Local Government Engineering Department,
Ministry of Local Government Rural
Development & Co-operatives, Bangladesh

Independent Review under
Proposed Rural Transport
Improvement Project (RTIP)
of LGED, Dhaka,
Bangladesh:
Social Assessment

March 2003
Local Government Engineering Department,
Ministry of Local Government Rural
Development & Co-operatives, Bangladesh

Rural Transport Improvement
Project (RTIP) of LGED, Dhaka,
Bangladesh:
Revised Social Assessment Report:
Executive Summary

March 2003

Reference I 5805

For and on behalf of
ERM

Approved by: Dr T K Moulik

Signed: T K Moulik

Position: Vice Chairman & CEO

Date: 18 March 2003

This report has been prepared by ERM India Private Limited a
member of Environmental Resources Management Group of
companies, with all reasonable skill, care and diligence within the
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EXECUTIVE SUMMARY

The SA review looked at both the process and procedural aspects of the social assessment assignment and report, as well as the outputs in terms of the entitlement matrix and the strategy and action plans. The RAP document was out of the purview of this review. Each of the review components were reviewed for adequacy of:

- Policy environment
- Methodology
- Baseline information
- Project impacts
- Analysis of alternatives

The key outputs of the SA report and the resettlement framework are:

- The assignment has identified critical impacts of the project and ranked project components according to severity of the impacts. This has been done through a screening process, through which the SA recommends a detailed SA assessment for critical components at the implementation stage.
- Project sub-components, where severe impacts are anticipated, have been dropped, which demonstrates that the screening process has informed project design.
- The stakeholder analysis is comprehensive, though they have not been categorised into primary and secondary stakeholders.
- Public consultations with stakeholders have been extensive, and public concerns and expectations have been brought out in parts of the report like the IPDP. People’s suggestions regarding alternatives have also been recorded.
- The resettlement framework is comprehensive in its coverage of project impacts and PAP categories.
- Issues such as implementation mechanisms, capacity building requirements and monitoring and evaluation have been covered in both the SA document and at resettlement framework.

However, the review has also identified certain gaps, some of which are as follows:

- The report is loosely structured and does not have common links through different sections.
- The baseline scenario and the description of the approach and methodology, for the entire project, as well for specific components like the IPDP and the Gender Action Plan is sketchy and would need elaboration to get a better idea of the project context.
- Definitions and policy framework, specially of critical issues such as indigenous people, are either missing or inconsistent through the project document.
- In the stakeholder analysis, specific group/institution interest and concerns have not been brought out in context of that group. One does not get a clear idea the specific opinions of different stakeholder groups.
- In Public consultations, women specific issues have not been brought out adequately. The review teams own consultations in the field revealed that...
creation of an enabling environment to encourage women to participate was perhaps weak in the entire consultation process.

- The inclusion and participation strategy for women limits itself to linking the project with existing programmes for women, and to identifying some economic activities that women in the project area can take up. No definite strategy to build capacities and provide space for women to effectively participate in the resettlement process as also in local governance has been outlined.

- The resettlement framework does not specifically identify vulnerability of PAFs (key criteria could be income, women-headed households, family with aged and physically challenged members, landless families etc.), nor does it outline any specific additional provisions for such vulnerable families.

- The resettlement framework concentrates on resettlement and does not have provisions for rehabilitation, though in parts of the documents rehabilitation measures such as training, skill upgrading of PAPs and income generating activities have been mentioned. There is also no mention of a resettlement site, in case self-relocation is not possible on specific cases.

- The institutional framework and roles and responsibilities of staff suggested in different sections sometimes do not tally. Co-ordination of components like IPDP, SDGAP and Capacity Building needs strengthening.

- Monitoring and evaluation strategy and indicators primarily deal with the process of LA and physical resettlement. Qualitative indicators of transparency, participation, specially of women, income restoration, health etc. need to be included.

Very broadly the independent review has recommended:

- restructuring of the SA report into one cohesive document
- additional information and definitions to be provided where such information is critical to meet WB guidelines.
- Certain actions that need to be undertaken at the implementation stage that are again critical in order to meet Bank guidelines. Some additional suggestions specially regarding institutional arrangements and processes that are not mandatory but definitely desirable have also been outlined.

On meeting the above recommendations and changes, and on ensuring that the critical implementation issues are taken care of during the implementation stage of the project, this SA report can be considered to be complete and to meet the World Bank requirements.
ERM understands that the Government of Bangladesh (GOB) has requested financial assistance from International Development Association (IDA) for a Rural Transport Improvement Project (RTIP), which will be implemented by the Local Government Engineering Department (LGED) of the Local Government Division (LGD) of the Ministry of Local Government, Rural Development and Co-operatives (MLGRD&C). A Project Preparatory study entitled Rural Transport Improvement Project in Sylhet & Comilla and in Dhaka, Rajshahi, Pabna and Bogra regions is expected to be completed by March 2003. This study will identify rural transport related infrastructure and maintenance needs of 21 (twenty one) districts comprising Dhaka, Gazipur, Narayanganj, Narsingdi, Munshigonj, Manikgonj, Rajshahi, Natore, Naogaon, Nawabgonj, Pabna, Sirajgonj, Bogra, Joypurhat, Sylhet, Moulvibazar, Sunamgonj, Hobigonj, Comilla, B.Baria and Chandpur. The total project cost is estimated to be about US $255 million.

As part of project preparation, the environmental and social assessments were carried under related Policies/Directives/ Guidelines/Technical reports and the Project Preparation Consultancy Services (PPC) have submitted following documents

* **Social Assessment Documents**

1) Report on Stakeholder Analysis  
2) Report on Social Screening  
3) Resettlement Action Plan (RAP)  
4) Indigenous People Development Plan (IPDP)  
5) Social Development and Gender Action Plan (SDGAP)

The findings and the recommendations of these different reports have been incorporated in engineering designs and contract documents of the proposed project are at an advanced stage.

