

# **Bangladesh Water Development Board (BWDB)**

## **COASTAL EMBANKMENT IMPROVEMENT PROJECT – PHASE 2 (CEIP-2)**

### **STAKEHOLDER ENGAGEMENT PLAN (SEP) DRAFT**

**May 2022**

## **Executive Summary**

The Coastal Embankment Improvement Project (CEIP) Phase 2 is the continuation of CEIP Phase 1. The CEIP-1, implemented by the Bangladesh Water Development Board (BWDB) and funded by the World Bank (WB), safeguards the Coastal Zone of Bangladesh against flooding due to storm surges and cyclones, combats erosion and enhances the coastal resilience. Project's objectives are to reduce the loss of assets, crops, and livestock during natural disasters, reduce the time of recovery after natural disasters, improve agricultural production by reducing saline water intrusion, which is expected to worsen due to climate change and improve the GoB's capacity to respond promptly and effectively to a natural disaster.

This Stakeholder Engagement Plan (SEP) of CEIP-2 involves effective engagement with all identified stakeholders including those who would be identified at any stage of the project implementation to ensure their contribution toward the successful implementation of the project benefitting from their pre-existing expertise, networks and agendas.

Stakeholders of CEIP-2 include the diverse communities living in the project/polder area including various groups in them namely farmers, boatmen, fishermen, petty businessmen, land owners, informal settlers, tribal communities and their organizations at District, Union, Ward and village levels; professional groups like teachers, students, school committees, local and regional contractors, suppliers, media, NGOs, Ministry of Water Resources, Ministry of Disaster Management and Relief, Ministry of Environment and Climate Change, Bangladesh Water Development Board (BWDB), Department of Disaster Management (DDM), local administration, local elected representatives, women and child rights groups,. According to experience from similar projects, the affected groups among the stakeholders may include displaced persons for third-party impacts of voluntary donation of land, people providing lands for temporary activities, contractors camps, labor sheds, and storages facilities during construction period, landowners providing land for acquisition etc. With the outbreak of COVID-19 across the country, Department of Health personnel, Upazila Hospital and Union health clinics may also to be involved in the COVID-19 response process in the process of civil works construction. BWDB has prepared this Stakeholder Engagement Plan (SEP) outlining general principles and a collaborative strategy and plan for an engagement process in accordance with this standard. Meaningful consultations with local communities including the VG and marginalized communities on the shelter designs, repairing and rehabilitating jetties and other project related interventions has been captured adequately.

There are 15<sup>1</sup> polders in considerations under CEIP-2, which is a continuation of CEIP-1. The project is in its preparatory stage awaiting finalization of the design, location and activities. Till date, PMU, CEIP-2 RIVER project had a good number of meeting/discussions at the macro and micro levels and the takeaways from these meetings were incorporated in the design and planning of CEIP-2. The Project is poised to be implemented amidst continuation of COVID-19 pandemic which is likely to affect the health of both the workers and the community. As such face-to-face interactions are likely to be limited and IT based interactions/FGD in small groups will be planned by the Project maintaining COVID 19 health protocols. BWDB, while planning stakeholder engagements in different forms, must comply

<sup>1</sup> The 15 polders were considered when activities for the preparation of this plan commenced and thereafter changed into 13 polders

with national, World Bank and WHO guideline in this regard. The intensity of interaction and stakeholder engagements would vary depending on various stages of the project, Grievance Mechanism of the SEP and COVID 19 situation.

During the consultation a number of inputs and comments have been garnered from the project stakeholders which can be summarized as:

- Cyclones and storm surges are major hazards in the coastal region. Cyclones, along with storm surges, are creating unfortunate deaths and huge damage to crops and houses due to breaching the embankment.
- Crisis of irrigation water during agriculture practices, fish culture (Fresh/sweet water), plant, etc. due to Salinity increase/salinity intrusion.
- The agricultural land is losing its normal productivity day by day because of salinity intrusion. Proper irrigation facilities are required for dry season crop production.
- Water supply and sanitation facilities need to be ensured for the PAPs and silted up rivers and canals needs to be addressed.
- Drainage congestion/water logging is hampering agriculture, fisheries, shrimp/prawn culture. Overflow of water during the rainy season due to an unprotected area.
- Early floods due to storm surges in the coastal region are affecting agriculture, fisheries, shrimp/prawn culture, and salt culture.
- The WMO activities are weak and needs monitoring and capacity development.
- The PMU must continue to engage the stakeholders from the early stage of the project development process and maintain this two-way connectivity as an integral part in project design, decision making, management and monitoring of the project.

The SEP provides a Grievance Redress Mechanism (GRM) with three tiers for the stakeholders to raise issues and complaints for the project activities. Grievance committee members have been nominated and will be trained on receiving grievances and managing their resolution.

Monitoring is an effective mechanism to ensure that the Project activities are on track. Regular monitoring of project progress and stakeholder engagement will be built into the design, in the form of appropriate indicators, targets, information systems, and review mechanisms. The Project will arrange necessary training associated with the implementation of this SEP that will be provided to the members of staff who, due to their professional duties, may be involved in interactions with the external public, as well as to the senior management.

### ABBREVIATION

BBS: Bangladesh Bureau of Statistics  
BDT: Bangladesh Taka  
BWDB: Bangladesh Water Development Board  
CBA: Cost Benefit Analysis  
CBO: Community Based Organizations  
CSO: Civil Society Organizations  
EMF: Environmental Management Framework  
E&S: Environmental and Social  
EHS: Environmental Health and safety  
ESCP: Environment and Social Commitment Plan  
ESIA: Environment and Social Impact Assessment  
ESMF: Environment and Social Management Framework  
ESMP: Environment and Social Management Plan  
ESS: Environment and Social Standards  
FGD: Focus Group Discussion  
FS: Feasibility Study  
GBV: Gender based Violence  
GoB: Government of Bangladesh  
GM: Grievance Mechanism  
GRC: Grievance Redress Committee  
GRM: Grievance Redress Mechanism  
GRS: Grievance Redress System  
IA: Implementing Agency  
IEC: Information, Education and Communication  
IT: Information Technology  
KII: Key Informant Interview  
KPI: Key Performance Indicators  
LMP: Labor management Procedures  
MoWR: Ministry of Water Resources  
NGO: Non-government Organization  
OHS: Occupational Health and Safety  
PAI: Project Area of Influence  
PAP: Project Affected Persons  
PD: Project Director  
PMU: Project Management Unit  
PPA: Project Preparation Advance  
PPE: Personal Protective Equipment  
PPP: Public Private Partnership  
RAP: Resettlement Action Plan  
SEP: Stakeholder Engagement Plan  
SOP: Standard Operating Procedures  
ToR: Terms of Reference  
WB: World Bank  
WHO: World Health Organization

## Table of Contents

<b>Executive Summary</b>	ii
<b>Abbreviation</b>	iv
<b>Chapter 1 Introduction and Project Description</b>	7
1.1 Introduction	7
1.2 Project Description	7
1.3 Project Objective and Components	8
1.4 Project Area and Population	10
1.5 Summary of Potential Environmental and Social Impacts	12
1.6 Purpose and Objectives of the Stakeholder Engagement Plan	13
1.7 World Bank Requirements for Stakeholder Engagement	13
<b>Chapter 2 Legal Requirement, Policy and Regulations</b>	15
2.1 Key National, Social, Legal Provisions and Citizen Engagement	15
2.1.1 Constitution of the People's Republic of Bangladesh	15
2.1.2 The Consumer Rights Protection Act, 2009	16
2.1.3 Right to Information Act (RTA), 2009	16
2.1.4 Law on Local Government	16
2.2 World Bank Requirements	16
<b>Chapter 3: Previous Stakeholder Engagement and Lessons Learned</b>	18
3.1. Previous Consultation and Stakeholder Engagement Activities	18
3.2. Lessons Learned from Former Stakeholder Engagement Activities	20
<b>Chapter 4: Stakeholder Identification and Analysis</b>	21
4.1 Stakeholder Categorization, Identification and Analysis	21
4.3 Vulnerable Groups	23
<b>Chapter 5: Stakeholder Engagement Methods and Program</b>	25
5.1 Stakeholder Engagement Methods and Tools	25
5.2 Engagement Method and Tools in light of COVID Outbreak	26
5.3 Description of Information Disclosure Method	29
5.4 Timetable for Disclosure	29
5.5 Planned Stakeholder Engagement Activities	30
<b>Chapter 6: Grievance Redress Mechanism</b>	32
6.1 Objectives and Scope of GRM	32
6.2 National Grievance Redress System	32
6.3 Project Grievance Redress Mechanism	33
6.4 Grievance Redress Committees (GRC)	33
6.5 Grievance Resolution Process	33
6.6 Composition of GRC	35

<b>Chapter 7: Implementation of the SEP and Budget</b>	<b>37</b>
7.1 Institutional and Implementation Arrangements	37
7.2 Specific Responsibility	40
7.3 Budget for SEP Implementation	40
<b>Chapter 8: Monitoring and Reporting</b>	<b>42</b>
8.1 Monitoring Principles, Internal and External Monitoring, Reporting	42
8.2 Closing the Feedback Loop: Reporting Back to Stakeholder Groups	43
<b>Annex 1. GRM Format</b>	<b>45</b>
<b>List of Tables and Figure</b>	
Figure 01:- Project Intervention Area	11
Figure 02: Grievance Redress Flow Chart	37
Figure 03: Project Institutional Arrangement	39
Table 01: Basic Dataset for CEIP-2 Project Area	11
Table 02: Public Consultations and Consultation Among Stakeholders	18
Table 03: Potential Stakeholders, their Interest in Engagement	23
Table 04. Vulnerable and Disadvantaged Stakeholders and Their Needs	24
Table 05: Stakeholder Engagement Techniques	25
Table 06: Stakeholder Engagement and Disclosure Methods	30
Table 07: Stakeholder Engagement Activities	30
Table 08: Steps in Grievance Resolution Process	34
Table 09: GRC Membership at Local level	35
Table 10: GRC membership at Project level	35
Table 11: GRC membership at Ministry level	36
Table 12: Role and Responsibilities for SEP Implementation	40
Table 13: SEP Implementation Budget	41
Table 14: Monitoring Report Matrix	42



## Chapter 1: Introduction and Project Description

### 1.1 Introduction

Stakeholder's engagement and communication is an important tool for ensuring transparency, accountability and effectiveness of development projects. This document lays out a stakeholder engagement strategy for engaging stakeholders associated with 'Coastal Embankment Improvement Project – Phase 2 (CEIP-2)' which is a continuation of CEIP-1. This Stakeholder Engagement Plan (SEP) is prepared for the World Bank funded CEIP-2 to be implemented by the Bangladesh Water Development Board (BWDB). The coordination and monitoring mechanism will consist of committees, with the participation of focal persons from various sections of BWDB and the Ministry of Water Resources (MoWR) at the central, divisional, district and upazila levels as the case may be.

The purpose of the present SEP is to detail how stakeholder engagement will be practiced throughout the course of the project and which methods will be used as part of the process; as well as to outline the responsible parties in the implementation of Stakeholder Engagement activities. In addition, the SEP will detail how the views and concerns of the stakeholders are reflected in the project. Timely and two-way information sharing, and communication can help to mobilize and maintain stakeholder support for the project and advance the overall project goals.

The SEP outlines in detail the commitment of the GoB as regards to engaging the stakeholders of the CEIP-2. It also details the project Grievance Redress Mechanism (GRM) and future plan of action as a measure to engage with the stakeholders and to resolve any potential cases of grievances arising out of implementation of the project.

The Project is being implemented amidst COVID-19 outbreak which is affecting the health of both the workers and the communities. Absence of PPE and mask, lack of training and awareness and social distancing protocol may exacerbate the situation. As such face-to-face interactions are to be avoided / undertaken maintaining COVID protocol and IT based interactions/FGD in small groups may have to be planned by the Borrower. BWDB, while planning stakeholder engagements in different forms is to comply with national, World Bank and WHO guidelines in this regard.

