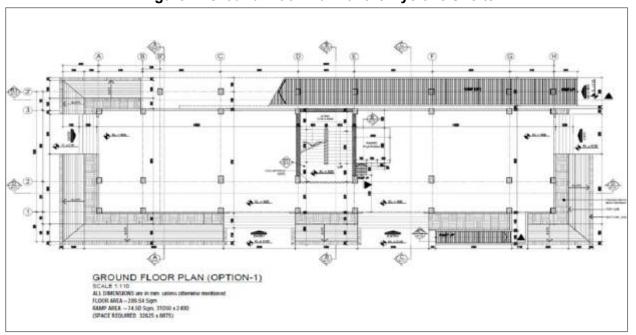


Figure 1: Ground Floor Plan for the Cyclone Shelter

Source: Project Management Unit and Detail Design Consultants

#### C. Assessment of Alternatives for the Multipurpose Cyclone Shelter

21. Swarupkathi Multipurpose Cyclone Shelter. Site-specific consultations were held and field visits undertaken to determine site suitability: Swarupkathi Homoeopathic Medical College and Hospital, ward no. 01, under Swarupkathi *Pourashava* is about 300 m away from the river. From involuntary resettlement perspective, Swarupkathi Homoeopathic Medical College and Hospital is more suitable; the quantity of the land is adequate, it is vacant land available within the College and Hospital compound for construction of the cyclone shelter. The cyclone shelter will serve dual purpose such as additional classrooms for the college and hospital and cyclone shelter in natural disaster period (as and required). The construction of the cyclone shelter will not impact the daily functioning of the college and hospital and this will not require the existing college and hospital to be demolished or to shift out temporarily to an alternate location. This will not cause any impact to the common property resource. Therefore, alternate site at Swarupkathi Homoeopathic Medical College and Hospital is no not required.

Figure 2: Location for Proposed Cyclone Shelter at Swarupkathi Homoeopathic Medical College and Hospital





#### III. LAND AVAILABILITY AND RESETTLEMENT IMPACTS

#### A. Land Acquisition and Involuntary Resettlement

- 22. **Proposed Site for Cyclone Shelter**. The scope of land acquisition and involuntary resettlement is assessed during the field visits. The project will not result in 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 college compound. There will be no permanent or temporary impact on the existing structures due to the proposed work.
- 23. All the construction works will be undertaken for implementation of the proposed cyclone shelters within the existing compound of Swarupkathi Homoeopathic Medical College and Hospital; the College authority has agreed to provide this land for the purpose of the subproject component. Detailed information of land availability is given in below Table 3.

Table 3: Land Details of the Proposed Site (Selected Alternative at Swarupkathi Homoeopathic Medical College and Hospital)

District	Barisal
Pourashava	Swarupkathi
Ward No.	01
Mouja Name	Swarupkathi
Owner of the Land	Swarupkathi Homoeopathic Medical College and Hospital
JL No	31
SA Khatian	13
Daag No.	322
Total Available Land	20
Area (decimals)	
Involuntary Resettlement Impacts	The multipurpose cyclone shelter will be constructed on a vacant and unused portion of Swarupkathi Homoeopathic Medical College and Hospital campus. Owner of the land is Swarupkathi Homoeopathic Medical College and Hospital. The present managing committee of the Homoeopathic Medical College and Hospital will provide (about 300 sq. m) for construction of the proposed cyclone shelter. Since the land for the proposed cyclone shelter is vacant, there will be no adverse impacts on the common property resource.

- 24. As per available records, verifications and site visits were conducted, there is no physical or economic, temporary or permanent, involuntary resettlement impact observed in the subproject component location. Local community will be benefited during cyclonic events. Similarly, no land or asset acquisition is necessitated in this subproject component as the College authority has agreed to provide the land for the proposed construction work and will benefit in the process, as the cyclone shelter will provide much-needed additional classrooms for the students. The no objection and land details submitted by College and Hospital managing committee is provided in Appendix 2. The approximate area required for the proposed multipurpose cyclone shelter is about 300 m². The College and Hospital managing committee has agreed to provide the required land area of about 300 m² for construction of the cyclone shelter.
- 25. The siting of the cyclone shelter building is laid in such a way so that its construction will not interfere with the existing or ongoing activities of the College and other buildings during the construction phase; it is easily accessible by the people. Site reconnaissance visit was undertaken in May 2022.
- 26. It is proposed that during construction of the new cyclone shelter no structure will be impacted or temporarily shifted; so, it will not impact daily activity of the College.
- 27. The project proponent has obtained a no objection certificate (NOC) from the Swarupkathi Homoeopathic Medical College and College committee for construction of the multipurpose cyclone shelter.
- 28. This DDR will be updated based on final design and site selection for construction of the multipurpose cyclone shelter. A provisional cost is included in the report for implementation of the subproject component.