**1.1.2 Objectives of Social Assessments**

The overall objectives of the *Independent Reviews of Social Assessment* is to ensure that the process and outputs of social aspects have complied with IDA’s ODs/OPs. Specific objectives include the following:

* **Social Assessment**

- To review the process and the outputs of Resettlement Action Plan (RAP) prepared in order to confirm that the World Bank Operational Policies OP 4.12 have complied with.
- To review the process and the outputs of Indigenous People Development Plan (IPDP) prepared to confirm that the World Bank Operational Policies (OD) have complied with.
To review the process and the outputs of Social Development and Gender Action Plan (SDGAP) prepared so as to confirm that the World Bank Operational Policies (OD) have complied with.

To confirm that above outputs are integrated with the project's economic, financial, institutional, social and technical analyses to ensure that social considerations are given weightage in designs and implementation of the project.

To study the outputs in order to determine whether the coverage is comprehensive, the analysis is adequate in its depth and the various outputs are consistent with each other.

To verify that the outputs have been adequately addressed in the project's engineering design in contract document and in its implementation procedures.

To finalise various outputs incorporating the review findings.

1.2 LAYOUT OF THE REPORT

This report has the following structure

Section 1 (this section): Project background

Section 2: Approach and methodology for the Social Assessment Review

Section 3: SA Review Findings

Section 4: Conclusions

Annex A: List of People interacted with
**APPROACH AND METHODOLOGY**

### 2.1 ERM’S UNDERSTANDING

ERM understands that this project has several sub-components that will be taken up over a period of 5 years. The details of the all the sub-components at this stage is not known. Hence instead of trying to provide detailed social assessment and RAP for all the project components at this stage, the project has adopted the Framework Approach to the assignment. Under this approach, an initial screening of all proposed components was conducted on the basis of which the key social impact were identified along with the categories of different project affected people/families. On this basis the principles of an entitlement framework along with people eligible and the procedures to be followed have been determined. This entitlement framework or "resettlement framework" as called by this project, will then be used for conducting detailed social assessment and preparation of a Resettlement Action Plan (RAP) as and when project components are taken up for implementation.

### 2.2 SCOPE OF WORK

The scope of work as delineated in the ToRs include the following:

#### 2.2.1 Social Assessment Review

1) The Consultant will review the project Resettlement Action Plan (RAP), Indigenous People Development Plan (IPDP) and Social Development and Gender Action Plan (SDGAP). The Consultant will also ensure that these project-specific reports are prepared in accordance with proper social screening and stakeholder analysis.

2) The Consultant will ensure that the methodology / approach adopted in undertaking the assessment and in producing the various reports are consistent with the requirements of World Bank Operational Policies (OPs)/ Operational Directives (ODs)/.

3) The Consultant will examine the Reports / information / data, both from primary and secondary sources, and incorporate the findings of the various surveys carried out during the screening of the project. The information / data will include Stakeholder Analysis, Social Screening, Census of the Affected Population, Participation Framework etc. The Consultant will verify that the baseline information adequately addresses those areas in which the project is impacted.

4) The Consultant will review the assessment of potential impact to determine whether these have been based on appropriate quantitative and qualitative extrapolative analyses, and are comprehensive in their coverage. The Consultant will ensure that the project impacts address social issues relating to - indigenous people and cultural property as per ODs/OPs. The Consultant will also review whether the project’s direct, indirect, induced and cumulative impacts have been suitably considered and addressed.
5) The Consultant will examine the proposed remedial (prevention, mitigation and compensation) measures and confirmed that it is commensurate to the nature, scale and potential of the project impacts.

6) The Consultant will also review the monitoring mechanisms for social components of the project. Monitoring mechanisms need to be established both for implementation and operation periods and be a part of the SA.

7) The Consultant shall review the efforts and methodologies adopted for obtaining, considering and incorporating public opinion / concerns in the designing the project. This include documentation of the consultation process, minutes / photographs of public hearings and other consultative meetings, issues raised and how these have been addressed or not addressed by the project.

8) The Consultant shall review public suggestions for enhancement measures vis-à-vis those included in the project design.

9) The Consultant will examine the SA in the following areas:

   a) The inclusion of all the remedial measures identified in the SA with particulars such as the stage in which they are applicable (design construction and operational), the sections / locations of the road corridor to which they are applicable and the reference to the appropriate contract clause.

   b) The inclusion of all the enhancement measure identified in the SA particularly the wage discrimination between male and female / child labour / women’s participation / public safety etc. are duly incorporated in the specifications / contract clauses.

   c) The sufficiency and the adequacy of the institutional arrangements, capacity and procedures to be able to implement the SA.

   d) The cost of remedial measures and that these, along with social related staffing, training and institutional requirements that are budgeted in the project cost.

   e) The monitoring mechanisms / plan for social components (with performance indicators wherever possible) for both the, preparation, construction and operational phases. The performance indicators selected should be easily comprehensible and measurable.

   f) The inclusion of focused, relevant plans across particular subject categories such as temporary shifting arrangements (if any), traffic ability of the road during construction, labour sheds etc.

   g) The inclusion of the social mitigation and enhancement measures including items described in the scope of work, complete with plans, designs, BOQ and technical specifications.

   h) The structure and content of the SA as a whole for distribution as an action plan and coverage of all elements for it to be a legal document so that it can be made a legal covenant when the loan is negotiated.

10. The Consultant shall assimilate information from the RAP to identify the gaps / deficiencies, if any, in relation to the estimates on land acquisition based on the final design, social impact assessment, institutional and implementation arrangements, livelihood strategies, budget and monitoring and evaluating parameters.