### 1.2 Project Description

The Coastal Embankment Improvement Project (CEIP) Phase 2 is the continuation of CEIP Phase 1. The CEIP-1, implemented by the Bangladesh Water Development Board (BWDB) and funded by the World Bank (WB), safeguards the Coastal Zone of Bangladesh against flooding due to storm surges and cyclones, combats erosion and enhances the coastal resilience. Project's objectives are to reduce the loss of assets, crops, and livestock during natural disasters, reduce the time of recovery after natural disasters, improve agricultural production by reducing saline water intrusion, which is expected to worsen due to climate change and improve the GoB's capacity to respond promptly and effectively to a natural disaster. The long-term objective of CEIP is to increase the resilience of the entire coastal population to tidal flooding and natural disasters by upgrading the whole embankment coastal

polders. With an existing network of the embankment of nearly 6,000 km long with 139 polders, the magnitude of such a project is enormous. Hence, a multi-phased approach has been adopted over 15 to 20 years. The Coastal Embankment Improvement Project –Phase 1 (CEIP-I) is the first phase of this long-term program. Developing a Multi-Criteria Analysis (MCA) (e.g., physical condition of the embankment and the drainage system, economic activities in the polders, population and socio-economic conditions, environmental condition, and economic efficiency) 17 polders were selected in the first phase of CEIP-I.

Of the 139 polders along the Bangladesh coast, 17 polders have been included in the defined Packages 1, 2, and 3 of the CEIP-1 program. Currently, only ten polders of Packages 1 & 2 are being implemented, and the seven remaining polders of the envisaged Package 3. Consequently, 122 polders were potentially considered for inclusion in CEIP-2. However, some of these 122 polders are not eligible for CEIP-2 because the locations are where threats are relatively limited and remote in terms of logistics.

Furthermore, certain polders will be improved by other Government budgets or other donors. After the detailed prioritization and the Multi-Criteria Analysis (MCA), 15<sup>1</sup> polders have been chosen for inclusion in CEIP-2.

### 1.3 Project Objective and Components

The project development objectives (PDO) are to (a) increase the area protected in selected polders from tidal flooding and frequent storm surges, which are expected to worsen due to climate change; (b) improve agricultural production by reducing saline water intrusion in selected polders; and (c) improve the Government of Bangladesh's capacity to respond promptly and effectively to an eligible crisis or emergency.

The CEIP-2 project will have the same component of CEIP -1 and consist of specific interventions for improving the embankment (polders) which are explained below. The project has five components:

*Component A – Rehabilitation and Improvement of Polders*

*Component B -- Implementation of Social Action and Environmental Management Plan*

*Component C-- Supervision and Monitoring and Evaluation of Project Impact*

*Component D – Project Management, Technical Assistance, Training, and Strategic Studies*

*Component E – Contingent Emergency Response.*

#### Component A - Rehabilitation and Improvement of Polders

This component will finance activities that aim to increase community resilience to tidal flooding and storm surges. Investments include: (i) rehabilitation of critical portions of polder embankments including slope protection work, (ii) increasing embankment height in some stretches to improve resilience, (iii) repairing and upgrading drainage and flushing systems within polders, and (v) improving operations and maintenance (O&M).



This component will also fund afforestation for the security of embankments and the livelihoods of communities as it provides protection from tidal flooding and storm surge. Planting selected mangrove and other salt tolerant species are planned on BWDB's land to demonstrate the important role of a protective belt on the tidal inundation zone on the riverside of the embankment.

### Component B-Implementation of Social and Environmental Management Frameworks and Plans

This component will support consultation with and strengthening of polder stakeholders and beneficiaries. Polder Committees (PCs) will be strengthened or established in all Polders to determine the competing needs and uses for water resources, and to decide on the operation of hydraulic infrastructure. The establishment of Water Management Organizations (WMOs) will follow an eight-step process, as identified in the *Guidelines for Integrated Planning for Sustainable Water Resources Management*, published by BWDB in 2008. This component will be implemented with the assignment of a Non-Government Organization (NGO).

The component will also fund the implementation of Resettlement Policy Framework (RPF) and Resettlement Action Plans (RAPs). A Social Management and Resettlement Planning Framework (SMRPF) was prepared for CEIP Phase 1 and was disclosed in accordance with Bank guidelines. This component will finance the implementation of the RAP, embankment monitoring and public consultation plans. The component will also finance land acquisition and the resettlement and rehabilitation of persons adversely affected by the project.

An overall environmental assessment (EA) of the polder system; a draft *Environmental Management Framework* (EMF) for the project; and *Environmental Impact Assessment* (EIA) for polders targeted under the first package of investment have already been prepared and disclosed. This component will finance: (i) the preparation of EIAs for all remaining polders; (ii) the implementation of the *Environment Management Plan* (EMP) and environmental mitigation and enhancement measures; and (iii) the establishment of an environmental monitoring system in BWDB to enable it to track continuous improvement in environmental performance of the polder system.

### Component C- Construction Supervision, Monitoring and Evaluation of Project and Coastal Zone Monitoring

This component will cover consulting services for (i) surveys, designs of remaining polders to be included in the project and (ii) construction supervision of rehabilitation and improvement of coastal embankments. This will include facilitating consultations with local communities in identifying needs and suitable design of the embankment as well as with other stakeholders such as local government, *upazilla* and union level governments. The component will finance surveys required prior to construction work.

This component will cover consulting services for continuously monitoring project activities and providing feedback to the government and the implementing agency on the project's performance. This includes supervising the implementation of the Governance and Accountability Action Plan (GAAP), EMP and RAP. This will be provided through third party assessment and monitoring of key aspects of project implementation.

The component will also support a comprehensive monitoring and morphological assessment of the Bangladesh Delta. A program to extend the current monitoring systems in Coastal Bangladesh is also essential to generate data, information, and new knowledge for assessments of effects of multiple drivers on the environment of coastal zone and guide future design, rehabilitation and improvement requirements. The monitoring will cover sediment rates and composition; erosion rates; SLR; subsidence rates; tidal dynamics changes; river cross section changes and meander migration; shoreline changes; and any relevant geomorphological attributes.

### Component D - Project Management, Technical Assistance, Training and Strategic Studies

This component will support BWDB in implementing the project through Project management support and audits; whereby a fully functioning Project Management Unit (PMU) will be established, and all necessary audit reports financed; Technical assistance and training whereby institutional capacity building, technical assistance and training for BWDB will be provided. In addition, this component will support the coordination and management of the Pilot Program for Climate Resilience (PPCR) at program level; and Strategic studies and future project preparation: whereby resources will be provided for needed strategic studies (including the continuous updating of the strategic polder assessment as well as all necessary preparatory studies for following phases of the CEIP.

**Component E - Contingent Emergency Response.** In case of a major natural disaster, the Government may request the Bank to re-allocate project funds to this component (which presently carries a zero allocation) to support response and reconstruction.

### 1.4 Project Area and Population

The project locations/polder locations will be in the same districts as of CEIP-1—Patuakhali, Borguna, Satkhira and Khulna. There are 15 polders selected for CEIP-2 (4, 5, 7/1, 7/2, 10-12, 13-14/2, 39/ 1A, 39/ 1B, 41/5, 41/7, 45, 47/1, 50-51, 54, 55/2D). Total gross protected area is 185,026 ha with 977 km of embankment. Total population is around 1.25 million.

In the area of interventions, as with CEIP-1, around 53% are male and remaining 47 % are female. In the area, about 93 % HHs are headed by the males while only 7% are headed by the females. Among the affected population, the Muslims make up around 72 % while the Hindus are about 28%. Literacy rate of the project affected population (5 years above) in Khulna, Satkhira & Bagerhat is 51.41% on an average which is relatively lower than national average according to the statistics of BBS (BBS, 2017).

As per available statistics, 78 % of this population is literate having education at different levels while the remaining 17% population can sign only and 5% is illiterate who cannot put their signature.

Among the demography, about 51% have the monthly income up to BDT 7,250 (Yearly income is BDT 87,000). Meaning their income is under the poverty line considering BBS (Bangladesh Bureau of Statistics) information on household income and expenditure. Sources of income of the affected households are mostly from agriculture and business. About 24 % of the HHs has a standard income level i.e. above 120,000 per year whose income level above BDT 10,000 per months. The table below illustrates basic dataset of the area of CEIP-2 interventions.

## Stakeholder Engagement Plan (SEP)

Table 01: Basic Dataset for CEIP-2 Project Area

Polder No	Location/ Thana	Gross Protected Area (HA)	Embkt. (Km)	Drainage Channel (Km)	Polder Population
4	Assasuni	10500	80.00	0.00	69882
5	Kaliganj, Shymnagar	55061	192.00	0.00	494835
7/1	Assasuni, Shamnagar	3110	34.25	0.00	25932
7/2	Assasuni.	10486	60.00	0.00	91121
10-12	Koyara, Paikgacha	16315	67.00	19.00	127460
13-14/2	Koyara	17854	93.00	0.00	127590
39/1A	Pathargatha	11740	58.00	40.00	100819
39/1B	Matbaria	13100	74.18	0.00	43077
41/5	Barguna Sadar	3880	50.00	39.50	17211
41/7	Mirzaganj	6984	47.48	74.00	53013
45	Amtali	4089	26.57	24.00	12143
47/1	Kalapara	2478	22.00	24.50	12002
50-51	Galachipa	6935	48.80	17.00	11551
54	Kalapara, Amtoli, Galachipa	13954	59.33	30.00	46230
55/2D	Patuakhali, Dashmina	8540	64.50	20.00	24936
		<b>185,026</b>	<b>977</b>	<b>288.00</b>	<b>1,257,802</b>

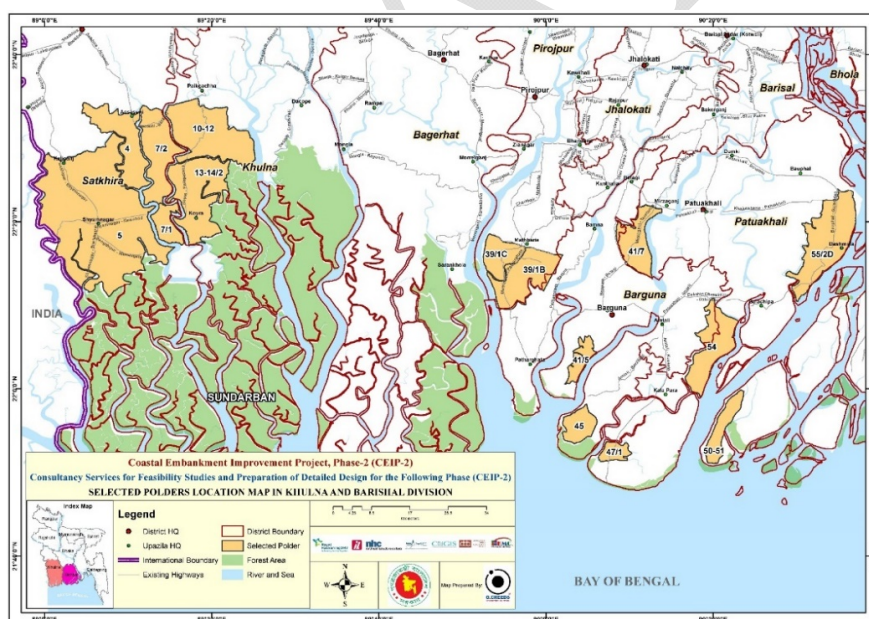


Figure 01:- Project Intervention Area

## **1.5 Summary of Potential Environmental and Social Impacts**

The Project aims at provided protection in selected polders from tidal flooding and frequent storm surges, improve agricultural production by reducing saline water intrusion in selected polders and improve client capacity to respond promptly and effectively to an eligible crisis or emergency. There are a number of project-associated risks and impacts likely to occur.

### **Environmental Risks and Impacts**

The following environmental risks are anticipated during the project implementation stage:

- Construction related works involved with the project would lead to dust, noise and light pollution in the project area and affect the project affected persons, the elderly, children, the pregnant mothers and people with respiratory diseases adversely
- A good number of plants, vehicles and machinery would be in use during civil works. This would lead to burning of fossil fuel and use and unsafe disposal of lubricants that would emit CO<sub>2</sub>, CO and GHG beside polluting soil and ground water.
- Construction related waste, when not disposed properly, would affect the air and water quality of the project area adversely

### **Social Risks and Impacts**

Overall, the project would benefit the greater populace of the area by providing protection against natural disasters and improving crops productivity, economic emancipation, creation of jobs etc. However, the following social risks are anticipated:

- Land acquisition will be required for the Polder construction/ provision of safety structure against flood and storms. Economic and physical displacement along with displacement of informal settlers are likely due to the acquisition. Thus, subsequent livelihood restoration and resettlement may be required.
- During the construction phase, significant number of workers will be employed by the contractors for various civil works many of which will be recruited from other districts. The impact of the labor issues, including OHS, waste generation and communicable diseases, will be of concern.
- Given labor migration, GBV/SEA/SH risk may be of concern.
- New jobs at the local level may increase prevalent gender gaps. Chances of employing child labor cannot be ruled out. The vulnerable and disadvantaged workforce may fall prey to discrimination.
- The waste generated during construction activities will expose communities to health and safety risks especially those communities that are immediately close to the construction sites and along the transport routes for acquisition of goods and materials during the construction



and operation phases. This could increase road traffic accidents in the vicinity of the project sites too.