#### IV. FIELD WORK AND PUBLIC CONSULTATION

#### A. Outline of Field Work

- 29. Field visit and transect walk was carried out in the subproject component location. No person or community is being adversely affected by this project implementation. The entire population of Ward No. 01 and surrounding areas under Swarupkathi *Pourashava* area will be benefited due to the cyclone shelter during natural hazards. No land acquisition is required for this project. Thus, no physical or economical displacement (temporary or permanent) is assessed. No common property resources will be affected. Also, no vulnerable groups such as the poor, women and their children, person with disability, the elderly, scheduled tribes, other ethnic groups and non-titleholder have been identified that will be adversely impacted due to construction of subproject component. Consultation meetings were conducted with local community, key informants of College by project team members to collect information and conduct a due diligence for the subproject.
- 30. Consultations were conducted with key stakeholders and community members in line with ADB's requirements pertaining to environmental and social considerations. These consultations helped in identifying the felt needs concerns and apprehensions of the communities related to the project and their priorities. Consultation was held with community members, key informants, College managing committee of Swarupkathi Homoeopathic Medical College and the officials of *Pourashava* regarding the project component. Project team members mentioned that the construction work will be undertaken in such a way that there will be no harm to anybody during the construction work.

#### B. Public Consultations

- 31. Public consultation meetings were held with the key stakeholders, College authority and community people in line with the ADB's requirements pertaining to environmental, economic and social considerations (Appendix 1) were conducted. More community level consultations could not be held due to pandemic restrictions. Consultation with locals, key stakeholders helped in identifying the felt needs and apprehensions related to the project and their priorities. Two FGDs were conducted. Total 90 participant (64 male and 26 female) attended the FGD session. The first FGD was attended by total 24 participants, out of which 8 were female participants for the proposed Multipurpose cyclone shelter and access road at Swarupkathi Homoeopathic Medical College and College and Hospital, Ward No. 01. In second FGD, 66 participants have attended out of which 48 male and 18 female. The meeting was conducted in presence of project authorities and the *Pourashava* representatives.
- 32. The local people have expressed their greater interest for this cyclone shelter for their safety during disaster period and using this facility for education purpose. They have also assured that they will provide required support in construction, operations and maintenance of this cyclone shelter. *Pourashava* management and local community will be responsible for providing required services for construction, operation and maintenance of cyclone shelter. The services/uses of cyclone shelter will result in saving lives of local people and reduce damage to their properties that caused due to irregular disaster in this coastal area.
- 33. During the group discussion, it has been clearly mentioned that the construction work will be undertaken in such a way that there will be no harm caused to any person due to project execution activity. Construction work for the cyclone shelter will be carried out during the vacation period of the children, such that their academic session is not disturbed. Project outcomes and

benefits were explained to the stakeholders. During the consultation, community people were explained in detail regarding the proposed developments of the plot under the ADB project. All the participants confirmed their extended support for the success of the project. In total 90 people have been consulted among which 64 were male participants and 26 were female participants those who resides in the area adjacent to the proposed plot.

- 34. Public information campaigns to explain the project details to a wider population will be conducted throughout project lifecycle. Public disclosure meetings will be conducted at key project stages to appraise community members. Prior to start of construction, the PIU will issue notification on the start date of implementation in local newspapers. A notice board showing the details of the project will be displayed at the construction sites for the information of public.
- 35. Public participation will be generated through use of various methods, such as, stakeholder consultation meetings, FGDs with different groups (including women), key informant interviews etc. It is also expected to offer a platform to the community people in to (i) know about the program, and (ii) express their opinion regarding priorities and concerns related to the project.
- 36. During public consultation following recommendations were provided: i) involve local communities in all stages of project planning and development, ii) establish permanent communication between project initiators and local authorities, iii) setup grievance redress mechanism which will function through *Pourashava* level co-ordination committee and a monitoring register will be kept, and iv) during construction, local people including women should be given first priority in the employment of skilled and unskilled labour.

