

Resettlement Plan

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Bangladesh: Coastal Towns Climate Resilience
Project – Construction/Improvement of 4 Roads in
Patharghata, District Barguna

Package No.: e-GP/CTCRP/ PATH/RD/01

CURRENCY EQUIVALENTS

(As of November 2023)

Currency unit	–	taka (Tk)
Tk1.00	=	\$0.009
\$1.00	=	Tk1 09.75

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 Manual
PAP	-	Project Affected Person
PAT	-	Patuakhali
PIU	-	Project Implementation Unit
PPTA	-	Project Preparatory Technical Assistance
SCF	-	Strategic Climate Fund
SEC	-	Small Ethnic Community
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 ²	–	square meter
mm	–	millimeter
m ³	–	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.

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EXECUTIVE SUMMARY

Project Background: The proposed Coastal Towns Climate Resilience Sector Project (CTCRSP) is a continuity to the ADB supported Coastal Towns Infrastructure Environmental Infrastructure Project (CTEIP) in 10 coastal towns that effectively commenced on September 2014 and will be completed on June 2022. CTCRSP will strengthen climate resilience and disasterpreparedness in 22 (twenty-two) vulnerable coastal *pourashavas* (secondary towns) of Bangladesh. The project has four major outputs as follows: (i) Output 1: Municipal infrastructure for resilience improved; (ii) Output 2: Resilient livelihood improved; and (iii) Output 3: Institutional capacity, governance, and climate-awareness strengthened. 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.

Subproject Description: The subproject component, 'Construction and Improvement of Five Roads in Patharghata *Pourashava*', includes the construction and rehabilitation of 8,265m RCC pavement within the municipal town limits.

Scope of Land Acquisition and Resettlement: Implementation of the subproject will not require acquisition of private land as the entire civil works for the construction of the drains will be done within ROW of roads under the ownership of Patuakhali *Pourashava* (who will form the project implementation unit). Efforts will be made to minimize impact to the extent possible through provisions of access planks. Where impact is unavoidable, compensation will be paid for the period of disruption/income loss as per the agreed entitlement matrix.

One affected person (shop owner) may incur temporary income loss during construction due to access disruption and during shifting of the structure, estimated at a maximum of seven days. The size of the temporary shop is 5.875m² (length 2.50m x width 2.35m) and needs to be shifted 0.761 meters behind its existing location. This shift will not impact the structure. The affected shop owner, who has been running the business at this location for five years, will only experience temporary loss of income due to the shifting process and during construction period.

The involuntary resettlement impacts will be further assessed and revalidated based on finalization of detailed design and detailed measurement survey (DMS) will be conducted to update and finalize the resettlement plan accordingly.

Categorization. The project is classified as 'Category B' in accordance with Asian Development Bank's Safeguard Policy Statement (ADB SPS) 2009. This draft resettlement plan has been developed in accordance with the agreed resettlement framework prepared for the project.

Legal Framework. The policy framework and entitlements for the program as well as for this project are based on the following laws and policies: The Acquisition and Requisition of Immovable Property Act, 2017 (ARIPA), and ADB SPS, 2009.

Entitlements, Assistance and Benefits. The entitlement matrix presented in the resettlement plan provides compensation of all potential losses to be provided to the affected person in the project area. In general, the affected person under the subproject component will be entitled to the following types of compensation and assistances: (i) compensation for loss of income; (ii) shifting allowance; and (iii) additional assistance to vulnerable group.

Majority of the envisaged impacts will be avoided as per the mitigation measures stated in the EMP, also working during night hours and nonmarket days should be considered for construction of drains along market areas. To avoid and minimize involuntary resettlement

impacts, consultations with the road-side shops in market areas will be conducted to finalize the construction schedule (in a phased manner), particularly in stretches of narrow roads and busy commercial areas. During construction, vehicle movement will be restricted in a one-way direction so that dwellers do not face any constraints in movement. The estimated period of 100m drain construction is 7 to 10 days. Construction works will take place section by section. Each section consists of 100 m.

Consultation and Disclosure: Project objectives, goals and scope of work of the subproject component have been disclosed to the potential beneficiaries of the project, affected persons, elected representatives and institutional stakeholders. The approved entitlement matrix and resettlement plan will be made available at public locations within the town and will be disclosed to a wider audience through the LGED and ADB website. A copy of the draft and final resettlement plan, translated in local language, will be always kept at site during the construction period.

Grievance Redress Mechanism: A project-specific grievance redress mechanism (GRM) has been established to receive, evaluate, and facilitate the resolution of affected person 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. A three-tier common GRM will be followed as outlined in this resettlement plan. A public awareness campaign will be conducted to ensure that awareness on the project and its grievance redress procedures is generated. The campaign will ensure that the poor, vulnerable and others are made aware of and are part of the awareness program. Grievance redress mechanism outlined in the draft resettlement plan will ensure that complaints and grievances are resolved in a collaborative, expeditious, and effective manner through dialogue, joint fact-finding, negotiation, and problem solving.

Resettlement Budget and Financing Plan: The total estimated resettlement cost for the contract package is BDT 382,080.00. PIU will issue an order for release of payment to affected person, which shall be released through electronic clearance service/National Electronic Fund Transfer (ECS/NEFT) transaction from bank, through concerned treasury of LGED.

Institutional Setup: The Ministry of Local Government, Rural Development and Cooperatives (MLGRDC) acting through its Local Government Engineering Department (LGED) is the Executing Agency. The Project Management Unit (PMU) at the LGED is headed by a Project Director (PD) who will be supported by two Deputy Project Directors (DPDs) overseeing safeguards and gender. The PMU level safeguard and gender team will have another three safeguard and gender personnel, Assistant Director (Environment), Assistant Director (Social Safeguards) and Assistant Director (Gender). For project implementation, two division level Regional Project Management Units (RPMUs) will be established, at Khulna and Barisal. *Pourashavas* are the implementing agencies of the project. The PMU will be supported by two institutional consultants under the supervision and control of Project Director, PMU: (i) the detail design consultants (DDC); (ii) the project management supervision consultants (PMSC), that will support PMU; and (iii) PMSC at the division level that will support the two RPMUs and the town-level Project Implementation Units (PIUs). The PIUs will be established in each participating *poursahava*/ subproject town and staffed with a safeguards and gender focal person.

Monitoring and Reporting. Resettlement plan implementation will be closely monitored to provide the PMU with an effective basis for assessing resettlement progress and identifying potential difficulties and problems. Monitoring will be undertaken by the PMSC, RPMUs and PMU. Monitoring will involve administrative monitoring to ensure that implementation is on schedule and problems are dealt with on a timely basis; socio-economic monitoring during and after any resettlement impact utilizing baseline information established

through the detailed measurementsurvey of affected persons undertaken during project sub-preparation, and overall monitoring.

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 level¹ 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.² 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.

¹ 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

² 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.³

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

C. About the Subproject Location

8. The proposed alignments for the roads under Patharghata *Pourashava*, District: Barguna 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.

9. 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.

10. Total length of RCC Pavement is 8,164m. To mitigate the water logging problem, drain was also designed along the roadside with footpath facilities to improve the urban facilities.

³ 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.

The RCC drains, cross culverts and protection work as precast RCC pile with cast in situ RCC vertical protection wall as were designed per field requirements.

11. Construction of 4 RCC roads in Patharghata *Pourashava*, District Barguna is one of the proposed subproject components of CTCRP. The proposed roads will improve connectivity of project area and improve transportation facility.

D. Description of Subproject Component

12. This subproject component, 'Construction and Improvement of RCC road in Patharghata *Pourashava* includes the rising and wedding for a total length of 8,164.00 m within the municipal town limits. The scope of work and the details of the number of roads considered for improvement is summarized in Table 2.

Table 2: Road Improvement in Parharghata *Pourashava*

SI No	Name of Roads	Start and End Point (Wards)	Total Length Proposed (m)	Present Width	Proposed Width (m)	Remarks
01	02	03	04	05	06	07
1	Improvement of Road by RCC from R and H Road to Sultan Doctor Bridge (Ch: 0+000m to 1+151m) Link-01 Start from Konok House to Chanmoti house (Ch 0+000m to 0+314.00m) at Ward No. 03 & 04	<i>Pourashava</i> end portion (RCC Bridge) to Suvash House front side BC Road and Khara Kanda Road to Konok House, Ward No. 03, 04 and 05	1465.00	3.00	5.00	The proposed road improvement will be within the existing road alignment under the ownership of <i>Pourashava</i> . No involuntary resettlement has been assessed.
2	(A) Improvement of Phalan Bari Road by RCC, Start from Phalan Bari Jame Mosque to Tangra main road via Mr. Ex. Councilor Habib House (Ch: 0+000 - 1+260.0m with Link-01 (Ch.0.00m-Ch.128m)	Korolia Road to Doctor Sultan House Road, Ward No. 03, 01 and 02	3938.00	2.44	3.65&	The proposed road improvement will be within the existing road alignment under the ownership of <i>Pourashava</i> . No involuntary resettlement has been assessed.
	(B) Improvement of	<i>Patharghata</i>	2550.00	3.65	5.00	The proposed road

SI No	Name of Roads	Start and End Point (Wards)	Total Length Proposed (m)	Present Width	Proposed Width (m)	Remarks
	road by Dence carpeting from Patharghata Stadium to end of the <i>Pourashava</i> boundary (Ch: 1+675m to 4+225m)	Stadium to <i>Pourashava</i> end Portion, Ward No. 07				improvement will be within the existing road alignment under the ownership of <i>Pourashava</i> . No involuntary resettlement has been assessed.
3	(A) Improvement of road by RCC from R&H Road to (Taslima High School Front side Road) to Dikraj Khal Culvert (Ch. 0+00m to 0+475.00m)	Bridge Approach to Bus Stand Ward No.06	475.00	3.00	5.00	The proposed road improvement will be within the existing road alignment under the ownership of <i>Pourashava</i> . For road 3(A), temporary income loss is estimated of 7 days duration during implementation of bridge approach road at Taltala Bazar. Details are discussed in Chapter 2.
	(B) Improvement of road by Uni-Block from R&H Road to (Taslima High School Front side Road) to Dikraj Khal Culvert, Link-01 (Ch. 00+00m to 0+250.00m)		250.00	5.00	7.00	No impact is assessed for road 3(B).
4	Improvement of road by RCC at Chunu Chottor to Paurashava End Boundary (Cunu Road) (Ch:0+00m to 1+820.00m) with Link-01(Ch: 00+00 to 0+216.00m)	Roads and Highways Road (Chunu Chottor) to <i>Pourashava</i> End Portion, Ward No. 06	2036.00	2.44 & 3.00	5.00	The proposed road improvement will be within the existing road alignment under the ownership of <i>Pourashava</i> . No involuntary resettlement

SI No	Name of Roads	Start and End Point (Wards)	Total Length Proposed (m)	Present Width	Proposed Width (m)	Remarks
						has been assessed.
Total:			8,164.00 m			

Source: Project Management Unit and Detail Design Consultants, April 2023

Figure 1: Existing Condition of the Selected Roads

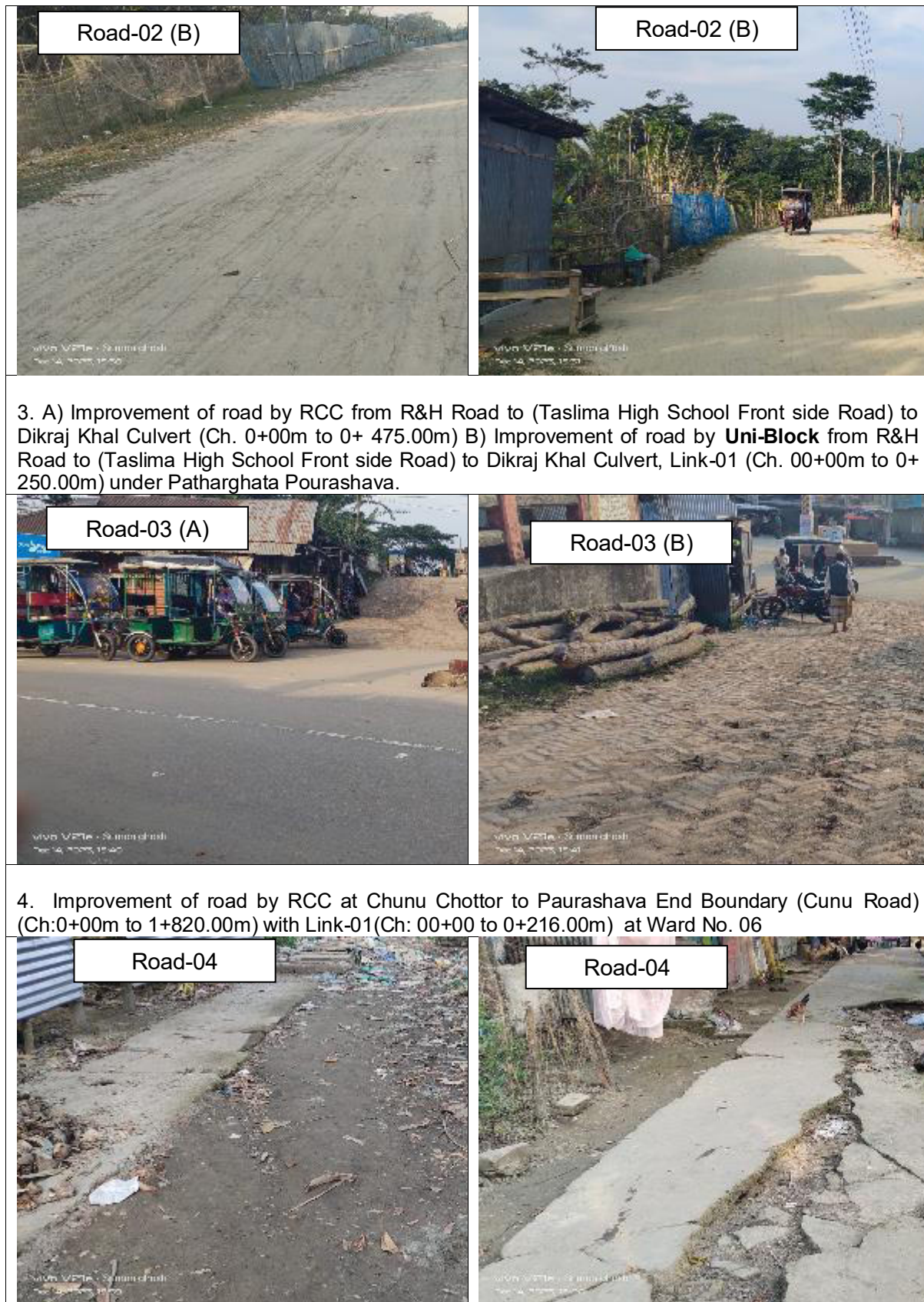
Figure Existing Condition of selected **road 1**. Improvement of Road by RCC from R & H Road to Sultan Doctor Bridge (Ch: 0+000m to 1+151m) Link-01 Start from start from Konok House to Chanmoti house (Ch 0+000m to 0+314.00m) at ward no. 03& 04



Road 2. (A) Improvement of Phalan Bari Road by RCC, Start from Phalan Bari Jame Mosque to Tangra main road via Mr. Ex. Councilor Habib House (Ch: 0+000 - 1+260.0m with Link- 01 (Ch.0.00m-Ch.128m)



(B) Improvement of road by Dence carpeting from Patharghata Stadium to end of the Pourashava boundary (Ch: 1+675m to 4+225m) at Ward No-01, 02 & 07 under Patharghata Pourashava.



(DMS). The draft and final RP will be reviewed and upon receipt of approval from ADB, disclosed on implementing agency and ADB websites. Civil work will be taken up only after compensation payment to affected persons is completed, as per approved entitlement matrix. The implementing agency will be responsible for handing over the project land/site to the contractor free of any kind of encumbrance.

14. **Measures to avoid and minimize the Involuntary Resettlement Impacts:** To avoid and minimize the involuntary impacts, the CTCRP proposes to use the government lands wherever available and right-of-way (RoW) of roads owned by the *Pourashava*/government agencies for augmentation and development of all the project assets and associated ancillaries as mentioned in the project description. The RCC roads are proposed to be constructed along existing available RoW of Patharghata *Pourashava*. The proposed roads for improvement are within the existing RoW of the roads. Construction contractor will ensure prior consultation with the community residing beside the construction site and shops in the area is conducted if the impact on access ramp is unavoidable.⁴

15. Livelihood impacts will be avoided in busy market areas and/or to permanent shops (if any). Work will be executed in night hours to avoid the impacts, drains will be constructed in narrow roads and commercial areas in phased manner with the due consultation with the shop owners and nearby residents. Civil works will be executed in small stretches in section-by-section phases. Noise level will be kept below the threshold levels as mentioned in the Environmental Management Plan (EMP). All safety norms would strictly be adhered to, taking into consideration the magnitude of work and the sensitivity of the location.

16. The Project Implementation Unit (PIU) and the Regional Project Management Unit (RPMU) will also ensure that all the necessary rules related to safety and security of the public and residents are duly followed by the contractor. The actual dates of construction schedule with respect to rush hour, festival time, and special business days will be discussed with vendors, squatters, market committee members, and residents, and accordingly construction activities will be planned. After construction of the roads, the shoulder of the roads and roads will be restored to its original condition (including bitumen, cement concrete [CC] and CC interlocking tiles as applicable).