- Pedestrian movement and safety in the subproject areas would be adversely affected by traffic congestion as additional transports would ply carrying construction material, waste/debris transportation to dump site.
- The Project is being implemented amidst COVID-19 outbreak, which is likely to affect health of both the workers and the communities. Absence of PPE, not using Mask and Gloves, lack of training on handling a COVID patient, non-compliance of social distancing protocol and lack of awareness etc. would exacerbate the situation.

### 1.6 Purpose and Objectives of the Stakeholder Engagement Plan

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the construction, other project activities, and operation of the proposed projects. The SEP outlines the ways in which Implementing Agency (BWDB) will engage with various stakeholders including development partners, Research Organizations, labors, and contractors and the local community. The purpose of SEP are:

- Involves interactions between and among identified groups of people and provides stakeholders with an opportunity to raise their concerns and share their opinions and ensures that this information is taken into consideration when making decisions pertaining to the project.
- Begins early during the project planning process to gather initial views on the project proposal and design.
- Encourages stakeholder's feedback, especially as a way of informing the project design and engagement by stakeholders in the identification and mitigation of environmental and social risks and impacts.
- Will be based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultation with stakeholders in a culturally appropriate format, in relevant local languages and is understandable to stakeholders.
- Supports active and inclusive engagement with project affected parties.
- Is free of external manipulation, interference, coercion, discrimination and intimidation.
- Ensures that implementation of the SEP will be documented and disclosed prior to Project appraisal.

In addition, the SEP will endeavor to disclose information that will allow stakeholders to understand the risks and impacts of the project as well as potential opportunities. And it will provide stakeholders with access to information, as early as possible before the Bank proceeds to project appraisal, and in a timeframe that enables meaningful consultations with stakeholders on project design.

### 1.7 World Bank Requirements for Stakeholder Engagement

The World Bank's ESF came into effect on October 1, 2018. The Framework includes Environmental and Social Standard (ESS) 10, "Stakeholder Engagement and Information Disclosure", which recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice". ESS10 emphasizes that effective stakeholder engagement can significantly improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

As defined by the ESF and ESS10, stakeholder engagement is an inclusive process conducted throughout the project lifecycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. Key elements of ESS10 include:

- Stakeholder engagement is most effective when initiated at an early stage of the project development process and is an integral part of early project decisions and the assessment, management and monitoring of the project.
- BWDB will engage with concerned stakeholders throughout the project lifecycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- BWDB will engage in meaningful consultations with all stakeholders. Borrower will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The PMU will maintain and disclose a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.

PMU of CEIP develops this SEP proportionate to the nature and scale of the project and its potential risks and impacts. Stakeholders have been identified and the SEP will be disclosed for public review and comment as early as possible, before the project is placed for the World Bank appraisal. ESS10 also requires the development and implementation of a Grievance Redress Mechanism (GRM) that allows project-affected parties and others to raise concerns and provide feedback related to the environmental and social performance of the project and to have those concerns addressed in a timely manner. In view of the COVID 19 outbreak in Bangladesh, the Borrower is also required to comply with World Bank and WHO guidelines along with national guidelines in this regard.



## Chapter 2 Legal Requirement, Policy and Regulations

### 2.1 Key National, Social, Legal Provisions and Citizen Engagement

Bangladesh has relevant and adequate law/regulation on right to information, information disclosure, transparency during decision making/public hearing etc. Relevant laws and regulations pertaining to these issues are given below:

#### 2.1.1 Constitution of the People's Republic of Bangladesh

**Article 36. Freedom of movement.** Subject to any reasonable restrictions imposed by law in the public interest, every citizen shall have the right to move freely throughout Bangladesh, to reside and settle in any place therein and to leave and re-enter Bangladesh.

**Article 37. Freedom of assembly.** Every citizen shall have the right to assemble and to participate in public meetings and processions peacefully and without arms, subject to any reasonable restrictions imposed by law in the interests of public order health.

**Article 38. Freedom of association.** Every citizen shall have the right to form associations or unions, subject to any reasonable restrictions imposed by law in the interests of morality or public order;

**Article 39. Freedom of thought and conscience, and of speech.**

(1) Freedom of thought and conscience is guaranteed.

(2) Subject to any reasonable restrictions imposed by law in the interests of the security of the State, friendly relations with foreign states, public order, decency or morality, or in relation to contempt of court, defamation or incitement to an offence-

(a) the right of every citizen of freedom of speech and expression; and freedom of the press, are guaranteed.

**Article 59. Local Government.**

(1) Local Government in every administrative unit of the Republic shall be entrusted to bodies, composed of persons elected in accordance with law.

(2) Everybody such as is referred to in clause (1) shall, subject to this Constitution and any other law, perform within the appropriate administrative unit such functions as shall be prescribed by Act of Parliament, which may include functions relating to-

(a) Administration and the work of public officers;

(b) the maintenance of public order;

the preparation and implementation of plans relating to public services and economic development.

**Article 60. Powers of local government bodies**

For the purpose of giving full effect to the provisions of article 59 Parliament shall, by law, confer powers on the local government bodies referred to in that article, including power to impose taxes for local purposes, to prepare their budgets and to maintain funds.

### **2.1.2. The Consumers' Right Protection Act, 2009**

This Act aims at protection of the rights of the consumers, prevention of anti-consumer right practices and related matters connected therewith.

### **2.1.3. Right to Information Act (RTIA) 2009**

The Act makes provisions for ensuring free flow of information and people's right to information. The freedom of thought, conscience and speech is recognized in the Constitution as a fundamental right and the right to information is an alienable part of it. The right to information shall ensure that transparency and accountability in all public, autonomous and statutory organizations and in private organizations run on government or foreign funding shall increase, corruption shall decrease, and good governance shall be established.

### **2.1.4. Law on Local Government**

Bangladesh is a democratic republic with two spheres of government: national and local. Local government is enshrined in the constitution (Chapter IV Articles 59 and 60) and the main legislative texts include the Acts covering zila parishads (2000), upazila parishads (1998, amended 2009), union parishads (2009), pourashavas (2009), city corporations (2009) and hill district councils (1989). The local government division within the Ministry of Local Government, Rural Development and Cooperatives is responsible for local government, with the exception of the hill district councils, which are under the Ministry of Hill Tract Affairs.

## **2.2 World Bank Requirements**

The World Bank's Environmental and Social Framework (ESF) includes Environmental and Social Standard (ESS) 10, "Stakeholder Engagement and Information Disclosure", which recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice". ESS10 emphasizes that effective stakeholder engagement can significantly improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

As defined by ESS10, stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. Key elements of ESS10 include:

- "Stakeholder engagement is most effective when initiated at an early stage of the project development process and is an integral part of early project decisions and the assessment, management and monitoring of the project."
- "Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts."

## Stakeholder Engagement Plan (SEP)

- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.

The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.” Borrowers are required to develop a Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts. Stakeholders have to be identified and the SEP has to be disclosed for public review and comment as early as possible, before the project is appraised by the World Bank. ESS10 also requires the development and implementation of a grievance redress mechanism that allows project-affected parties and others to raise concerns and provide feedback related to the environmental and social performance of the project and to have those concerns addressed in a timely manner.

## Chapter 3: Previous Stakeholder Engagement and Lessons Learned

### 3.1. Previous Consultation and Stakeholder Engagement Activities

There had been a good number of visits, consultations/workshop/discussion at macro and micro level under the auspices of MoWR /BWDB. Due to COVID 19 pandemic, many of the meetings were conducted virtually while some were physically conducted maintain health protocol following national, WHO and Bank protocol on COVID 19. There were about 55 consultations made with various stakeholders where a total of 3867 individuals were present. Some major consultation outcomes are provided in the Table below:

Table 02: Public Consultations and Consultation Among Stakeholders

Date	Venue	No. of Participants	Main points discussed
05 December 2021	Pakhimara Primary school, Samnagar, Paddopukur	Upazila Chairman, Upazila Nirbahi Officer (UNO), Upazila officials from different departments (fisheries, agriculture, and livestock, etc.);	Project interventions and activities
	Protap Nagor Union Parishad Assasuni	Chairman, Member, and secretary of Union Parishad,	Potential risks and impacts
	Garkumarpur Bazar Samnagar	local people of varying occupations, including farmers, business owners, day laborers, farm and non-farm laborers,	Participation of communities and grievance redress mechanism
		Landowners, informal occupants	Land acquisition and compensation
		Women groups and vulnerable people and NGO representing them	How jobs will be created and assigned
18 December 2021	Hazirhat Govt. Primary School Dashmina	BWDB local office, representatives from Ministry of Disaster Recovery, Ministry of Environment and Climate Change	Polder future resilience to natural shocks
	Betagi Sankipura Union Parishad Office, Dashmina	Upazila Chairman, Upazila Nirbahi Officer (UNO), Upazila officials from different departments (fisheries, agriculture, and livestock, etc.)	Waste generation, community health and safety
	Aoliapur High School, Dashmina.	Chairman, Member, and secretary of Union Parishad	COVID protocol
		Fishermen community and associations	Crisis of irrigation water during agriculture practices, fish culture (Fresh/sweet water), plant, etc. due to Salinity increase/salinity intrusion.
			Interactions with labor, labor camp setup
18 December 2021	Hazirhat Govt. Primary School Dashmina	BWDB local office, representatives from Ministry of Disaster Recovery, Ministry of Environment and Climate Change	Project timeline
	Betagi Sankipura Union Parishad Office, Dashmina	Upazila Chairman, Upazila Nirbahi Officer (UNO), Upazila officials from different departments (fisheries, agriculture, and livestock, etc.)	Risk and impacts and mitigation measures
	Aoliapur High School, Dashmina.	Chairman, Member, and secretary of Union Parishad	Performance of WMO
		Fishermen community and associations	Grievance redress system
			Land acquisition and compensation
18 December 2021	Hazirhat Govt. Primary School Dashmina	BWDB local office, representatives from Ministry of Disaster Recovery, Ministry of Environment and Climate Change	Livelihood impact and resettlement issues
	Betagi Sankipura Union Parishad Office, Dashmina	Upazila Chairman, Upazila Nirbahi Officer (UNO), Upazila officials from different departments (fisheries, agriculture, and livestock, etc.)	Duties and responsibilities of various departments
	Aoliapur High School, Dashmina.	Chairman, Member, and secretary of Union Parishad	
		Fishermen community and associations	

## Stakeholder Engagement Plan (SEP)

Date	Venue	No. of Participants	Main points discussed
		<p>Media Personnel</p> <p>local people of varying occupations, including farmers, business owners, day laborers, farm and non-farm laborers,</p> <p>Landowners, informal occupants</p> <p>Women groups and vulnerable people and NGO representing them</p>	<p>Employment issues</p> <p>Impact of salinity on agricultural production</p> <p>How early floods due to storm surges in the coastal region are affecting agriculture, fisheries, shrimp/prawn culture, and salt culture</p>
<b>16 January 2022</b>	<p>Nizampur Govt. Primary School, Kalapara.</p> <p>Mohipur Union Parishad, Kalapara</p> <p>Nizshipbaria Primary Govt. School, Kalapara</p>	<p>Ministry of Water Resource Official</p> <p>BWDB local office</p> <p>Upazila Chairman, Upazila Nirbahi Officer (UNO), Upazila officials from different departments (fisheries, agriculture, and livestock, etc.)</p> <p>Chairman, Member, and secretary of Union Parishad</p> <p>School teachers and various local associations</p> <p>Media Personnel</p> <p>local people of varying occupations, including farmers, business owners, day laborers, farm and non-farm laborers,</p> <p>Landowners, informal occupants</p> <p>Women groups and vulnerable people and NGO representing them</p>	<p>Objective and scope of CEIP-2 and project timeline</p> <p>Social and environmental issues</p> <p>Polder selection methods</p> <p>Performance of WMO</p> <p>Grievance redress system</p> <p>Livelihood impact and resettlement issues</p> <p>Duties and responsibilities of various departments</p> <p>Employment issues</p> <p>Waste generation and management</p> <p>Operation and maintenance of Polders</p> <p>How drainage congestion/water logging is hampering agriculture, fisheries, shrimp/prawn culture. Overflow of water during the rainy season due to an unprotected area.</p>
<b>30 March 2022</b>	<p>Barobaisdia UP Office</p> <p>Degree Govt Primary School</p> <p>Charganga Cyclone Center</p>	<p>Upazila Chairman, Upazila Nirbahi Officer (UNO), Upazila officials from different departments (fisheries, agriculture, and livestock, etc.)</p> <p>Chairman, Member, and secretary of Union Parishad</p> <p>School teachers and various local associations</p> <p>Media Personnel</p> <p>local people of varying occupations, including farmers, business owners,</p>	<p>Project activities and timeline</p> <p>Potential risks and impacts and mitigation measures</p> <p>Job creation and women's involvement</p> <p>How agricultural land is losing its normal productivity day by day because of salinity intrusion.</p>