#### V. GRIEVANCE REDRESS MECHANISM

- 37. A project-specific grievance redress mechanism (GRM) has been 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 Infrastructure Environmental Infrastructure Project (CTEIP) shows that the system is effective in timely resolution of grievances in a transparent manner. The arrangements under CTEIP is appropriately adjusted to accommodate the change in institutional arrangements under CTCRP.
- 38. **Common GRM**. A common GRM 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.
- 39. Across *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.

- 40. 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 complaints register that will be kept in *Pourashava* offices. **Appendix 5** 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 redressal on environmental and social safeguards issues and for registration of grievances, related disclosure, and communication with the aggrieved party.
- 41. **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) onsite 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.
- 42. **1st Level Grievance,** *Pourashava* **Level PIU.** The contractors, PIU Safeguard and Gender Focal personcan 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
- 43. 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 small ethnic communities (SECs), in subproject towns (example: Kuakata), the grievance redress team must have representation of the affected SECs, the chief of the SEC group as traditional arbitrator (to ensure that traditional grievance redress systems are integrated) and/or an NGO working with SECs.
- 44. **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
- 45. **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
  - (vi) women representative(s) from a Civil Society Organization (CSO), local elected representative (if required), and representative from small ethnic community<sup>4</sup>
- 46. The grievance redress process is represented in Figure 4.
- 47. 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.
- 48. 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 compliant 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.

<sup>4</sup> Small ethnic community representation at GRC 3<sup>rd</sup> level (PMU level) will be ensured in case of any small ethnic communities/ indigenous peoples' impacts (positive or negative) is assessed in the project area. The representative from small ethnic community can be a leader of SEC groups, or representative suggested by the SEC themselves,

and/or a representative member of a CSO working with the SEC, to be decided by PMU.

-

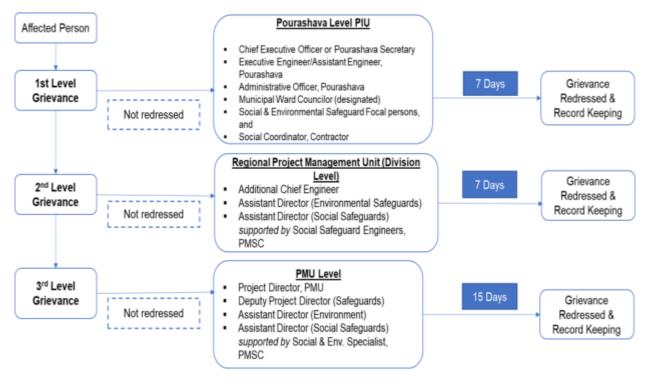


Figure 3: Grievance Redress Process

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 SEC are assessed, the PIU-level grievance redress committee/team will have representation of the affected SECs.

- 49. **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.
- 50. **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.
- 51. **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, SEC 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

- 52. A budget estimate of BDT 360,000 is considered for implementation of the subproject component, 'Construction of Multipurpose Cyclone Shelter' under Swarupkathi *Pourashava*'. The budget includes consultation, grievance redress cost, and information dissemination.
- 53. A budget is included in this due diligence for implementation of the subproject component, 'Construction of Multipurpose Cyclone Shelter' under Jhalokhati *pourashava*. The budget will include (i) conducting detailed measurement survey, (ii) consultation and grievance redress cost, and (iii) contingency provision amounting of about 20% of the total cost.<sup>5</sup> The budget is outlined in Table 6.

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, Grievance Redress	LS		1,50,000.00
Sub-total			300,000
Contingency at 20%			60,000.00
Grand total			3,60,000.00