11. The Consultant will undertake site visits, surveys and discussions with relevant representatives of the project team and public in suitable manner to fulfill the requirements of this review assignment.
12. The Consultant will examine the SA and RAP vis-à-vis the engineering
designs and the overall project implementation plans in order to ensure that
the findings are suitably incorporated.
13. The Consultant will interact with the PIO / PPC on the continuous basis
throughout the conduct of this review assignment. The Consultant will
collect any information required from the World Bank.
14. The Consultant will prepare a draft review report (outline is provided
under Reporting Requirements) and discuss the same with the PIO.
15. The PIO will provide comments to the Consultant on the draft review
report that will focus on the required modifications to the SA outputs and
RAP.

2.3 APPROACH AND METHODOLOGY FOR REVIEW

ERM has carried out the assignment as per the terms of reference and scope of
work outlined by LGED. The general methodology of the review would be as
per relevant World Bank’s Operational Policies and Directives (OPs, ODs, BPs,
GPs).

Through our considerable experience in working on Environmental and Social
Assessments and related mitigation and resettlement issues, specially in the
road sectors, we understand the safeguard requirements of the World Bank as
expressed in the various Operational Directives and Operational Policies. We
have also been involved in a number of independent reviews and monitoring of
Resettlement and Rehabilitation programmes in the road sector and are very
much aware of the ground realities and problems that emerge during the
implementation stage. We understand that for the social assessment
assignments are undertaken keeping in mind the following relevant
policies/directives:

Table 2.1 World Bank: Safeguard Policies

<table>
<thead>
<tr>
<th>Policy/Directive</th>
<th>Key Features</th>
</tr>
</thead>
</table>
| OP 4.12 Involuntary Resettlement | • Implemented in projects which displace people  
• Requires public participation in resettlement planning as part of EA for project  
• Intended to restore or improve income-earning capacity of displaced populations |
| OD 4.20 Indigenous Peoples |   
• Purpose is to ensure indigenous peoples benefit from Bank-financed development and to Avoid or mitigate adverse affects on indigenous peoples  
• Applies to projects that might adversely affect indigenous peoples or when they are targeted beneficiaries  
• Requires participation of indigenous peoples in creation of "indigenous peoples development plans" |

Based on our understanding of the assignment and the scope of work this
review was conducted within the framework approach, and has also tried to
identify some of the crucial issues that may not have been dealt with adequately
at this stage of the project, but would need attention and consideration at the
implementation stage.
Our approach to the review assignment is based on the following:

- The environment and social teams for the review worked as a team and undertook the field survey together. This ensured that there was no duplication of work, considering the fact that some processes are common to both the assignments.
- Considering the very limited time frame provided, the review is a purely desk based review wherein all the relevant document and supporting information were made available to us by the SA consultants preparing these reports. No primary baseline data were collected or generated by the review teams.
- While the desk review was done in Delhi, the review team ensured that there was regular communication and interaction with the PPC team and the LGED (client) to ensure smooth progress of work and a spirit of collaboration.
- A rapid reconnaissance appraisal was conducted in two phases for 10 days wherein the review consultants made first hand observations of the field situation in terms of social issues and possible impacts throughout the project area. Observations have been supplemented with consultations with Project Affected People at different stretches.
- During the reconnaissance survey the ERM team was accompanied by at least one member of the LGED team.

Based on the above approach the following tasks were undertaken:

2.3.1 
Activity A1: Kick-off Meeting with Concerned Project Officials in LGED

Immediately following the completion of the contract negotiations, the Project Director, together with the Project Manager completed all logistical arrangements. In accordance with ERM’s quality requirements, the Project Manager formalised team briefing notes outlining the scope of work and outputs required from each of the team member. A kick-off meeting was arranged between ERM’s project team and concerned officials of LGED and Project Preparation Consultants between 22 and 25 January, 2003, in order to appraise the project background, present status, sources of secondary data/reports etc. The team also visited 3 project roads in the Gazipur district to get a first hand impression of the project area and the social implications.

2.3.2 
Activity A2: Collection & Preliminary Review of Documents Pertinent to RTIP Components

ERM collected and reviewed relevant documents pertaining to Social Assessment as prepared by PPC and LGED. The documents included the following:

1) Report on Stakeholder Analysis
2) Methodology for Socio-Economic Baseline Survey
3) Report on Social Screening
4) Resettlement Framework
5) Draft Report on Participation and Consultation
6) Indigenous Peoples Framework Indigenous Peoples Development Plan (IPDP)
7) Social Development and Gender Action Plan (SDGAP)
8) Linkage of Social Screening with Design
9) Implementation Mechanisms and Capacity Building

This preliminary review helped the team to:

- broadly assess the quality of the reports and the details provided
- identify inadequacy of information provided, which would in turn require more information to be provided by the SA consultants
- understand the exact scope of work and the time frame required for carrying out the required tasks efficiently and to the satisfaction of the client.

2.3.3 Activity A3: Identifying Applicable Guidelines of World Bank, State/Local Level

ERM looked at the applicable WB guidelines, Operational Policies and Operational Directives on Social Assessment together with applicable local government guidelines, legislation and regulations and fully recognise the need to comply with them. In particular “The Acquisition and Requisition of Immovable Property Ordinance, 1982” was collected and reviewed to understand the Land Acquisition procedures and compensation mechanisms in the country.

Specific requirements for the RTIP project were identified and the reports reviewed in light of the applicable guidelines.