## Stakeholder Engagement Plan (SEP)

Date	Venue	No. of Participants	Main points discussed
		day laborers, farm and non-farm laborers,  Landowners, informal occupants  Women groups and vulnerable people and NGO representing them	Need for proper irrigation facilities for dry season crop production.  Water supply and sanitation facilities need to be ensured for the PAPs  Early floods due to storm surges in the coastal region are affecting agriculture, fisheries, shrimp/prawn culture, and salt culture.  The WMO activities are weak and needs monitoring and capacity development.
<b>21 and 22 April 2022</b>	Amragachia UP office  Hogolpati Bazar  Baro Masua Govt. Primary School	Ministry of Water Resource Official, BWDB local office  Upazila Chairman, Upazila Nirbahi Officer (UNO), Upazila officials from different departments (fisheries, agriculture, and livestock, etc.)  Chairman, Member, and secretary of Union Parishad  School teachers and various local associations  Media Personnel  Local people of varying occupations, including farmers, business owners, day laborers, farm and non-farm laborers,  Landowners, informal occupants  Women groups and vulnerable people and NGO representing them	Objective and scope of CEIP-2 and project timeline  Social and environmental issues  Polder selection methods  Performance of WMO  Grievance redress system  Livelihood impact and resettlement issues  Water supply and sanitation facilities need to be ensured for the PAPs  How drainage congestion/water logging is hampering agriculture, fisheries, shrimp/prawn culture. Overflow of water during the rainy season due to an unprotected area.

### 3.2. Lessons Learned from Former Stakeholder Engagement Activities

Through CEIP-2 stakeholder engagement the PMU has contacted their relevant stakeholders physically and virtually following COVID 19 protocols and have received various inputs. In the process, the PMU has learnt certain lessons, which are given below:

- Cyclones and storm surges are major hazards in the coastal region. Cyclones, along with storm surges, are creating unfortunate deaths and huge damage to crops and houses due to breaching the embankment.
- Crisis of irrigation water during agriculture practices, fish culture (Fresh/sweet water), plant, etc. due to Salinity increase/salinity intrusion.



- The agricultural land is losing its normal productivity day by day because of salinity intrusion. Proper irrigation facilities are required for dry season crop production.
- Water supply and sanitation facilities need to be ensured for the PAPs and silted up rivers and khals needs to be addressed.
- Drainage congestion/water logging is hampering agriculture, fisheries, shrimp/prawn culture. Overflow of water during the rainy season due to an unprotected area.
- Early floods due to storm surges in the coastal region are affecting agriculture, fisheries, shrimp/prawn culture, and salt culture.
- The WMO activities are weak and needs monitoring and capacity development.
- The PMU must continue to engage the stakeholders from the early stage of the project development process and maintain this two-way connectivity as an integral part in project design, decision making, management and monitoring of the project.
- It is important that the PMU identify the project affected persons (PAP) and the vulnerable groups pertinent to their component precisely.
- It is important for the senior officials of the PMU (who are particularly involved with designing the project) to understand the needs and concerns of the PAP and the vulnerable groups (those would become vulnerable owing to the project) and how to address their plight in terms of livelihood restoration and be able to benefit from the project.
- Whenever there is a scope of creating jobs for the unskilled laborers from the local PAPs and the vulnerable groups, that must include women, the marginalized and the ethnic communities, when available.
- There would be lot of construction work under BWDB in all the 15 polders. BWDB could seek help of the Local Administration, local political leadership and the project contractors, who form an effective team in identifying the needy ones from the locality and assist in job creation so to support their livelihood. Contractual obligation should include relevant clauses for the adherence of the contractors involved in construction activities.
- Information, Education and Communication (IEC) by the PMU will go a long way in aligning public perception in favor of the project. The PMU need to have a strong PR mechanism and use all available resources including print and electronic media, FGD, Web-based information and social media to propagate project related information.
- The ethnic communities are very important stakeholder in any World Bank financed project. The PMU must ensure that continuous consultation is done the ethnic communities being cognizant with cultural differences. Project activities requiring Free, Prior Informed Consent (FPIC) will be avoided.
- Virtual Meeting with the stakeholders is an effective alternative to physically meeting large group of stakeholders under COVID 19 pandemic situation.
- Closing the feedback loop is important—the stakeholders must know how their inputs have been taken into project design.
- Under a pandemic situation like the ongoing COVID-19 outbreak, the PMU should ensure that WHO and Ministry of Health (MoH) protocols of COVID 19 pandemic including all precautionary

measures like use of PPE, compliance of social distancing protocol, using Mask and Gloves, training on handling a COVID patient, and social awareness amongst its health workers and the community are followed by the contractors while implementing the project. The Contractual obligation should include these clauses for adherence by the contractors.

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## Chapter 4: Stakeholder Identification and Analysis

### 4.1 Stakeholder Categorization, Identification and Analysis

Stakeholder engagement process for the CEIP-2 has begun from identification, mapping and analysis. It is anticipated that this SEP will help clarify the stakeholder identification procedure at the project level.

For the purposes of effective and tailored engagement, stakeholders of the CEIP-2 can be divided into the following core categories:

**Affected Parties:** Persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures;

**Other Interested Parties:** Individuals/groups/entities that may not experience direct impact from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way; and

**Vulnerable Groups:** Persons who may be disproportionately impacted or further disadvantaged by the project as compared with any other groups due to their vulnerable status<sup>2</sup>, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

Engagement with all identified stakeholders will help ensure the greatest possible contribution from the stakeholder parties toward the successful implementation of the project and will enable the project to draw on their pre-existing expertise, networks and agendas. It will also facilitate both the community's and institutional endorsement of the project by various parties. Access to the local knowledge and experience also becomes possible through the active involvement of stakeholders.

A general list of stakeholder groups and interested parties identified along with their influence and interest is presented in the Table below. SEP being a live document and new stakeholders, whenever identified, would be included in the list as and when necessary.

<sup>2</sup> Vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

Table 03: Potential Stakeholders, their Interest in Engagement

Type	Stakeholder Parties	Interest/cause in engagement
<b>Affected Party</b>	Local landowners, informal settlers, communities living around the polder areas	If there is land acquisition and resettlement, the landowners and informal settlers will be impacted. Potential vulnerable groups, affected communities and other interested parties living in close vicinity to the project areas
	Local businessmen, fishermen, job holders, and entrepreneurs	Loss of business and employment also ensue following land acquisition and resettlement
<b>Interested Party</b>	Contractors, sub-contractors, wage labor, vendors and suppliers	Different labors, contractors, sub-contractors, suppliers and vendors will be engaged with physical activities and construction works etc of this project.
	Local community leaders	Represents interests of affected communities (land users, local businessmen etc.) and vulnerable groups
	Administrative body of various Ministries	Legislative and executive authorities. Functions of supervision and monitoring
	Local government and administrative bodies	Due to the development and construction works, local administrative permissions are required
	NGOs and Women organizations in the area	Represents the interests of different interested parties and vulnerable groups, different women organizations in the project will be highly interested with the project as during the implementation and operational stage, there may be issues of GBV and employment of local women in the project.
	Mass media (Print and Electronic)	They are intermediaries for informing the general public about the planned activities of the project developer and for information disclosure in connection with the proposed Project.

## 4.2 Vulnerable Groups

A significant factor in achieving inclusiveness of the engagement process is safeguarding the participation of vulnerable entities/individuals in public consultations and other engagement forums established by the project. The vulnerability may stem from person's origin, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g. minorities or fringe groups), dependence on other individuals or natural resources, In the business community vulnerability may stem from not being treated fairly by the competent authority responsible for allotting contract, political pressure of not to submit tender documents, threatening with thugs/ political activists and asking for bribe by the relevant GoB officials in return of contract etc.

Engagement with the vulnerable groups and individuals often require the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input to the overall process commensurate to those of the other stakeholders. In the context of the CEIP-2 project, vulnerability stems of persons/entities involved directly with the implementation of various component and subcomponents of the project.

Vulnerable groups adversely affected by the project will be further confirmed and consulted through dedicated means, as appropriate. Description of the methods of engagement including face-to-face meetings, FGD, public consultations etc. that will be undertaken by the project is provided in the following sections. Identified Vulnerable or disadvantaged stakeholders, their needs and their preferred means of notification/ consultation are given at the Table below.

Table 04. Vulnerable and Disadvantaged Stakeholders and Their Needs

Vulnerable Groups and Individuals	Characteristics/ Needs	Preferred means of notification/ consultation
Job seekers for employment in the project that would include the disabled, women, members of the tribal community and members of the transgender community.	These are mostly low/ semi-skilled workers, living on daily wages.	Web based Circulation  Notification through daily newspapers, social media; and  FGD, One-on-One meeting, formal meeting, discussion with the workers, etc. maintaining COVID 19 protocol.
Women, in general, who may fall prey to GBV/SEA/SH, STD related incidents due to presence of migrant workers at various subproject sites.	Women living in communities around the project, especially those living under poverty. Contractors to develop project centric Labor and GBV Action Plan, appraise the workers on the issue and maintaining strict Labor camp discipline with respect to entry and exit of the labors at the labor Camp.	Face to face meeting keeping cultural issues into cognizance
Landowners likely to lose land, especially those that have legal issues with land	People living in land but lacking papers, these are mostly people with limited education and living in lands handed down through generations	Face to face meeting  FGD, One-on-One meeting, formal meeting, discussion with the workers, etc. maintaining COVID 19 protocol.
The informal settlers and non-titled holders including ones under 'Extreme Poverty' who might be living in the sub-project lands by erecting shanties and/or having temporary sheds where they do petty business and need to vacate the sub-project areas to make room for construction of the community facilities.	The informal settlers/petty businessmen occupying sub-project locations are to be comforted that they would get certain cash compensation and transport support to move their goods to new location.	Face to face meeting  FGD, One-on-One meeting, formal meeting, discussion with the workers, etc. maintaining COVID 19 protocol.
The elderly, mentally and physically disabled ones, pregnant women, single mothers, the school going children and persons needing medical attention etc. may face difficulty to commute through the sub-project area due to construction related activities.	These are the people in the lowest rung of the social ladder who are often excluded from project benefits due to their lack of power to influence	Face to face meeting  FGD, One-on-One meeting, formal meeting, discussion with the workers, etc. maintaining COVID 19 protocol.  Informal courtyard meeting
People directly affected by the construction and operation of the ancillary facilities and workers' camps. Including those who have rented out their land temporarily for the project purpose.	This group would be identified at the subproject level, consulted with and their difficulties vis-a-vis economic advantages through renting of fallow land, unused accommodation etc. studied	Face to face meeting  FGD, One-on-One meeting, formal meeting, discussion with the workers, etc. maintaining COVID 19 protocol.  Informal courtyard meeting

## Chapter 5: Stakeholder Engagement Methods and Program

### 5.1 Stakeholder Engagement Methods and Tools

This chapter describes stakeholder engagement activities that will be implemented by PMU for various activities tailored to the specific component and subcomponent of the project phases as well as the on-going routine engagement.

Due to the nature of the activities, the project intends to utilize various methods of engagement that will be used by as part of its continuous interaction with the stakeholders. For the engagement process to be effective and meaningful, a range of various techniques needs to be applied that are specifically tailored to the identified stakeholder groups. As various specific stakeholders are being identified, methods used for consulting with statutory officials may be different from a format of liaising with the local communities, interested groups and international stakeholders.