#### VII. CONCLUSIONS

#### A. Summary and Conclusion

- 54. The proposed infrastructure improvements for the construction of the cyclone shelter within the compound of Swarupkathi Homoeopathic Medical College will not change the present land use pattern. The College authorities have agreed to allow construction of the cyclone shelter on vacant College land and will enjoy the use of the new building for expansion of the College. No transfer of land or donation will be involved. A formal legal agreement will be signed between the *Pourashava* and the College authority and appended to this DDR, reflecting this arrangement.
- 55. Due to project intervention, there will be no compensation requirements, no loss of income of any person or any asset, either privately or publicly owned. However, in case any claims or complaints are submitted during the construction period, an effective and efficient Grievance Redress Mechanism will be established, and mitigation measures will be adopted as per the approved EMP. This will enhance provision of timely and sensible hearings and facilitate solutions.
- 56. The location of the proposed cyclone shelter at Swarupkathi Homoeopathic Medical College, Ward No. 01 has been assessed as being a viable solution for providing a reliable protection facility to the nearby population during extreme storm events. The selected cyclone shelter area is mostly inhabited by medium and low-income people.
- 57. There are no land acquisition and resettlement related issues as the entire work is proposed on vacant land parcel which the College authority has agreed to provide with the understanding that it will also benefit the College. All development works will be carried out within the compound of the College and no additional land will be required.

<sup>&</sup>lt;sup>5</sup> The estimated costs are conservative and will be confirmed during detailed project preparation at the time of updating the DDR.

- 58. Detailed measurement surveys will be conducted during and after finalization of the detailed design. In case any involuntary resettlement impacts identified, this due diligence report will be updated accordingly including the revision of project impact category and will be submitted to ADB for approval before start of civil works.
- 59. **DDR Cost.** A budget estimate of BDT **9,60,000.00** for DDR updating and other activities including DMS, grievance redress, consultation and information dissemination, is considered.

#### B. Next Steps

- 60. The DDR will be updated during detailed design and detailed measurement survey. Any change in site or alignments during detailed design will be assessed for land acquisition and involuntary resettlement impacts. The following information will be included in the updated DDR:
  - (i) During detailed design, if any involuntary resettlement impact is identified, a resettlement plan would be prepared in accordance with the project Resettlement Framework.
  - (ii) The project proponent has obtained a no objection certificate (NOC) from the Swarupkathi Homoeopathic Medical College committee for construction of the multipurpose cyclone shelter. A legal agreement between the *Pourashava* and the College and Hospital Managing Committee which will formalize the arrangement will be signed by both parties (pourashava and the college committee and will be appended in the updated and/or final DDR, prior start of civil works.
  - (iii) The project proponent will approve the DDR budget.
  - (iv) Google earth map of the selected location of the cyclone shelter will be updated to the DDR.
  - (v) Formal and informal consultations will be carried out including, but not limited to: focus group discussions (FGDs), public meetings, community discussions, and indepth and key informant interviews. An intensive information dissemination campaign will be conducted. The updated DDR will include details of such consultations.

#### **Appendix 1: Details of Consultation**

Name of the component: Cyclone Shelter Location:Swarupkathi Second FGD First FGD Venue: Swarupkathi Homoeopathic Medical Venue: Swarupkathi Homoeopathic Medical College and Hospital College and Hospital Number of Participants=24; (Male- 15 and Number of Participants=66 (Male- 48 and Female- 8) Female- 18) Date: 5 May 2022 Date: 9 February 2024 Time: 12.00 pm Time: 10.00 am Conducted by: Md. Mohshin Conducted by: Md. Akbar Hossain Designation: Executive Engineer Swarupkathi Designation: Social Safeguards Expert Pourashava

#### **Issues Discussed**

- Opinions of local people for construction of cyclone shelter at Swarupkathi Homoeopathic Medical College and Hospital Campus;
- Ownership of land and conditions for offering land for cyclone shelter;
- Resettlement and Environmental issues;
- Support of local community for constructions and maintenance;

#### **Summary of FGD**

The community people, representatives and concerned officials of the *Pourashava* are quite aware about CTEIP and Cyclone Shelters to be constructed under this project. During feasibility phase, FGD and Public consultations have been carried out with the members of the existing managing committee of Swarupkathi Homoeopathic Medical College, representative of the college staffs, Swarupkhati *Pourashava* officials and the local community people for selection of the site and construction of cyclone shelter at the proposed location.

The cyclone shelter will be constructed inside the college and hospital campus of college and hospital owned land. This land is vacant and no trees or any type of structures on the proposed location. The College management, local community, teachers and students expressed their great interest to construct the proposed cyclone shelter on this vacant land. Since there is no sufficient building/classroom of the Homoeopathic Medical College and Hospital that is why the cyclone shelter will use as class room around the year except disaster period.

The local people male and female equally interested for construction of the cyclone shelter at this Homoeopathic Medical College and Hospital campus. Because most of the residence are surrounded by the college and hospital and access to the college and hospital is very easy. The community as a whole will support construction of cyclone shelter and provide maintenance service.