2.3.4 Activity A4 Rapid Reconnaissance Survey / Discussions with LGED/PPC Consultants

Social Experts undertook a rapid reconnaissance survey of the project area between the 15 February and 23 February, 2003. The reconnaissance visit comprised of the following activities:

- Meeting with the clients: A meeting was held with the Project Director, Rural Road Project -11, LGED and other relevant officials on 17, 18 and 22 February to fully comprehend the scale of the project, the various activities that are being envisaged, key social issues in the area and the progress of the Project Preparation.
- Meeting with the World Bank Mission: The World Bank Review Mission for the project was in Bangladesh in early February. The ERM team met the members of the mission both in Delhi (14 Feb) and in Dhaka on 18 February. The WB apprised the review team of its expectation from this review assignment, and clarified issues raised by the team.
- Meeting with the Project Preparation Consultants. The team met with the PPC members on 17 February to understand the approach and methodology adopted for the social assessment and the preparation of the resettlement framework. Meeting was also useful in understanding how the various issues brought out by the SA have been considered or incorporated in the engineering designs.
- Field visit to the project road: The team visited the following project components:
### Table 2.1 Site Visits

<table>
<thead>
<tr>
<th>Sub-Project</th>
<th>District</th>
<th>Frj Type</th>
<th>Date of Visit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dhaka Aricha Highway - Kalatpara via Vakuta</td>
<td>Dhaka</td>
<td>FKB</td>
<td>17 Feb 03</td>
</tr>
<tr>
<td>Boalia R&amp;H - Solanga GC Road</td>
<td>Sirajganj</td>
<td>FKB</td>
<td>18 Feb 03</td>
</tr>
<tr>
<td>Santhuya 24 mile - Asharafsar road</td>
<td>Pabna</td>
<td>FKB</td>
<td>19 Feb 03</td>
</tr>
<tr>
<td>Rajabari Kakonhat road</td>
<td>Rajshahi</td>
<td>FKB</td>
<td>20 Feb 03</td>
</tr>
<tr>
<td>Godagan Bidirpur</td>
<td>Rajshahi</td>
<td>GCM</td>
<td>20 Feb 03</td>
</tr>
<tr>
<td>Jamshaha ghat</td>
<td>Manikganj</td>
<td>GCM</td>
<td>22 Feb 03</td>
</tr>
</tbody>
</table>

During these site visits the consultants:
- Assessed the social conditions with focus on the following issues:
  - Presence of sensitive features, religious structures etc, within along the proposed RoW of RTIP components;
  - Public utilities/ facilities, viz, power supply lines (both overhead and underground cables), water supply lines, sewage lines, and underground Cables, etc.
  - Baseline conditions
  - Proposed construction yard, storage sheds, labour camps locations, etc.
- Conducted Stakeholder Consultations: The review team randomly held consultations with:
  - Project Affected People and Families
  - Political and other local administrative representatives
  - Members of NGOs and CBOs working in that area
  - Representatives of tribal groups (from the Santhal and the Oraon community in Rajshahi District)

The consultations enabled the consultants to assess the appropriateness of the approach and methodology adopted under the SA studies. It also helped assess the awareness about the project in the project area, and the opinions/expectations of the affected people in terms of compensation and rehabilitation measures and then compare them to the measures suggested in the SA report.

### 2.3.5 Activity A5: Detailed Review of Project Documents

On the basis of site visits and comprehensive assessment of the documents made available to the review team, the SA document was reviewed on the following parameters:
- Adequacy of baseline information and the qualitative and quantitative analysis
- Adequacy of the policy framework and analysis
- Whether there is adequate evidence that social concerns have been duly incorporated into the engineering designs and contract documents
- That public consultations held and documented reflect the issues raised by the people and whether these have informed the SA and Resettlement framework.
- That the resettlement or entitlement framework comprehensively identifies the project impacts and provides adequate mitigation measures.
- That the strategies and recommendations have effectively dealt with institutional mechanisms, monitoring and evaluation systems and grievance redressal processes at different stages of the project implementation.
• That the mitigation measures and the consequent requirement of staff, capacity building and reporting have been looked into.
3 REVIEW FINDINGS

The review findings of the social assessment report (including the IPDP, Social Development and Gender Strategy and Action Plan and Resettlement Framework) is being provided under the specific heads. However we have first provided the some general comments and then go down to the specific issues.

3.1 GENERAL COMMENTS

The SA report is comprehensive in its coverage of issues and broadly meets the requirements of the World Bank in terms of process. However, as the entire exercise was conducted in a disjointed manner, there is a lack of cohesiveness and linkage in the report which further leads to problems such as repetition, issues (such and gender and indigenous peoples) being dealt with in isolation, gaps and deficiencies in the baseline, and dissimilar profile and recommendations for same parameters in different sections of the report etc. This basic problem will get reflected in different sections of the review.

Some specific comments on the structure are:

- The report does not yet read like one Social Assessment Report, as each section still stand out as separate document with no common links with other sections
- The resettlement framework is still not a part of the main SA document
- The socio-economic profile of the project area has been described in bits and pieces in different sections of the report, but one still does not get a comprehensive picture of the socio-economic status of the area.
- Some issues and recommendations in terms of institutional and implementation mechanisms in the main report do not tally with what has been recommended in the resettlement framework.

We recommend that the report should be seen as one comprehensive report and it is suggested that the report follows the following structure:

Vol I
1. Introduction
2. Approach and methodology
3. Socio-economic profile of the project area (Project context)
4. Stakeholder Analysis
5. Summary findings of the Screening process and linkages with design
6. Resettlement Framework
7. Institutional Arrangements, Implementation Mechanisms and Capacity Building

Vol II
Indigenous People's Development Plan

Vol III
Social Development and Gender Strategy and Action Plan
In addition references and sources of data have not been mentioned in any of the report, and these need to be added wherever relevant.

### 3.2 Specific Review Findings

We have divided the review into two sections:

1. Review of Process and methodological tools that the SA study used. This aspect is more procedural but it is important as it forms the basis on which the study has approached the social dimensions of the project, analysed critical issues such as project impacts, indigenous people, gender etc. In this section we will review the social screening, socio-economic baseline, stakeholder analysis and public consultations.

2. Review of Outputs or plans and strategies that the SA study has come up with. The processes discussed in the earlier point, are designed to inform and shape this “output” stage that includes analysis of aspects flagged for special attention like, (specific plans for Indigenous peoples,) development and safeguarding the interest of more vulnerable groups and the planning and design of strategies for future action.