17. The contractor will ensure to: (i) maintain the access to shops and residences or other buildings along the stretches where drains are constructed, to institutions located close to proposed sites by providing pedestrian access through planks; and (ii) assistance to mobile hawkers and vendors, and safety through hard barricading of excavated alignments/sites. Any damage to access ramps during construction will be restored by contractor as per contractual provisions included in contract document and considered as part of bill of quantity (BOQ), in line with the agreed principles of this resettlement plan.

18. Measures to be taken up by the contractor to avoid/mitigate economic impacts will include: (a) announcement of proposed civil works in advance (to enable shop owners to stock up and remain unaffected if goods vehicles are unable to reach them during construction), (b) provision of planks to ensure pedestrian access; (c) careful timing of implementation to avoid peak sale hours/days or school timings; (d) minimizing construction period to the extent possible; (f) assistance to mobile vendors if any present during construction, to shift nearby; (g) signage with project details and contact details for grievance redress; and (h) proper traffic management. These measures will be part of the contract and will be implemented with careful monitoring by the concerned PIU.

⁴ In the Engineers estimate provision of utility shifting and repair of minor structures shall be proposed under provisional sum of Contractor.

E. Objectives of Resettlement Plan

19. This resettlement plan is prepared for the 'Construction and Improvement of RCC roads in the Patharghata *Pourashava* subproject, one of the coastal towns under Coastal Towns Climate Resilience Sector Project (CTCRSP). It addresses the potential involuntary resettlement impacts of the proposed subproject components and is consistent with the agreed resettlement framework for the project, prepared in accordance with national laws and ADB SPS (2009) requirements for involuntary resettlement category B projects to meet the following objectives:

- (i) to describe the identified scope and extent of land acquisition and involuntary resettlement impacts because of identified project components, and address them through appropriate recommendations and mitigation measures in the RP;
- (ii) to present the socio-economic profile of the population in the project area, identify social impacts, including impacts on the poor and vulnerable, and the needs and priorities of different sections of the population, including women, poor and vulnerable;
- (iii) to describe the likely economic impacts and identified livelihood risks of the proposed project components;
- (iv) to describe the process undertaken during project design to engage stakeholders and the planned information disclosure measures and the process for carrying out consultation with affected people and facilitating their participation during project implementation;
- (v) to establish a framework for grievance redressal for affected persons that is appropriate to the local context, in consultation with stakeholders;
- (vi) to describe the applicable national and local legal framework for the project, and define the involuntary resettlement policy principles applicable to the project;
- (vii) to define entitlements of affected persons, and assistance and benefits available under the project;
- (viii) to present a budget for resettlement and define institutional arrangements, implementation responsibilities and implementation schedule for resettlement implementation; and
- (ix) to describe the monitoring mechanism that will be used to monitor resettlement plan implementation.

II. SCOPE OF LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT

A. Land Acquisition and Involuntary Resettlement

20. The scope of land acquisition and involuntary resettlement is identified based on the field visits to the subproject component locations and transect walk along the roads where 8,164.00 m roads will be constructed. There will be no private land acquisition undertaken for the construction of the subproject component; the entire civil works for the project will be done within RoW of roads under the ownership of Patharghata *Pourashava* (who will form the project implementation unit). Efforts will be made to minimize impact to the extent possible through provisions of access planks. Where impact is unavoidable, compensation will be paid for the period of disruption/income loss as per the agreed entitlement matrix.

21. The summary of involuntary resettlement impacts under the subproject is consolidated in Table 3 and further elaborated in subsequent paragraphs.

Table 3: Subproject Component and their Land Acquisition and Resettlement Impacts

Sl. No.	Name of the Components	Permanent Land Acquisition and Resettlement Impacts	Temporary Impacts	Remarks
1.	Improvement/Construction of 8,264.00m RCC drains	Land acquisition and permanent involuntary resettlement impact is not assessed for this subproject component.	Total: 1 affected household (1 roadside shop owner)	Construction of the roads will not cause land acquisition or permanent impacts. It is assessed to cause temporary impacts due to shifting of temporary/movable structure 0.761mt behind from the existing location.

22. Transect walk and 100 percent walk-through surveys along the proposed road alignment were jointly undertaken by executive engineer and other staffs of Patharghata Pourashava. Both visual screening and transect walks confirm that the subproject resettlement impact is temporary in nature. The walk-through survey identified that of the five proposed roads, one roadside shop who is anticipated to face temporary loss of income during his structure shifting period situated at Taltala Bazar, Bridge Approach Road Under Construction Package No. e-GP/CTCRP/PATH/RD-01, SL. No. 03. Appendix 4 provides photographs of the affected structure. The road will be constructed is under the ownership of Patharghata Pourashava that forms the PIU at the town level.

23. The involuntary resettlement impact will be further assessed and revalidated based on finalization of detailed design and a detailed measurement survey (DMS) will be conducted to update and finalize the resettlement plan accordingly. Rigor in data collection and consultations with local people will be required to ensure that all affected persons eligible for compensation are identified. The Contractor may consider adopting best engineering and construction practices to be implemented, as like using pre-cast road,⁵ to minimize the period of disruption to the livelihood of the affected persons and general public. Efforts will be made by the Contractor to shift (if any) roadside temporary shops to an adjacent location (if possible) so that they can continue with their livelihood activity. Summary of Involuntary resettlement impacts is provided in Table 4.

B. Inventory of Losses

24. Based on the site visit, it was assessed that a roadside shop/structure will be affected which is situated in a government land under the ownership of Patharghata Pourashava. The impact duration is assessed to be maximum 7 days during implementation of bridge approach road at Taltala Bazar. The size of the temporary shop is 2.50m (length) x 2.35 (width). The entire structure measuring 5.875 m² needs to be shifted 0.761m behind the existing location which owned by Bangladesh Water Development Board (BWDB).⁶ The shop owner can continue his business activities once the structure is slightly 0.761m back from its the current location. There will be no impact to the structure. As per the field survey and site visit, the

⁵ The contract document for the Contractor may contain suggestions to consider precast drains also.

⁶ During field visit, the project management team engaged in discussion with the BWDB local officials and conveyed that they shopowner can continue his business operations in the area.

shop will potentially face temporary income loss due to the implementation of the subproject. Shifting/moving the shop will cause temporary loss of business at the location. There are no employees as the person himself is the owner and shopkeeper. He is running the business at this location for last five years.

25. The involuntary shifting impact will be further assessed and revalidated through joint surveys by the Design Consultants and PIU before contract award. This draft resettlement will be updated and will be finalized. However, design optimization and appropriate mitigation measures must be adopted to avoid any relocation. If unavoidable, relocation of the affected household will be completed before the start of construction work and after compensation payment is provided. A summary of involuntary resettlement impacts is provided in Table 4.

Table 4: Summary of Involuntary Resettlement Impacts and Inventory of Loss

Sl. No.	Details	No. of Affected Person	Remarks
1.	Permanent land acquisition	None	Land acquisition is not required for the subproject component. The affected structure is situated in government land owned by Bangladesh Water development Board. XXX.
2.	Structure loss	0	One structure (shop) needs to be shifted 0.761m behind its original location. No structure loss is anticipated. A provisional sum is included in the resettlement plan budget if the shop needs to be dismantled and reassembled during shifting.
3.	Physical Relocation (Loss of shops)	None	A minor shift (not assessed as physical relocation from the vicinity) of 0.761m, behind and immediately adjacent to the current location is needed for one shop.
4.	Temporary disruption to livelihood	Yes	One household with 4 family members running a shop will be impacted due to implementation. Temporary income loss due to access disruption and shifting of the structure is assessed. The shopowner will incur an estimate income loss of 7 days.

Sl. No.	Details	No. of Affected Person	Remarks
5.	Number of Vulnerable Affected Persons	1 (4 household members)	Age of the shop owner is over 65, ⁷ lives below the poverty line and he is the only earning person of among the household members.

Source: Field survey and site visit in February 2024

C. Tribes Minor Races, Ethnic Sects and Communities (TMRESC)

26. Based on field visits and consultation conducted so far, impacts to indigenous peoples (referred hereinafter as TMRESC) are not anticipated under the subproject component. None of the potentially affected person (temporary loss of livelihood) identified during the community consultations held at the time of field visit and socioeconomic survey, belong to SECs. As per ADB SPS, indigenous people safeguards are triggered if a project directly or indirectly affects the dignity, human rights, livelihood systems, or culture of indigenous peoples or affects the territories or natural or cultural resources that indigenous peoples own, use, occupy, or claim as their ancestral domain; no such impacts are anticipated in the subproject area. As per population and households census 2022, there are no TMRESC in Patharghata *Pourashava* which was also confirmed during the field survey and consultation with the local stakeholders.. In consideration of all of the above, no TMRESC is required for this subproject.

III. SOCIOECONOMIC INFORMATION AND PROFILE

27. This section presents socioeconomic profile of household likely to be affected by the proposed works. Findings presented here are based on information collected from one affected shop identified during field survey. The survey provides information on the socioeconomic conditions of affected households based on initial design. The census and socioeconomic survey was conducted for one affected shop within RoW of the bridge approach road. The census survey will be further revalidated through joint surveys before contract award. A wide range of data including, social category, type of losses, type of occupation, sources of income, have been collected for socioeconomic profiling of the affected person.

1. Demography

28. Primary survey identified one household, comprising 4 household members (female: 2 and male: 2) who will be potentially impacted due to construction of the project. Average family size of the affected households is 4.00. The socioeconomic survey undertaken has not identified any affected woman headed household.

Table 5: Demographic Details of Affected Population

Total No. of Affected Persons	Male	Female	Household Size
4	2	2	4.00

Source: Field Survey February 2024

⁷ The eligibility will follow the Department of Social Service of Ministry of Social Welfare that uses 65 years old for man and 62 years old for woman to define elderly people.

2. Religious Affiliation

29. According to the field survey, 100% of the affected household members are Muslim.

Table 6: Religious Affiliation of the Affected Persons

Religious Group	Number	Percentage
Muslim	4	100.00

Source: Field Survey February 2024

3. Occupation Profile

30. The head of the household are engaged in business. The occupation profile of head of the household is presented in Table 7.

Table 7: Occupation of the Head of the Household

Occupation	Number of Households
Small Business (tea stall and betel leaf)	1

Source: Field Survey February 2024

4. Income

31. The socioeconomic survey identified that 1 affected household have average net monthly income of BDT 6,000 (100%).

Table 8: Average Monthly Income of the Affected Household

Average Monthly Income Range	Affected Household	Percentage
BDT 6,000	1	100.00

Source: Field Survey February 2024

5. Vulnerability

32. Certain groups of the population are considered vulnerable due to their socio-economic status and thus need special consideration, in order to ensure that their livelihood is improved. They will have provision for special assistance allowance under the project. They will derive benefits of livelihood programs and additional assistance from the project. These groups include, households belonging to following category:

- (i) Below the poverty line (BPL)⁸
- (ii) Small ethnic community (SEC)⁹ or indigenous people as termed in ADB SPS, 2009;
- (iii) Female-headed households (FHH);
- (iv) Elderly-headed households;
- (v) Households with out-of-school/working children;
- (vi) Households headed by persons with disabilities;

⁸ The upper poverty line for urban areas from the 2016 upper poverty line determined by the Bangladesh Bureau of Statistics (BBS), with added inflation rate 5.32 (Source: Consumer Price Index (CPI), Inflation Rate and Wage Rate Index (WRI) in Bangladesh, Bangladesh Bureau of Statistics (BBS), February 2021). The upper poverty line for the year 2016 for urban areas is BDT 2,929 [source: Report on Household Income and Expenditure Survey 2016, published on October 2017 (latest publication) by Statistics and Information Division, BBS]. Thus, BPL definition for urban metropolitan areas is BDT 3,085 per capita/month in 2021. As such the per capita average monthly household income for BPL category stands at BDT 13,882.50 {BDT 3,085 × 4.5 (HH size) =13,882.50}

- (vii) Landless households; and
- (viii) Households with no legal title / tenure security (non-titleholders).

33. The socioeconomic survey undertaken identified the vulnerability status of the affected person. It was assessed that the affected household fall under the below poverty line category and is elderly.⁹

Table 9: Vulnerability of the Affected Household

Vulnerable Group	No, of Affected Household
Below Poverty Level/Elderly	1

Source: Field Survey February 2024

Table 10: Summary of the Affected Persons

Impacts	Number of Affected Persons/Quantity
1. Loss of Land	Land acquisition is not required for the implementation of the project.
2. Loss of Structures/Permanent relocation	Permanent relocation not required.
3. Loss of structure	One temporary/movable structure/shop will be affected which needs to be shifted.
4. Loss of livelihood	1 person (4 family members)
5. No. of temporarily affected business owners	
6. Employees in the temporarily affected shops/businesses	Nil
7. Number of women affected persons	Nil
8. Average monthly income of the households	BDT 6,000
9. Vulnerable (facing temporary impact)	1 person (4 family members)

IV. CONSULTATION, PARTICIPATION AND DISCLOSURE

A. Public Consultation

34. The draft resettlement plan preparation involved meaningful consultations with stakeholders. The key stakeholders consulted during RP preparation include (i) affected persons, including vulnerable households; (ii) program beneficiaries; (iii) elected representatives, community leaders; (iv) local government (*Pourashava*); and (v) project staff, PMU, PIU, and consultants. Meetings and individual interviews were held involving stakeholders particularly the affected families, requiring relocation; and site reconnaissance, survey and interviews were conducted to determine the potential impacts due to the implementation of subproject component. During meetings, stakeholders were briefed about the landfill site and the potential mitigations planned for reducing environmental impacts due to improvement of the bridge approach road; project benefits as well as adverse impacts envisaged during construction; environmental and social safeguards, gender inclusion, community participation aspects built into the project etc. Consultations covered issues such as awareness and scope of the project components, benefits of project, envisaged impacts such as potential relocation and loss of income of the furniture shop. It was informed to surveyed affected persons that appropriate measures for relocation will be undertaken before start of construction work as per the regulatory requirements. It was also informed that, despite mitigation measures, if relocation is required, they would be compensated in accordance with the agreed entitlement matrix. Further consultations, including Focus Group Discussions

⁹ Calculation based on monthly income against total number of family members. The monthly per capita per head income is found to be below the threshold limit.

(FGDs) and joint surveys would be conducted before contract award and final mitigation measures approved by DoE.

35. Minutes of consultation meeting, signature sheet and photographs are attached in Appendix 2. Public consultation conducted for preparation of the draft RP is provided in Table 11. Consultation was held at Taltala area, under Patharghat *Pourashava*, with the affected members of the household. The details such as salient features of technical provisions in projects, proposed project implementation schedule, benefits as well as possible inconveniences and envisaged adverse impacts; environmental and social, gender inclusion, community awareness and participation, have been shared; the entitlement matrix and the project grievance redress mechanism were also discussed. Key concerns raised by the participants during consultation meetings are as follows:

Table 11: Summary of consultation

Sl. No.	Date	Location	Total Participants	Female Participant	Remarks
1	1 May 2022	Patharghata <i>Pourashava</i>	95	0	
2	8 February 2024	Taltal, Patharghata <i>Pourashava</i>	22	4	Affected person desires to run his business in the existing location. He requested the authority to shift his shop about 0.76 meter behind from the existing location.

36. A range of formal and informal consultative methods will be carried out for the subproject component including, but not limited to: (i) FGDs; (ii) public meetings; (iii) community discussions; and (iv) in-depth and key informant interviews, in addition to the census and socioeconomic surveys and individual meetings, consultations will be held with special emphasis on vulnerable groups. Consultations with women members of affected persons' households will be given priority. Encouraging public participation in consultations info the public of the program and serves as a venue for the public to express their opinion on priorities which the program should address.

37. The key stakeholders to be consulted at various stages during subproject preparation, resettlement plan implementation, and program implementation include:

- (i) all affected persons, including vulnerable households;
- (ii) program beneficiaries;
- (iii) elected representatives, community leaders, and representatives of community-based organizations;
- (iv) local NGOs; (v) local government and relevant government agency representatives; and
- (v) Project staff of LGED, PMU, *Pourashava* level PIU, PMSC, DDC and contractor.

38. Continuing involvement of those affected by subprojects is necessary in the resettlement process. The PIU will ensure that affected persons and other stakeholders are informed and consulted about the subproject, its impact, their entitlements and options, and allowed to participate actively in the development of the subproject. This will be done particularly in the case of vulnerable affected persons, who will be encouraged to choose

options that entail the lowest risk. This exercise will be conducted throughout the subproject—during preparation, implementation, and monitoring of subproject results and impacts. *Pourashava* level PIU through monitoring support will ensure that stakeholder consultation, participation and information disclosure activities are carried out in project area through the project cycle.

39. All consultations will be organized by *Pourashavas*/ PIU level social safeguards officers. The safeguard officers appointed by the *Pourashava*, with assistance from DDC social safeguard specialist (SSS), will prepare detail consultation and disclosure plan and carry on consultation and disclosure of the entitlement package accordingly. Social safeguard office, PIU will be responsible for conducting/ arranging participatory consultation and disclosure meetings in such a manner that the affected persons and the stakeholders at community level will feel free to express their views without coercion, fear or hesitation. If there is any change in project design in sites or alignment depending on inputs of the consultation process these will be made known to the affected persons. Participatory consultation with the affected persons will be documented and appended to the respective resettlement plan containing consultation meeting details, minutes of the meetings, list of participants.