### Photographs and Attendance Sheets of FGDs



Name of Pourashava: SDGTUP Kathi Package Name: e-GP/CTERP/SWAP/CS-01

Place/Venue: SHCH Campus Date: 07 February 2029

SI. No.	Name	Designation	Contact No.	Signature
o	Md, Aslam	puran	01721027368	CONTINUE OF THE PARTY OF THE PA
2	rud. Sumon	Laber	01714266533	3/मा
3	Md. Salim	Desmess	01823435016	solin
14	ud Rofique 1slam	Driver	01710874416	Polo
5	Md. Humaun Kabir	Besness	01755568143	Human
6	Md. Kamtcuzzaman	Engineers	01716192211	
7	Md. Nasir Adamal	Election .	01577844965	mo
8	rud. Salam	Rolar	0171619 4640	Som
9	Abdus Salam	Line man Electrica	01740954175	याभाग
0	nd. Jafor	supper	01913 8929 77	Q2000
l i	Md. Aslam	Laber	01864805951	012/20120
12	md. Po Aim	Laber	01736779315	4806-
13	nd. Akar	Besness	01721675194	GN50004
14	red. Al-Amin	Teacher	0171II 5919	Afam
15	Alim Hossain	Service	01743684747	
16	Md. Tonmay	Combuctor	01711031036	Tone

Name of Pourashava: Swarupkathi Package Name: e-GPICTCRP/SWAPICS-01

Place/Venue: SHC H Campus Date: 09 Fc6 - 2024

SI. No.	Name	Designation	Contact No.	Signature
17	Abul Kalan AZAS	tiels	01729882736	Ann
18	MD. Aminul Blum	(I	01718631395	esm
19	DR. Ramen Lea Walt Bossl	1Q	01714902381	Luce
20	Dr. Prolip Mondal	N	01743677549	gondal
21	Dr. Md Raight Kanin	library Attendent	01789466234	Rising
22	guetans CHORA	gard	0173445304	gae
23	DIL UJ Walkuman	Ma Diangall	01728966784	resswal
24	Dr.MST. NAJMUN NAHAR		01718871741	NAJMUN
25	MD ABURAYHAN	Student	01712-399862	Almos
26	Musteba Mahmud	Student	01715658746	*
22	MD. AZIM	Student	01766703127	Air
28	MD. MASUD.	Busner,	01740-034416	Grasid,
29	Jany GSISIA		01770495555	Jons
30	क्षिम म्हार	36m	OFF 01753737836	9/2
31	रम्बर्धास	Student	01795 177232	रभड़िक्स
32	<u>त्रूब जावा</u>	द्योग्फ	01739029880	Su)

Name of Pourashava: Swarupkathi Package Name: e-GP/CTCRPISWAPfCS-01

Place/Venue: SHCH Campus Date:09 Feb - 2024

SI. No.	Name	Designation	Contact No.	Signature
03	अभारत	936,000	01743836931	आर्य
34	आर्री-	तत्रमुख	01810918100	आववा
35	Kanij Fatama	8 fahrt	01733833933	Jan S
36	Carally -	025	01729581348	65 W1 24
37	Hindry	Stalet	01876002955	A.
38	@wardel and lyn	8 feedent	61739557610	oing
39	of st. 7 Berush.	. 8 fuhrt		#
40	प्पः भारत्मा हुई हिल्ला	अल्प्रक	0 [723727933	- mine
41	4. CATNEYRY MILLE	MARGE.	01757832753	CONTAN
42	साः (मर्थमणान्या उत्त	afterson	01724322372	Ann
43	आएका व्यक्ताव	हात्री	01757871431	Hester
44	िसम्मान जिस्तु अभ्य	1275ी	01834047221	Asam
45	नुमार्थम कानाज	student	01777065942	Sur
46	মাহামুশ্যা বহুমান	student	01765206688	यार्शिका बद्धाप
47	अामुला नास्मितिन	多月	01737063141	अणंथा
48	दिभाषा । शांतक शांमक	2001	01764313113	का विस्