For comparability, we have analysed both these sections on the basis of common parameters namely:

- Policy environment
- Methodology
- Adequacy of baseline information/data
- Adequate Identification of project impacts and Remedial measures
- Analysis of alternatives

Some of the parameters may not be relevant for all the components for review. We have left those sections as blanks.
<table>
<thead>
<tr>
<th>Processes and methodological tools</th>
<th>Parameters: observations</th>
<th>Gaps - Deficiencies</th>
<th>Recommendations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Methodology</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Identified critical issues for all project components</td>
<td>• Sample selection process for screening of Ghats, bridges, SRRs and GCMs not included</td>
<td>• Provide details of how the sample selection for screening have been done for Ghats, bridges, SRRs and GCMs</td>
<td></td>
</tr>
<tr>
<td>• Ranked components according to severity of impact</td>
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<tr>
<td><strong>Baseline</strong></td>
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<tr>
<td>• Extensive information available, however some of the data fields need to be supported with additional information</td>
<td>• Terms like 'Poverty line' MMC, NMB, MB have not been defined</td>
<td>• Include definition of terms that have been used along with sources.</td>
<td></td>
</tr>
<tr>
<td>• 'Expected income enhancement' needs to be substantiated in case of GCMs (at places it is pegged at 200% with no base figures to go by)</td>
<td></td>
<td>• Wherever there are projections, include the logic and basis for such projection of impacts</td>
<td></td>
</tr>
<tr>
<td>• In many places data fields have 'NA' for FRBs and GCMs</td>
<td></td>
<td>• Clarify whether NA stands for 'Not Applicable' or 'Not available' and alter/delete fields in tables accordingly</td>
<td></td>
</tr>
<tr>
<td><strong>Project Impacts and remedial measures</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Severity or scale of potential impacts have been used to identify project components that need a detailed Social Assessment at the implementation stage</td>
<td>• Though impacts in terms of income loss and livelihood have been identified (specially in the case of GCMs), SA is not recommended in some cases</td>
<td>All land, structure and livelihood related impacts would need a detailed social assessment</td>
<td></td>
</tr>
<tr>
<td>• At places where 'Khas land' or vacant land is not available for temporary relocation of GCMs, alternative arrangements have not been discussed</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Processes and methodological tools</td>
<td>Parameters: observations</td>
<td>Gaps - Deficiencies</td>
<td>Recommendations</td>
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<tr>
<td><strong>Analysis of alternatives</strong></td>
<td></td>
<td>Refer to the issue of availability of 'Khas land'/vacant land for temporary relocation of GCMs, in the preceding row</td>
<td></td>
</tr>
<tr>
<td>To the extent possible, cultural property and homestead structures have been saved</td>
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<tr>
<td>Roads, ghats and GCMs with more serious impacts have been dropped</td>
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</tr>
<tr>
<td><strong>Socio-economic baseline</strong></td>
<td></td>
<td></td>
<td>Key criteria for selecting sample should include income, ethnicity, physical location in project area and vulnerability (women headed household, destitute people, physically challenged people etc)</td>
</tr>
<tr>
<td><strong>Methodology</strong></td>
<td></td>
<td></td>
<td>'PAPs' and 'indigenous PAPs' need to be described accurately and the definitions of 'indigenous people' needs to be consistent across all documents pertaining to the project</td>
</tr>
<tr>
<td>It is understood that the sample socio-economic survey will provide supplementary information to the PAF census information</td>
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<tr>
<td>The methodology for the socio-economic baseline has been included as a separate section and contains method for determining sample size, questionnaire and methodology for data analysis</td>
<td></td>
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</tr>
<tr>
<td>The Introduction of Section 5 (SA Report), titled &quot;Methodology for socio-economic baseline survey' describes 'non-indigenous PAPs' and 'indigenous PAPs'</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The complementarity of socio-economic sample studies with PAF census data is not brought out in the methodology outlined</td>
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<tr>
<td>The sampling method concentrates only on loss of land as criteria for identifying a sample</td>
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</tr>
<tr>
<td>The description of 'PAPs' and 'indigenous PAPs' in the mentioned section is incorrect</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Processes and methodological tools</td>
<td>Parameters: observations</td>
<td>Gaps - Deficiencies</td>
<td>Recommendations</td>
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</tr>
</tbody>
</table>
| **Baseline scenario**            |                          | A comprehensive picture of the socio-economic status of the area is missing. This profile is necessary to get a clear idea about the project context and should inform the entitlement framework, remedial measures and recommendations and strategy action plans | A comprehensive socio-economic profile of the area needs to be included before the section on screening. The profile should broadly focus on:  
  - Demography (population, density, sex ratio, literacy)  
  - Occupational pattern/workforce participation  
  - Landholding pattern  
  - Land use pattern  
  - Agriculture and cropping pattern  
  - Trends in poverty etc.  
  
