Land Acquisition and Resettlement Due Diligence Report

PUBLIC

Document Stage: Draft for Consultation

Project Number: 55201-001

February 2024

Bangladesh: Coastal Towns Climate Resilience Project – Construction of Multipurpose Cyclone Shelter under Kuakata *Pourashava*, District: Patuakhali

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

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

CURRENCY EQUIVALENTS

(As of February 2022)

Currency unit - taka (Tk) Tk1.00 = \$0.0116 \$1.00 = Tk85.94

ABBREVIATIONS

ADB - Asian Development Bank

AIDS - Acquired Immunodeficiency Syndrome

BAN - Bangladesh

CDTA - Capacity Development Technical Assistance

CTEIP - Coastal Towns Environmental Infrastructure Project

DDS - Detailed Design Services

DPHE - Department of Public Health Engineering

FGD - Focus Group Discussion

HIV - Human Immunodeficiency Virus Infection

IEE - Initial Environmental Examination ILO - International Labor Organization

LGED - Local Government Engineering Department

PAM - Project Administrative Management

PAP - Project Affected Person
PIU - Project Implementation Unit

PPTA - Project Preparatory Technical Assistance

SCF - Strategic Climate FundSIA - Social Impact AssessmentSPS - Safeguard Policy Statement

WEIGHTS AND MEASURES

cm – centimeters km – kilometer m – meter

m² – square meter mm – millimeter

m³ – 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 dollar.

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I. INTRODUCTION

A. Background

- The ADB supported Coastal Towns Infrastructure Environmental Infrastructure Project 1. (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 Pourashava (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) 25 elderly, women, children, and persons with disability friendly cyclone shelters with early warning system; (ii) 247.7 kms roads with drainage, bridges, and culverts rehabilitated or constructed for improved connectivity and access to emergency services in the event of disasters caused by natural hazards including access to cyclone shelter; (iii) climate-resilient infrastructure including 201.0 stormwater drainages, at least 3 nature-based solutions, water bodies restoration, and 4 integrated waste management (IWM) developed rehabilitated or constructed for improved urban flood risk management including; (iv) gender-responsive and socially inclusive urban public spaces improved; (v) slum improvement program implemented; and (vi) EWCD-friendly (elderly, women, children, and differently

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.

abled) sanitation facilities constructed for poor households. Output 1 will also support development of EWCD-friendly socio-economic infrastructures including (i) local markets; (ii) bus terminals; and (iii) other priority roads, bridges, culverts, and boat landing stations.

- 5. **Output 2: Resilient livelihood enhanced**. Output 2 includes (i) climate vulnerable households covered in the graduation program in six project towns; (ii) women, including person with disabilities, reported increased skills for resilient livelihood; and (iii) inventory of productive assets of vulnerable households documented and insured. The Graduation Approach and Program will be adopted to ensure livelihood resilience.³
- Output 3: Institutional capacity, governance, and climate-awareness strengthened. Output 3 includes (i) risk-informed urban development plans and poverty reduction action plans of project towns submitted to Pourashavas council: (ii) staff of LGED and Pourashavas including 90% eligible women staff reported increased knowledge on climate and disaster risk assessment to inform the urban development plans and to enforce development control regulations linked with natural hazards; (iii) knowledge and capacity of LGED and Pourashavas' staff including 90% of women staff on nature-based solutions and green solution application developed;4 (iv) disaster management committee on disaster preparedness measures, cyclone shelter management committees, and standing committees on women and children affairs, poverty reduction and slum improvement in project Pourashavas operationalized for improving municipal governance and sustainable service delivery;5 (v) revenues enhancement plan adopted by each project *Pourashava* to improve municipal finance systems; (vi) computerized tax records and billing systems made functional; (vii) annual gender responsive operation and maintenance (O&M) plans approved and at least 75% of the required annual budget is allocated and spent; and (viii) gender responsive urban space quidelines developed. Output 3 supports to enhance public awareness, behavior change, and community mobilization in light of emergencies such as coronavirus disease (COVID-19) and cyclone Amphan in 2020. It will also support training and capacity building of LGED and Pourashavas to institutionalize information technology-based remote monitoring through strengthening LGED's geographic information systems section, monitoring and evaluation unit, and project management unit (PMU).
- 7. The proposed CTCRP is to be implemented in 22 *Pourashavas* or urban local bodies (ULBs). District wise location of the CTCRP towns is summarized in Table 1.

Table 1: District Wise Pourashavas where Project (CTCRP) will be Implemented

Table 1. District Wise i ourasnavas where i roject (OTOR) will be implemented			
District	Town (Pourashava)	District	Town (Pourashava)
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. Kolaroa
	7. Morelganj	8. Khulna	7. Paikgacha

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.

-

⁴ Nature-based solutions promote actions to protect, sustainably manage and restore natural and modified ecosystems in ways that address societal challenges effectively and adaptively, to provide both human well-being and biodiversity benefits. (Source: IUCN (2020). Guidance for using the IUCN Global Standard for Nature-based Solutions. A user- friendly framework for the verification, design and scaling up of Nature-based Solutions. First edition. Gland, Switzerland: IUCN).

⁵ A risk-informed performance-based budget allocation strategy will be adopted to promote governance-led infrastructure improvement to ensure sustainable urban services. The *pourashava* will need to fulfil a set of performance criteria to receive fund for infrastructure improvement. Performance criteria is elaborated in project administration manual (footnote 27).