Name of Pourashava: Swarupkathi Package Name: @-GP/CTERPISWAPICS-01

Place/Venue: SHCH Campus Date: 09 Feb 2024

SI. No.	Name	Designation	Contact No.	Signature
49	Tann	5257		(इन T
50	विन्य	অস		जानेशी
51	सेवृत्ता ज्याया	कार्ज	01746737906	
52	त्र्राप्ने	student	01918-288090	श्राप्र
53	श्रीववा	7/20	0175477/291	211221
54	वाव (दन	ч		Malen
55	<b>प्राक</b> ्रिया	. 4		MANGENE
56	मध्याव	ч		Maran
52	md. Farchard Hasse	1 Eng.	OP741-415857	Giran
58	Md. Mahsin	XEN	61718847864	SPU -
59	ज्याः सुन्नि विग्रेश	CHETZ16	01980491222	D.
60	\$1.90xny 7 (6100	Principal	01712286705	Holonym
61	ON E BOY LATERON	जाव	01326201470	७४१ कि. पीर की
62	अ: विकान स्मित्त	9012/26	01715009036	<i>नि</i> द्व
83	Ent & 345 9 42	25/2-	01717387279	Com
64	1	900	447594828	Apost.

Name of Pourashava:	Swaapkathl	Package Name: <u>e-/GP/CTCRP/SWAP/CS-0</u>
Place/Venue: SH	CAH Pamous	Date: 9 Feb - 2024

List of	Partici	pants
---------	---------	-------

SI. No.	Name	Designation	Contact No.	Signature
65	an; Baremeren	<b>ভিত্ৰ</b>	01611009283	THE .
66	त्यः क्षिम्पर्यम्	20	01730966282	WAY T
		72		
				1

**Photographs of First FGD** 



### **Attendance Sheet of First FGD**

51-9

### Second Costrel Town Environmental Infrastructure Improvement Project (SCTEIIP)

Focus Group Discussion

Name of Pourashava:

Place:

Date:

Ward No: 7+8+3

SL No	Name	Mobile No	Signature
t.	(मा: इजिह्रीम	01923706136	CR 1312
2.	कार्यकार जारायाक		2 Walterism
3.	বারোন	01281906315	EN STERM
4.	वाद्यान	1 02	Can: Zorom
5.	বাজ্ঞাক	01757742251	3740841
6.	আ:আনান	01747049;	751716 Yorka
7.	वारवया	0728698768	বাবেয়া
8.	1	01439399624	3 Par
9.	(Ali sentano sterra	017781512816	-words
10.	0.0	0/462949695	EUM
11.	(भाः भार्य में श्रीर	01756405605	Compa,
12.		01775611810	Super
13.	খার্য	0131800808	R Par
14.	जा: प्रवंदात (दाखाप	01753803739	200214
15.	पैदक्षे । इ. ज	01709808539	প্রথারাপ
16.	ला! असे व	0139 X2 X00EX	11 1 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2
17.	अज्ञान किन्द्रिय	013-26271119	£2.c.
18.	(मी. कामना मुक्त है कार्य	01716616938	Second
19.	antony (02m	017-51235	ansone
20.	ahagar grason	01719160790	Some

#### **Question and Answer Session of the FGDs**

Question:	What is the construction plan of the proposed cyclone shelters?
Answer:	It will be three storied building with required facilities for women children and physically disabled persons
Question:	Who will be responsible for construction and operations?
Answer:	Swarupkathi <i>Pourashava</i> will execute the construction work and College and Hospital authority will be responsible for operation and maintenance of the proposed cyclone shelter.
Question:	How will Pourashava support cost for major maintenance?
Answer:	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
Question:	What will be the criteria for labour recruitment during construction?
Answer:	Labours will recruit by the contractor. There is an instruction to the contractor to engage labour and that is unskilled labour will engage from local.
Question:	Happy for this project, as it comes to solve the problem of shelter during storms
Answer:	Accepted thankfully.
Question:	How does this project help vulnerable people, people with disabilities?
Answer:	The layout has provided separate space for male, female and pregnant women including separate toilet. Ramp access to ground floor is provided to take care of people with disabilities.
Question:	Who will engage the labour?
Answer:	Contractor will engage the labour. Priority for jobs should also consider women; women can do the same work. Priority will include women and there will not be any discrimination in daily wages. Raised the issue of employment, he suggested that the local people should be the first ones to be employed in the project The consultant team explained that local people will be employed accordingly to job requirement.
Question:	Wishes to speed up the project
Answer:	It was explained that implementation will take place immediately after the rainy season after getting all necessary clearance from the authority. The construction creates lot of dust and noise, is there any increase anticipated. The increase in dust and noise at construction site will be mitigated by the contractor through project IEE.