The format of every consultation activity should meet general requirements on accessibility, i.e. *should be held at venues that are easily reachable and do not require long commute, entrance fee or preliminary access authorization, cultural appropriateness (i.e. with due respect to the local customs and norms), and inclusiveness*, i.e. engaging all segments of the local society, including disabled persons, the elderly, the small ethnic communities and other vulnerable individuals. If necessary, logistical assistance should be provided to enable participants from the remote areas, persons with limited physical abilities and those with insufficient financial or transportation means to attend public meetings scheduled by the project.

The Project should ensure the participation of vulnerable individuals and groups in project consultations that may require the implementation of tailored techniques. Since their vulnerable status may lead to people's hesitancy and reluctance or physical incapacity to participate in large-scale community meetings, visiting such individuals/ families at their homes or holding separate small group discussions with them at an easily accessible venue is a way for the project to reach out to the groups who, under standard circumstances, are likely to be insufficiently represented at community gatherings. Attention to local dialect in oral communication must be given in consideration to the type of stakeholders being addressed.

Table 05: Stakeholder Engagement Techniques

Engagement Technique	Appropriate application of the technique
<b>Correspondences (Phone, Emails, Text, instant messaging)</b>	Distribute information to BWDB/PMU officials and other related government agencies, Research Organizations, CSO and Professional Organizations, INGOs/NGOs, Local Government, and other relevant Stakeholders' organizations/agencies
<b>One-on-one meetings</b>	Seeking views and opinions Enable stakeholder to speak freely about sensitive issues Build personal relationships Record meetings
<b>Formal meetings</b>	Present the Project information to a group of stakeholders Allow group to comment – opinions and views



## Stakeholder Engagement Plan (SEP)

	Build impersonal relation with high level stakeholders Record discussions
<b>Public meetings/workshop</b>	Present Project information to a large group of stakeholders, especially communities Allow the group to provide their views and opinions Build relationship with the communities, especially those impacted Distribute non-technical information Facilitate meetings with presentations, PowerPoint, posters etc. Record discussions, comments, and questions.
<b>Focus group meetings</b>	Present Project information to a group of stakeholders Allow stakeholders to provide their views on targeted baseline information Build relationships with communities Allow small groups of people (women, youth, vulnerable people, disabled people, small ethnic communities, Tourists etc.) to provide their views and opinions Record responses
<b>Project on website/Information Centre/information Boards</b>	Establish Information Board in each project area Present project information and progress updates Disclose ESIA, ESMP, draft SEP and other project documents
<b>Direct communication with affected people</b>	Share information on timing of project activities Collect the opinion about the project
<b>Radio/TV emissions/media</b>	Arrange for broadcast Radio/TV emissions and local/national newspaper to bring the project for large public awareness.
<b>Project information on site</b>	Share information on project activities Provide information on construction materials that will be needed to incite potential suppliers
<b>Project leaflet</b>	Brief project information to provide regular update Site specific project information in local language
<b>Surveys</b>	Gather opinions and views from individual stakeholders Gather baseline data and develop database for monitoring impacts Record data and analysis
<b>Virtual Meeting</b>	Under COVID 19 pandemic situation, virtual meetings are effective mechanisms and are widely used for stakeholder consultation
<b>Social Media/ Mobile Telephone</b>	Social media, bulk SMS in mobile phone could be another effective way of communication with the stakeholders, particularly under COVID 19 pandemic.

### 5.2 Engagement Method and Tools in light of COVID 19 Outbreak

With the spread of COVID-19, people have been mandated by WHO and national law, to exercise social distancing, and specifically to avoid public gatherings to prevent and reduce the risk of the virus transmission. Various restrictive measures, some imposing strict restrictions on public gatherings, meetings and people's movement, and others advising against public group events have been adopted. At the same time, the general public has become increasingly aware and concerned about the risks of transmission, particularly through social interactions at large gatherings.

WHO has issued technical guidance in dealing with COVID-19, including: (i) Risk Communication and Community Engagement (RCCE) Action Plan Guidance Preparedness and Response; (ii) Risk Communication and Community engagement (RCCE) readiness and response; (iii) COVID-19 risk communication package for healthcare facilities; (iv) Getting your workplace ready for COVID-19; and (v) a guide to preventing and addressing social stigma associated with COVID-19. All these documents are available on the WHO website through the following link:

<https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance>.

With growing concern about the risk of virus spread, there is an urgent need to adjust the approach and methodology for continuing stakeholder consultation and engagement. Taking into account the importance of confirming compliance with national law requirements, below are some suggestions for stakeholder consultation amidst COVID-19 outbreak:

- Identify and review planned activities under the project requiring stakeholder engagement and public consultations.
- Assess the level of proposed direct engagement with stakeholders, including location and size of proposed gatherings, frequency of engagement, categories of stakeholders.
- Assess the level of risks of the virus transmission for these engagements, and how restrictions that are in effect in the country / project area would affect these engagements.
- Identify project activities for which consultation/engagement is critical and cannot be postponed without having significant impact on project timelines.
- Assess the level of ICT penetration among key stakeholder groups, to identify the type of communication channels that can be effectively used in the project context.

Based on the above, specific channels of communication that should be used while conducting stakeholder consultation and engagement activities need consideration. The following are some considerations while selecting channels of communication, in light of the current COVID-19 situation:

- Avoid public gatherings (taking into account national restrictions), including public hearings, workshops and community meetings;
- If smaller meetings are permitted, conduct consultations in small-group sessions, such as focus group meetings. If not permitted, make all reasonable efforts to conduct meetings through online channels, including WebEx, Zoom and Skype;
- Be sure that everyone involved in stakeholder planning articulate and express their understandings on social behavior and good hygiene practices, and that any stakeholder engagement events be preceded with the procedure of articulating such hygienic practices.
- Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chatgroups appropriate for the purpose, based on the type and category of stakeholders;
- Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders do not have access to online channels or do not use them frequently. Traditional channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions;
- Where direct engagement with project affected people or beneficiaries is necessary, identify channels for direct communication with each affected household via a context specific

combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators;

- Each of the proposed channels of engagement should clearly specify how feedback and suggestions can be provided by stakeholders;
- However, in situations where none of the above means of communication are considered adequate for required consultations with stakeholders, IA should discuss whether the project activity can be rescheduled to a later time. Where it is not possible to postpone the activity or where the postponement is likely to be for more than a few weeks, IA should consult WB Teams to obtain advice and guidance.

### 5.3 Description of Information Disclosure Methods

As a standard practice, the Project materials (ESMF, ESCP, SEP) released for disclosure are accompanied by making available the registers of comments and suggestions from the public that are subsequently documented by the PMU in a formal manner. PMU will continue applying the similar approach to disclosure for any additional E&S appraisal materials that will be prepared as part of the project development. PMU would manage a web-based platform, which will be developed to track the project's progress based on the Results Framework. A link to this web-based platform should be specified on all the printed materials distributed to stakeholders. The platform will support a participatory M&E, which will allow project stakeholders to collect data on project progress. The M&E system will be used to take corrective actions, improve coordination, and facilitate learning throughout project implementation.

The executive summary of ESMF, ESIA, ESMP, RPF in Bangla, and English will be made available for public review in accordance with the World Bank and standard international requirements. The SEP will also be released in the public domain simultaneously with the ESMF and ESMP reports and will be available for stakeholder review.

Distribution of the disclosure materials in relation to various component/subcomponent will be through making them available online using the existing website of PMU besides dedicate project website managed by BWDB. Upon improvement of the COVID 19 situation, distribution of the disclosure material will be through making them available at venues and locations frequented by the relevant Project Affected Parties (PAPs) and larger society and places to which public have unhindered access in the usual manner. Distribution of the disclosure materials (free printed copies of the ESMF/ESMPs in Bangla and English and other related documents) will be through making them available at following venues and locations frequented by the community and places to which public have unhindered access:

- The PMU main Offices at Dhaka
- All important public places, local administration offices where various subcomponents of the project would be implemented
- Selected District/Upazilla HQs where polders are located

- Other designated public locations to ensure wide dissemination of the materials.

In view of the spread of COVID 19 pandemic all over the country including the project area, only digital, internet, social media etc. will be followed where face to face interaction with stakeholders can be avoided until COVID-19 situation improves. Other on-line based platforms can also be used, such as web-conferencing, webinar presentations, web-based meetings, Internet surveys/polls etc. Comments are generally received from stakeholders orally or in the written form at the project level. However, due to COVID-19 outbreak and spread, comments should now be received through other means avoiding physical interactions (telephone, email etc.).

Electronic copies of the ESMF, ESMP and SEP will be placed in the project website. This will allow stakeholders with access to Internet to view information about the planned development and to initiate their involvement in the public consultation process. The website will be equipped with an on-line feedback feature that will enable readers to leave their comments in relation to the disclosed materials. The mechanisms that will be used for facilitating input from stakeholders will include press releases and announcements in the media, notifications of the aforementioned disclosed materials to local and national NGOs as well as other interested parties. Limitation of this online based communication is that not all parties/stakeholders have access to the internet/the knowhow to communicate online.

### 5.4 Timetable for Disclosure

The disclosure process associated with the release of project E&S appraisal documentation, as well as the accompanying SEP will be implemented within the following timeframe:

- Placement of the ESMF (including ESMP, ESIA and ESCP), and SEP in public domain – dates to be confirmed by the PMU;
- Public consultation meetings in project affected communities and with other stakeholders to present and discuss findings of the ESMF and measures proposed in the ESMP - dates to be confirmed by the PMU;
- Addressing stakeholder feedback received on the entire disclosure package - dates to be confirmed by the PMU.

The SEP will remain in the public domain for the entire period of project development. It is a live document and will be updated on a regular basis as the project progresses through its various phases, in order to ensure timely identification of any new stakeholders and interested parties and their involvement in the process of collaboration with the project. The methods of engagement will also be revised periodically to maintain their effectiveness and relevance to the project's evolving environment.

The outline presented in the table below summarizes the main stakeholders of the project, types of information to be shared with stakeholder groups, as well as specific means of communication and methods of notification. Table below provides a description of recommended stakeholder engagement and disclosure methods to be implemented during stakeholder engagement process.

Table 06: Stakeholder Engagement and Disclosure Methods

Stakeholder Group	Disclosure Method
Project Affected persons, implementing Contractors, business entities, beneficiaries of the project and General Population	<ul style="list-style-type: none"> <li>Public notices.</li> <li>Electronic publications (in Bangla and English languages) and press releases on the BWDB Project website.</li> <li>Dissemination of hard copies (in Bangla and English languages) at designated public locations.</li> <li>Press releases in the local media.</li> <li>Public Meetings after COVID 19 pandemic is over</li> <li>Consultation meetings maintaining Health protocol.</li> <li>Information leaflets and brochures (in Bangla and English languages).</li> <li>Separate focus group meetings with vulnerable groups, as appropriate.</li> </ul>
Research Organizations, NGOs, CSOs and CBOs in at the national and sub-national level	<ul style="list-style-type: none"> <li>Public notices (in Bangla and English languages).</li> <li>Electronic publications and press releases on the project website.</li> <li>Dissemination of hard copies at designated public locations.</li> <li>Press releases in the local media (in Bangla and English languages).</li> <li>Consultation meetings.</li> <li>Information leaflets and brochures (in Bangla and English languages)</li> <li>Virtual Meetings, FGD and EII etc.</li> </ul>
Relevant GoB Ministries/ BWDB and other related authorities	<ul style="list-style-type: none"> <li>Dissemination of hard copies of the ESMF, ESMP, RPF and SEP developed by PMU at sub project sites, Divisional and District HQs, municipal and local administration, Press Club etc.</li> <li>Virtual Meetings</li> </ul>
Related businesses and enterprises	<ul style="list-style-type: none"> <li>Electronic publications and press releases on the Project website.</li> <li>Information leaflets and brochures.</li> <li>Procurement notifications.</li> </ul>
Project Employees including contractor and subcontractor and Labor Force	<ul style="list-style-type: none"> <li>Staff Handbook.</li> <li>Email updates covering the Project staff and personnel.</li> <li>Regular meetings with the staff maintaining health protocol.</li> <li>Posts on information boards in the offices and on site.</li> <li>Reports, leaflets.</li> </ul>

## 5.5 Planned Stakeholder Engagement Activities

Stakeholder engagement activities will need to provide stakeholder groups with relevant information and opportunities to voice their views on issues that matter to them. The Table below presents the stakeholder engagement activities PMU will undertake for the project. The activity types and their frequency are adapted to the three main project stages: project preparation (including design, procurement of contractors and supplies), construction, and operation and maintenance.