District	Town (Pourashava)	District	Town (Pourashava)
	8. Patuakhali		8. Chalna (Dacope)
Patuakhali	9. Kuakata	9. Pirojpur	9. Swarupkathi
4. Shariatpur	10. Zanjira	10. Barguna	10. Patharghata
	11. Bhedarganj		11. Betagi

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

C. Scope of Due Diligence Report

- 9. This due diligence report (DDR) is prepared for the proposed construction work of Cyclone Shelter at Panjupara Government Primary School, ward no. 08 under Kuakata *Pourashava*, District: Potuakhali. The report is prepared based on the available preliminary design and the Sub Project Appraisal Report (SPAR) prepared for this project and relevant sections of the Capacity Development Technical Assistance (CDTA) Report; discussions with related stakeholders and PIU/ *Pourashava* authorities and LGED personnel.
- 10. A due diligence process was conducted to examine the land acquisition and resettlement issues in detail based on the preliminary design and information, aligned with Asian Development Bank's Safeguard Policy Statement (ADB SPS), 2009. The Panjupara Government Primary School has agreed to provide the land to construction the cyclone shelter, hence, no land acquisition or involuntary resettlement impacts have been identified as the proposed land parcels are vacant and free from any encumbrances. This draft DDR has been prepared consistent with the provisions in the resettlement framework, which stipulates preparation of such report for any subproject assessed as Category C.
- 11. Any adverse impacts in terms of permanent or temporary such as land acquisition, physical displacement, economic displacement, adverse impacts on livelihood, community properties or any other impacts is not anticipated due to the proposed project. This report describes the findings and provides copies of relevant documents, community consultations and photographs.
- 12. The DDR will be further updated and reconfirmed for final impacts following final detailed design and based on detailed measurement survey. The draft DDR will be reviewed and disclosed on MLGRDC, LGED and ADB websites.

II. PROJECT DESCRIPTION

A. About the Project Area

- 13. Kuakata is a town in southern Bangladesh known for its panoramic sea beach. Kuakata beach is a sandy expanse 18 km long and 3 km wide. From the beach, one can have an unobstructed view of both sunrise and sunset over the Bay of Bengal. Kuakata is situated in Kalapara Upazila, Patuakhali District. It is about 320 km south of Dhaka, the capital, and about 70 km from the district headquarters.
- 14. The town Kuakata has sea beach named Kuakata Beach. Many tourists visit the place to see the beach although it hasn't received international recognition like Cox's Bazar Beach but it remains to be popular in Bangladesh. There are many places tourist visit such as: (a) Kuakata National Park; (b) Kuakata Ecopark; (c) Forest of Fatra (The protected mangrove forest on the western side of the beach is known as the 'second Sundarban'); (d) Well of

Kuakata; (e) Shima Buddhist Monastery; (f) Rakhaine settlement of Keranipara; (g) Alipur Port; (h) Mishripara Buddhist Monastery; and (i) Forest of Gangamati

- 15. Being situated adjacent to the Bay of Bengal, Kuakata Pourashava has experience frequent natural disasters every year, leading to increase suffering among its inhabitants. Adding to this, climate change effect has speed up the frequency of natural disaster like, cyclone, tidal, storm surge, thunderstorm, excessive rainfall, rising temperature, increase salinity, land slide, erosion of riverbanks, etc. and these are the major disaster for Kuakata in Potuakhali district. The *Pourashava* is more susceptible to floods, cyclonic surges and heavy rainfalls. There are no sufficient cyclone shelters in Kuakata *Pourashava* that would provide refuge to the affected vulnerable population during the hazard situation.
- 16. The area of Kuakata *Pourashava* is 12.75 km² spread over 3 mouzas, 9 *mahallas* in Kalapara Upazila of Potuakhali District under Barisal Division. Kuakata *Pourashava* is bounded by 7 No. Latachapli Union to the North, East and Weast and Bay of Bengal to the south. About 6,000 households with 49,900 population (male 25,100 and female 24,800)⁶ are currently living in the town. The *Pourashava* consists of 9 wards and.
- 17. The *pourashava* has a total of 40 km pucca road, 2 km semi pucca road, 30 km kancha road. There are 1 government hospital, 4 private clinics, 1 post office, 11 public toilets in Kuakata *Pourashava*. The *Pourashava* also 1 non-government, secondary schools, 7 government, primary schools, 3 kindergarten, 10 madrasha, 2 pegoda, 32 mosques, and 102 ponds. **
- 18. One elected mayor, 9 councilors and 3 reserved female councilors are working as public representative in Kuakata *Pourashava*. The *Pourashava* has plans to strengthen the provision of citizen services by increasing collection of revenue by taking up income generating activities. Kuakata Pourashava also has plans to develop as a tourist centre with roads, sewerage modernization, construction of children's park, installation of cable cars, modernization of entertainment spots.

B. About Subproject Component

- 19. The subproject proposes construction of one cyclone shelter in Kuakata *Pourashava*. The proposed site for construction of the cyclone shelter is located within the compound of Panjupara Government Primary School, ward no. 08 under Kuakata *Pourashava*. The area is mostly semi-urban in nature and inhabited by low-income group people. The site for cyclone shelter is located in between 21.81667917 N and 90°13383936 E (google earth map provided in Figure 5).
- 20. Kuakata *Pourashava* is bounded by 7 No. Latachapli Union to the North, East and Weast and Bay of Bengal to the south. The Cyclone Shelter is about 800m away from the Bay of Bengal. School authority gives lands for construction of the proposed cyclone shelter. School authority owns this land. The cyclone shelter is designed as a multipurpose functional building, whereby the shelter has been located within School compounds.
- 21. The Cyclone Shelter is proposed for multi-functional purpose within the Panjupara Government Primary School compounds on vacant land parcel. The school managing committee has agreed to provide the land for the proposed project. The buildings will accommodate more than 508 persons of the nearby area during storm/ cyclonic events. The proposed cyclone shelter follows the tentative design of the LGED prototype cyclone shelter cum primary school. However, some design aspects have been adopted to make it area

⁶ According to the office documents of Kuakata *Pourashava*

⁷ Kuakara *Pourashava* Office

⁸ Kuakata *Pourashava* Office

specific.