B. Disclosure

40. Information will be disseminated to affected persons at various stages. In the subproject initiation phase, the Assistant Director, Social Safeguard, PMU supported by Assistant Director Social Safeguard, RPMU and concerned *Pourashava* level PIU and DDC will be responsible to intimate the community and the affected persons about the sub-project along with program information/details. The resettlement framework and subproject RP will be made available in relevant government agencies at district level including the *Pourashava* office in each town, near affected area, and PIU and PMU offices. The resettlement framework and sample subproject RP (both draft and final versions) will be disclosed in ADB's website and the LGED, PMU websites.

41. Information dissemination, through subproject specific leaflets (in local language Bengali) and public announcements, and consultation will continue throughout program implementation. The project leaflets will be distributed by community mobilisers to the affected communities for their information. The subproject cut-off-date will be established upon the completion of final detail design, detail measurement survey (DMS) and census of affected person. The subproject cut-off date will be informed to the affected persons directly, through dissemination of project leaflet public announcements in the local media, as well as stated in the project sign boards.

42. The PIU/RPMU/PMSC social safeguards personnel will be entrusted the task of ensuring ongoing consultations and public awareness program during project implementation. This task will be carried out in coordination with the PIU, detailed design consultant, PMSC and contractors to ensure the communities are made fully aware of project activities in all stages of construction. A community participation action plan will be prepared by Assistant Director, RPMU in consultation with *Pourashava*/PIU. The community in general and the affected families, vendor associations in particular will be consulted and made aware of the civil works under project activities prior to construction and about ADB policy of involuntary resettlement.

43. An intensive information dissemination campaign for affected persons will be conducted by the PIU with assistance from RPMU and DDC at the outset of resettlement plan implementation. All the comments made by the affected persons will be documented in the subproject records and summarized in subproject monitoring reports. A summary of consultation and disclosure activities to be followed for each subproject is in Table 12.

Table 12: Summary of Consultation and Disclosure Activities

Subproject Phase	Activities	Details	Responsible Agency
Subproject Initiation Phase	Mapping of the subproject area	Subproject area to be mapped, clearly showing survey numbers of titleholders of land/property proposed for acquisition	Project implementation unit (PIU) in co-ordination with local land revenue office, under the overall supervision of the Project management unit (PMU).
	Stakeholder identification	Cross section of stakeholders to be identified in order to facilitate their participation in the subproject	PIUs, under the overall supervision of the PMU
	Subproject information dissemination; Disclosure of proposed land acquisition and subproject details	Leaflets containing information on subproject to be prepared. Public notice will mention the names and survey nos. of titleholders of land/property proposed for acquisition along with subproject details. Notice will be issued in local newspapers. Web disclosure on website also proposed.	PIUs in coordination with local land revenue office will be involved in information dissemination, under the overall supervision of the PMU. PIUs will be assisted by consultants for leaflet preparation. Notice will be issued from the Deputy Commissioner's office. Executing agency to post notice on its website.
	Stakeholder Meetings	Meetings at community/ household level with titleholders of affected land/property and their family members during project scoping.	PIUs with officials from Deputy Commissioner's/ Land Acquisition office/ <i>Pourashva</i> officials will facilitate meetings to disclose the information to each affected person.
Resettlement Plan Preparation Phase	Disclosure of cut-off-date	For land acquisition, Section 4 Notice under ARIPA, 2017 and for nontitle holders (NTHs) start date of DMS and census survey is cut-of date.	Section 4 notice under ARIPA, 2017 will be published by Deputy Commissioner's Office. PIU with the support of DDC social safeguard specialist will inform the NTHs
	Social impact assessment surveys	Resettlement framework will be made available in Deputy Commissioner/	PMU/RPMU/PIU will ensure the availability

Subproject Phase	Activities	Details	Responsible Agency
		Land Acquisition office and PMU office/ PIU office at <i>Pourashava</i> level, to be translated in local language, Bengali	of resettlement framework.
	Formulating compensation measures and rehabilitation measures	Conducting discussions/ meetings/workshops with all affected persons and other stakeholders	PIUs under overall supervision of PMU will conduct all required discussions/ meetings/ workshops and will invite all primary and secondary stakeholders.
	Disclosure of final entitlements and rehabilitation packages.	Web disclosure of the resettlement plans. Circulating Copies of resettlement plans to all stakeholders including affected persons, translating summary resettlement plan in local language before conducting final disclosure meeting. Conducting public meetings for resettlement plan approval by affected persons.	PIU will undertake all activities related to circulation of resettlement plan. PIU will arrange public meeting of all stakeholders with affected persons for resettlement plan approval. The PIU and RPMU safeguard personnel will document all the comments and suggestions made by affected persons and will send it to the PMU along with the resettlement plan.
Resettlement Plan Implementation Stage	Disclosing final resettlement plan approved by ADB to all important stakeholders	Final resettlement plan reviewed and approved by ADB, to be updated/disclosed on the implementing agency/ executing agency's website. The final plan will be disclosed to affected persons and other stakeholders. Ensuring the availability of copy of the approved resettlement plan and ADB involuntary resettlement policy at PMU, PIU, <i>Pourashava</i> and Deputy Commissioner's office.	Executing agency/PMU/RPMU and PIUs
	Consultation with Affected persons during	Meetings/discussions will be arranged with affected persons. Affected households to be identified	PIUs will arrange required meetings/ discussions. Social safeguard personnel

Subproject Phase	Activities	Details	Responsible Agency
	resettlement plan implementation	those who will require rehabilitation assistance.	from PMU, RPMU and PIUs will participate, while PMSC social safeguard consultant will monitor the consultation activities

DDC = detail design consultants; PIU = project implementation unit; PMSC = project management supervision consultant; PMU = project management unit

V. GRIEVANCE REDRESS MECHANISM

44. A project-specific grievance redress mechanism (GRM) will be established to receive, evaluate, and facilitate the resolution of affected person 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 CTCRSP.

45. **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.

46. 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.

47. 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 3 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.

48. 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.

49. **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); and
- (iv) EHS Supervisor/Social Coordinator, Contractor.

50. 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.

51. **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); and
- (iv) Assistant Director (Gender) supported by Construction Supervision and Safeguards Engineers /Asst. Supervision and Safeguards Engineers, PMSC.

52. **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;

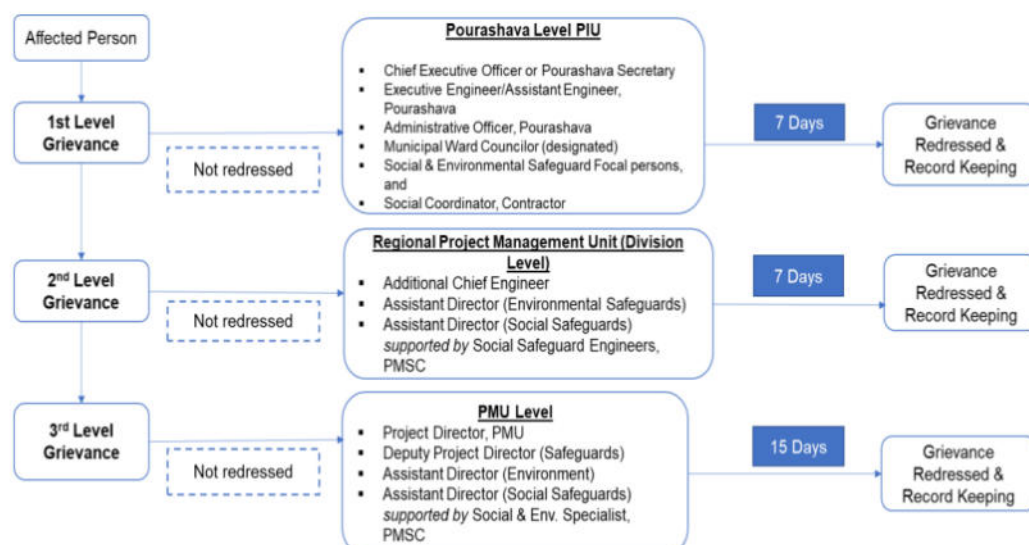
- (vi) women representative(s) from a Civil Society Organization (CSO), local elected representative (if required), and representative from small ethnic community.¹⁰

53. The grievance redress process is represented in Figure 2.

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 2: 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.

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,

¹⁰ Small ethnic community representation at GRC 3rd 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.

municipal office, and on the web, as well as reported in the safeguards monitoring reports submitted to ADB on a semiannual 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, 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. POLICY AND LEGAL FRAMEWORK

59. The legal framework for the project is based on applicable legal and policy frameworks of the Government of Bangladesh, namely the Acquisition and Requisition of Immovable Property Act, 2017 (ARIPA) and ADB's Safeguards Policy Statement (SPS), 2009. Under the law, the owners affected by the acquisition will be eligible to receive compensation for (i) land permanently acquired (including standing crops, trees, houses); and (ii) any other impact and damages caused by such acquisition. In accordance with the land acquisition Act, the legal process is initiated by an application by the requiring agency or department to the Deputy Commissioner (DC) of the concerned District with a detailed map of the proposed area. In determining the compensation, the Deputy Commissioner considers the recorded price of land transacted during the past 12 months in the Project area, plus 200 percent premium on the assessed value of the property for compulsory acquisition. The new Act of 2017, however, does not cover the project Affected Persons such as informal settlers/squatters or persons without titles or ownership records. Further, being a relatively new policy, the compensation payment needs to be studied by an appropriate authority (which, in case of the project, is the Property Valuation Advisory Committee (PVAC)) to ensure that it constitutes replacement cost of the property acquired, in line with ADB policy. In case of discrepancy between the policies of ADB and the government, the ADB policy will prevail. The provisions of the Resettlement Framework Framework will guide the entitlements for compensation and other assistance for different types of impacts applicable in this resettlement plan.

A. The Acquisition and Requisition of Immovable Property Act, 2017 (ARIPA)

60. For determination/ assessment of land price the existing Acquisition and Requisition of Immovable Property Act, 2017 spells out the following points: Matters to be considered in determining compensation:

- (i) in determining the amount of compensation to be awarded for any property to be acquired under this Part, the Deputy Commissioner shall take into consideration-
 - (a) the market value of the property at the date of publication of the notice under section 4;
 - (b) provided that in determining such market value, the Deputy Commissioner shall take into account the average value, to be calculated in the prescribed manner, of the properties of similar description and with similar advantages in the vicinity during the twelve months preceding the date of publication of the notice under section 4;
 - (c) the damage that may be sustained by the person interested, by reason of the taking of any standing crops or trees which may be on the property at the time of the making of the joint list;

- (d) the damage that may be sustained by the person interested by reason of severing such property from his other property;
 - (e) the damage that may be sustained by the person interested by reason of the acquisition injuriously affecting his other properties, movable or immovable, in any other manner, or his earnings; and
 - (f) if in consequence of the acquisition of the property, the person interested is likely to be compelled to change his residence or place of business, the reasonable expenses, if any, incidental to such change.
- (ii) While the government is acquiring land, it shall provide the persons interested with compensation of 200 per centum of the market price as defined in sub-section 1(a): Provided that if the government acquires the land for any non-government person then the amount of compensation shall be 300 per centum;
 - (iii) In cases of injuries made under sub-section 1(b), (c), (d) and (e), additional 100 per centum compensation shall be provided; and
 - (iv) Notwithstanding any compensation provided under this section, necessary steps may be taken to rehabilitate evicted persons due to acquisition in the prescribed form.

61. The first step in acquiring land is an application to the Ministry of Land through the concerned ministry requesting requisition and transfer of the land and property in question. A detailed statement specifying whether the land mentioned in the application is needed for public or private purpose, the area of the land, a sketch-map, purpose for which it could be used, etc. should be submitted as well. The Ministry of Land examines the application and sends it to the concerned Deputy Commissioner for necessary action. The Deputy Commissioner then authorizes the Additional Deputy Commissioner related to land (ADC Revenue) to prepare and execute a plan of action for requisition. The Deputy Commissioner in turn issues a public notice regarding the acquisition with a view to settling matters relating to payment of compensation to the owner or owners of the property or any other person or persons entitled to compensation, and any other related issues. When any property is required temporarily for a public purpose or in the public interest, the Deputy Commissioner may requisition it by an order in writing. In case of such a requisition of property, compensation shall be paid to the owner or owners of the property determined in accordance with legal provisions, and the decision taken by the government is deemed to be final. Any person who contravenes or attempts to contravene an order, or who obstructs the enforcement of an order, is punishable with imprisonment for a term which may extend to three months, or with a fine which may extend to Taka three thousand, or with both.

B. ADB's Safeguard Policy Statement (2009)

62. The objectives of ADB's Safeguard Policy Statement (SPS) 2009 with regard to involuntary resettlement are: (i) to avoid involuntary resettlement wherever possible; (ii) to minimize involuntary resettlement by exploring project and design alternatives; to enhance, or at least restore, the livelihoods of all displaced persons in real terms relating to pre-project levels; and (iii) to improve the standards of living of the displaced poor and other vulnerable groups.

63. ADB's Safeguard Policy Statements covers physical displacement (relocation, loss of residential land, or loss of shelter) and economic displacement (loss of land, assets, access to assets, income sources, or means of livelihoods) as a result of (i) involuntary acquisition of land, or (ii) involuntary restrictions on land use or on access to legally designated parks and protected areas. It covers them whether such losses and involuntary restrictions are full or partial, permanent or temporary. Following are the basic policy principles of ADB's SPS, 2009:

- (i) Identification of past, present, and future involuntary resettlement impacts

- and risks and determination of the scope of resettlement planning;
- (ii) Carry out meaningful consultations with affected persons, host communities, and concerned non-government organizations;
- (iii) Improvement or at least restoration of the livelihoods of all displaced persons;
- (iv) Ensure physically and economically displaced persons with needed assistance;
- (v) Improvement of the standards of living of the displaced poor and other vulnerable groups;
- (vi) Development of procedures in a transparent, consistent, and equitable manner if land acquisition is through negotiated settlement;
- (vii) Ensure that displaced persons without titles to land or any recognizable legal rights to land are eligible for resettlement assistance and compensation for loss of nonland assets;
- (viii) Preparation of a resettlement plan elaborating on displaced persons' entitlements, the income and livelihood restoration strategy, institutional arrangements, monitoring and reporting framework, budget, and time-bound implementation schedule;
- (ix) Disclosure of resettlement plan, including documentation of the consultation process in a timely manner to affected persons and other stakeholders;
- (x) Execution of involuntary resettlement as part of a development project or program.
- (xi) Payment of compensation and provide other resettlement entitlements before physical or economic displacement; and
- (xii) Monitoring and assessment of resettlement outcomes, their impacts on the standards of living of displaced persons.

C. Comparison Between ARIPA, 2017 and ADB SPS, 2009

64. The difference between the national land acquisition act and principles laid down in ADB SPS, 2009 is compared in Table 13 below and the measures to bridge the gaps are discussed.

Table 13: Comparison between Government of Bangladesh Laws and ADB Safeguard Policies on Land Acquisition and Resettlement

Sl. No.	ADB's SPS (2009)	The Acquisition and Requisition of Immovable Property Act (ARIPA) of 2017	Gaps Between ARIPA and ADB's Policies and Action Taken to Bridge the Gap
1	Involuntary resettlement should be avoided wherever possible.	The Act has no direct statement that involuntary Resettlement should be avoided. The Section-4 of the act mentions: 4. Publication of preliminary notice of acquisition of immovable property:(1) Whenever it appears to the Deputy Commissioner that any property in any locality is needed or is likely to be needed for any public purpose or in the public interest, he shall cause a notice to be published at convenient places on or near the property in the prescribed form and manner stating that the property is proposed to be acquired.	The Executing Agency will follow ADB's SPS to avoid involuntary resettlement where feasible, if involuntary resettlement impacts cannot be avoided mitigation measures will be taken as per policy
2	Regarding the compensation issue, ADB safeguards policy 2009 spells out the following points: The borrower/client will provide adequate and appropriate replacement land and structures or cash compensation at full replacement cost for lost land and structures, adequate compensation for partially Damaged structures, and relocation assistance, if applicable, to those persons (i) with formal legal rights to land lost in its entirety or in part; and (ii) persons who lost the land they occupy in its	Payment of compensation at "market value" for the properties acquired for development projects. Land Acquisition Acts does not clearly mention regarding the 'full replacement cost'. The Section-9 of the ARIPA, 2017 point outs the following: Matters to be considered in determining compensation: (1) In determining the amount of compensation to be awarded for any property to be acquired under this Part, the Deputy Commissioner shall take into consideration- (a) the market value of the property at the date of publication of the notice under section 4: Provided that in determining such market value, the Deputy Commissioner shall take into account the average value, to be calculated in the prescribed manner, of the properties of similar description and with similar advantages in the vicinity during the twelve	The Executing Agency will ensure the full replacement cost dealing with ADB safeguards policy and will address the gaps between the government and ADB policy. The project proponent will ensure payment of compensation and other resettlement entitlements prior to physical or economic displacement.