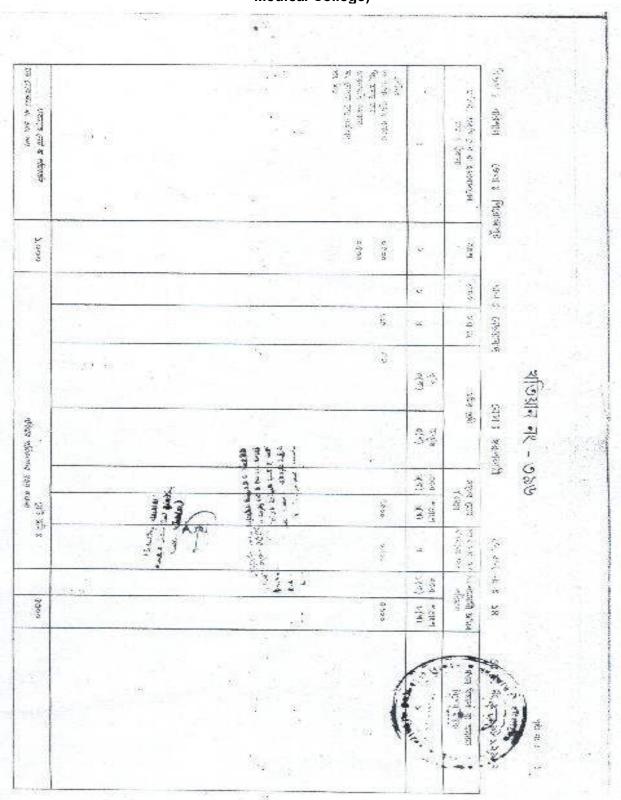
Appendix 2: No Objection Certificate issued by the College Committee



#### Covenant/No objection Certificate.

This is to certify that we have no objection if a Cyclone Shelter is constructed for the safe shelter of the students, teachers and residents of the surrounded area during cyclone and tide at Swarupkathi Homoeopathic Medical College and Hospital in Swarupkathi *Pourashava* under Swarupkathi Upazila of Pirojpur District. We hope for continued success of the institution.

Appendix 3: Land Ownership Certificate for Selected Site (Swarupkathi Homoeopathic Medical College)



### Appendix 4: Sample Grievance Registration Format

The			Project welcom			
queries and comme	ents regarding pro	oject implementa	ation. We encou	urage person	s with g	grievance
to provide their nam	ne and contact inf	ormation to enal	ble us to get in t	touch with yo	u for cla	arification
and feedback. Sho	uld vou choose t	o include vour p	personal details	but want the	at infori	mation to
remain confidential						
Thank you.	, ,	3 37	<b>5</b> (	,	,	
, , ,						
Date		Place of regis	tration			
Contact Informati	on/Personal Det	ails	1	<u> </u>	1	
Name			Gender	* Male	Age	
				* Female		
Home Address						
Place						
Phone no.						
E-mail						
Complaint/Sugge	stion/Comment/	Question Pleas	e provide the d	letails (who v	vhat wi	here and
how) of your grieva		<b>Quodion</b> i ioud	o provido tiro d	otano (mno, r	mat, m	noro arra
non, or your grove						
If included as attac	·hment/note/letter	nlease tick her	·•·			
How do you want				our commor	t/ariov	anco?
now do you want	us to reacti you	TOT TEEUDACK C	n upuate on y	our commen	ivgriev	ance:
FOR OFFICIAL US	T ONLY					
FOR OFFICIAL US	EUNLY					
Transcription: It is he						
Cyclone Centre; pr						
"Coastal Towns Clir						
people as an emerg	ency sneiter. The S	chool Authority w	ill not nave any o	objection for th	e reaso	n.
Registered by: (N	ame of Official re	gistering grieval	nce)			
			,			
Mode of commun	ication:					
Note/Letter						
E-mail						
Verbal/Telephonic						
Reviewed by: (Na	mas/Positions of	Official(s) review	vina arievance	1		
Reviewed by. (Na	11163/7031110113 01	Official(S) Teviel	wing grievance,	,		
A . (*						
Action Taken:						

Whether Action Taken Disclosed:	Yes	
	No	
Means of Disclosure:		
Grievance Related to Project Component	Modalities of Financing:	