This profile needs to be prepared from a combination of primary information and secondary data. |
<p>| <strong>Stakeholder analysis</strong>         |                          |                     |                 |
| <strong>Policy environment</strong>           |                          |                     |                 |
| • Bases itself on the World Bank’s GP 10.05 for conducting stakeholder analysis | | | |</p>
<table>
<thead>
<tr>
<th>Processes and methodological tools</th>
<th>Parameters: observations</th>
<th>Gaps - Deficiencies</th>
<th>Recommendations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Methodology</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Stakeholder analysis has been done in two places:</td>
<td>• The stakeholder groups have not been categorised under 'primary' and 'secondary' and secondary stakeholders should include the central government, other government departments, donors like the World Bank and other institutional stakeholders</td>
<td>• Stakeholder groups need to be analysed in terms of their expectations and concerns viz the project impacts, both positive and negative.</td>
<td></td>
</tr>
<tr>
<td>- Stakeholder Analysis done by the PPC</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Draft report on participation and consultation by LGED</td>
<td></td>
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<tr>
<td>The LGED document contains a detailed methodology for conducting consultations as well as the theoretical underpinnings</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>• A comprehensive list of stakeholders has been included for each category of project</td>
<td>• The list of group and institutional stakeholder interests needs to be identified in the context of specific groups eg. Women, local traders associations, NGOs, local government departments etc.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Stakeholder interests and influence have been listed under three categories of 'institutional', 'group' and 'individual'</td>
<td>• The list of group and institutional stakeholder interests have not been identified in the context of specific groups</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Project impacts and remedial measures</strong></td>
<td>• Project impacts have not been summarised with respect to other stakeholder groups. Key concerns and expectations have not been identified with the corresponding group</td>
<td>• Stakeholder groups need to be identified in the context of specific groups</td>
<td></td>
</tr>
<tr>
<td>• Stakeholders' reactions to project impacts have been briefly provided in the IPDP, covering only Indigenous People as a stakeholder group</td>
<td>• Stakeholder groups need to be analysed in terms of their expectations and concerns viz the project impacts, both positive and negative.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Processes and methodological tools</td>
<td>Parameters: observations</td>
<td>Gaps - Deficiencies</td>
<td>Recommendations</td>
</tr>
<tr>
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</tr>
<tr>
<td><strong>Methodology</strong></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>• Several consultations and FGDs have been held with the local communities and NGOs at different locations. People are aware of the project and know the benefits and adverse impacts through these consultations.</td>
<td></td>
<td>• Consultations with the local people by the review team revealed that at places these consultations have not adequately encouraged women to participate and voice their opinions, which in turn explains why gender specific problems do not get reflected in the entitlement matrix or the IPDP.</td>
<td>• A framework should be developed on the basis of women specific meetings, held to prepare the gender action plan for each project component. This should be preceded by creating an enabling environment to facilitate women to participate effectively. It would be helpful to have women sociologist or community organisers be responsible for such consultations process.</td>
</tr>
<tr>
<td>• Consultations have been adequate and people’s concerns have found place in different sections of the report and recommendations including design.</td>
<td></td>
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</tbody>
</table>

**Analysis of Alternatives**

- People’s suggestions regarding alternatives and additional comments has been recorded

<p>| | | |</p>
<table>
<thead>
<tr>
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<tbody>
<tr>
<td></td>
<td></td>
<td>To the extent possible, this should be followed up through monitoring in the implementation stage</td>
</tr>
</tbody>
</table>
## Table 3.2 Review of Outputs: Strategy and action plans

<table>
<thead>
<tr>
<th>Outputs/Strategies</th>
<th>Parameters: Observations</th>
<th>Gaps - Deficiencies</th>
<th>Recommendations</th>
</tr>
</thead>
</table>

**Policy Environment**
- The policy analysis describes general Constitutional Provisions in terms of fundamental rights of citizens and support for cultural traditions in general. The IPDP also goes on to quote a convention of 1957 (Indigenous and Tribal Population Treaty of 1957, an ILO convention) which the Government of Bangladesh ratified in 1972. This convention is outdated and has now been superseded by another to which the GoB is not a signatory.
- We understand that the issue of indigenous peoples/ethnic minorities/tribal groups have been covered by the GoB through various policies and treaties, though there is no one umbrella definition for indigenous people in the country. An acceptable definition has been provided as below:

> "This term describes social groups with a social and cultural identity distinct from the dominant society that makes them vulnerable to being disadvantaged in the development process. Generally this refers to the different tribal people in the country."

The World Bank OD 4 20 requires the legal framework to contain an assessment of:
- The legal status of the groups to be covered by this OD as reflected in the country's constitution, legislation, and subsidiary legislation
- The ability of such groups to obtain access to and effectively use the legal system to defend their rights (specially in terms of rights over land, forests natural resources etc.)

This needs to be included in the policy analysis of IPDP.
<table>
<thead>
<tr>
<th>Outputs/Strategies</th>
<th>Parameters: Observations</th>
<th>Gaps - Deficiencies</th>
<th>Recommendations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Methodology and baseline</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- The IPDP has been prepared based on the survey of 7 affected IP households and FGDs with the IP community in general</td>
<td>- Though the 7 IP households surveyed form a census in terms of the directly impacted, they are not an adequate sample to represent and cover all the issues pertaining to the larger group of IPs present in the project areas. This includes critical issues that need to be targeted through the IPDP like land tenure, access to resources, participation in development processes and projects, social organisation and representation in local politics etc.</td>
<td>- The baseline socio-economic profile of the tribal areas in the project needs to be provided before going into the details of the strategy for participation in the IPDP.</td>
<td></td>
</tr>
<tr>
<td>- The IPDP is representative of approximately 61,000 IP households in the project area</td>
<td></td>
<td>- Issues such as status of land tenure, social organisation, legal and policy framework needs to be strengthened. It is suggested that during the implementation stage, micro-level IPDPs need to be prepared at project sites with IP populations, through extensive PRA exercises such as resource planning, settlement mapping, stakeholder analysis, poverty assessment and wealth ranking to develop more locally relevant action plans for participation and mitigation.</td>
<td></td>
</tr>
</tbody>
</table>