Sl. No.	ADB's SPS (2009)	The Acquisition and Requisition of Immovable Property Act (ARIPA) of 2017	Gaps Between ARIPA and ADB's Policies and Action Taken to Bridge the Gap
	entirety or in part who have no formal legal rights to such land, but who have claims to such lands that are recognized or recognizable under national laws.	<p>months preceding the date of publication of the notice under section 4. (b) the damage that may be sustained by the person interested, by reason of the taking of any standing crops or trees which may be on the property at the time of the making of the joint list; (c) the damage that may be sustained by the person interested by reason of severing such property from his other property; (d) the damage that may be sustained by the person interested by reason of the acquisition injuriously affecting his other properties, movable or immovable, in any other manner, or his earnings; and (e) if in consequence of the acquisition of the property, the person interested is likely to be compelled to change his residence or place of business, the reasonable expenses, if any, incidental to such change. (2) While the government is acquiring land, it shall provide the persons interested with compensation of 200 per centum of the market price as defined in sub- section 1(a): Provided that if the government acquires the land for any non-government person, then the amount of compensation shall be 300 per centum. (3) In cases of injuries made under sub-section 1(b), (c), (d) and (e), additional 100 per centum compensation shall be provided. (4) Notwithstanding any compensation provided under this section, necessary steps may be taken to rehabilitate evicted persons due to acquisition in the prescribed form.</p>	

Sl. No.	ADB's SPS (2009)	The Acquisition and Requisition of Immovable Property Act (ARIPA) of 2017	Gaps Between ARIPA and ADB's Policies and Action Taken to Bridge the Gap
3	For those persons who lost the land they occupy in its entirety or in part who have neither formal legal rights nor recognized or recognizable claims to such land, prior to their relocation is given only if they occupied the land or structures in the project area prior to the cut-off-date for eligibility for resettlement assistance.	ARIPA 2017, Section 9 subsection (b) mentions the damage that may be sustained by the person interested, by reason of the taking of any standing crops or trees which may be on the property at the time of the making of the joint list.	The Executing Agency will ensure payment of compensation for the lost assets and crops and trees to both title holders and non-title holders for their lost assets.
4	As per ADB safeguards policy, displaced persons in a project area could be of three types: (i) persons with formal legal rights to land lost in its entirety or in part; (ii) persons who lost the land they occupy in its entirety or in part who have no formal legal rights to such land, but who have claims to such lands that are recognized or recognizable under national laws; and (iii) persons who lost the land they occupy in its entirety or in part who have neither formal legal rights nor recognized or recognizable claims to such land. The involuntary resettlement requirements	ARIPA, 2017 of the GOB does not allow to be compensated to the persons who do not have legal title of the lands/ assets to be acquired. It recognizes only the entitlements of the legal titleholders who are capable of establishing their ownership rights. The only exception is for sharecroppers who have cultivated standing crops under a legally constituted written agreement; they are entitled to a part of the compensation money as provided for in the written agreement. Section 12 for ARIPA 2017. Payment of compensation to bargadar: (sharecropper) Notwithstanding anything contained in this Act, when the property acquired under this Part contains standing crops cultivated by bargadar, such portion of the compensation as may be determined by the Deputy Commissioner for the crops shall be paid to the bargadar. 23. Payment of compensation: (1) On section 22, the Deputy Commissioner's the compensation awarded by	Non-titleholders are considered eligible to receive compensation as per ADB safeguards policy. The project will recognize both titleholder and non-titleholder affected persons and compensate them for the inconvenience as per the entitlement matrix.

Sl. No.	ADB's SPS (2009)	The Acquisition and Requisition of Immovable Property Act (ARIPA) of 2017	Gaps Between ARIPA and ADB's Policies and Action Taken to Bridge the Gap
	apply to all three types of displaced persons.	him to the thereto according to the award and shall prevented by any of the contingencies (2).	
5	Preference will be given to land-based resettlement strategies for displaced persons whose livelihoods are land-based.	ARIPA 2017 indicate cash compensation for properties to be acquired.	The Project may consider land for land for vulnerable affected persons on case-to-case basis.
6	The rate of compensation acquired housing, land and to assets will be calculated at replacement costs. The calculation of full replacement cost will be based on following elements: (I) fair market value; (ii) transaction costs; (iii) interest accrued, (iv) transition and restoration costs; and (v) other applicable payments, if any.	Section-9 of the ARIPA, 2017. Matters to be considered in determining compensation: (1) In determining the amount of compensation to be awarded for any property to be acquired under this Part, the Deputy Commissioner shall take into consideration- (a) the market value of the property at the date of publication of the notice under section 4: Provided that in determining such market value, the Deputy Commissioner shall take into account the average value, to be calculated in the prescribed manner, of the properties of similar description and with similar advantages in the vicinity during the twelve months preceding the date of publication of the notice under section 4;	The GOB Act is consistent with ADB safeguards policy at large, in case of considering market price/value, however, it is not consistent with the 'Replacement Cost' which needs to be addressed by the Executive Agency in the resettlement plan.
7	Establishment of Grievance Redress Mechanism/ Committee for resolving the Grievances of the affected persons.	Land Acquisition Laws does not have any provision of forming GRM/GRC. The affected persons may appeal in dealing with the following section of the land acquisition acts: Objections against acquisition: (1) Any person concerned may file an objection against the acquisition proceeding to the Deputy Commissioner within 15 working days. (2) The Deputy Commissioner shall, speedily hear the objection filed under sub-section 1 in the	As per ADB Safeguards Policy 2009, GRM/ GRC will be established to redress the grievances of the project affected persons and appraise them on the same.

Sl. No.	ADB's SPS (2009)	The Acquisition and Requisition of Immovable Property Act (ARIPA) of 2017	Gaps Between ARIPA and ADB's Policies and Action Taken to Bridge the Gap
		presence of the appellant or an agent, after hearing all such objections and after making such further inquiry, if any, as he thinks necessary, prepare a report within thirty working days, and in case of a nationally important project within 15 working days, following the expiry of the period specified under sub-section (1) containing his opinion on the objections.	
8	Meaningful consultations with affected persons, host communities, and concerned nongovernment organizations, and establish a grievance redress mechanism that would receive and facilitate resolution of the concerns of the affected persons.	No provisions for stakeholder consultations or to establish a grievance redress mechanism. Affected persons may raise objections to land acquisition only after section 5 Notice is issued, while disputes over land acquisition have to be settled through an arbitrator or the courts of law. The Section-4 spells out: Section 4. Publication of preliminary notice of acquisition of immovable property:(1) Whenever it appears to the Deputy Commissioner that any property in any locality is needed or is likely to be needed for any public purpose or in the public interest, he shall cause a notice to be published at convenient places on or near the property in the prescribed form and manner stating that the property is proposed to be acquired. (2) In case of acquisition of immovable property for any.	Stakeholder consultations and disclosure meetings with the project affected persons are required before starting the acquisition process by the Government. Any grievances will have to be addressed as per established/ agreed GRC of the project. Meaningful consultations must be carried out by the Project with affected persons and community and other stakeholders, throughout the life cycle of the Project.
9	ADB's Public Communications Policy, requires that relevant information on social and environmental safeguard issues is made available in a	Under ARIPA 2017, Section 4, the Deputy Commissioner, whenever it appears to him that any property in any locality is needed or is likely to be needed for any public purpose or in public interest, will cause a notice, to be published at convenient places on or near the property in the	The project proponent will disclosure of draft and final resettlement plan, including documentation of the consultation process in a timely manner. It will also disclose project information leaflet, entitlement matrix, the grievance

Sl. No.	ADB's SPS (2009)	The Acquisition and Requisition of Immovable Property Act (ARIPA) of 2017	Gaps Between ARIPA and ADB's Policies and Action Taken to Bridge the Gap
	timely manner, in an accessible place, and in a form and language(s) understandable to affected people and to other stakeholders, including the general public, so they can provide meaningful inputs into project design and implementation.	prescribed form and manner stating that the property is proposed to be acquired. There is no other disclosure requirement under the Act.	redress mechanism and semi-annual social safeguard monitoring reports (SSMRs) with the affected persons and other stakeholders. The draft and final resettlement plans and the SSMRs will be disclosed on the website of the CTCRSP project and ADB.
10	Need to conduct census for the Displace Persons (DPs) for resettlement plan preparation.	ARIPA 2017 does not have any provision for conducting census/ socio-economic survey for those who will be displaced due to land acquisition. The laws spell out: Section 40. Power to enter and inspect: (1) With a view to acquiring or requisitioning any property or determining the compensation payable in respect thereof or securing compliance with an order made under this Act, the Deputy Commissioner or any officer, generally or specially authorized by the Deputy Commissioner in this behalf, and any of the assistants and workmen may- (a) enter upon and survey and take levels of any property; (b) inspect any property or anything therein; (c) measure and set out the boundaries and prepare a plan of any property and the intended line of the work, if any, proposed to be made thereon; (d) mark such levels, boundaries and line by placing marks and cutting trenches, and, where otherwise the survey cannot be completed and the levels	As per ADB safeguards policy census survey for the affected households for the assessment of the affected properties required, and the findings will be incorporated in the resettlement plan.

Sl. No.	ADB's SPS (2009)	The Acquisition and Requisition of Immovable Property Act (ARIPA) of 2017	Gaps Between ARIPA and ADB's Policies and Action Taken to Bridge the Gap
		taken and the boundaries and line marked, cut down and clear away any part of any standing crop, tree or jungle: Section 41. Power to obtain information: With a view to acquiring or requisitioning any property or determining the compensation payable in respect thereof, the Deputy Commissioner may, by order in writing, require any person to furnish to such officer or authority, as may be specified in the order, such information in his possession as may be specified relating to any property which is acquired or requisitioned, or intended to be acquired or requisitioned, under this Act.	
11	A comprehensive income and livelihood rehabilitation program, supported by an adequate budget, is in place to help displaced persons improve, or at least restore, their incomes and livelihoods	Government laws does not have any provision for providing livelihoods support for those who will be displaced due to land acquisition.	Livelihood restoration/ support program and budget will be included in the Resettlement Plan document.

ADB = Asian Development Bank, ARIPA = Acquisition and Requisition of Immovable Property Act, 2017, IOL = inventory of losses, SPS = Safeguard Policy Statement

D. Policy Principles for the Project CTCRSP

65. The project will recognize three types of physically displaced persons like (i) persons with formal legal rights to land lost in its entirety or in part; (ii) persons who lost the land they occupy in its entirety or in part who have no formal legal rights to such land, but who have claims to such lands that are recognized or recognizable under national laws; and (iii) persons who lost the land they occupy in its entirety or in part who have neither formal legal rights nor recognized or recognizable claims to such land. The involuntary resettlement requirements apply to all 3 types of physically displaced persons. It also applies to all types of economically displaced persons – those facing permanent income loss as well as those facing temporary income loss.

66. For any ADB financed projects requiring involuntary resettlement, resettlement planning is an integral part of project design, to be dealt with from the earliest stages of the project cycle, taking into account the following basic principles:

- (i) Screen the project early on to identify past, present, and future involuntary resettlement impacts and risks. Determine the scope of resettlement planning through a survey and/or census of displaced persons, including a gender analysis, specifically related to resettlement impacts and risks.
- (ii) Carry out meaningful consultations with affected persons, host communities, concerned nongovernment organizations and other relevant stakeholders. Inform all displaced and affected persons of their entitlements and resettlement options. Ensure their participation in planning, implementation, and monitoring and evaluation of resettlement programs. Pay particular attention to the needs of vulnerable groups, especially those below the poverty line, the landless, the elderly, women and children, and Indigenous Peoples, and those without legal title to land, and ensure their participation in consultations. Establish a grievance redress mechanism to receive and facilitate resolution of the affected persons' concerns. Support the social and cultural institutions of displaced persons and their host population.
- (iii) Improve, or at least restore, the livelihoods of all displaced persons through (i) land-based resettlement strategies when affected livelihoods are land based where possible or cash compensation at replacement value for land, (ii) prompt replacement of assets with access to assets of equal or higher value, (iii) prompt compensation at full replacement cost for assets that cannot be restored, and (iv) additional revenues and services through benefit sharing schemes where possible.
- (iv) Provide physically and economically displaced persons with needed assistance, including the following: (i) if there is relocation, secured tenure to relocation land, better housing at resettlement sites with comparable access to employment and production opportunities, integration of resettled persons economically and socially into their host communities, and extension of project benefits to host communities; (ii) transitional support and development assistance, such as land development, credit facilities, training, or employment opportunities; and (iii) civic infrastructure and community services, as required.
- (v) Improve the standards of living of the displaced poor and other vulnerable groups, including women, to at least national minimum standards.
- (vi) Develop procedures in a transparent, consistent, and equitable manner if land acquisition is through negotiated settlement to ensure that those people who

enter into negotiated settlements will maintain the same or better income and livelihood status.

- (vii) Ensure that displaced persons without titles to land or any recognizable legal rights to land are eligible for resettlement assistance and compensation for loss of non-land assets.
- (viii) Prepare a resettlement plan for all packages with resettlement impacts elaborating on displaced persons' entitlements, the income and livelihood restoration strategy, institutional arrangements, monitoring and reporting framework, budget, and time-bound implementation schedule.
- (ix) Disclose a draft resettlement plan, including documentation of the consultation process in a timely manner, before project appraisal, in an accessible place and a form and language(s) understandable to affected persons and other stakeholders. Disclose the final resettlement plan and its updates to affected persons and other stakeholders.
- (x) Conceive and execute involuntary resettlement as part of a development project or program. Include the full costs of resettlement in the presentation of project's costs and benefits. For a project with significant involuntary resettlement impacts, consider implementing the involuntary resettlement component of the project as a stand-alone operation.
- (xi) Pay compensation and provide other resettlement entitlements before physical or economic displacement. Implement the resettlement plan under close supervision throughout project implementation.
- (xii) Monitor and assess resettlement outcomes, their impacts on the standards of living of displaced persons, and whether the objectives of the resettlement plan have been achieved by taking into account the baseline conditions and the results of resettlement monitoring. Disclose monitoring reports.

VII. ENTITLEMENTS, ASSISTANCES AND BENEFITS

A. Types of Losses and Affected Person Category

67. As mentioned in **Chapter II**, the anticipated losses due to the proposed subproject component (Construction and Improvement of Roads in Patharghata *Pourashava*) under CTCRSP comprise potential temporary income loss to one road-side shopowner. The income loss to affected person will be temporary in nature (loss of daily income for the period of disruption) and is assessed as seven estimated working days or the actual period of disruption.¹¹ The shop has no wage employees.

68. As per the ADB SPS 2009, regarding involuntary resettlement in the context of economic impacts, affected persons are those who are physically and economically displaced (loss of productive land, structures, assets, access to assets, income sources, or means of livelihood). Absence of formal and legal title to the land does not bar the affected person from receipt of compensation and resettlement assistance from the project. Vulnerable affected persons are eligible for additional compensation and assistance and are to be accorded priority in employment in project related construction activities.

B. Eligibility

69. The project will consider the following persons eligible for compensation, assistance, and benefits. These include:

- (i) persons who will lose land/assets/income in their entirety or in part, and have formal legal rights to the land;
- (ii) persons who will lose the land they occupy in its entirety or in part, and have no formal legal rights to such land, but who have claims to such lands that are recognized or recognizable under national laws, e.g., tenants and leaseholders;
- (iii) persons occupying land over which they neither have legal title, nor have claims recognized or recognizable under national law e.g., sharecroppers, squatters, encroachers, wage labour without formal contracts; and
- (iv) Vulnerable households comprise below poverty line households, female-headed households, households with out of school/working children, disabled person-headed household, elderly-headed household or elder,¹² landless household, household with no legal title / tenure security, and indigenous people.

C. Cut-off-Date

70. For legal title-holders, the date of publication of the notice by the Deputy Commissioner under Section 4 of ARIPA, 2017 will be considered as the cut-off-date. The date of detailed measurement survey (DMS) is the cut-off-date for the affected non-titleholders. Any persons moving into the subproject area after the cut-off date will not be entitled for compensation or assistance under the project. The cut-off-date for this resettlement plan is 5 April 2023.

¹¹ If the shop owner gets affected during construction, they will be compensated as per the entitlement matrix for the actual days of disruption.

¹² The eligibility will follow the Department of Social Service of Ministry of Social Welfare that uses 65 years old for man and 62 years old for woman to define elderly people.

71. Any person who purchases or occupies land within the corridor of impact or demarcated project area after the cut-off-date is not eligible for compensation or resettlement assistance or both. Similarly, fixed assets (such as, built structures, crops, fruit trees, and woodlots) established after this date or an alternative mutually agreed on date, will not be compensated.

72. CTCRSP will document and disseminate the cut-off- date information throughout the project area. The survey presented in this draft Resettlement Plan will be revised based on the need for additional surveys has already been identified during civil works.

73. Affected person will be informed in advance 30 days before to ensure no or minimal disruption in livelihood. One shop owner will incur temporary income loss due to access disruption during construction period and shifting of the structure behind the original location. Ensuring continued access during sub project construction is the responsibility of contractors.

Table 14: Entitlement Matrix

Sl. No.	Type of Loss	Application	Entitled Person	Compensation Entitlements ¹³	Remarks
A. Loss of Income					
A.1 (refer to row # D.2 in Resettlement Framework)	Loss of Income	Temporary business losses along the ROW/ proposed land for the subprojects	Shop owners (<i>non-titleholders</i>)	(i) 30 days' advance notice regarding construction activities, including duration and type of disruption. (ii) Cash compensation equivalent to net income from the affected business or minimum wage rate (whichever is higher) for the period of disruption on producing relevant income or income tax return documents; in absence of proper income documents, the income will be calculated by the Joint Verification Committee. (iii) Shifting allowance based on actual cost of moving calculated at BDT 15,000.00 will be paid to the affected road-shop owners (if they are required to shift out of the place) temporarily to an alternate location; the shifting cost will include	<ul style="list-style-type: none"> • Determination of income loss during detail census and socio-economic survey conducted as a part of final resettlement plan preparation. • PIU will do the Identification of alternative temporary sites to support the road-side shops to continue economic activity. • Contractor's actions to ensure there is no income/access loss consistent with the initial environmental examination. This includes: leaving spaces for access between mounds of soil, providing walkways and metal sheets to maintain access across trenches for people and vehicles where required, increased workforces to finish work in areas with impacts on access, timing of works to reduce disruption during business hours, phased

¹³ All cash compensations other than statutory compensations in this entitlement matrix will be adjusted for inflation until the year of compensation payment.