- 22. The proposed cyclone shelter follows 3-storey building prototype with a ground floor which will provide an open space that can be used for public gathering, functions and refuge for cattle (if any) during times of excessive storm events. The first floor will be accessible from the ground floor through a staircase. A ramp from the ground floor will be included for access to person with disabilities. The second floor is designed to be used for classrooms, teacher's room and separate male and female toilets with spaces for pregnant women. The proposed cyclone shelter will have a designated roof plan for serving as a rainwater harvesting system and will be the location for two water storage tanks, and solar panels. The main staircase connects to the roof, which will be bounded with a wall. The entire cyclone shelter cum primary school will be plastered with anti-salinity and damp-proofing mixture. These spaces are proposed to be used as shelter during cyclonic storm events.
- 23. There are existing access roads to the Panjupara Government Primary School building. One is on the south side and another is on the East side of the school. These roads, named Nilendranath Road and Mahabub Road, are the prime roads of ward no. 08 of Kuakata *Pourashava*. This existing access roads are bituminous paved and the present condition is good. Road improvement work is not required for access to the proposed cyclone shelter site. The school/proposed cyclone shelteris located at the centre of the municipal ward no. 08. This area is mostly inhabited by low-income groups in Kuakata *Pourashava*.

Figure 1: Location for Proposed Cyclone Shelter at Panjupara Government Primary School, Ward No. 08, Kuakata Pourashava



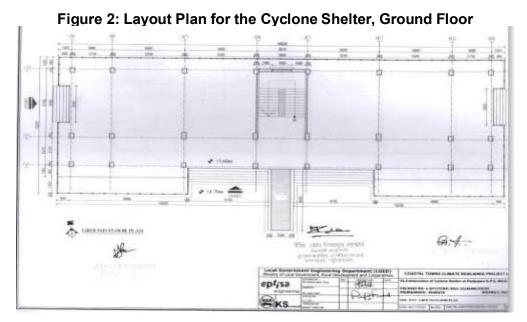
24. The scope of work for the proposed cyclone shelter is presented in Table 2.

Table 2: Summary of the Design for Subproject Component

Component	Description/Provisions	Total Area/ Usable Area Capacity
Ground Floor	 Open space with columns; Multiple entries with large ramp at the front entry; Staircase to access first floor; Raised platform (2.2 m from existing ground); and 2000-Lwater storage tanks (2 units). 	Total area: 291.86 square meters (m ²)
First Floor	 Staircase to the second floor; Classrooms (3 classrooms and 1 teacher's room); Wide veranda; Toilets (2 toilets and one washroom on one side for male, and 3 toilets (with one isolated toilet for pregnant women) and one washroom for women on the other side; and Room for pregnant women First aid room. 	Total area: 291.86 m ² Usable space: 232.84m ² Capacity: 508 people
Second Floor	 Four rooms (4 classrooms) Wide verandah Staircase to rooftop; and Toilets (3 toilets and one washroom on one side for male and three toilets and one washroom for women on the other side) 	Total area: 291.86 m² Usable space: 231.95 m² Capacity:266 people
Rooftop	 Rainwater harvesting system (including 2000-L water storage tanks, 2 units) 	Total area: 291.86 m ²
Water supply	Deep tubewells including pumping system (3 units).	
Sewerage System	Two-chambered septic tank.	Total volume: 24 cubic meters
Power Supply	From rural electrification network; andSolar panels.	Solar panel total generating capacity: 4 kilowatts

^{*}A Tube well will be installed within the vicinity of the cyclone shelter lot. Per design, the tube well will be installedor drilled to a depth where ground water quality is free from or at least in compliance with the standard for arsenic parameter.

25. The site layout plan of the cyclone shelter and the drawing of the ground floor, first floor and second floor plan of the cyclone shelter are given in Figure 2, 3 and 3 respectively.



Source: Project Management Unit and Detail Design Consultants

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THENT PLOCE PLAN

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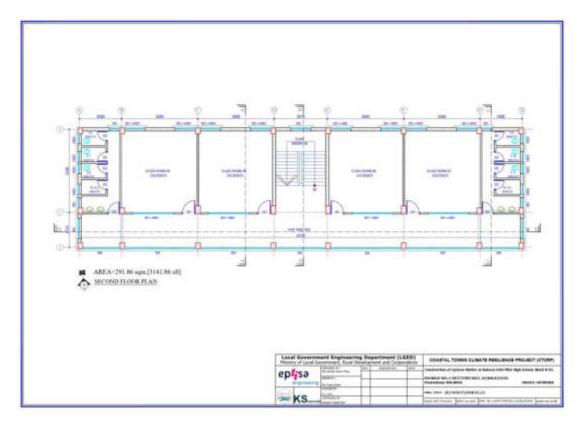
THENT PLOCE PLAN

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Figure 3: Layout Plan for the Cyclone Shelter, Fast Floor

Source: Project Management Unit and Detail Design Consultants

Figure 4: Layout Plan for the Cyclone Shelter, Second Floor



Source: Project Management Unit and Detail Design Consultants

III. LAND AVAILABILITY AND RESETTLEMENT IMPACTS

A. Land Acquisition and Involuntary Resettlement

- 26. **Proposed Site for Multipurpose Cyclone Shelter.** The scope of land acquisition and involuntary resettlement is assessed during the field visits. The project will not result in any permanent or temporary land acquisition, and no involuntary resettlement impact is envisaged, as the proposed site and development activities will be undertaken in the vacant and available land with the Panjupara Government Primary School., There will be no permanent or temporary impact on the existing structures as represented in Figure 1, due to the proposed work at the school. Hence, no impact during construction of cyclone shelter is envisaged to regular functioning of the primary school.
- 27. The construction works for implementation of the proposed cyclone shelter will be undertaken within the available, vacant, unused land parcels of Panjupara Government Primary School. The school authority has agreed to provide the land parcel for the purpose of the subproject component. Detailed information of land is given in below Table 3 and no objection certificate, resolution by managing committee and signature sheet issued by Panjupara Govt. Primary School in Appendix 2.