Table 07: Stakeholder Engagement Activities

Target stakeholders	Topic(s) of engagement	Method(s) used	Responsibilities
Preparatory Phase			



## Stakeholder Engagement Plan (SEP)

<ul style="list-style-type: none"> <li>Project Affected community</li> <li>People potentially affected by land acquisition</li> <li>People residing in project area</li> <li>Roadside residential and business, informal settlers</li> <li>Vulnerable households</li> <li>Local government</li> <li>Media</li> <li>Transport workers</li> <li>Local businessmen</li> </ul>	<ul style="list-style-type: none"> <li>All the social management planning documents will be disclosed</li> <li>Land acquisition process</li> <li>Assistance in gathering official documents for authorized land uses</li> <li>Compensation rates, methodology</li> <li>Project scope and rationale</li> <li>Resettlement principles</li> <li>Resettlement and livelihood restoration options</li> <li>Grievance mechanism process</li> <li>Future consultation</li> </ul>	<ul style="list-style-type: none"> <li>Public meetings, separate FGD for women and vulnerable</li> <li>Face-to-face meetings</li> <li>Disclosure of written information: brochures, posters, flyers, website</li> <li>Information boards or desks in local language</li> <li>Grievance procedures through consultation, information brochures</li> </ul> <p>The following modes to be adopted specifically for the vulnerable groups:</p> <ul style="list-style-type: none"> <li>Robust engagement with local community-based organizations.</li> <li>The project would arrange separate consultation sessions for different target groups</li> <li>Resources allocation towards local administration representatives and councilors.</li> <li>Engagement of local CBO's who work with vulnerable people at the community level to help disseminate information and organize consultations</li> <li>Manageable and gendered FGD to be arranged so that women can speak freely</li> <li>The project must have adequate means to reach the disabled ones in the community. If need be, teams must visit the disabled ones in their habitat</li> <li>Notice board for employment recruitment</li> <li>Training/workshop</li> </ul>	<ul style="list-style-type: none"> <li>BWDB, PMU, and PSC</li> <li>Specialists responsible for land acquisition</li> <li>Environmental and Social consultants</li> </ul>
<b>Construction Phase</b>			
<ul style="list-style-type: none"> <li>Project Affected People</li> <li>People potentially affected by land acquisition</li> <li>People residing in project area</li> <li>Vulnerable households</li> <li>Contractors</li> <li>Local Government</li> <li>Local NGOs and CBOs</li> <li>DC office</li> <li>Local Press</li> <li>Local businessmen</li> <li>Transport workers</li> </ul>	<ul style="list-style-type: none"> <li>Grievance Mechanism</li> <li>Health and safety impacts (RAP, community H&amp;S, community concerns)</li> <li>Employment opportunities</li> <li>Project status</li> </ul>	<ul style="list-style-type: none"> <li>Public meetings, open houses, trainings/workshops</li> <li>Separate meetings as needed for women and vulnerable</li> <li>Individual outreach to PAPs as needed</li> <li>Disclosure of written information: brochures, posters, flyers, website</li> <li>Information boards in BWDB local offices</li> <li>Notice board(s) at construction sites</li> <li>Grievance mechanism</li> </ul> <p>The following modes to be adopted specifically for the vulnerable groups:</p> <ul style="list-style-type: none"> <li>Robust engagement with local community-based organizations.</li> <li>The project would arrange separate consultation sessions for different target groups</li> <li>Resources allocation towards local administration representatives and councilors.</li> </ul>	<ul style="list-style-type: none"> <li>BWDB, PMU, PSC</li> <li>Specialists responsible for land acquisition</li> <li>Environmental and social consultants</li> <li>Contractor</li> <li>NGO</li> <li>External Monitor</li> </ul>



## Chapter 6: Grievance Redress Mechanism

### 6.1 Objectives and Scope of GRM

The fundamental objectives of the GRM, implemented through the GRC serving as a para-legal body, are to resolve any resettlement-related grievances locally in consultation with the aggrieved party to facilitate smooth implementation of the social and environmental action plans. Another important objective is to democratize the development process at the local level and to establish accountability to the affected people. The procedures will however not a person's right to go to the courts of law pre-empt.

### 6.2 National Grievance Redress System

**6.2.1 Description.** In 2007 the Government of Bangladesh (GoB) established a framework for a grievance redress system in all line ministries to address complaints and improve public service delivery. In 2014, the Cabinet Division launched the Grievance Redress System (GRS), an online and centralized system that includes line ministries, government departments and subordinate departments/agencies. The GRS is intended to address i) public grievances about service provision that is under the purview of government, semi-government or autonomous organizations, and ii) staff complaints that can be submitted by the officials of government/semi-government/autonomous organizations regarding their access to services or rights as employees. Citizens can also use the GRS to provide suggestions for simplification of services, law and regulation reforms or share other ideas. However, complaints related to religious matters, right to information, departmental cases against government officials or employees, or issues pending in any court are beyond the scope of the GRS. The GRS includes all government ministries and departments/agencies under them, as well as the Union Parishad, the lowest tier of local government in Bangladesh which are the most recent additions.

**6.2.2 Uptake Channels.** The GRS has online and offline uptake channels. To avail of the online option, complainants are required to register through the GRS webpage, upon which they can submit their feedback and receive email and SMS-based notifications acknowledging the receipt of their complaint. The GRS webpage also provides the option to submit complaints anonymously, though such cases do not receive email notifications and their status cannot be tracked. For offline submission of complaints, members of the public can download and print the grievance form from the GRS webpage. They can also use citizen service booths located at the gates of the Cabinet Secretariat Complex in Dhaka. These booths are staffed by authorized personnel who have administrative access to the GRS software, and who are tasked with recording the particulars of the complaint in the GRS software, generating acceptance slips for the users, and forwarding letters to the grievance redress officer (GRO) of the concerned ministry. Complainants can use the information printed on their acceptance slips to track their complaints on the GRS website. For departments/agencies which are outside Dhaka, the complainant(s) can submit their written grievance in the 'complaint box' of the respective institutions' premises or send by post.

**6.2.3 Processing System.** The GRS has a three-tier redressal mechanism. Upon receipt, complaints are classified as severe, medium or low based on their sensitivity, and forwarded to the GROs of respective ministries/divisions/agencies. If the complaint is forwarded successfully, a receipt specifying the case tracking number and information about the GRO is emailed to self-identified complainants. The GRO

addresses and responds to the complaint. If there is no resolution or understanding, the Cabinet Division will forward the grievance to one or more relevant ministries, that will endeavor to address the issue in cooperation with the GRO. If a third-party decision is required as a last resort, the complaint will be forwarded to an authority that is superior to the GRO. Self-identified complainants can track the status of their complaints and are notified via SMS and email when their complaint has been resolved. Procedures for grievance redress are outlined in detail here.

**6.2.4 Timeframe.** GROs are expected to address complaints within 40 working days, and to resolve cases for which an investigation has been initiated in no more than an additional 20 working days.

### 6.3 Project Grievance Redress Mechanism

The Project will develop a GRM following the principles of ESS10. There needs to be a mechanism to address grievances and complaints that individual stakeholders may bring up in any stage of the Project. As experienced in past projects, complaints and grievances may range from disputes over job assignment to compensation payment to interactions with the project personnel, complains against noise, pollution, accident, GBV and other social and environmental issues. In view of this, BWDB has established a procedure in CEIP Phase-1 to deal with and resolve any queries as well as address complaints and grievances about any irregularities in the application of the guidelines adopted for the project for assessment and mitigation of social and environmental impacts through Grievance Redress Mechanism (GRM). This will be used in CEIP-2. The GRM will deal with complaints and grievances related to both social and environmental issues in this Project. The GRM will also be accessible to all Internal, external, regional and international stakeholders, including affected people, community members, civil society, media, vulnerable people and other interested parties. External stakeholders including international and regional can use the GRM to submit complaints, feedback, queries, suggestions, or even compliments related to the overall management and implementation of the Project. The GRM is intended to address issues and complaints in an efficient, timely, and cost-effective manner.

### 6.4 Grievance Redress Committees (GRC)

Grievance redress committees (GRC) will be formed to receive and resolve complaints as well as grievances from aggrieved persons from the local stakeholders including the project-affected persons. Based on consensus, the procedure will help to resolve issues/conflicts amicably and quickly, saving the aggrieved persons from having to resort to expensive, time-consuming legal actions. The procedure will, however, not pre-empt a person's right to go to the courts of law.

### 6.5 Grievance Resolution Process

There will be three tiers of grievance resolution system – Union/local level, Project (PMU) level and the Ministry level. The complaint will first be received at the local level. If the resolution attempt at the local level fails, the GRC will refer the complaint with the minutes of the hearings to the Project level for further review. The PD will assign the Senior Social Specialist at PMU for review the grievance cases and assist PD in making decision. The Social Specialist will review the case records and pay field visits for cross examining and consult the GRC members and aggrieved persons, if required. If a decision at

this level is again found unacceptable by the aggrieved person(s), BWDB can refer the case to the Ministry level with the minutes of the hearings at local and project level. At the Ministry level, decisions on unresolved cases, if any, will be made in no more than four weeks by an official designated by the Secretary, MoWR. A decision agreed with the aggrieved person(s) at any level of hearing will be binding upon BWDB. Various steps in the grievance process are summarized in the Table below in light of the institutional responsibilities:

*Table o8: Steps in Grievance Resolution Process*

<b>Step 1</b>	<ul style="list-style-type: none"> <li>The local office on behalf of BWDB informs PAPs and counsels them on social and environmental issues, risks and impacts of the project.</li> <li>The stakeholders are also informed about the GRM. Various channels will be established and mass campaign about the existence of the GRM will be done.</li> <li>GRCs will be formed and training will be given to address complaints through GRM.</li> </ul>
<b>Step 2</b>	<ul style="list-style-type: none"> <li>The local level offices assist the aggrieved PAPs to produce a written complaint to the convener of GRC at local level with stories, expectations and any parties. This will be recorded in appropriate register.</li> <li>Hearing is organized on cases with merit at the GRC secretariat or at Union Parishad Offices at local level and resolution is given by the GRC in 4 weeks of receiving the complaints.</li> <li>The agreed resolution is forward to PMU for approval by the PD, if required.</li> <li>In case the resolution is not acceptable to the aggrieved person, he/she approaches the Project level through the local GRC convener.</li> </ul>
<b>Step 3</b>	<ul style="list-style-type: none"> <li>Cases with all proceedings are placed with the Project level GRC, where the PD reviews them at PMU with assistance from the Senior Social Specialist. If found necessary, field investigation is carried out and the resolutions are given within 4 weeks of receiving the complaints.</li> <li>The resolution will be sent to the Conveners office to communicate to the aggrieved persons for acceptance. The resolution accepted by the aggrieved person is then approved by the PD.</li> <li>In case the resolution is not acceptable to the aggrieved person, he/she approaches the Secretary, MoWR at the Ministry Level GRC through the Social Staff at PMU.</li> </ul>
<b>Step 4</b>	<ul style="list-style-type: none"> <li>Cases with all proceedings from local and Project level GRC are placed with the Secretary, MoWR where the Secretary appoints a reviewer to resolve the grievance in view of the merits and redirect the case records to the PD with written resolutions within 4 weeks of receiving the complaints.</li> <li>The resolution will be sent to the Conveners office to communicate to the aggrieved persons for acceptance. The resolution accepted by the aggrieved person is then approved by the PD.</li> <li>Aggrieved PAPs may opt to approach to the Court of Law, if the resolution at MoWR is not acceptable to him/her.</li> </ul>

Step 5

- The resolution accepted by the aggrieved persons at any level (Local, Project, Ministry) is approved/nodded by the PD and forwarded back to the Conveners' office keeping records at his/her office.

## 6.6 Composition of GRC

The Grievance Redress Committees (GRCs) will be established at three levels: (i) Local Level (ii) Project level and (iii) Ministry Level.

### 6.6.1 Composition of Local Level GRC

The local level complaints will be received at the local level GRC. This local GRC will ensure easy accessibility by the PAPs, local communities and interested stakeholders, so that any grievances can be solved directly or within a very short period of time. All cases at the local level complains will be heard within four weeks of their receipt.