Sl. No.	Type of Loss	Application	Entitled Person	Compensation Entitlements ¹³	Remarks
				<p>dismantling, reconstruction, loading, unloading and any other related cost;</p> <p>(iv) For construction activities involving disruption for a period of more than a month, provision of alternative sites for road-side shops for continued economic activities. If not possible, allowance based on the net income of the affected business or minimum wage rate for the affected households up to 3 months or the actual period of disruption whichever is more.</p> <p>(v) Additional compensation for vulnerable affected persons as specified in row # F of Resettlement Framework or row # C of this resettlement plan.</p>	<p>construction schedule and working one segment at a time and one side of the road.</p> <ul style="list-style-type: none"> It is assessed that three (3) road-side shop owners will receive compensation for temporary income loss for the period of disruption.
B. Vulnerability Assistance¹⁴					
B.1	Impact on vulnerable household ¹⁵	Affected due to land acquisition,	Temporarily and/or insignificantly affected	On top of the entitlement specified in item # A.1 and B.1., vulnerable affected households facing temporary	<ul style="list-style-type: none"> Vulnerable households identified during DMS and socio-economic survey as part of resettlement plan

¹⁴ Vulnerable households comprise below poverty line households, female-headed households, households with out of school/working children, disabled person-headed household, elderly-headed household, landless household, household with no legal title / tenure security, and households belonging to small ethnic communities.

¹⁵ Vulnerability benefits are incremental, i.e., in addition to other entitlements and benefits.

Sl. No.	Type of Loss	Application	Entitled Person	Compensation Entitlements ¹³	Remarks
		involuntary resettlement	vulnerable households	and/or insignificant adverse involuntary resettlement impact (temporary loss of income or any other adverse involuntary resettlement impact that is not significant) will receive additional cash compensation equivalent for five days of the prevalent minimum wage rate, and preferential employment in the project construction for one family member.	<p>update for respective subprojects.</p> <ul style="list-style-type: none"> The extent of impact may further be assessed if any damage happened during construction. Based on socioeconomic survey and assistance for the vulnerable households will be accordingly determined. Construction contracts will require contractors to employ specific numbers of vulnerable affected persons in their construction workforces. Representation from vulnerable affected persons will be a requirement of all committees and consultation forums for CTCRSP. Three (3) vulnerable households will receive one-time vulnerability assistance.
C. Other Impacts					
C.1	Unanticipated losses	Any other loss not identified in the matrix	Any affected person or affected entity	Unanticipated involuntary impacts will be documented and mitigated based on principles and policies of ARIPA, 2017 and ADB SPS, 2009.	The social safeguard personnel from PMU/PIU will ascertain the nature and extent of impact and loss and finalize the entitlements as per the resettlement policies

Sl. No.	Type of Loss	Application	Entitled Person	Compensation Entitlements ¹³	Remarks
					of government and ADB and update the same into the respective resettlement plan.

Note:

- (i) Damages or impacts to structures such as compound walls, fencing, ramps, concrete platforms and stairs etc. during construction will be covered under contractor's civil cost and will be budgeted under the Contractor's contract. The PMU will ensure that the cost is included in the bill of quantities (BOQ). Restoration of such damage to previous or better condition than before by the contractor will be monitored.

74. The vulnerable affected person or any member of the vulnerable affected family, will be selected on priority basis for works /jobs in the project construction employment and provided with additional special assistance for income restoration support.

75. Compensation Mechanism. Assistance for temporary loss of income and livelihood will be paid to the displaced persons as per the Entitlement Matrix. The computation of the loss will be based on the monthly income of the affected shop owners as stated by them during the consultation and social impact assessment conducted. Compensation will be provided for the actual period of disruption.

76. The payment of compensation and assistance amount to affected persons should be transferred in their bank account before the possession of land/ assets/ ROW of roads and prior to start of construction work. Identity cards will be prepared and distributed after completion of DMS.

D. Entitlements

77. The affected person will be eligible for compensation for temporary income loss and structure shifting (if required) as specified in the entitlement matrix of the agreed resettlement framework. The affected person will be entitled to receive compensation for income loss for the period of disruption. For construction activities involving disruption for a period of more than a month provision of alternative sites for continued economic activities may be provided. If that is not possible, transitional allowance based on the net income of the affected business or minimum wage for the affected households up to 3 months or the actual period of disruption whichever is more should be provided.

78. For this subproject component, the estimated period of disruption during construction of road is assessed to be maximum of 7 working days (considering construction and restoration work). In case the period of disruption is more than one month (30 days), the affected persons will be compensated based on the actual number of days of disruption. The affected person will also be compensated for the time lag (taking into account the annual inflation rate) between the time of payment of compensation and the time of survey. 'Shifting assistance' of BDT 15,000 will be paid to the affected road side-shop owner (if they are required to shift out of the place) temporarily to an alternate location; the shifting cost will include dismantling, reconstruction, loading, unloading and any other related cost. Temporarily affected persons who are identified as vulnerable will be eligible for one-time additional cash compensation equivalent for five days of the prevalent minimum wage rate for livelihood restoration.

79. Civil work will be undertaken on one side of the road and temporarily affected person will be facilitated to move slightly behind the existing location. Access will be ensured by the contractor through measures suggested in bidding documents / environmental management plan (EMP). Entitlement matrix is provided in **Table 15**.

80. Damages/unanticipated losses caused during construction, if any will be eligible for compensation. Such issues will be identified and closely monitored by the safeguard focal person at PIU and safeguard personnel at RPMU. Compensation for impacts to secondary structures of private owners or common property resources or any other unanticipated temporary impacts and damage during construction will be borne by the contractor. Unanticipated losses, if any, will be mitigated/ compensated as per the entitlement matrix provided in resettlement framework. Loss of drinking water, sanitation and/or any other facility due to damage of existing infrastructure during construction will be mitigated through provision of alternate facilities (e.g., alternate means

of water supply). The time gap between transfer from old system to new in certain areas will be minimized to avoid inconvenience to the public.

VIII. RESETTLEMENT BUDGET AND FINANCING PLAN

81. The resettlement budget for “Construction and Improvement of Five Roads in *Patharghata Pourashava*”, is based on the entitlements outlined in the entitlement matrix and contingency provision amounting of about 20% of the total cost. PIU safeguard focal person along with RPMU safeguard personnel will be involved in facilitating the meetings/camps for disbursement process and will facilitate by making aware about the process of opening of bank accounts for the affected persons who do not have bank accounts. The costs are conservative estimates and will be confirmed during detailed project preparation and planning. The total resettlement cost for the contract package is BDT **382,080.00**. PIU will issue order for release of payment to affected persons, which shall be released through electronic clearance service/National Electronic Fund Transfer (ECS/NEFT) transaction from bank, through concerned treasury of LGED. The resettlement plan budget is outlined in Table 16.

82. Details of resettlement plan budget estimation are as follows:

- (i) Total number of affected persons – One business owner is potentially identified as project affected person as per preliminary/final design, DMS, transect walk and socioeconomic loss survey. Temporary livelihood losses are estimated to be for maximum of seven working days (considering excavation, clearing, construction of roads and restoration work) for the resettlement budget for each affected person under this project. Should actual days of disruption be higher, compensation will be as per the agreed entitlement matrix. The affected business owner is identified based on final design and DMS, and those found to be impacted will be eligible to receive compensation as per entitlement matrix.
- (ii) The affected household has been identified to be below poverty line and elderly is considered as vulnerable affected persons. Vulnerability assistance for those temporarily impacted CTCRSP has been considered equivalent for five days of the prevalent minimum wage rate per affected household, in accordance with the entitlement matrix.
- (iii) As reported during the survey, the monthly net income of the affected business owner is BDT 6,000. Based on this, an average daily net income of the affected business owners is calculated at BDT 200.
- (iv) A provisional shifting assistance has been considered for the affected road-side shop if they are required to shift to an alternate location during the construction work of the drains; shifting assistance of BDT 15,000 will be paid to the affected road-shop owner (if they are required to shift out of the place) temporarily to an alternate location; the shifting cost will include dismantling, reconstruction, loading, unloading and any other related cost.

83. The estimated resettlement plan budget is provided in following **Table 15**.

Table 15: Estimated Resettlement Plan Budget

Sl. No.	Item Description	Unit	Number	Rate (BDT)	Total Amount (BDT)
A.	Resettlement and Rehabilitation Cost				
A.1	Compensation for income loss for 1 affected business owner for 7 working days at BDT 200 per day (one affected person x 7days x BDT 200)	Number	1	200	1,400.00
A.2	One-time Vulnerability assistance (one affected vulnerable household) equivalent to five days of the prevalent minimum wage rate ¹⁶ per affected household (1 affected vulnerable person x 5 days x BDT 400)	Number	1	400	2,000.00
A.3	Provisional one-time shifting allowance for 1 affected road-side shop (1 affected structure x BDT 15,000)	Number	1	15,000	15,000.00
	Sub-total of A				18,400.00
B.	Implementation Cost				
B.1	Resettlement Plan facilitation cost, ID preparation, documentation, etc.)			LS	100,000.00
B.2	Consultation, Grievance Redress			LS	1,00,000.00
B.3	Awareness Generation and Capacity Building			LS	1,00,000.00
	Sub-total of B				300,000.00
	Total = A + B				318,400.00
	Contingency @ 20%				63,680.00
	Grand total				382,080.00

LS = lumpsum

Note:

* Compensation for income loss will be based on the actual period of disruption; the number of days of disruption is maximum of 7 days as assumed in the resettlement plan budget. The affected person will receive compensation for the actual number of days of disruption. Any additional temporary income loss assessed during construction/improvement of roads would be compensated from the contingency provision.

** Damage to minor structures such as boundary walls, ramps or steps during construction, if any, will be covered under the Contractor's civil construction cost and is therefore not included in the resettlement budget.

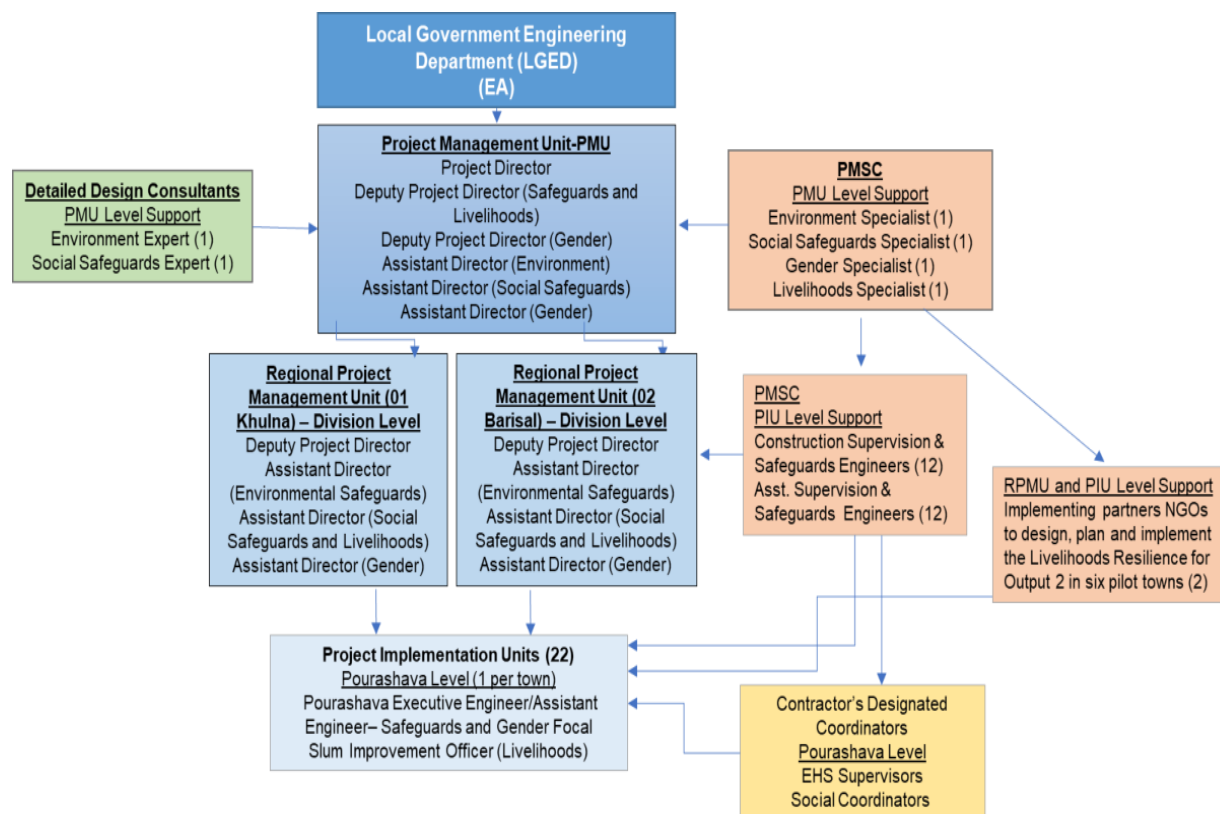
¹⁶ Bangladesh government does not have any directive on minimum wage rate except for readymade garments employees. Minimum wage rate for them is BDT 8100 per month as updated in December 2020. The Resettlement Framework considers the minimum daily wage rate for the affected employees at current market rate for wage labor, BDT 400.

IX. INSTITUTIONAL ARRANGEMENTS AND IMPLEMENTATION SCHEDULE

A. Implementation Arrangement

84. **Executing agencies and project management unit.** The Ministry of Local Government, Rural Development and Cooperatives (MLGRDC) acting through its Local Government Engineering Department (LGED) is the Executing Agency. *Pourashavas* are the implementing agencies of the project.

85. **Project Management Unit (PMU).** The PMU is headed by a Project Director (PD) of Chief Engineer rank, who will be responsible for overall project management. The Project Director is supported by two Deputy Project Directors (DPDs), DPD (Safeguards) and DPD (Gender); the two DPDs will be responsible for overall safeguards and gender for the project. The PMU level safeguard and gender team will have another three safeguard and gender personal, Assistant Director (Environment), Assistant Director (Social Safeguards) and Assistant Director (Gender). These safeguards and gender Assistant Directors will be responsible for social safeguard compliance and planning (as per the agreed resettlement framework), environmental safeguards compliance as per ADB's SPS, 2009 and GOB rules and ensuring gender equality (as per Gender Action Plan) in the CTCRSP. For project implementation, two division level Regional Project Management Units (RPMUs) will be established, one at Khulna and the other at Barisal. The safeguard implementation arrangement is represented in **Figure 3**.

Figure 3: Safeguard Implementation Arrangement

DDC = Detailed Design Consultant; EHS = Environment, Health and Safety; PIU = Project Implementation Unit; PMSC = Project Management Supervision Consultant; PMU = Project Management Unit

86. The PMU will be supported by two institutional consultants under the supervision and control of project director, PMU: (i) the detail design consultants (DDC); (ii) the project management supervision consultants (PMSC), that will support PMU; and (iii) PMSC at the division level that will support the two RPMUs and the town-level PIUs.

87. Key tasks and responsibilities of the Assistant Director (Social Safeguard), PMU are as follows:

- (i) Ensure subprojects conform to the agreed project selection criteria for the project;
- (ii) Review and finalize project involuntary resettlement and indigenous people category;
- (iii) Oversee preparation of resettlement plans/Due Diligence Report (DDRs)/RIPP; confirm existing resettlement plans/DDRs/RIPP are updated based on detailed designs, and that new project resettlement plans/DDRs/RIPP are prepared in compliance with ADB SPS, 2009 and policies, regulations of GOB for the project;
- (iv) Responsible for issuing the public notice along with project information/details as well as the project cut-off-date;
- (v) Ensure that resettlement plans/DDRs are included in bidding documents and civil works contracts;
- (vi) Provide oversight on social safeguard management aspects of projects and ensure resettlement plans and impact avoidance measures outlined in the resettlement

- plan/environmental management plan/DDR are implemented by PIU and contractors;
- (vii) Supervise and guide the RPMUs and town/*pourashava* level PIUs to properly carry out the social safeguard monitoring;
 - (viii) Ensure and monitor the provision in the contract to include the vulnerable people to be the beneficiaries of the facilities constructed under the Project;
 - (ix) Facilitate and ensure compliance with all government rules and regulations regarding project implementation. Obtain No Objection Certificates, land ownership and transfer details etc. for each site, as relevant and include the same in the respective social safeguard documents for the package;
 - (x) Supervise and guide the PIUs to properly carry out the social safeguard and gender monitoring (resettlement plan/Gender Action Plan);
 - (xi) Review, monitor, and evaluate the effectiveness with which the resettlement plans/provisions of DDRs are implemented, and recommend corrective actions to be taken as necessary;
 - (xii) Consolidate monthly social safeguard and gender monitoring reports from PIUs/PMSCs, prepare and submit semi-annual social safeguard monitoring reports (SSMR) to ADB;
 - (xiii) Ensure timely disclosure of final resettlement plans/DDR/RIPP in locations and form accessible to the public and affected persons;
 - (xiv) Address any grievances brought about through the grievance redress mechanism in a timely manner;
 - (xv) Oversee training needs assessment of affected persons and vulnerable persons by PIUs and PMSC; coordinate training skill training activities and establish linkages with national level non-government organisations (NGOs) providing with livelihood programs, in case any permanent and significant impacts to livelihood of affected persons or impacts to vulnerable are identified;
 - (xvi) Ensure effective implementation of GRM at all level;
 - (xvii) Identify training needs and coordinate training activities for the PIUs/contractors/project consultants for capacity building to implement the Resettlement Plans/DDR, and GRM;
 - (xviii) Coordinate database management for social safeguards implementation and monitoring; and
 - (xix) Coordinate public awareness campaigns by the PIUs including resettlement provisions with the help of print and electronic media.