Table 3: Land Details of the Proposed Site

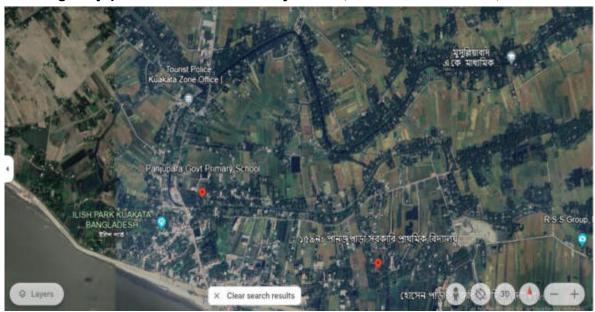
i abie 3. Lailu Detail	s of the Froposed ofte
District	Patuakhali
Pourashava	Kuakata
Ward No.	08
Mouja Name	Kuakata
JL No.	57
SA Khatian	621
Daag No.	4006
Owner of the land	Panjupara Government Primary School, Ward
	No. 08
Total Available Land Area (decimals)	29 Decimal (1,173.48 m ²)
Area Required	519 m ²
Involuntary Resettlement Impact	The multipurpose cyclone shelter will be
	constructed on a vacant, unused portion of the
	available land (about 519 m²) provided by the
	school managing committee. There will be no
	impact on the common property resource.

Source: Project Management Unit (PMU), CTCRP and Kuakata Pourashava

- 28. As per available records, verifications and site visits were conducted to the proposed cyclone shelter site, there is no physical or economic, temporary or permanent, involuntary resettlement impact observed at the subproject location. Local communities will be benefited during cyclonic events. Similarly, no land or asset acquisition is necessitated for this subproject component as the school authority has agreed to provide the above-mentioned land parcel for the proposed construction work. They are of the opinion that it will benefit the school, as the cyclone shelter will provide much-needed additional classrooms for the students and they can upgrade the school. The no objection and land details provided by Panjupara Government. Primary School authority is provided in Appendix 2. The approximate area required for the proposed multipurpose cyclone shelter is about 300 m². The school authority has agreed to provide the required land area of about 300 m² for construction of the cyclone shelter.
- 29. The existing Panjupara Government Primary School has approximately 750 students. As the cyclone shelter structure will be constructed on vacant land, within the existing school campus, the regular classes will not be disrupted. Additionally, the school authority expressed that the cyclone shelter rooms can be also used for other purposes, specifically as classrooms and they can upgrade the school to higher level and accommodate more students.

- 30. The siting of the cyclone shelter building is planned in such a way so that its construction will not interfere with the existing or ongoing activities of the school and other buildings during the construction phase; it is easily approachable by the people through road. A site reconnaissance visit was undertaken on 27 September 2021 and again on 8 February 2024.
- 31. The proposed site is located close to the Bay of Bengal in ward no. 08. The Bay of Bengal is to the South of the proposed site. There are existing bituminous roads in front and beside the school and the existing road condition is good. Since two access roads are available and their condition is good, new access road or improvement of road is not required. The owner of these roads is Kuakata *Pourashava*. The layout of the proposed site is provided in Figure 5.
- 32. The project proponent has obtained no objection certificate (NoC) from Panjupara Government Primary School authority for construction of the cyclone shelters in ward number 08 under Kuakata *Pourashava*.

Figure 5: Google Earth Map showing the Proposed Cyclone Shelter Location at the Existing Panjupara Government Primary School, Kuakata Pourashava, Ward No. 08



Source: Project Management Unit (PMU), CTCRP and Kuakata Pourashava

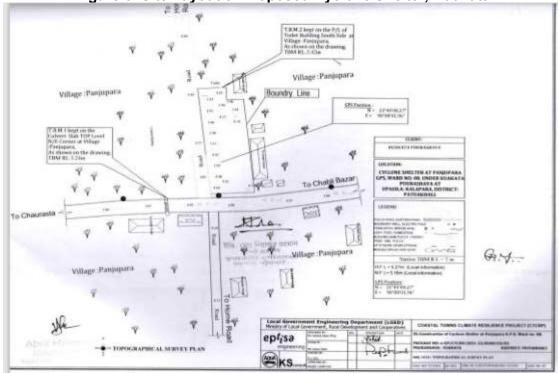


Figure 6: Site Layout of Proposed Cyclone Shelter, Kuakata

Source: Project Management Unit (PMU), CTCRP and Kuakata Pourashava

33. This DDR will be further updated based on final design for construction of the cyclone shelter at the location or if there is any change in proposed location. A provisional cost is included in the report for implementation of the subproject component.

IV. FIELD WORK AND PUBLIC CONSULTATION

A. Outline of Field Work

- 34. Field visit and transect walk was carried out in the subproject component location. No person or community is being adversely affected by this project implementation at the present identified location. The entire population of ward no. 08 and surrounding areas under Kuakata *Pourashava* area will be benefited due to construction of the cyclone shelter during natural hazards. No land acquisition is required for the construction of the cyclone shelter. Thus, no physicalor economical displacement (temporary or permanent) is assessed. No common property resources will be affected. Also, vulnerable groups such as the poor, women and their children, person with disability, the elderly, tribes, minor races, ethnic communities and non-titleholders will not be adversely impacted. Consultation meetings were conducted with local community, key informants of Panjupara Government Primary School authority by project team members and consultants, *Pourashava* officials to collect information and conduct a due diligence for the subproject on 27 September 2021 and 8 February 2024.
- 35. Consultations were conducted with key stakeholders, managing committee members of the Panjupara Government Primary School and community members in line with ADB's requirements pertaining to environmental and social considerations. These consultations helped in identifying the felt needs concerns and apprehensions of the communities related to the project and their priorities. Consultations were held with community members, officials of *Pourashava* and the school authority regarding the project component. Project team members mentioned that the construction work will be undertaken in such a way that there will be no adverse impact to anybody during construction work.