Table 09: GRC Membership at Local level

Executive Engineer (PMU, FO)	Convener
UP Local UP Member/Ward Councilor	Member
Teacher from Local Educational Institution (nominated by Upazila Administration)	Member
Representative from Local Women's Group	Member
Representative from the PAP Group	Member
Representative of the Implementing Agency	Member Secretary

### 6.6.2 Composition of Project Level GRC

If the resolution attempt at the local level fails, the GRC will refer the complaint with the minutes of the hearings of the local GRC to Project level for further review. With active assistance from the social specialist of implementation support unit, the committee will make a decision and communicate it to the concerned GRC. The decisions on unresolved cases will be communicated to the GRC within four weeks of the complaint receipt. PD will be the convener, and social specialist will be the member secretary of the Project level GRC.

Table 10: GRC membership at Project level

Project Director (PD)	Convener
Senior Social Specialist at PMU	Member-Secretary
Representative from respective areas local government	Member
Representative from respective areas Local Women's Group	Member
Representative from respective areas PAP Group	Member

The membership of the GRCs will ensure proper presentation of complaints and grievances as well as impartial hearings and investigations, and transparent resolutions. Where grievances are among the affected persons, the membership composition of the GRCs will take into account any traditional conflict resolution arrangements that communities may practice. If the aggrieved person is a female, BWDB will ask the concerned female UP Member or Municipal Ward Councilor to participate in the hearings. All cases at the project level will be heard within four weeks of their receipt. Grievances

received through any channel will be registered and a notification of receipt with assurance of necessary review and resolution given in writing to the aggrieved persons.

### 6.6.3 Composition at Ministry level GRC

If a decision at project level is again found unacceptable by the aggrieved person(s), the Project level GRC can refer the case to the Ministry level GRC with the minutes of the hearings at local and Project levels. All the unsolved cases will be decided on in no more than four weeks by an official designated by the Secretary, Ministry.

Table 11: GRC membership at Ministry level

Secretary of the MoWR	Convener
Project Director (PD)	Member-Secretary
Communication Specialist	Member
Senior Social Specialist	Member
External Monitor	Member

A decision agreed with the aggrieved person(s) at any level of hearing will be binding upon BWDB. There will be budgetary allocation for local, Project and Ministry committee members for participating meetings and refreshments during meeting. To ensure that grievance redress decisions are made in formal hearings and in a transparent manner, the Convener will apply the following guidelines:

- Reject a grievance redress application with any recommendations written on it by a GRC member or others such as politicians and other influential persons.
- Remove a recommendation by any person that may separately accompany the grievance redress application.
- Disqualify a GRC member who has made a recommendation on the application or separately before the formal hearing: Where a GRC member is removed, appoint another person in consultation with the Project Director.
- The Convener will also ensure strict adherence to the impact mitigation policies and guidelines adopted in the project and the mitigation standards.

The affected persons and their communities will be informed of the project's grievance redress mechanism in open meetings at important locations and in PAP group meetings. Bangla translations of the process in the form of information brochures will be distributed among the affected persons. The PAPs will also be briefed on the scope of the GRC, the procedure for lodging grievances cases and the procedure of grievance resolution at the project level.

To ensure impartiality and transparency, hearings on complaints will remain open to the public. The GRCs will record the details of the complaints and their resolution in a register, including intake details, resolution process and the closing procedures. Each GRC will maintain the following three Grievance Registers:



**Intake Register:** (1) Case number, (2) Date of receipt, (3) Name of complainant, (4) Gender, (5) Father or husband, (6) Complete address, (7) Main objection (loss of land/property or entitlements), (8) Complainants' story and expectation with evidence, and (8) Previous records of similar grievances.

**Resolution Register:** (1) Serial no., (2) Case no (3) Name of complainant, (4) Complainant's story and expectation, (5) Date of hearing, (6) Date of field investigation (if any), (7) Results of hearing and field investigation, (8) Decision of GRC, (9) Progress (pending, solved), and (10) Agreements or commitments.

**Closing Register:** (1) Serial no., (2) Case no., (3) Name of complainant, (4) Decisions and response to complainants, (5) Mode and medium of communication, (6) Date of closing, (7) Confirmation of complainants' satisfaction, and (8) Management actions to avoid recurrence.

If aggrieved persons are not satisfied with the resolution, can appeal to higher level GRCs for further investigation. Even if the case is not resolved with MoWR, can appeal to court according to the law of the land. Grievance resolution will be a continuous process in project level activities and implementation of those. The GRCs will keep records of all resolved and unresolved complaints and grievances (one file for each case record) and make them available for review as and when asked for by Bank and any other interested persons/entities. The PMU also prepares periodic reports on the grievance resolution process and publish these on the Project website.

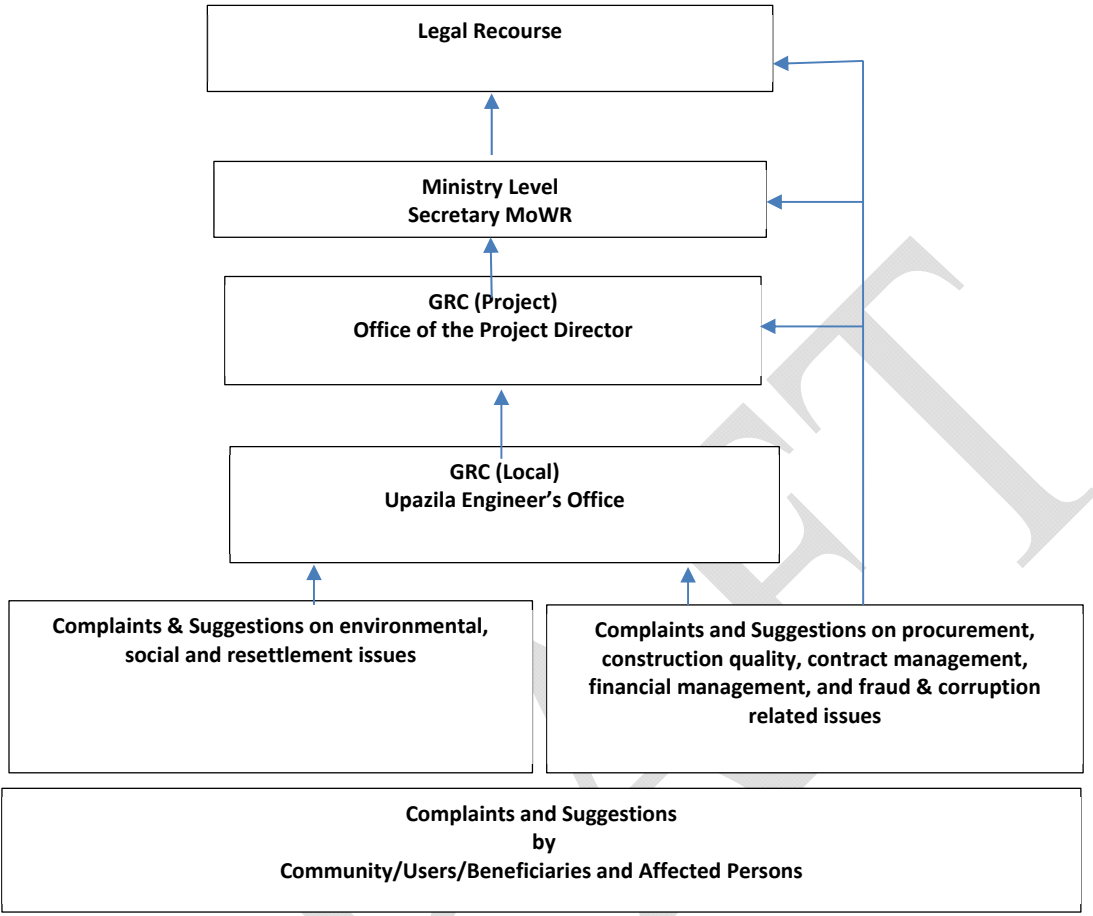


Figure 02: Grievance Redress Flow Chart

## Chapter 7: Implementation of the SEP and Budget

### 7.1 Institutional and Implementation Arrangements

#### 7.1.1 Project Executing Agency (EA)

The implementation arrangement of CEIP Phase 2 will follow that of CEIP Phase 1. GoB will implement the project under the overall responsibility for project management and coordination through the MoWR. A Project Steering Committee (PSC) provides the forum with overall guidance, policy advice and coordination of the project activities and addressing the inter-agency issues. BWDB under the MoWR is the Executing Agency (EA) of the Project. BWDB shall be responsible for the execution and implementation of the Project through the PMU.

#### 7.1.2 Project Steering Committee (PSC)

The PSC would be chaired by the Secretary of MoWR and will include the Secretaries of Finance, Agriculture, Environment, Public Health Engineering, Forestry and Wildlife, the Chief Executive officer of selected NGO, and representatives of the local/district administration as its members. The PSC will oversee the project; provide policy-level guidance and inter-agency coordination for the project. The PD of the PMU will act as the secretary of the PSC.

#### 7.1.3 Project Management Unit (PMU)

BWDB will set up a PMU to oversee the development and management of the project. The PMU will be led by a Project Director (PD) appointed by BWDB. It will have a central project office located at the headquarters of BWDB in Dhaka. The PD will have the rank of Chief Engineer and will report directly to the Director General (DG). The PMU will have 3 subordinate units: (i) Engineering Unit; (ii) Procurement and Finance Unit; and (iii) Social, Environment & Communication Unit (SECU). In addition to PMU at Dhaka, 3 Field Offices (FO) will be set up, each headed by a Project Manager (PM) of the rank of Executive Engineer, recruited by the project. The FOs will be located in each of the three main project districts, namely Khulna, Patuakhali/Barguna, and Bagerhat. The role of the PMU is, therefore, largely to contract competent organizations, to carefully supervise their performance, to enable them to perform efficiently, and to ensure transparent and regular reporting to MoWR and BWDB.

The PMU will be supported by an experienced and reputable Non-Governmental Organization (NGO) with strong presence in the project area for social mobilization including establishment of Water Management Organizations (WMO), and activities related to compensation, resettlement and rehabilitation of project affected persons (PAPs). The NGO will perform its activities directly under the supervision of the PD but will coordinate with the Design and Supervision Consultant (DSC) acting as the Engineer for the project.

A separate consultancy for Monitoring and Evaluation (M&E) will provide support in the supervision of the preparation and implementation of RAPs and will report to the PMU. The PMU will also be assisted by an Independent Panel of Expert (IPOE) for oversight of all aspects of the project including social issues.

#### 7.1.4 Ministry of Water Resources (MoWR)

MoWR will provide overall administrative support and inter-ministerial coordination. The Ministry through gazette notifications will form various participatory management bodies (committees) for preparation and implementation of the RAPs at the field level. The Implementing NGO will work as the member secretary for all the committees involving representatives from DC, BWDB, LGIs and PAPs. These committees will ensure stakeholders' participation and uphold the interest of the vulnerable PAPs. The powers and jurisdictions of the committees will be clearly defined in the gazette notification.