88. **Project Implementation.** The RPMUs will be the extended arms of the PMU at regional level. Under the guidance and overall management of the PMU the project will be implemented by the two RPMUs and town/*pourashava*-level PIUs. The participating *pourashavas* will be the implementation agencies at the town-level and will establish a PIU within the *pourashava* structure.

89. **Regional Project Management Units (RPMUs), Division Level.** Two regional project management units will be established, one at Khulna and the other at Barisal (Division level), who will be responsible for overall implementation of CTCRSP in the 22 *pourashavas*. The respective RPMUs will be headed by Deputy Project Directors. Each RPMU will be staffed by an Assistant Director (Environment Safeguards), an Assistant Director (Social Safeguards) and an Assistant Director (Gender) who will assist the PMU safeguards and gender team in implementation of social and environment safeguard plans and gender action plan. The RPMU will undertake internal monitoring and supervision and record observations throughout the project period to ensure that the safeguards and mitigation measures are provided as intended.

90. The regional level social safeguards Assistant Director will oversee safeguards implementation by the *pourashava*/town level PIUs, coordinate public consultations, information disclosure, regulatory clearances and approvals, implementation of resettlement plans, EMP implementation, and grievance redressal.

91. The key tasks of the social safeguard Assistant Director at the RPMU-level will be as follows:

- (i) Finalize involuntary resettlement and indigenous people impact checklist and classify the project;
- (ii) Supervise PMSC to coordinate with PIUs, conduct consultations with affected persons and key stakeholders, supervise and monitor census and socio-economicsurveys, detailed measurement surveys, and verification surveys of affectedpersons and update PMU accordingly for all subproject locations;
- (iii) Ensure and support preparation and/or updating of the resettlement plans, DDRs, RIPP by DDC and submit to PMU for review and approval and submission to ADB;
- (iv) Supervise PIUs to inform affected persons about (a) the project cut-off date; (b) public notice for the schedule of land acquisition and/or occupation; (c) entitlementmatrix; and (d) compensation packages against different categories of loss and a tentative schedule of land clearing and/or acquisition for the start of civil works activities;
- (v) Coordinate valuation of assets, such as land, structures, trees and other assets bythe property valuation advisory committee (PVAC). Finalize compensation packages based on proper due diligence and assessment;
- (vi) Facilitate land acquisition and compensation processes in consultation with the district administration; coordinate, supervise, and monitor the disbursement of compensation by the Deputy Commissioner's Office (cash compensation under law) and resettlement and rehabilitation compensation by the project in addition tothe affected persons;
- (vii) Support PIUs to obtain no objection certificates, land documents, and third-party certifications as required for the subproject, in coordination with PIUs;
- (viii) Support PMU to include resettlement plans, and DDRs in bidding documents andcivil works contracts;
- (ix) Guide PIUs to oversee implementation of avoidance and mitigation measures in the resettlement plans, DDRs by contractors, including compliance with all government rules and regulations; take necessary action for obtaining ROW;
- (x) Guide and monitor PIUs to oversee resettlement plans, DDR, and gender action plan implementation and maintenance of data for monitoring by contractors;
- (xi) Ensure vulnerable households are appropriately identified and receive compensation as stated in the entitlement matrix;
- (xii) Assist in conducting needs assessment to list skills relevant to the sector;
- (xiii) Assist to identify participants for livelihood and skilling training for women andmembers of other vulnerable groups;
- (xiv) Ensure that the project maintains sex disaggregated data on staff, consultants, construction workforce participation, labour and project related trainings;
- (xv) Ensure that gender focal points are nominated in town level PIUs;
- (xvi) Ensure that corrective actions are taken when necessary to ensure compliancewith SPS and loan covenants;

- (xvii) Consolidate and submit monthly social monitoring reports received from PIUs to PMU;
- (xviii) Guide PIUs to conduct continuous public consultation and awareness with affected persons and other key stakeholders;
- (xix) Address any grievances brought about through the grievance redress mechanism promptly;
- (xx) Organize an induction course for the training of contractors, preparing them on RPs, DDR, and gender action plan implementation, social safeguard, and gender monitoring requirements related to mitigation measures, grievance redress mechanism and on taking immediate action to remedy unexpected adverse impacts or ineffective mitigation measures found during implementation;
- (xxi) Liaise with the district administration, and NGOs for income generation and development programs for affected people, as and when required; and
- (xxii) Assist in the implementation, monitoring, and reporting progress of gender action plan.

92. **Project Implementation units (PIUs), *Pourashava*/Town Level.** The PIUs will be established in each participating *Pourashava*/ subproject town and staffed with a safeguards and gender focal person (Executive Engineer/Assistant Engineer, *Pourashava*). The PIUs will be assisted and will receive support from the RPMUs environment, social and gender Assistant Directors and region level Construction Supervision and Safeguards Engineers, PMSC. The PIUs will be responsible for implementation of the IEE/resettlement plan/gender action plan. The Executive Engineer (safeguards and gender focal person) with the support of Assistant Directors (social, environment and gender), RPMU and the Construction Supervision and Safeguards Engineers, PMSC will support PMU safeguards Assistant Directors in subproject implementation. The Executive Engineer/ Assistant Engineer (safeguards and gender focal person) at PIU level will be assisted by Sub-Assistant Engineers (if available at the *Pourashava* level) with the safeguard and gender tasks. The Slum Improvement Officer at the *Pourashava* will be responsible for livelihood intervention tasks and responsibilities.

93. Key tasks and responsibilities on social safeguards of the PIU safeguard and gender focal person on involuntary resettlement safeguards compliance are as follows:

- (i) Assist the detailed design services consultants to communicate, consult and disclose the updated/finalized safeguards documents to the affected people acknowledgement for their endorsement;
- (ii) Implement final resettlement plans and ensure timely payment of compensation and other assistance prior the dispossession of the affected assets or the starts of civil works;
- (iii) Facilitate/ assist the detailed design consultants for the draft resettlement plan/DDR updating and preparation of safeguards documents for future subprojects;
- (iv) Support the DDC in assessing and reviewing the land availability and ownership status of the proposed subproject areas;
- (v) Inform affected persons about tentative schedule of land acquisition/occupation, entitlement matrix and compensation packages against different categories of loss, and cut-off date;
- (vi) Coordinate valuation of assets, such as land, trees of various species, etc. based on proper due diligence and assessment, prepare compensation packages;

- (vii) Coordinate, supervise and monitor disbursement of compensation;
- (viii) Liaise with Deputy Commissioner's Office to ensure timely payment of CCL and oversee any road blocks faced by the affected land owners;
- (ix) Obtain no objection certificates (NOCs), land documents, third party certifications as required for the project;
- (x) Oversee maintenance of data for monitoring, by consultants and contractors;
- (xi) Conduct social safeguards monitoring during civil works and submit monthly report to PMU;
- (xii) Take corrective actions when necessary to ensure avoidance/minimization of involuntary resettlement impacts;
- (xiii) Establish the GRC, disclose the project GRM to the affected communities and coordinate with other local government agencies for the preparation and implementation of the resettlement plan;
- (xiv) Address any grievances brought about through the project's grievance redress mechanism in a timely manner;
- (xv) Undertake day-to-day implementation of final resettlement plans and GAP action plan;
- (xvi) Ensure relevant data on implementation of gender action plan is collected and a gender-sensitive communication strategy and information, education and communication (IEC) materials are designed, illustrating key social and behavioural messages related to hygiene, sanitation, and health jointly with the communication specialist and in accordance with the gender action plan; and
- (xvii) Extend support in carrying out awareness campaigns in project towns.

94. **Project Management Supervision Consultant (PMSC).** The PMSC will provide project management and supervision services to support the Project Management Unit (PMU). PMSC will provide support to the LGED, PMU for project management and administration, construction supervision and quality control, safeguard compliance, municipal services operation and maintenance, monitoring and evaluations, and other activities as appropriate. PMSC will have an environment specialist, a social safeguard specialist (SSS) and a gender specialist.

95. The key tasks of social safeguard specialist (SSS), of PMSC (to be stationed at PMU level) are as follows:

- (i) Assist PMU to set up project management, implementation and monitoring systems and procedures;
- (ii) Assist PMU and PIUs in preparing annual work plans, detailed implementation schedule and budgets using computer-based project management tools;
- (iii) Establish a system to monitor social safeguards outcomes of the Project; including the functioning of the GRM, and prepare indicators for monitoring important parameters of safeguards;
- (iv) Take proactive action to anticipate the social safeguards aspects of the Project to avoid delays in implementation;
- (v) Ensure safeguards reports prepared by the detailed design consultants (DDC) are reviewed and approved by ADB and PMU and disclosed prior to contract award;
- (vi) Support PMU to prepare/update resettlement plan and quarterly and semi-annual social safeguard monitoring reports (SSMR) that will be appraised during project implementation;
- (vii) Support the PMU and PIUs in ensuring that the social safeguard activities are

- carried out in accordance with the agreed plans and frameworks;
- (viii) Ensure that the relevant measures specified in the resettlement plan will be incorporated in bidding documents and approved by ADB prior to issuance of invitation for bidding and monitor their compliance on behalf of PMU;
- (ix) Assist PMU in establishing the grievance redress mechanism, and handling any grievance and redress process and solution for safeguard complaints
- (x) Ensure monitoring of social safeguards plans and address unanticipated impacts, if any; and
- (xi) Provide training programs to PMU/PIUs/DDC/PMSC staff and contractors involved in the project implementation for strengthening their capacity in managing and monitoring social safeguards.

96. The key social safeguard tasks of Construction Supervision and Safeguard Engineer and Assistant Supervision and Safeguards Engineers to support RPMUs and PIUs, are as follows:

- (i) Assist regional PMUs and town level PIUs to implement resettlement plans/IEEs/GAP;
- (ii) Guide PIU staff and contractor's social coordinators conduct surveys, collect information, conduct site specific consultations and implementation of GAP;
- (iii) Guide and support RPMU and PIUs to announce cut-off dates, and disclose RPs to affected persons and implement RPs;
- (iv) Support RPMU and town-level PIUs in resettlement plan and GAP implementation, monitoring and reporting, and grievance resolution and reporting;
- (v) Support RPMUs to ensure (through field staff) that PIUs and contractors implement impact avoidance and mitigation measures;
- (vi) Assist town-level PIUs (through field staff) to ensure resettlement plans are implemented and all compensation paid prior to start of civil works;
- (vii) Assist in monitoring and reporting, preparation of quarterly and semi-annual reports;
- (viii) Assist in grievance resolution and reporting;
- (ix) Supervise contractors to ensure any land required temporarily during construction, is restored to original condition, post construction; and
- (x) Assist RPMUs in monitoring of socioeconomic status of affected persons, post resettlement plan implementation.
- (xi) Assists PIUs in information dissemination campaign for affected persons at the outset of resettlement plan implementation and all the comments made by the affected persons will be documented in the subproject records and summarized in subproject monitoring reports;
- (xii) Prepare periodic safeguard monitoring reports as per the format acceptable to ADB and quarterly gender action plan updates in format provided in PAM;
- (xiii) Collect relevant data on implementation of gender action plan and design gender-sensitive communication strategy in accordance with the gender action plan;
- (xiv) Extend assistance to LGED PMU in carrying out awareness campaigns focused on involving social and behavioural messages related to hygiene, sanitation, and health activities in the focus areas.

97. **Detailed Design Consultants (DDC).** The project will be supported by detailed design consultants (DDC). The DDC will be staffed by an Environment Expert and a Social Safeguard Expert. DDC will support PMU in designing and planning of subproject components. The DDC will screen all subprojects for climate resilience, conduct technical surveys and detailed studies, and prepare all engineering designs, bidding and safeguard documents. The key social safeguard tasks of the Social Safeguard Expert include:

- (i) Screen and categorize subproject components;
- (ii) Carry out baseline census and socio-economic surveys and carry out meaningful consultations for resettlement plan/RSECP/DDR;
- (iii) Ensure the contractors comply with the agreed social safeguards frameworks, resettlement plans, and due diligence reports on social safeguards for the project;
- (iv) Prepare/update existing resettlement plans/DDRs and prepare any additional draft resettlement plans, due diligence reports and prepare any new safeguard documents as and when required.

98. **Civil works contractors.** The contractor will be required to designate a Social Coordinators to (i) ensure compliance with RP and RF during civil works, and to (ii) carry out all mitigation and monitoring measures such as rebuilding of damaged structures/private property outlined in their contract.

99. The PMU and PIUs will ensure that bidding and contract documents include specific provisions requiring contractors to comply with (i) all applicable labour laws and core labour standards on (a) prohibition of child labour as defined in national legislation for construction and maintenance activities; (b) equal pay for equal work of equal value regardless of gender, ethnicity, or caste; and (c) elimination of forced labour; and with (ii) the requirement to disseminate information on COVID-19 safety protocols, sexually transmitted diseases, including HIV/AIDS, to employees and local communities surrounding the project sites. The key responsibilities of social safeguard/resettlement supervisor on social compliance are as follows:

- (i) Compliance with all government rules and regulations particularly health and safety, take necessary action for obtaining ROW;
- (ii) Implement corrective actions where ever necessary, to ensure no adverse social impacts are caused due to project implementation;
- (iii) Submit monthly progress reports to PIU;
- (iv) Conduct meaningful public consultation and awareness;
- (v) Support PIU in setting up GRM at field/site level and ensure it is fully functional; Address any grievances brought about through the grievance redress mechanism in a timely manner;
- (vi) Make sure that that induction course for the training of contractors is conducted regularly. Prepare contractors (with consultants' support) on resettlement plans/RIPP/DDR/GAP implementation, social safeguard and gender monitoring requirements related to mitigation measures, health and safety and on taking immediate action to remedy unexpected adverse impacts or ineffective mitigation measures found during the course of implementation;
- (vii) Establish working rapport and liaison with the District Administration and line departments for execution of work;
- (viii) Assist in collection of field level information required to prepare periodic safeguard monitoring reports (as asked by PIU) in a format acceptable to ADB and quarterly gender action plan updates in the format provided in PAM;

- (ix) Make sure that relevant data on implementation of gender action plan (activities assigned to contractor if any) is collected in accordance with the GAP;
- (x) Provide support in carrying out awareness campaigns in project towns/city level.

Table 16: Institutional Roles and Responsibilities for Safeguards

Activities	Responsible Agency
Subproject Initiation Stage	
Finalization of sites/alignments for sub-project (on ground)	PMU/RPMUs/PIUs
Finalization of detail Design/implementation of Detailed Measurement Survey (DMS)	DDC/PIUs/RPMU
Resettlement Plan Preparation/ Updating Stage	
Conducting DMS Survey/Census of all affected persons; identification of poor and vulnerable APs	DDC/PIUs/RPMU
Conducting FGDs/ meetings / workshops during census surveys	PIUs/DDC/ contractor/ RPMU
Verification of survey results, vulnerable households	PMU/PMSC
Computation of compensation	DDC, PIU, PMSC, PMU
Conducting discussions/ meetings/ workshops with all affected persons and other stakeholders	PIU/ PMSC/RPMU/ Contractor
Finalising entitlements	PMU/RPMU/PIUs
Disclosure of final entitlements and compensation packages	PIU/ DDC/RPMU
Disclosure of grievance redress mechanism/process	PMU/PIU/ RPMU/PMSC
Approval of Final Resettlement Plan	PMU/ADB
Resettlement Plan Implementation Stage	
Payment of compensation	PMU/RPMU/PIU/PMSC
Consultations with affected persons during rehabilitation activities	PIU/ RPMU/Contractor
Grievance redressal	PMU/PIU/RPMU/ PMSC/Contractor
Internal monitoring	PMU/RPMU/PMSC

DDC = Detailed Design Services Consultant; ICCDC= Institutional Capacity and Community Development Consultants; PIU = Project Implementation Unit; PMSC = Project Management Supervision Consultant; PMU = Project Management Unit

B. Safeguard Capacity Development

100. The PMSC Social Safeguard Specialist along with Assistant Directors (social safeguard, environment and gender) will be responsible for development of a training program based on a capacity assessment of target participants (PMU, RPMU, PIU staff, Contractor(s)) and for implementation of the training program to build capabilities on resettlement policy, planning, mitigation measures and safeguards. The resettlement framework includes indicative training modules on safeguards. The PMSC will coordinate with PMU and PIUs on specific capacity development program.