B. Indigenous Peoples

36. Since there are no indigenous people present in the project area, there will be no impact on Indigenous peoples (IPs). All the proposed construction activities will be done on Government land within the existing premises of the school.

C. Public Consultations

37. Public consultation meetings were held with the key stakeholders, school authority and community members in line with the ADB's requirements pertaining to environmental, economic and social considerations (Appendix 1). Consultation with locals, key stakeholders helped in identifying the felt needs and apprehensions related to the project andtheir priorities. The summary of public consultations held is presented in Table 4; the meetings were attended by total 42 participants, out of which 9 (21.42 percent) were female. The meetings were conducted in the presence of project authorities and the *Pourashava* representatives.

Table 4: Summary of Public Consultations for Proposed Cyclone Shelter in Kuakata Pourashava

	i Odiasiiava				
Date	Location	Proposed Work	Total No. of Participants	No. of Women Participants	
8 February 2024	Panjupara Government Primary School, Ward No. 08	Cyclone shelter and access road	22	6	
27 September 2121	Panjupara Government Primary School, Ward No. 08	Cyclone shelter and access road	20	3	
	TOTAL		42	09 (21.42%)	

- 38. The local people have expressed their great interest in the proposed cyclone shelter for their safety during disasters and for using the facility for the purpose of education. They have also assured that they will provide required support in construction, operations and maintenance of the cyclone shelter. *Pourashava* management and local community will be responsible for providing required services for construction, operation and maintenance of the cyclone shelter. The services/uses of cyclone shelter will result in saving lives of local people and reduce damage to their properties that were caused due to various disasters in the coastal area.
- 39. During the group discussion, it was clearly mentioned that the construction work will be undertaken in such a way that there will be no harm caused to any person or the existing school building due to project execution activity. The daily functioning of the school or academic sessions will not be disturbed. Project outcomes and benefits were explained to the stakeholders. During the consultation, it was explained to the community members in detail regarding the proposed development under the ADB-supported project. All the participants confirmed and extended their support for the success of the project. In total, 42 people have been consulted among which 33 were male participants and 9 were female participants, who reside in the area adjacent to the proposed plot.
- 40. Public information campaigns to explain the project details to a wider population will be conducted throughout the project lifecycle. Public disclosure meetings will be conducted at key project stages to appraise community members. Prior to start of construction, the PIU will issue notification on the start date of implementation in local newspapers. A notice board showing the details of the project will be displayed at the construction site for the information of public.

- 41. Public participation will be encouraged through the use of various methods, such as, stakeholder consultation meetings, FGDs with different groups (including women), key informant interviews etc. It is also expected to offer a platform to the community to (i) know about the program, and (ii) express their opinions regarding priorities and concerns related to the project.
- 42. During public consultation, the following recommendations were provided by the participants: (i) involve local communities in all stages of project planning and development, (ii) establish permanent communication between project initiators and local authorities, and (iii) set up a grievance redress mechanism which will function through *Pourashava* level coordination committee and maintain a grievance monitoring register, and iv) during construction, local people including women should be given first priority in the employment of skilled and unskilled labour.
- 43. Management committee meeting of Panjupara Government Primary School was held on 25 September 2021, where the managing committee members unanimously agreed to provide the vacant land of the school for the construction of the cyclone shelter, (refer land details in Table 3) would be given for construction of the cyclone shelter in ward no. 08, and that they have no-objection to it. The managing committee expressed every support to the project as it will help with additional classrooms and shelter during natural calamity for the community members. A copy of the resolution, no-objection and signature sheets are attached in Appendix 2.

V. GRIEVANCE REDRESS MECHANISM

- 44. A project-specific grievance redress mechanism (GRM) has been established to receive, evaluate, and facilitate the resolution of affected persons' concerns, complaints, and grievances about the social and environmental performance at the level of the project. The GRM aims 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 are appropriately adjusted to accommodate the change in institutional arrangements under CTCRP.
- 45. **Common GRM**. A common GRM is 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 email, by post, WhatsApp or by writing in complaints register that will be kept in *Pourashava* offices. **Appendix 5** has the sample grievance registration form. Careful documentation of the name of the complainant, date of receipt of the complaint, address/contact details of the

person, location of the problem area, and how the problem was resolved will be undertaken. The Assistant Directors from project management unit (PMU), RPMU and Project Implementation Unit (PIU) will have the overall responsibility for timely grievance redressal on environmental and social safeguards issues and for registration of grievances, related disclosure, and communication with the aggrieved party.

- 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) on-site will provide the most easily accessible or first level of contact for quick resolution of grievances. Contact phone numbers and names of the concerned PIU safeguards assistant, contractors, PMU safeguards officer, PMSC environmental and social safeguards specialists will be posted at all construction sites at visible locations.
- 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 councilor 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/Assistant Engineer, *Pourashava* (Safeguard and Gender Focal person)
 - (iii) Administrative Officer, Pourashava
 - (iv) Municipal Ward Councilor (designated)
 - (v) 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)
 - (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 GenderSpecialist, PMSC
- (vi) women representative(s) from a Civil Society Organization (CSO), local electedrepresentative (if required), and representative from small ethnic community.9
- 53. The grievance redress process is represented in Figure 7.
- 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 compliant eligible for review. The complaint can be submitted in any of the official languages of ADB's developing member countries. The ADB Accountability Mechanism information will be included in the project-relevant information to be distributed to the affected communities, as part of the project GRM.

⁹ 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.