Issues pertaining to implementation, monitoring and capacities are addressed in a subsequent section in this table.
<table>
<thead>
<tr>
<th>Outputs/Strategies</th>
<th>Parameters: Observations</th>
<th>Gaps - Deficiencies</th>
<th>Recommendations</th>
</tr>
</thead>
</table>
| **Project impacts** | 7 IP households impacted in FRBs  
No IP households affected in other project components.  
Table 3 summarises 'perceived benefits', 'problems identified' and 'remedies suggested' | The table is inconsistent in terms of the remedies suggested with respect to the problems identified eg. Problem identified: “restricting area of play for children’ while the remedies suggested are ‘well maintained vehicles’ and ‘require more space at both sides of the road’  
Some of the remedies suggested are too broad in their scope and not focussed enough to be translated into action | The table needs to be made consistent across ‘problems identified’ and its ‘remedies’  
More ‘do-able’ action points need to be included under ‘remedies suggested’ eg. The perceived problem of increase in accidents needs actions like awareness campaigns regarding road safety, traffic calming measures, the installation of appropriate traffic signage, strict monitoring of speeds, specially in inhabited areas, etc. |
<p>| <strong>Policy environment</strong> |  |  |  |
| <strong>Methodology</strong> | The Gender action plan has been prepared largely on the basis of findings of the FGDs | Many sections are repeated and overall editing is required. | Editing required |</p>
<table>
<thead>
<tr>
<th>Outputs/Strategies</th>
<th>Parameters: Observations</th>
<th>Caps - Deficiencies</th>
<th>Recommendations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Baseline scenario</strong></td>
<td>• A small section in the annex is the only baseline description of the status of women in Bangladesh, the rest of the information is about the various development policies and programs</td>
<td></td>
<td>Additional information, to the extent possible, needs to be added on the key parameters relating to the status of women, like literacy, participation in economic activities, and degree of involvement with decision making at various levels as baseline</td>
</tr>
<tr>
<td>Outputs/Strategies</td>
<td>Parameters: Observations</td>
<td>Gaps - Deficiencies</td>
<td>Recommendations</td>
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<tr>
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</tr>
</tbody>
</table>
| **Project impacts and remedial measures** | - The report brings out the importance of women's participation in rural infrastructure development  
- It highlights certain assumptions made regarding women in the planning of such projects viz. the field level realities.  
- It identifies activities like seasonal vegetable and seed production, formation of women’s cooperatives for economic activities, tree planting, as part of the gender action plan | - The ‘inclusion’ and participation strategies are limited to identifying activities that the women can take up, in the project and does not give strategies to build their capacities and enhance their level of participation in the project  
- No monitoring strategies have been included.  
- The implementation of the gender action plan to enhance project benefits requires a dedicated agency/body to coordinate its various aspects. At a broad level the LGED has been identified to carry out this task. More specific and targeted arrangements need to be included to adequately address this issue of co-ordination and implementation | - Refer to the section on ‘public consultation’ for increasing participation of women  
- During the socio-economic sample survey, in the implementation stage, a ‘skill mapping’ exercise for women in the project area needs to be conducted to help identify the most appropriate activities for income generation and capacity building requirements  
- Monitoring framework for the project should include gender specific monitoring indicators including health.  
- It may be more feasible to limit linkages with only a select set of gender development projects  
- Within the LGED, a social development unit may be identified/included, as feasible under the current overall structure. This unit could include a Social Development Specialist and 2-3 gender and indigenous people’s specialists (NGOs or individuals), and a member of the relevant government department for women as external resource persons. This unit can then be responsible for implementation and M & E of both the Gender Action plan and the IPDP. |
<table>
<thead>
<tr>
<th>Outputs/Strategies</th>
<th>Parameters: Observations</th>
<th>Gaps - Deficiencies</th>
<th>Recommendations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Policy Environment</strong></td>
<td>• The issue of resettlement has been addressed in the context of the Land Acquisition Ordinance of Bangladesh includes some aspects of the World Bank Guidelines on Involuntary Resettlement OP 4.12. Bangladesh does not have any specific policy framework on resettlement.</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td><strong>Methodology</strong></td>
<td>• A census survey has been undertaken for all the project affected families along the first year FRBs and will be carried out for all other project components. This survey till now has not identified any family that is losing more than 10% of land.</td>
<td>From the information made available, the census does not categorise the project-affected families in terms of degree of vulnerability.</td>
<td>Future census surveys should identify vulnerability under criteria such as families below poverty line, women headed households, families with physically challenged and aged members, etc. These families would require additional support in the resettlement process.</td>
</tr>
<tr>
<td><strong>Project impacts and remedial measures</strong></td>
<td>• The issue of 'rehabilitation' has been addressed through the provision of 'top-up payment', in terms of cash compensation. <strong>We understand that 'relocation of the PAFs is not in the scope of the RF and that a policy of 'self-relocation' has been adopted as a feasible option.</strong></td>
<td>Section 16 of the resettlement framework dealing with the modalities of compensation and entitlement mentions that 'in case self-relocation is not feasible, the project will arrange for lands to relocate and provide for social and physical infrastructure'. However the relocation matrix itself does not provide for the process and criteria for identifying a resettlement site or ensuring the adequate provision of social and physical infrastructure. The issue of vulnerability has not been identified for special attention while suggesting remedial measures for impacts.</td>
<td>Should a relocation site be required to be provided, it should be identified in consultation with the project affected families that require resettlement, the district authorities and host communities, and, should have adequate basic infrastructure (sanitation, health, drainage, water, electricity, communication etc.). The PAFs should be assisted in shifting to the site. Vulnerable families need to be given additional support through skill enhancement and/or added compensation for a reasonable period of time.</td>
</tr>
</tbody>
</table>
### Table 3.3 Review of Implementation Arrangements and Capacity Building