- (i) sensitization on ADB's Policies and guidelines on social and indigenous people safeguards (ADB's Safeguard Requirement 2 and 3: Involuntary Resettlement and Indigenous Peoples) including meaningful consultation, GRM and accountability mechanism; introduction to the assessment of involuntary resettlement and indigenous peoples impacts and mitigation measures, including best practices, in the design, construction, operation and maintenance of water supply, sewerage, roads, and drainage subprojects;
- (ii) preparation and review of RPs/RIPP/DDR based on preliminary design,

- and updating of the documents based on the final design;
- (iii) improved coordination within nodal departments;
- (iv) disbursement of compensation, consultation; and (vi) monitoring and reporting requirement.

101. PMU and PMSC will also organize trainings PMU, RPMU, PIU staffs, DDC, contractors, *pourashava* officials preparing them on resettlement plan implementation including ADB policy, GRM, and social safeguards monitoring requirements and mitigation measures. Table 18 provides the indicative training needs assessment. The cost of trainings will be borne under the Project's capacity building program by PMU.

Table 17: Indicative Training Program

Description	Contents	Schedule	Participants
Program 1 Orientation Workshop	Module 1 – Orientation ADB Safeguard Policy Statement Government of Bangladesh policy Module 2 – Social/Environmental Assessment and Resettlement Planning/IEE Process ADB policy and process, identification of impacts and mitigation measures, RP/IEE preparation, implementation, and monitoring requirements. Incorporation of safeguards into project design and contracts. Importance of robust GRM.	1 Day	LGED officials involved in project implementation PMU, RPMUs, PIUs, <i>pourashava</i> officials
Program 2 Workshop for Contractors and Supervisory staff	IR/environmental issues during construction Implementation of RP/IEE Monitoring of RP/IEE implementation, Reporting Requirements, GRM	1 Day	PIUs, Contractors
Program 3 Experiences and Best Practices Sharing	Experiences on RP/IEE implementation, grievance redress – Issues and Challenges - Best Practices followed	1 Day (on a regular interval to be determined by PMU and PMSC)	PMU, RPMUs, PIUs PMSC, Contractors

DDC = Detailed Design Consultant; IEE = Initial Environment Examination; LGED = Local Government Engineering Department; PIU = Project Implementation Unit; PMSC = Project Management Supervision Consultant; PMU = Project Management Unit

C. Implementation Schedule

102. The project will be implemented over a period of 7 years. The resettlement plan implementation schedule will vary from subproject to subproject. In general, the project implementation will consist of the three major phases, namely project preparation, land acquisition (if required), and rehabilitation of affected persons. In line with the principles laid down in this resettlement framework, the executing agency and implementing agency will ensure that project activities are synchronized between the resettlement plan implementation activities and the subproject implementation. The executing agency and implementing agency will ensure that no physical or economic displacement of affected households will occur until: (i) compensation at full replacement cost has been paid to each displaced person for project components or sections that

are ready to be constructed; (ii) other entitlements listed in the resettlement plan are provided to the displaced persons; and (iii) a comprehensive income and livelihood rehabilitation program, supported by adequate budget, is in place to help displaced persons improve, or at least restore, their incomes and livelihoods.

103. All compensation for a subproject will be completed before award of civil works contracts. All land required will be provided free of encumbrances to the contractor prior to handing over of subproject sites and the start of civil works. The implementation of the resettlement plan will include: (i) identification of cut-off-date and notification; (ii) verification of losses and extent of impacts; (iii) finalization of entitlements and distribution of identity cards; (iv) consultations with affected persons on their needs and priorities; and (v) resettlement, provision of compensation and assistance, and income restoration for affected persons. The expected implementation schedule for a subproject is given in **Table 18**.

Table 18: Schedule of Resettlement Plan Implementation

Activity	Months																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
Establishment of PMU, RPMUs and PIUs																		
Appointment of safeguards and gender personnel																		
Appointment of PMSC																		
Appointment of DDC																		
Setting up of project level GRM																		
Census and socio-economic surveys																		
Consultations and disclosure																		
Confirmation of government land to be used and transfer from other departments																		
Preparation of draft resettlement plan																		
Review and approval of draft resettlement plan by PMU and ADB																		
Finalization of design, detailed measurement survey and updating of draft resettlement plan																		
Issue notice to affected persons																		
Compensation and resettlement assistance																		
Skills training as required																		
Takeover possession of acquired property																		
Internal monitoring																		
Handover land to contractors																		
Start of civil works																		
Rehabilitation of temporarily occupied lands																	Immediately after construction work	

Notes: (i) The census is the cut-off-date for non-titled affected persons. For affected titled holders, the cut-off date is the date declaration of Section 4 Notice under ARIPA 2017. (ii) The resettlement plan will be updated if required during assessment of unforeseen losses. Based on affected person census and surveys. (iii) Endorsement and disclosure of finalized resettlement plans consistent with the resettlement framework is undertaken.

X. MONITORING AND REPORTING

104. Resettlement plan implementation will be closely monitored to provide the PMU with an effective basis for assessing resettlement progress and identifying potential difficulties and problems. Monitoring will be undertaken by the PMSC, RPMUs and PMU. Monitoring will involve administrative monitoring to ensure that implementation is on schedule and problems are dealt with on a timely basis; socio-economic monitoring during and after any resettlement impact utilizing baseline information established through the detailed measurement survey of affected persons undertaken during project sub-preparation, and overall monitoring.

105. The Assistant Director (Social Safeguard) at PMU with the support of Assistant Director (Social safeguard) at RPMU and Safeguards and Gender Focal person at respective PIUs will be required to submit monthly progress reports, to be consolidated by PMSC social safeguards specialist to report the status of RPs implementation under the project. The EA will submit semi-annual monitoring reports to ADB for review and will be published on the website.

A. Internal Monitoring

106. Internal monitoring for resettlement plan implementation will be carried out during the entire project period. Regular monitoring of resettlement progress will identify potential difficulties and problem areas. Internal monitoring will be undertaken by the PMU through RPMU and PMSC for overall safeguard implementation and compliances. The *pourashava*/ town level PIU will monitor performance at ground level and implementation of resettlement plan. Monthly progress reports will be prepared by town level PIUs submit it to PMU. The PMSC on behalf of PMU will manage and supervise internal monitoring at multiple levels. Monitoring reports will document actual achievements against targets fixed and identifying reasons for shortfalls, if any. All monitoring reports will be produced within fifteen days of the end of each quarter or half-year.

107. Broadly, the monitoring system will involve:

- (i) Administrative monitoring including but not limited to: daily planning, implementation, feedback and troubleshooting, individual affected person file maintenance, progress reporting;
- (ii) Socio-economic monitoring including but not limited to: case studies, using baseline information for comparing affected person socioeconomic conditions, evacuation, demolition, salvaging materials, morbidity and mortality, communal harmony, dates for consultations, number of grievances and resolutions; and
- (iii) Impact evaluation monitoring including but not limited to income standards restored or improved.

B. Monitoring Progress of Resettlement Plan Implementation

108. Internal monitoring will involve the following:

- (i) Administrative monitoring to ensure that implementation is on schedule and problems are dealt with on a timely basis;
- (ii) Socioeconomic monitoring during and after the relocation process to ensure that people are settled and recovering. This will utilize the baseline information

- established by the socioeconomic survey of affected persons undertaken during subproject preparation; and
- (iii) Overall monitoring whether recovery has taken place successfully and on time.

109. Data from baseline socio-economic surveys undertaken during subproject preparation will provide the benchmark for monitoring to assess the progress and success of resettlement plan implementation. Monitoring will also include the following:

- (i) Communication with and documentation of reactions from affected persons;
- (ii) Information from affected persons on entitlements, options, alternative developments, etc.;
- (iii) Valuation of properties;
- (iv) Usage of grievance redress mechanism; and
- (v) Disbursement of compensation amounts and all assistance.

110. Monitoring will also cover the physical progress of resettlement plan implementation. This will include relocation of affected persons and affected community properties.

C. Internal Monitoring Indicators

111. The indicators for achievement of objectives during resettlement plan implementation are of two kinds:

- (i) Process Indicators. Indicating project inputs, expenditure, staff deployment, etc.; and
- (ii) Output Indicators. Indicating results in terms of numbers of affected persons compensated, area of temporarily occupied lands restored with topsoil (and other pre-project features), number of affected persons provided with skills training, etc.

Input and output indicators related to physical progress of the work will include items such as:

- (i) Training of PIU and other staff completed;
- (ii) Census, assets inventories, assessments and socioeconomic studies completed;
- (iii) Resettlement plan implementation agency recruited and trained;
- (iv) Grievance redress procedures in-place and functional;
- (v) Compensation payments disbursed;
- (vi) Compensation against temporary income loss paid for the actual number of days of disruption
- (vii) Infrastructure rehabilitated or constructed;
- (viii) Monitoring and evaluation reports submitted.

112. A set of indicators will be used to monitor Program objectives. These indicators will form the basis of the monitoring and evaluation of resettlement plan implementation. The information collected through the household survey will provide benchmarks for comparison on the socio-economic status of the affected persons in the Program implementation period. A key objective will be the estimation of the affected persons incomes and quality of lives. If monitoring and documentation done during the first 6 months of resettlement plan implementation indicate that these objectives are not being achieved, more resources will be allocated for implementation.

During implementation, benchmarks and indicators will be monitored to ensure that comparisons made on socioeconomic status including income streams and not just fixed assets lost due to the subproject.

XI. FOLLOW-UP ACTION FOR RESETTLEMENT PLAN UPDATING AND IMPLEMENTATION

113. The major tasks associated with the resettlement plan updating and implementation is given in the Table 20 placed below.

Table 19: Follow-up Action for Resettlement Plan Updating and Implementation

S. No.	Major Follow-up Tasks
1.	The draft resettlement plan will be updated with road wise detailed measurement and revalidation census surveys where roads will be constructed if any unforeseen resettlement plan identified during construction.
2.	Land ownership records and mouza maps depicting the roads, OR, self-certification by pourashava/road owning entity of ownership of road RoWs need to be included
3.	Google earth map demarcating the proposed road alignment must be included to the updated resettlement plan.
4.	The updated/revised resettlement plan will be submitted to the ADB for approval. A 100 percent census and socio-economic survey will be undertaken to register and document the status of affected people within project areas. If required during implementation, detailed measurement survey will be jointly conducted by DDC, PIU and supervised by RPMU and PMU prior to start of civil construction work at each site/stretch of drain alignment.
5.	ADB's approval of the updated resettlement plan based on the final assessment at detailed measurement survey stage needs to be obtained by the PMU, before start of civil works by Contractor.
6.	Disclosure of cut-off-date for affected persons following DMS and same to be updated in resettlement plan.
7.	Public consultations and engagement will be carried out through the entire project planning and implementation phase. Project disclosure meeting with affected persons and preparation of project information leaflet in local language to be shared with stakeholders and affected persons.

Appendix 1: Involuntary Resettlement and Indigenous Peoples Screening Form

A. Project Data																		
<div style="display: flex; justify-content: space-between;"> <div> Country/Project No./Project : Title </div> <div> Country: Bangladesh ADB No.: (No. to be designated) Coastal Towns Climate Resilience Project (CTCRP) Subproject: e-GP/ CTRP /PATH/RD/01 </div> </div>																		
B. Involuntary Resettlement Category																		
[] New [] Re categorization — Previous Category []																		
<input type="checkbox"/> Category A		<input checked="" type="checkbox"/> Category B																
<input type="checkbox"/> Category C		<input type="checkbox"/> Category FI																
C. Comments																		
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 10%;">S. No</th> <th style="width: 55%;">Name of Roads</th> <th style="width: 35%;">Start and End Point</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1.</td> <td>Improvement of Road by RCC from R & H Road to Sultan Doctor Bridge (Ch: 0+000m to 1+151m) Link-01 Start from start from Konok House to Chanmoti house (Ch 0+000m to 0+314.00m) at ward no. 03& 04</td> <td>Pourashava End Portion (RCC Bridge) to Suvash House front side BC Road & Khara Kanda Road to Konok House, Ward No-03, 04 & 05</td> </tr> <tr> <td style="text-align: center;">2.</td> <td>(A) Improvement of Phalan Bari Road by RCC, Start from Phalan Bari Jame Mosque to Tangra main road via Mr. Ex. Councilor Habib House (Ch: 0+000 - 1+260.0m with Link- 01 (Ch.0.00m-Ch.128m) (B) Improvement of road by Dence carpeting from Patharghata Stadium to end of the Pourashava boundary (Ch: 1+675m to 4+225m) at Ward No-01, 02 & 07 under Patharghata Pourashava.</td> <td>Korolia Road to Doctor Sultan House Road & Patharghata Stadium to Pourashava End Portion, Ward No-03, 01,02 & 07</td> </tr> <tr> <td style="text-align: center;">3.</td> <td>A) Improvement of road by RCC from R&H Road to (Taslima High School Front side Road) to Dikraj Khal Culvert (Ch. 0+00m to 0+ 475.00m) B) Improvement of road by Uni-Block from R&H Road to (Taslima High School Front side Road) to Dikraj Khal Culvert, Link-01 (Ch. 00+00m to 0+ 250.00m) under Patharghata Pourashava.</td> <td>Bridge Approach to Bus Stand Ward No-06</td> </tr> <tr> <td style="text-align: center;">4.</td> <td>Improvement of road by RCC at Chunu Chottor to Paurashava End Boundary (Cunu Road) (Ch:0+00m to 1+820.00m) with Link-01(Ch: 00+00 to 0+216.00m) at Ward No. 06</td> <td>R&H Road to New Culvert Both Side Approach Road & R&H Road to Modumnoti School Back side Road,Ward No-08</td> </tr> </tbody> </table>				S. No	Name of Roads	Start and End Point	1.	Improvement of Road by RCC from R & H Road to Sultan Doctor Bridge (Ch: 0+000m to 1+151m) Link-01 Start from start from Konok House to Chanmoti house (Ch 0+000m to 0+314.00m) at ward no. 03& 04	Pourashava End Portion (RCC Bridge) to Suvash House front side BC Road & Khara Kanda Road to Konok House, Ward No-03, 04 & 05	2.	(A) Improvement of Phalan Bari Road by RCC, Start from Phalan Bari Jame Mosque to Tangra main road via Mr. Ex. Councilor Habib House (Ch: 0+000 - 1+260.0m with Link- 01 (Ch.0.00m-Ch.128m) (B) Improvement of road by Dence carpeting from Patharghata Stadium to end of the Pourashava boundary (Ch: 1+675m to 4+225m) at Ward No-01, 02 & 07 under Patharghata Pourashava.	Korolia Road to Doctor Sultan House Road & Patharghata Stadium to Pourashava End Portion, Ward No-03, 01,02 & 07	3.	A) Improvement of road by RCC from R&H Road to (Taslima High School Front side Road) to Dikraj Khal Culvert (Ch. 0+00m to 0+ 475.00m) B) Improvement of road by Uni-Block from R&H Road to (Taslima High School Front side Road) to Dikraj Khal Culvert, Link-01 (Ch. 00+00m to 0+ 250.00m) under Patharghata Pourashava.	Bridge Approach to Bus Stand Ward No-06	4.	Improvement of road by RCC at Chunu Chottor to Paurashava End Boundary (Cunu Road) (Ch:0+00m to 1+820.00m) with Link-01(Ch: 00+00 to 0+216.00m) at Ward No. 06	R&H Road to New Culvert Both Side Approach Road & R&H Road to Modumnoti School Back side Road,Ward No-08
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Refer to Involuntary Resettlement Impact Categorization Checklist below.																		

Involuntary Resettlement Impact Screening

Probable Involuntary Resettlement Effects	Yes	No	Not Known	Remarks
Involuntary Acquisition of Land				
1. Will there be land acquisition?		No		
2. Is the site for land acquisition known?				Not applicable
3. Is the ownership status and current usage of land to be acquired known?				Not applicable
4. Will easement be utilized within an existing Right of Way (ROW)?				Not applicable
5. Will there be loss of shelter and residential land due to land acquisition?				Not applicable
6. Will there be loss of agricultural and other productive assets due to land acquisition?				The shop owned by one businessowner will be slightly move next to its previous location (just 0.716m) but not due to land acquisition.
7. Will there be losses of crops, trees, and fixed assets due to land acquisition?				Not applicable
8. Will there be loss of businesses or enterprises due to land acquisition?				One shopowner will face temporary income loss but not due to land acquisition.
9. Will there be loss of income sources and means of livelihoods due to land acquisition?				
Involuntary restrictions on land use or on access to legally designated parks and protected areas				
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		
Information on Displaced Persons:				
Any estimate of the likely number of persons that will be displaced by the Project? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes If yes, approximately how many? _____ One shopowner (4 family members) will face temporary income loss for seven days.				
Are any of them poor, female-heads of households, or vulnerable to poverty risks? <input type="checkbox"/> No <input checked="" type="checkbox"/> 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.