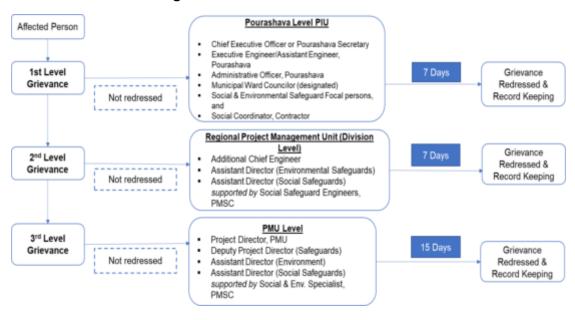


Figure 7: Grievance Redress Process

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, municipal office, and on the web, as well as reported in the safeguards monitoring reports submitted to ADB on a semi-annual basis.
- 57. **Periodic review and documentation of lessons learned**. The PMU safeguard officer will periodically review the functioning of the GRM in each town and record information on the effectiveness of the mechanism, especially on the project's ability to prevent and address grievances.
- 58. **Costs.** All costs involved in resolving the complaints (meetings, consultations, communication and reporting/information dissemination) will be borne by the concerned PIU at town-level; while costs related to escalated grievances will be met by the PMU. Any transportation costs incurred by affected persons or their representatives (e.g., CBOs, SEC representative/NGOs) to attend GRC meetings will be reimbursed by the concerned PIU. Cost estimates for grievance redress are included in resettlement cost estimates.

VI. BUDGET TO IMPLEMENT SUBPROJECT COMPONENT

59. A budget estimate of BDT 350,000 is considered for implementation of the subproject component, 'Construction of Multipurpose Cyclone Shelter' under Kuakata *Pourashava*. The budget includes consultation, grievance redress cost, and information dissemination.

VII. CONCLUSIONS

A. Summary and Conclusion

60. The proposed infrastructure improvements for the construction of the cyclone shelter within the compound of Panjupara Government Primary School are not anticipated to have any involuntary resettlement impacts. The members of the managing committee of the Panjupara Government Primary School have agreed to allow construction of the cyclone

shelters on a vacant land parcel and will enjoy the use of the new building for expansion of the school. No transfer of land or donation will be involved. A formal legal agreement will be signed between the *Pourashava* and the school authority and appended to this DDR, reflecting this arrangement.

- 61. Due to project intervention, there will be no compensation requirements, no loss of income of any person or any asset, either privately or publicly owned. However, in case any claims or complaints are submitted during the construction period, an effective and efficient Grievance Redress Mechanism will be established, and mitigation measures will be adopted as per the approved EMP. This will enhance provision of timely and sensible hearings and facilitate solutions.
- 62. The location of the proposed cyclone shelter at Panjupara Government Primary School, ward no. 08 has been assessed as a viable solution for providing a reliable shelter/protection facility to the nearby population during extreme storm events. The selected cyclone shelter areas are mostly inhabited by low-income people.
- 63. No land acquisition and resettlement related issues are anticipated as the entire work is proposed on vacant land parcel which the managing committee of Primary School has agreed to provide with the understanding that it will also benefit the educational institute. All development works will be carried out within the boundary of identified land parcelof the school and no additional land will be required.

B. Next Steps

- 64. The DDR will be further updated during finalization of the detailed design. Any change in site or design at detailed design stage will be assessed afresh for land acquisition, involuntary resettlement impacts. The following information will be included in the updated social safeguards document:
 - (i) During detailed design, if any involuntary resettlement impact is identified, a resettlement plan will be prepared in accordance with the project Resettlement Framework and submitted to ADB for approval prior to contract award;
 - (ii) The project proponent has obtained no objection certificate (NOC) from Panjupara Government Primary School managing committee for construction of the multipurpose cyclone shelter. A legal agreement between the Kuakata *Pourashava* and the school managing committee, which will formalize the arrangement will be signed and appended to the updated document, prior to award of contract. The legal agreement will clearly mention that Kuakata *Pourashava* will be responsible for construction and O&M of the cyclone shelter and school authority will provide the land free of cost as per agreement. The school authority can use the building as classroom around the year except disaster period. The cyclone shelter will be taken under control of *Pourashava* and opened for people for safe shelter after receiving danger signal by Goverment/Meteorological Department.
 - (iii) The project proponent will approve the DDR budget;
 - (iv) Formal and informal consultations will be carried out including, but not limited to: focus group discussions (FGDs), public meetings, community discussions, and in-depth and key informant interviews. Intensive information dissemination campaign will be conducted. Emphasis should be given to more consultations with female members of the community and appraise them about the facilities at the cyclone shelter. The updated DDR will include details of such consultations.

Appendix 1: Details of Stakeholder Consultation at Kuakata Pourashava

Name of the component: Cyclone Shelter Location: Kuakata
Construction Package: e-GP/CTCRP/KUAK/CS-01

First FGD

Venue: Panjupara Government Primary School Number of Participants=20 (Male- 17 and Female- 3)

Date: 27 September 2121
Time: 12.00 pm
Conducted by: Mazanur Rahaman
Designation: Assistant Engineer Kuakata
Pourashava

Second FGD

Venue: Panjupara Government Primary School

Number of Participants =26 (Male- 16 and

Female- 6)
Date: 8 February 2024
Time: 03.00 pm

Conducted by: Md. Akbar Hossain Designation: Social Safeguards Expert

Issues discussed

• Opinions of local people for construction of cyclone shelter at this place;

- Ownership of land and conditions for offering land for cyclone shelter;
- Resettlement and Environmental issues;
- Support of local community for constructions and maintenance.

Summary of consultation

The community people, representatives and concerned officials of the *Pourashava* are quite aware about CTCRP and Cyclone Shelters to be constructed under this project. During feasibility phase FGD and Public consultations were conducted with the representatives, officials and community people for site selection and construction of cyclone shelter at the proposed location.