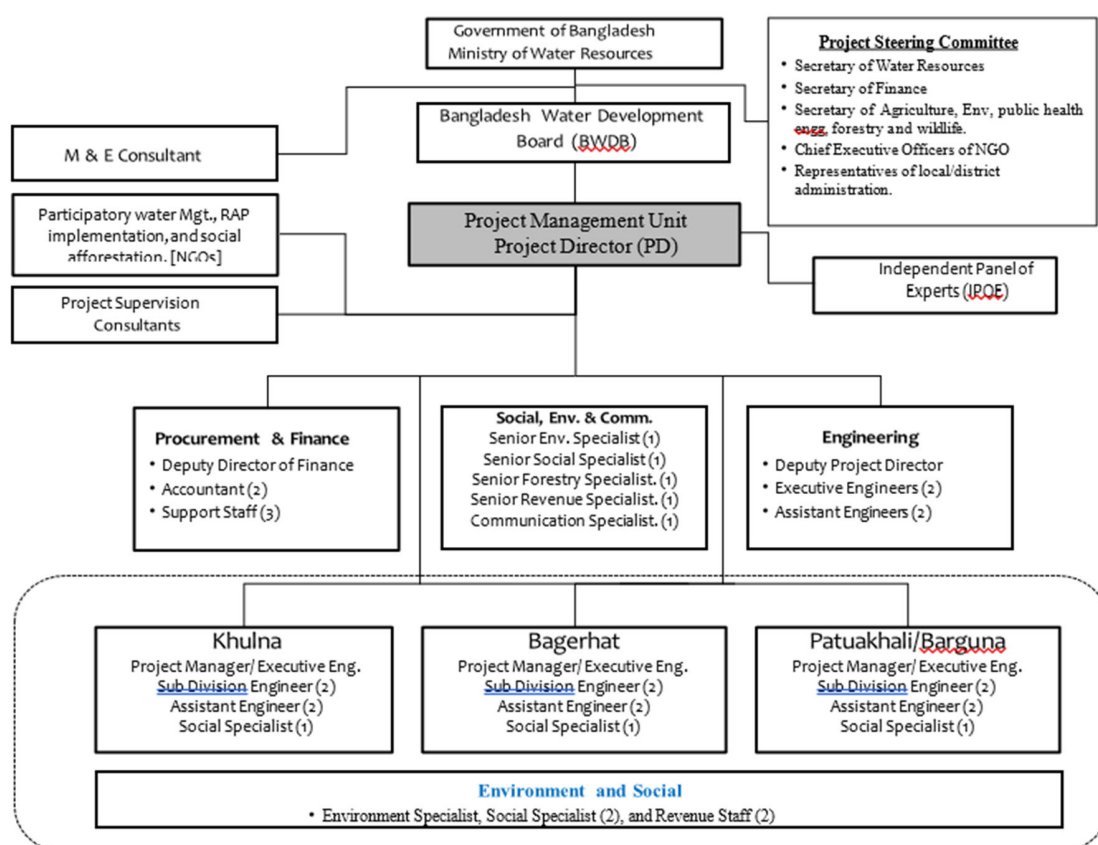


Figure 03: Project Institutional Arrangement

## 7.2. Specific Responsibilities

The specific role/responsibilities as regard the project's stakeholders' management is provided below:

Table 12: Role and Responsibilities for SEP Implementation

Actor/Stakeholder/ responsible person	Responsibilities
E&S Specialists and GRM team	<ul style="list-style-type: none"> <li>- Overall planning and implementation of the SEP;</li> <li>- Lead activities on stakeholders' engagement</li> <li>- Management and resolution of grievances;</li> <li>- Guide/coordinate/supervise the contractors for activities related to the SEP</li> <li>- Monitoring and reporting on SEP by MoWR, BWDB and World Bank</li> <li>- Take lead in carrying out the beneficiary satisfaction survey</li> </ul>
PMU Officials at HQ level	<ul style="list-style-type: none"> <li>- Visit dedicated project/subproject area for M&amp;R (at least Twice a year or as planned by the hierarchy)</li> </ul>
Implementation Consultants	<ul style="list-style-type: none"> <li>- Supervision/monitoring of Contractor on SEP and GRM</li> </ul>
Site Contractor(s) / sub-contractors	<ul style="list-style-type: none"> <li>- Report/inform PMU representatives at the subcomponent level</li> <li>- implementation of the SEP / engagement with the stakeholders.</li> <li>- Resolve and convey management/resolution of grievance cases to the project GRM team, in particular labor related grievance cases.</li> <li>- Prepare, disclose and implement the contractor's code of conduct, ESMP, etc.</li> <li>- Collaborate/inform the local communities and other local level stakeholders on the E&amp;S monitoring</li> </ul>
Other interested stakeholders (external/regulatory agencies)	<ul style="list-style-type: none"> <li>- Participate in the implementation of SEP, and ESMP activities</li> <li>- Monitor/ensure project's compliance with the laws of Bangladesh</li> <li>- Engage with the project's stakeholders on E&amp;S issues</li> </ul>

## 7.3 Budget for SEP Implementation

The PMU will develop its own DPP as per GOB requirements. As such, PMU will receive its own budget allocation during project implementation. The budget includes all the activities pertaining the project's stakeholder engagement plan and comprises of a range of activities of the project. This budget will be annually reviewed by the MoWR/ BWDB and if necessary, will be revised and adjusted. The budget is provided at Table below (all figures are in USD):

A tentative budget for implementing this SEP by PMU for the entire duration of the project is suggested as the Table below:



## Stakeholder Engagement Plan (SEP)

Table 13: SEP Implementation Budget

Serial	Activities	Quantity	Unit Cost (USD)	Times/Month-36 months from Effective Date	Total Cost (USD)
1.	<b>Stakeholder Engagement Activities</b>				
1.1	Salary - Environment and Social Specialists, Monitoring and Evaluation (M&E) Specialist, Procurement Specialist, Financial Management Specialist {Gender and GBV Specialist and Labor and OHS Specialist would need to be hired during construction }	5	1000	5 specialists for 48 months	240,000 (will be paid from project)
1.2	Travel expenses of the two specialists for 3 years to monitor construction work and Stakeholder/Community/Sensitization meeting/survey	4 times in the first year and 6 times in following two years – Total 10 times- visit number of districts in one go	1000	36 months	10,000
1.3	Stakeholder Meeting at MoWR/BWDB at Macro Level	3 meetings at BWDB prior effective date and then minimum twice in each year in the following 3 years	500	48 months	4,500
1.4	Communication Materials (Posters; Brochure, Flyers, Billboard uploading information in website etc.)	Lump Sum	5,000	48 months	5,000
1.5	Travel Expenses for Senior staffs of Ministry/BWDB	2-3 visits in a FY	1,000	36 months	9,000
1.6	Miscellaneous	Lump Sum	5000 a year	36 months	5,000
1.7	<b>TOTAL ON SEP ACTIVITIES (except for salary)</b>				<b>33,500</b>
2	<b>Grievance Redress Activities</b>				
2.1	Communication Materials	Lump sum for whole period	5,000	48 months	5,000
2.2	GRM Guidebook	1	2,000	48 months	2,000
2.3	Suggestions Box	36 Numbers	100	48 months	3,600
2.4	GRM MIS Database	Lump sum	5000	48 months	5,000
2.5	Honorarium for committees	Lump sum	2,500 a year	48 months	10,000
2.6	<b>TOTAL ON GRM</b>				<b>25,600</b>
<b>GRAND TOTAL (USD)</b>					<b>79,100</b>

## Chapter 8: Monitoring and Reporting

### 8.1 Monitoring Principles, Internal and External Monitoring, Reporting

Regular monitoring of project progress and stakeholder engagement will be built into the design, in the form of appropriate indicators, targets, information systems, and review mechanisms. The local BWDB/Project office will perform its own M&E activities while the PMU will perform M&E activities at the project level. BWDB will be responsible for managing a web-based platform, which will be developed to track the project's progress based on the Results Framework. The platform will support a participatory M&E, which will allow project stakeholders, such as the local BWDB Project office, MoWR, PMU officials, and consultants, to collect data on project progress. The M&E system will be used to take corrective actions, improve coordination, and facilitate learning throughout project implementation.

The PMU will prepare quarterly progress reports during project implementation on: (a) updated stakeholder engagement; (b) input from the stakeholders; (c) the status of project indicators against stakeholder engagement; and (d) inputs from vulnerable groups and status of grievance redress mechanism. The consolidated quarterly progress reports will be submitted by the BWDB to the World Bank and relevant line ministries. In addition, the World Bank, the PMU and other stakeholders will carry out annual progress reviews and a midterm review (MTR) of the project.

Monitoring and reporting will include involving Project Affected Parties (PAP), internal and external stakeholders, interested group and the vulnerable in monitoring mitigation measures that will be agreed on the ESCP to satisfy stakeholder concerns, including grievance resolution; thus, promoting transparency. The ESCP will further outline, based on close consultations with all stakeholders, how affected parties and interested or beneficiary parties will be involved in the monitoring and evaluation and assess whether or not capacity building and training programs will be required to enable affected parties and local staff participate in monitoring. The Project will establish a monitoring system that is participatory, which will utilize indicators that are sensible to concerned stakeholders. Furthermore, the project will involve affected parties by gathering their observations to triangulate scientific findings and involve them in participatory discussions of external and monitoring and evaluation missions.

The monitoring report will include clear and specific indicators both as regard the engagement with stakeholders and also the project's grievance redress management. The assigned officer for communication will work on a reporting matrix in this regard.

Table 14: Monitoring Report Matrix

Key elements	Timeframe	Methods	Responsibilities
Stakeholders' access to project information and consultations	Periodic (during project preparation and maintained throughout project implementation)	Interviews, observations, survey	PMU together with their representatives at the project sites and external monitor whenever employed
Project beneficiaries' awareness of project	Periodic (during project implementation)	Interviews, observations, survey	PMU together with external monitor

Key elements	Timeframe	Methods	Responsibilities
activities, their entitlements and responsibilities			
Acceptability and appropriateness of consultation and engagement approaches	Periodic (during project implementation)	Interviews, observations, survey, score card as relevant	PMU together with external monitor
Community facilitators' engagement with target beneficiaries	Periodic (during project implementation)	Interviews, observations, survey, score card as relevant	PMU together with external monitor
Public awareness of GRM channels and their reliability	Periodic (during project implementation)	Spot checks, interviews, observations	PMU together with external monitor
Accessibility and readability of public information dissemination materials	Periodic (during project implementation)	Spot checks, interviews, desk-review	PMU together with external monitor
Tones in social media and broader public perceptions (including NGOs/CSOs)	Periodic (during project implementation)	Social media monitoring, interviews, observations	PMU together with external monitor
Rate of grievances and complaints (reported and unreported)	Periodic (during project implementation)	Desk review, interviews, survey	PMU together with external monitor

## 8.2 Closing the Feedback Loop: Reporting Back to Stakeholder Groups

The CEIP Project team will ensure regular/periodic reporting back and information sharing with the PAPs and as well as the stakeholders' groups. This 'reporting back' measures vis-à-vis the PAPs and other stakeholders (including the disadvantaged and the vulnerable) should be carried through face-to-face meeting or direct interactions maintaining health protocol, whenever possible. Other pertinent media, such as website, social media, press briefing, may also be used.

Monthly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the senior management of the project. The monthly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner.

The Project will arrange necessary training associated with the implementation of this SEP that will be provided to the members of staff who, due to their professional duties, may be involved in interactions with the external public, as well as to the senior management. Specialized training will also be provided to the staff appointed to deal with community stakeholder grievances as per the Public Grievance Procedure. Project contractors will also receive necessary instructions for the Grievance Procedure and in relation to the main principles of community relations GRM in relation to the labour force working under them.

Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in two possible ways:

- Publication of a standalone annual report on project's interaction with the stakeholders.
- A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis, including the following parameters:
  - Number of public hearings, consultation meetings and other public discussions/forums conducted within a reporting period (e.g. monthly, quarterly, or annually);
  - Frequency of public engagement activities;
  - Geographical coverage of public engagement activities – number of locations and settlements covered by the consultation process, including the settlements in remote areas within the Project Area of Influence (PAI);
  - Number of public grievances received within a reporting period (e.g. monthly, quarterly, or annually) and number of those resolved within the prescribed timeline;
  - Type of public grievances received;
  - Number of press materials published/broadcasted in the local, regional, and national media;
  - Amount of Project's charitable investments in the local communities in the Project Area of Influence.

The outcomes/feedback from these 'reporting back' measures will be compiled and shared/disclosed with the stakeholders' and general public through the use of proper media, such as BWDB website along with MoWR website, social media accounts, and relevant communication materials, etc.

## Annex - 1: Sample 'Grievance Form' – CEIP-2

Grievance Form			
Grievance reference number (to be completed by Project):			
Contact details (may be submitted anonymously)	Name (s):		
	Address:		
	Telephone:		
	Email:		
How would you prefer to be contacted (check one)	By mail/post: <input type="checkbox"/>	By phone: <input type="checkbox"/>	By email <input type="checkbox"/>
Preferred language	<input type="checkbox"/> Bangla	<input type="checkbox"/> English	
Provide details of your grievance. Please describe the problem, who it happened to, when and where it happened, how many times, etc. Describe in as much detail as possible.			
What is your suggested resolution for the grievance, if you have one? Is there something you would like BWDB or another party/person to do to solve the problem?			
How have you submitted this form to the project?	Website <input type="checkbox"/>	Email <input type="checkbox"/>	By hand <input type="checkbox"/>
	In person <input type="checkbox"/>	By telephone <input type="checkbox"/>	Other (specify) <input type="checkbox"/>
Who filled out this form (If not the person named above)?	Name and contact details:		
Signature			
Name of BWDB/ official assigned responsibility			
Resolved or referred to GRC1?	<input type="checkbox"/> Resolved	<input type="checkbox"/> Referred	If referred, date:
Resolved referred to GRC2?	<input type="checkbox"/> Resolved	<input type="checkbox"/> Referred	If referred, date:
Completion			
Final resolution (briefly describe)			
	Short description	Accepted? (Y/N)	Acknowledgement signature
1 <sup>st</sup> proposed solution			
2 <sup>nd</sup> proposed solution			
3 <sup>rd</sup> proposed solution			