<table>
<thead>
<tr>
<th>Issue</th>
<th>Gaps/deficiencies</th>
<th>Recommendations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Implementation</strong></td>
<td></td>
<td></td>
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<tr>
<td><strong>Issue</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The tasks in the implementation stage have been given in adequate detail in the resettlement framework whereas the institutional arrangements (roles and responsibilities) have been better described in Section 7 of the SA report</td>
<td>Some roles envisaged in the two reports for the same designated staff do not match. E.g., the role of the Project Director and the Community Organiser is much wider in scope, in Section 7 of the SA report.</td>
<td>Roles and responsibilities for the key implementation staff identified in various components should be consistent across all action plans.</td>
</tr>
<tr>
<td>A number of responsibilities identified for some of the staff fall under the ambit of 'rehabilitation' like training, identifying alternative economic activities etc.</td>
<td>The resettlement framework does not make any commitments towards 'rehabilitation'.</td>
<td>This issue needs clarification and parallel alterations in the resettlement framework or Section 7 of the SA report.</td>
</tr>
<tr>
<td><strong>Capacity Building</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Comprehensive capacity building measures outlined for the staff to handle their roles and responsibilities.</td>
<td>No coordination arrangements have been mentioned for capacity building efforts proposed.</td>
<td>A social development cell within the LGED is recommended to coordinate and provide the necessary linkages to support all social development initiatives including those targeted at indigenous people and women.</td>
</tr>
<tr>
<td>A social development cell within the LGED is recommended to coordinate and provide the necessary linkages to support all social development initiatives including those targeted at indigenous people and women.</td>
<td>No specific capacity building or skill development measures proposed for PAPs.</td>
<td>Additionally, each project district may consider second level cells for areas where these issues are more critical. PAPs from the immediate area may be involved for local coordination, in the district level cells.</td>
</tr>
<tr>
<td>A coordination unit needs to be specified for capacity building and if such a cell/post already exists within the LGED, and would undertake this role, mention must be made of it.</td>
<td>Provisions should be made to include a periodic review and re-assessment of capacity building efforts.</td>
<td></td>
</tr>
</tbody>
</table>

**Ref.** IPDP and Gender action plan

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**ERM INDIA**  
LGED, BANGLADESH: REVIEW OF SOCIAL ASSESSMENT  
25
**Issue Monitoring and Evaluation**

- The R&R Coordinator/Specialist in the LGED has been identified as the person responsible for the monitoring process, supported by the up-zila engineer and the DSM consultant.
- Mid term and end term evaluation by an external agency has been proposed.

**Gaps/deficiencies**

- The monitoring indicators largely focus on progress and time schedules of land acquisition and compensation and do not equally emphasise key qualitative indicators.

**Recommendations**

- Qualitative indicators such as participation of PAPs, specially women; transparency; quality of consultations, income restoration, health etc need to be strengthened.
- The indicators mentioned above also need to be assessed during mid term and end term evaluation. In addition indicators to evaluate whether the resettlement objectives are being met; whether PAPs, specially vulnerable groups are participating in decision making and whether capacities of staff and PAPs have enhanced during the project.

**Contract Documents**

- Existing contract documents cover issues such as safety, maintenance of field office, disruption to existing public utilities and services, health norms as well as provisions of basic amenities in the workforce camps.
- The report mentions the provision of “Appropriate facilities for women”.

- Additional provisions should be made for illumination of working sections during night-time.
- Provision of group insurance for accident coverage for all workers along with adequate compensation in the event of injury or death.
- The point on “appropriate facilities for women” needs to be elaborated to include separate toilets for women, creche facilities for children in the age group 0-6yrs. It is desirable for the medical facilities to include a gynaecologist. In terms of assignment of tasks to women, the Contractors should conform to the existing labour/industrial laws of Bangladesh.
The review process looked at both the process and procedural aspects of the social assessment assignment and report, as well as the outputs in terms of the entitlement matrix and the strategy and action plans. The RAP document was out of the purview of this review. Each of the review components were reviewed for adequacy of:

- Policy environment
- Methodology
- Baseline information
- Project impacts
- Analysis of alternatives

The review has found certain problems with the structure of the report, and identified inadequacy of information and definitions in some sections of the report. It has recommended:

- restructuring of the SA report into one cohesive document
- additional information and definitions to be provided where such information is critical to meet WB guidelines.
- Certain actions that need to be undertaken at the implementation stage that are again critical in order to meet Bank guidelines. Some additional suggestions specially regarding institutional arrangements and processes that are not mandatory but definitely desirable have also been outlined.

On meeting the above recommendations and changes, and on ensuring that the critical implementation issues are taken care of during the implementation stage of the project, this SA report can be considered to be complete and to meet the World Bank requirements.
List of Persons Met
# Table 1: List of persons met

<table>
<thead>
<tr>
<th>Name of Person and designation</th>
<th>Organisation</th>
<th>Date of Meeting</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Mr Mohd Azizul-Haque</td>
<td>Project Director, LGED</td>
<td>22, 23 Feb '03</td>
</tr>
<tr>
<td>2 Mr Torab Ali Khan</td>
<td>Dy Project Director, LGED</td>
<td>17, 18 Feb '03</td>
</tr>
<tr>
<td>3 Mr Momun Mozib-ul Haq Shamaji</td>
<td>LGED</td>
<td>17-23 Feb '03</td>
</tr>
<tr>
<td>4 Mr Md Sajjad-ul Haque</td>
<td>LGED</td>
<td>17, 18, 22, 23 Feb '03</td>
</tr>
<tr>
<td>5 Mr Khan Shahab-ud-din</td>
<td>Resettlement Specialist, LGED</td>
<td>22, 23 Feb '03</td>
</tr>
<tr>
<td>6 Mr Pramod Kumar</td>
<td>Environment Specialist, PPC</td>
<td>17, 18, 22, 23 Feb '03</td>
</tr>
<tr>
<td>7 Mr Momun Khondakar</td>
<td>Environment Specialist, PPC</td>
<td>17, 18, 22, 23 Feb '03</td>
</tr>
<tr>
<td>8 Dr Khursheed Alam</td>
<td>Sociologist, PPC</td>
<td>23 Feb '03</td>
</tr>
<tr>
<td>9 Mr Fabio Galli</td>
<td>The World Bank</td>
<td>18 Feb '03</td>
</tr>
<tr>
<td>10 Mr TK Barua</td>
<td>The World Bank</td>
<td>18 Feb '03</td>
</tr>
<tr>
<td>11 Mr Mohi-uz-Zaman Quazi</td>
<td>The World Bank</td>
<td>18 Feb '03</td>
</tr>
<tr>
<td>12 Mr S Vaideeswaran</td>
<td>Consultant, The World Bank</td>
<td>14 Feb '03</td>
</tr>
</tbody>
</table>