- The school management and students expressed their great interest to construct this proposed cyclone shelter in this land, because they will use it as class room in most of the time except disaster period.
- The local people men and women are equally interested for construction of the cyclone shelter at this place. During disaster people will have easy access to this shelter. The community as a whole will support construction of cyclone shelter and provide maintenance service on
- Pourashava Engineer communicated that the construction work will be undertaken in such a way that there will be no harm caused to any person/students and also to the existing school building, due to project execution activity. The construction site will be barricaded.
- The school teachers and managing committee members enquired, if the cyclone shelter can be used as classrooms, in general (where there is no extreme climatic conditions). The *Pourashava* engineer and the project consultants, assured that the structure will be constructed as multipurpose facility and can be used as a school in general.
 - A legal agreement between the Kuakata *Pourashava* and the managing committee of school, which will formalize the arrangement will be signed and appended to the updated DDR, prior to award of contract. Kuakata Pourashava will be responsible during implementation and O&M of the cyclone shelter.
- Project outcomes and benefits were explained to the stakeholders. Community peoplewere explained in detail regarding the proposed developments on the proposed plot under the ADB project.
- The school management, teachers and community people expressed their great interest for the proposed cyclone shelter in this land, because they will use it as classroom in most of the time except disaster period.
- The community people enquired whether it will be a double storied building; the

- project consultants and the *Pourashava* engineer briefed that the cyclone shelter structure will be three storied building with required facilities for women and children; there will be ramps to ground floor for wheelchair access to take care of people with disabilities. There will be separate toilet facilities.
- The local men and women were equally interested in construction of the cyclone shelter at this place. During disaster people will have easy access to this shelter. The community as a whole will support the project and wishes to provide maintenance service also.
 - Pourashava will execute the construction work and will be responsible for operation and maintenance of the proposed cyclone shelter.

Attendance Sheet of First FGD

Second Coastal Towns Environmental Infrastructure Improvement Project (SCTEIIP-II) Local Government Engineering Department (LGED)

Name of Pourashava: Kuakata (C3)

Word No: 8

Date: 27-9-2021

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Attendance Sheet of Second FGD

- Coastal Towns Climate Resilience Project (CTCRP) Focus Group Discussion

Name of the P	ourashava: Kuakata	Package Name: s-GP/CTCRP/KUA	K/CS-01
Place/Venue	Panjupara Govt. Primary Sch	Date: 8 Februs	ary 2024

List of Participants

SI. No.	Name	Designation/ Occupation	Contact No.	Signature
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Coastal Towns Climate Resilience Project (CTCRP)

Focus Group Discussion

Name of the Pourashava:		Kuakata Package Na		e-GP/CTCRP/KUAK/CS-01
Place/Venue	Panjupara G	ranjupara Govt. Primary School		Date: 8 February 2024

List of Participants

SI. No.	Name	Designation/ Occupation	Contact No.	Signature
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Question and Answer Session of the FGDs

Question:	Whether the common people can use the cyclone shelter during cyclone, Storm surge and other natural disaster period?
Answer:	Yes, each and every person can use the cyclone shelter in any kind of natural disaster, free of cost. During the natural disaster period the cyclone shelter will be open for all. The facility will be accessible for physically disabled persons and women as well.
Question:	What is the construction plan of the proposed cyclone shelters?
Answer:	It will be a three-storied building with required facilities for women children and physically disabled persons
Question:	Who will be responsible for construction and operations?
Answer:	Kuakata <i>Pourashava</i> will execute the construction work and will be responsible for operation and maintenance of the proposed cyclone shelter.
Question:	How will Pourashava support cost for major maintenance?
Answer:	It is the responsibility of the <i>Pourashava</i> to manage required fund for repair and maintenance, as well as logistics during disaster period to realize the development objective of this project
Question:	What will be the criteria for labour recruitment during construction?
Answer:	Labour will be recruited by the contractor. There is an instruction to the contractor to engage unskilled labour from local communities.
Question:	Happy for this project, as it comes to solve the problem of shelter during storms
Answer:	Accepted with thanks.
Question:	How does this project help vulnerable people, people with disabilities?
Answer:	The layout has provided separate space for men, women and pregnant women including separate toilets. Ramp access to ground floor is provided to take care of people with disabilities.
Question:	Who will engage the labour?
Answer:	Contractor will engage the labour. Priority for jobs should also consider women. Priority will include women and there will not be any discrimination in daily wages. Raised the issue of employment, he suggested that the local people should be the first ones to be employed in the project. The consultant team explained that local people will be employed according to job requirements.
Question:	Wishes to speed up the project. The construction creates lot of dust and noise, is any increase in dust and noise anticipated.
Answer:	It was explained that implementation will take place immediately after the rainy season after getting all necessary clearance from the authority. The increase in dust and noise at construction site will be mitigated by the contractor through project IEE and EMP.

Photograph of Consultation: Panjupara Government Primary School (27 September 2121)



Photograph of Consultation: Panjupara Government Primary School (8 February 2024)



Appendix 2: No Objection Certificate and Resolution by Managing Committee and Signature Sheet issued by Panjupara Government Primary School

Resolution by Managing Committee and Signature Sheet

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English Transcript of Resolution by Managing Committee and Signature Sheet

Name of the Institution: Panjupara Government Primary School Venue: School Office Room Time 09.00 am to 9.00 am Date: 25 September 2021

SI. No.	Name of the Attended	Category	Designation
01	Most Lucky Begum	Education enthusiastic	Chairman
02	Md. Ashrab Ali	Councilor	Assistant Chairman
03	Md. Kaiyum Sikder	Land Donor	Member
04	Most. Sumi	Guardian	Member
05	Md. Liton Mridha	Guardian	Member
06	Md. Saidur Rahman	Education enthusiastic	Member
07	Most. Sharmin	Guardian	Member
80	Md. Ibrahim	Guardian	Member
09	Mr. Harun Mir	Education enthusiastic	Member
10	Most. Maksuda	Representative of Teacher	Representative of Teacher
11	KM Monir	Headmaster	Member Secretery

Agenda:

- (i) Reading and approval of decisions of previous meetings;
- (ii) Construction of Cyclone Shelter by Kuakata Pourashava for safe shelter during cyclones and tide; and
- (iii) Others

Decisions:

The chairman of the meeting welcomes all participants of the managing committee. The member secretary cited the decisions taken in the previous meeting for approval by all members of the committee. Since there is no objection against the decision, it has been approved by the committee.