Indigenous Peoples Screening Checklist

KEY CONCENS (Please provide elaborate on the Remarks column)	YES	NO	NOT KNOWN	Remarks
A. Indigenous Peoples Identification				
1. Are there socio-cultural groups present in or use the project area who may be considered as "tribes" (hill tribes, scheduled tribes, tribal peoples), "minorities" (ethnic or national minorities) or "indigenous communities" in the project area?		X		There are no tribes, minor races, ethnic sects and communities or indigenous peoples present in this area.
2. Are there national or local laws or policies as well as anthropological researches/studies that consider these groups present in or using the project area as belonging to "ethnic minorities", scheduled tribes, tribal peoples, national minorities, or cultural communities?				Not applicable.
3. Do such groups self-identify as being part of a distinct social and cultural group?				Not applicable.
4. Do such groups maintain collective attachments to distinct habitats or ancestral territories and/or to the natural resources in these Habitats and territories?				Not applicable.
5. Do such groups maintain cultural, economic, social, and political Institutions distinct from the dominant society and culture?				Not applicable.
6. Do such groups speak a distinct language or dialect?				Not applicable.
7. Has such groups been historically, socially and economically marginalized, disempowered, excluded, and/or discriminated against?				Not applicable.
8. Are such groups represented as "Indigenous Peoples" or as "ethnic minorities" or "scheduled tribes" or "tribal populations" in any formal decision-making bodies at the national or local levels?				Not applicable.
B. Identification of Potential Impacts				
9. Will the project directly or indirectly benefit or target Indigenous Peoples?		X		
10. Will the project directly or indirectly affect Indigenous Peoples' traditional socio-cultural and belief practices? (e.g., Child-rearing, health, education, arts, and governance)		X		
11. Will the project affect the livelihood systems of Indigenous Peoples? (e.g., food production system, natural resource management, crafts and trade, employment status)		X		
12. Will the project be in an area (land or territory) occupied, owned, or Used by Indigenous Peoples, and/or claimed as ancestral domain?		X		
A. Identification of Special Requirements <i>Will the project activities include:</i>				
13. Commercial development of the cultural resources and knowledge of Indigenous Peoples?		X		
14. Physical displacement from traditional or customary lands?		X		

KEY CONCERNS (Please provide elaborate on the Remarks column)	YES	NO	NOT KNOWN	Remarks
15. Commercial development of natural resources (such as minerals, hydrocarbons, forests, water, hunting or fishing grounds) within customary lands under use that would impact the livelihoods or the cultural, ceremonial, spiritual uses that define the identity and community of Indigenous Peoples?		X		
16. Establishing legal recognition of rights to lands and territories that are traditionally owned or customarily used, occupied or claimed by indigenous peoples ?		X		
17. Acquisition of lands that are traditionally owned or customarily used, occupied or claimed by indigenous peoples ?		X		Road improvements are proposed within the RoW of pourashava roads.

Appendix 2: Record of Focus Group Discussion

FGD for: Contract Package No. e-GP/CTCRP/ PATH/RD/01

Date: 8 February 2024,

Venue: Bridge Approach Road, Taltala Bazar, Patharghata Pourashava, District: Barguna

Number of Participants: 22

Time: 11.30am

Conducted by: Akbar Hossain

Designation: Social Safeguard Expert

Discussion Made on FGD: Extent of Impact Identification for construction of Bridge Approach Road Rising and wedding (Ch: 0+00m to 0+100.00m) Ward No-06.

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

A. Social Safeguard Issues:

1. Position of shops, 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. Community 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 95 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 on the proposed road schemes:

- Proper compensation will be provided to the affected person(s);

- The affected businessman agreed to shift his shop if he gets proper compensation;
- The local stakeholders will be happy to have improved road communication.
- Affected persons will be provided with compensation if found to be eligible during project implementation
- The participants were happy to have improved road communication with improved road facility in the near future by the *Pourashava*.
- Engage local people for construction works as per their capacity.
- Construction works should be completed in dry season.

The photographs of the FGD and attendance sheets are attached separately.

FGD Pictures:



Coastal Towns Climate Resilience Project (CTCRP)

Focus Group Discussion

Name of Pourashava: Patharghata Package Name: 0/GP/CTCRP/PATH/RD-01

Place/Venue: Taltala Bazar Date: 08 February 2024

List of Participants

Sl. No.	Name	Designation	Contact No.	Signature
01	শ্রী: রিফাত		01735672750	শ্রী: রিফাত
02	শ্রী: হুমায়ুন কবির		01622228065	শ্রী: হুমায়ুন
03	শ্রী: রশিদ		01724422153	শ্রী: রশিদ
04	শ্রী: বেলাল		01784821105	শ্রী: বেলাল
05	শ্রী: মনিম		01741226571	শ্রী: মনিম
06	শ্রী: সাদেক		01746981482	শ্রী: সাদেক
07	শ্রী: সজ্জা হোসেন		01772585093	শ্রী: সজ্জা হোসেন
08	শ্রী: মনিম		01718247588	শ্রী: মনিম
09	শ্রী: মনিম		01731531980	শ্রী: মনিম
10	শ্রী: হুমায়ুন		01736712747	শ্রী: হুমায়ুন
11	শ্রী: মনিম		01718898574	শ্রী: মনিম
12	শ্রী: মনিম		01995-502486	শ্রী: মনিম
13	শ্রী: মনিম		01786577616	শ্রী: মনিম
14	শ্রী: মনিম		01723361022	শ্রী: মনিম
15	শ্রী: মনিম		01313222210	শ্রী: মনিম
16	শ্রী: মনিম		01712389330	শ্রী: মনিম

Coastal Towns Climate Resilience Project (CTCRP)

Focus Group Discussion

Name of Pourashava: Patharghata Package Name: E-GP/CTCRP/PATH/RO-01

Place/Venue: Talala Bazar Date: 08 February 2024

List of Participants

[illegible]

FGD for: Contract Package No. e-GP/CTCRP/ PATH/RD/01

Date : 1-5-2022

Place: Patharghata Pourashava, District: Barguna

Road Identification: Road No. 1

Number of Participants=95

Date: 1st May 2022

Time: 9.30a m

Conducted by: Mamun Ar Rashid

Designation: Resettlement Expert and Environmental Expert

Discussion Made on FGD: SCTEIP-II Social Safeguard Expert and Resettlement Expert conducted Focus Group Discussion Meeting on 1/5/2022. The FGD meeting was attended by a group of community people including local elites. The respective Ward Councillor presided over the meeting and Environmental Expert recorded the minutes including participants' attendance. The surveyor of *Pourashava* also attended the meeting. The CTCRP's 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. Community 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 95 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 on the proposed 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 with improved road facility in the near future by the *Pourashava*.
- Engage local people for construction works as per their capacity.
- Construction works should be completed in dry season.

The photo on FGD conduction and attendance are attached separately.

2.14FGD Session Pictures:





Attendance Sheets of Focus Group Discussions

Improvement of road by RCC form R&H Road to Sultan Doctor Bridge and Drain with Footpath
Ward No. 03 and 04.

Second Costrel Town Environmental Infrastructure Improvement Project (SCTEIP)

Focus Group Discussion

①

କ୍ରମ ନଂ	ନାମ	ସ୍ଥାନ
୧	ଭ୍ରା. ଅମିତଭୁବ୍ଧ ଦେବୀ	ଘର ନଂ.
୨	ଭ୍ରା. ଅମିତଭୁବ୍ଧ ଦେବୀ	ଭା. ନଂ. ୫୪୯୯୯୯
୩	ଭ୍ରା. ଅମିତଭୁବ୍ଧ ଦେବୀ	ଭା. ନଂ. ୫୪୯୯୯୯୯୯୯୯
୪	ଭ୍ରା. ଅମିତଭୁବ୍ଧ ଦେବୀ	ଭା. ନଂ. ୫୪୯୯୯୯୯୯୯୯
୫	ଭ୍ରା. ଅମିତଭୁବ୍ଧ ଦେବୀ	ଭା. ନଂ. ୫୪୯୯୯୯୯୯୯୯
୬	ଭ୍ରା. ଅମିତଭୁବ୍ଧ ଦେବୀ	ଭା. ନଂ. ୫୪୯୯୯୯୯୯୯୯
୭	ଭ୍ରା. ଅମିତଭୁବ୍ଧ ଦେବୀ	ଭା. ନଂ. ୫୪୯୯୯୯୯୯୯୯
୮	ଭ୍ରା. ଅମିତଭୁବ୍ଧ ଦେବୀ	ଭା. ନଂ. ୫୪୯୯୯୯୯୯୯୯
୯	ଭ୍ରା. ଅମିତଭୁବ୍ଧ ଦେବୀ	ଭା. ନଂ. ୫୪୯୯୯୯୯୯୯୯
୧୦	ଭ୍ରା. ଅମିତଭୁବ୍ଧ ଦେବୀ	ଭା. ନଂ. ୫୪୯୯୯୯୯୯୯୯
୧୧	ଭ୍ରା. ଅମିତଭୁବ୍ଧ ଦେବୀ	ଭା. ନଂ. ୫୪୯୯୯୯୯୯୯୯
୧୨	ଭ୍ରା. ଅମିତଭୁବ୍ଧ ଦେବୀ	ଭା. ନଂ. ୫୪୯୯୯୯୯୯୯୯
୧୩	ଭ୍ରା. ଅମିତଭୁବ୍ଧ ଦେବୀ	ଭା. ନଂ. ୫୪୯୯୯୯୯୯୯୯
୧୪	ଭ୍ରା. ଅମିତଭୁବ୍ଧ ଦେବୀ	ଭା. ନଂ. ୫୪୯୯୯୯୯୯୯୯
୧୫	ଭ୍ରା. ଅମିତଭୁବ୍ଧ ଦେବୀ	ଭା. ନଂ. ୫୪୯୯୯୯୯୯୯୯
୧୬	ଭ୍ରା. ଅମିତଭୁବ୍ଧ ଦେବୀ	ଭା. ନଂ. ୫୪୯୯୯୯୯୯୯୯
୧୭	ଭ୍ରା. ଅମିତଭୁବ୍ଧ ଦେବୀ	ଭା. ନଂ. ୫୪୯୯୯୯୯୯୯୯
୧୮	ଭ୍ରା. ଅମିତଭୁବ୍ଧ ଦେବୀ	ଭା. ନଂ. ୫୪୯୯୯୯୯୯୯୯
୧୯	ଭ୍ରା. ଅମିତଭୁବ୍ଧ ଦେବୀ	ଭା. ନଂ. ୫୪୯୯୯୯୯୯୯୯
୨୦	ଭ୍ରା. ଅମିତଭୁବ୍ଧ ଦେବୀ	ଭା. ନଂ. ୫୪୯୯୯୯୯୯୯୯

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ક્રમ નં	નામ	તાલુકો
૧	શ્રીમતી રાજીવ રાજ	મોરબી
૨	શ્રીમતી રાજીવ	મોરબી
૩	શ્રીમતી રાજીવ માડાલા	મોરબી
૪	શ્રીમતી રાજીવ	મોરબી
૫	શ્રીમતી રાજીવ	મોરબી
૬	શ્રીમતી રાજીવ	મોરબી
૭	શ્રીમતી રાજીવ	મોરબી
૮	શ્રીમતી રાજીવ	મોરબી
૯	શ્રીમતી રાજીવ	મોરબી
૧૦	શ્રીમતી રાજીવ	મોરબી
૧૧	શ્રીમતી રાજીવ	મોરબી
૧૨	શ્રીમતી રાજીવ	મોરબી
૧૩	શ્રીમતી રાજીવ	મોરબી
૧૪	શ્રીમતી રાજીવ	મોરબી
૧૫	શ્રીમતી રાજીવ	મોરબી
૧૬	શ્રીમતી રાજીવ	મોરબી
૧૭	શ્રીમતી રાજીવ	મોરબી
૧૮	શ્રીમતી રાજીવ	મોરબી
૧૯	શ્રીમતી રાજીવ	મોરબી
૨૦	શ્રીમતી રાજીવ	મોરબી

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କ୍ରମ ନଂ	ନାମ	ସାକ୍ଷର
୨	ବିଜେନ୍ଦ୍ର କୁମାର	କେ. ବିଜେନ୍ଦ୍ର
୩	କେ. ବିନୟ	କେ. ବିନୟ
୪	କେ. ଅନନ୍ତ	କେ. ଅନନ୍ତ
୫	କେ. ବିନୟ	କେ. ବିନୟ
୬	କେ. ଅନନ୍ତ	କେ. ଅନନ୍ତ
୭	କେ. ଅନନ୍ତ	କେ. ଅନନ୍ତ
୮	କେ. ଅନନ୍ତ	କେ. ଅନନ୍ତ
୯	କେ. ଅନନ୍ତ	କେ. ଅନନ୍ତ
୧୦	କେ. ଅନନ୍ତ	କେ. ଅନନ୍ତ
୧୧	କେ. ଅନନ୍ତ	କେ. ଅନନ୍ତ
୧୨	କେ. ଅନନ୍ତ	କେ. ଅନନ୍ତ
୧୩	କେ. ଅନନ୍ତ	କେ. ଅନନ୍ତ
୧୪	କେ. ଅନନ୍ତ	କେ. ଅନନ୍ତ
୧୫	କେ. ଅନନ୍ତ	କେ. ଅନନ୍ତ
୧୬	କେ. ଅନନ୍ତ	କେ. ଅନନ୍ତ
୧୭	କେ. ଅନନ୍ତ	କେ. ଅନନ୍ତ
୧୮	କେ. ଅନନ୍ତ	କେ. ଅନନ୍ତ
୧୯	କେ. ଅନନ୍ତ	କେ. ଅନନ୍ତ
୨୦	କେ. ଅନନ୍ତ	କେ. ଅନନ୍ତ
୨୧	କେ. ଅନନ୍ତ	କେ. ଅନନ୍ତ
୨୨	କେ. ଅନନ୍ତ	କେ. ଅନନ୍ତ
୨୩	କେ. ଅନନ୍ତ	କେ. ଅନନ୍ତ
୨୪	କେ. ଅନନ୍ତ	କେ. ଅନନ୍ତ
୨୫	କେ. ଅନନ୍ତ	କେ. ଅନନ୍ତ
୨୬	କେ. ଅନନ୍ତ	କେ. ଅନନ୍ତ
୨୭	କେ. ଅନନ୍ତ	କେ. ଅନନ୍ତ
୨୮	କେ. ଅନନ୍ତ	କେ. ଅନନ୍ତ
୨୯	କେ. ଅନନ୍ତ	କେ. ଅନନ୍ତ
୩୦	କେ. ଅନନ୍ତ	କେ. ଅନନ୍ତ

Improvement of road by RCC at Chunu Chottor to Pourashava End Protion (Chunu Road) Ward
No. 06

201/5

ক্রম নং	নাম	স্বাক্ষর
২	শ্রী. সুব্রত	স্বাক্ষর
২৭	শ্রী. বিজয়	স্বাক্ষর
৩	শ্রী. সুব্রত	স্বাক্ষর
৪	শ্রী. সুব্রত	স্বাক্ষর
৫	শ্রী. সুব্রত	স্বাক্ষর
৬	শ্রী. সুব্রত	স্বাক্ষর
৭	শ্রী. সুব্রত	স্বাক্ষর
৮	শ্রী. সুব্রত	স্বাক্ষর
৯	শ্রী. সুব্রত	স্বাক্ষর
১০	শ্রী. সুব্রত	স্বাক্ষর
১১	শ্রী. সুব্রত	স্বাক্ষর
১২	শ্রী. সুব্রত	স্বাক্ষর
১৩	শ্রী. সুব্রত	স্বাক্ষর
১৪	শ্রী. সুব্রত	স্বাক্ষর
১৫	শ্রী. সুব্রত	স্বাক্ষর
১৬	শ্রী. সুব্রত	স্বাক্ষর
১৭	শ্রী. সুব্রত	স্বাক্ষর
১৮	শ্রী. সুব্রত	স্বাক্ষর
১৯	শ্রী. সুব্রত	স্বাক্ষর
২০	শ্রী. সুব্রত	স্বাক্ষর

12/12/4

ક્રમ નં.	અવર	અવર નં.
૧	કાંચી ૫ જિલ્લા	(કાંચી ૫ જિલ્લા)
૨	કાંચી જિલ્લા	(મ: કાંચી જિલ્લા)
૭	કાંચી	કાંચી
૮	કાંચી ૨૦૦૬	કાંચી
૯	કાંચી ૨૦૦૬	કાંચી
૧૦	કાંચી ૨૦૦૬	કાંચી
૧૧	કાંચી ૨૦૦૬	કાંચી
૧૨	કાંચી ૨૦૦૬	કાંચી
૧૩	કાંચી ૨૦૦૬	કાંચી
૧૪	કાંચી ૨૦૦૬	કાંચી
૧૫	કાંચી ૨૦૦૬	કાંચી
૧૬	કાંચી ૨૦૦૬	કાંચી
૧૭	કાંચી ૨૦૦૬	કાંચી
૧૮	કાંચી ૨૦૦૬	કાંચી
૧૯	કાંચી ૨૦૦૬	કાંચી
૨૦	કાંચી ૨૦૦૬	કાંચી
૨૧	કાંચી ૨૦૦૬	કાંચી
૨૨	કાંચી ૨૦૦૬	કાંચી
૨૩	કાંચી ૨૦૦૬	કાંચી
૨૪	કાંચી ૨૦૦૬	કાંચી
૨૫	કાંચી ૨૦૦૬	કાંચી
૨૬	કાંચી ૨૦૦૬	કાંચી
૨૭	કાંચી ૨૦૦૬	કાંચી
૨૮	કાંચી ૨૦૦૬	કાંચી
૨૯	કાંચી ૨૦૦૬	કાંચી
૩૦	કાંચી ૨૦૦૬	કાંચી

Appendix 3: 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.

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

FOR OFFICIAL USE ONLY

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

Appendix 4: Photographs of the Affected Temporary Shop and Shopowner