Then the Chairman of the meeting informed the present participants of the meeting that honorable mayor of Kuakata Pourashava proposed for the construction a cyclone shelter for the safe shelter of the students, teachers and all residents of the surrounding area during cyclone and tide at Panjupara Government Primary School and ADB will fund for construction of the Cyclone Shelter. He also informed the participants that the cyclone shelter can be use as classroom for the school students except during natural disasters like cyclone, tsunami, storm surge, etc. The building will be used for the common people during the cyclone, tsunami, storm surge, etc. period.

After listening to the statement, the participants who were present unanimously decided to construct a cyclone shelter in the school complex. The participants also agreed to provide vacant and unused land for construction of the proposed cyclone shelter.

Since no more discussions were held in the meeting, the headmaster thanks all the participants and concludes the meeting.

Copy of No Objection Certificate by the Panjupara Government Primary School Managing Committee

न्यात्रक नर १ १८०% माय /४/५ /३०

তারিখ ঃ ০৮.02.028

সম্মতি পত্ৰ (No Objection Certificate)

এই মর্মে প্রত্যয়ন করা যাচ্ছে যে, পটুয়াখালী জেলার , কলাপাড়া উপজেলাধীন কুয়াকাটা পৌরসভার অন্তর্গত ১৫৯ নং পাঞ্জুপাড়া সরকারি প্রাথমিক স্কুলে ঘূর্নিঝড় ও জলোচ্ছাসের সময় ছাত্র- ছাত্রী শিক্ষক ও এলাকাবাসীর নিরাপদ আশ্রয়ের জন্য সাইকোন সেল্টার নির্মান করা হলে আমার কোন আপত্তি থাকবে না । আমি প্রতিষ্ঠানটির উত্তরোত্তর সাফল্য ও উন্নতি কামনা করি ।



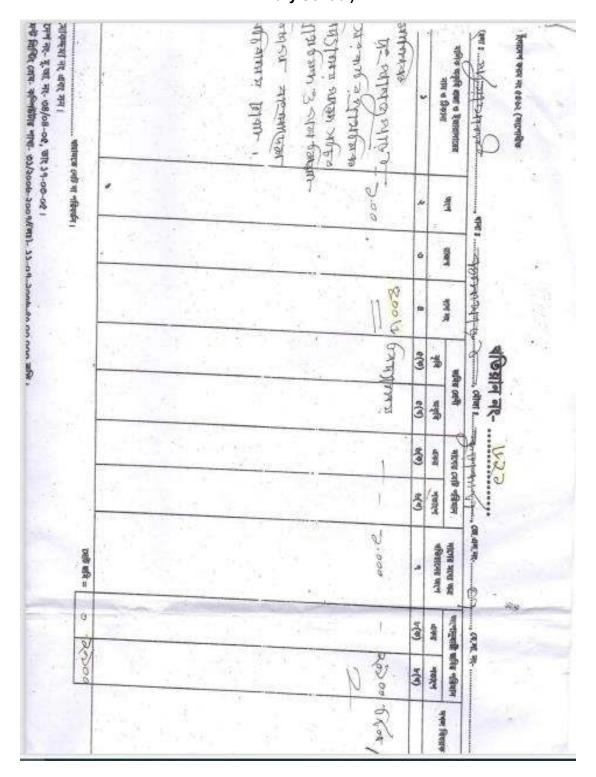
কে এম মনির প্রধান শিক্ষক পার্গাড়া সরকারি প্রাথমিক বিদ্যালয় ভূয়াকটা পৌরসভা, ক্যাপাড়া, পট্টাখান

NO OBJECTION CERTIFICATE

This is to certify that we have no objection if a Cyclone Shelter is constructed for the safe shelter of the students, teachers and all residents of the surrounding area during cyclone and tide at Panjupara Govt. Primary School in Kuakata *Pourashava* under Kalapara Upazila of Patuakhali District. We wish continued success of the institution.

Md. Babul Hang Chairman KM Monir Headmaster Panjupara Govt. Primary School

Appendix 3: Land Ownership Certificate for Selected Site (Panjupara Government Primary School)



Appendix 4: Sample Grievance Registration Format

The			Project	welcome	s co	mplaints,
suggestions, que	eries and comme	ents regarding p				
	vance to provide t					
touch with you fo	or clarification and	l feedback. Shou	ld you choos	e to include	your	personal
details but want t	that information to	remain confide	ntial, please	inform us by	y writir	ng/typing
(CONFIDENTIAL	_) above your nar	me. Thank you.				
Date		Place of registration				
Contact Informa	ation/Personal D	etails				
Name			Gender	* Male * Female	Age	
Home Address			-4-			
Place						
Phone no.						
E-mail						
Complaint/Sugg	gestion/Commen	t/Question Pleas	se provide the	e details (wh	o, wha	at, where
andhow) of your	grievance below:		•	`		
, .						
	achment/note/lette					
How do you wa	nt us to reach you	u for feedback o	r update on y	our comme	ent/gri	evance?
FOR OFFICIAL U	JSE ONLY					
	Name of Official r	egistering grievar	nce)			
		-9	/			
Mode of commu	ınication:					
Note/LetterE-mail	il					
Verbal/Telephoni	ic					
Reviewed by: (N	Names/Positions of	of Official(s) review	wing grievand	ce)		
Action Taken:						
		_ I	,			
Whether Action	Taken Disclose		es			
		N	o			
Means of Disclo			1141 6 = 1			
⊥ Grievance Rela	ted to Project Co	mponent / Moda	auties of Fina	ancina:		