



### **3. Project Description**

The original Project Description is mainly unchanged and thus the various resettlement, social and environment issues are unchanged. The original project appraisal document highlights the world-wide view of the importance of participatory approaches in the water sector. However, successful approaches to such decentralized reforms require both commitments from nascent local community institutions and traditional government departments. Since many of these local institutions (e.g. water management organizations) are relatively new and the BWDB has not fully operationalized the supporting guidelines on PSM amongst its own staff, a full-scale implementation program is not realistic. This is evidenced by the experience with PSM throughout Bangladesh which is limited to only a few donor-supported programs. Thus, under the restructuring fewer schemes will be taken up under components 1 and 2 to allow for greater focus on the participatory and community mobilization aspects of system management transfer and the involvement of communities in operations and maintenance (O&M) management. Component 1 is reduced to cover an initial 32 schemes (25 medium schemes and 7 large schemes) for rehabilitation and Component 2 is reduced to cover an initial 35 schemes (26 medium schemes and 9 large schemes) with routine O&M. Medium schemes are those defined to cover on average 2500 ha while large schemes are those defined to cover on average 8400 ha. Component 1 will also include the provision of civil works for the construction of training centers to support the PSM process and water management organization (WMO) mobilization.

Finally, the project shifted its focus toward emergency repairs to damaged BWDB flood control and drainage infrastructure (FCDI) schemes following the unforeseen floods of 2007. According to the BWDB, damages from these floods (see World Bank 2007 Damage and Needs Assessment Report) occurred to several flood control and irrigation structures, comprising 1,592 km of embankments (147 km fully damaged), 140 km of irrigation-drainage systems (1 km fully damaged), 282 km of riverbank protection works (18 km fully damaged), and 279 water control structures (16 fully damaged). Embankment and riverbank protection works account for almost 90 percent of the damage; the remaining 10 percent comprise water control structures and irrigation-drainage systems. In response to this, a fourth component for FDR works was added to the WMIP and about US\$32 million re-allocated (from Components 1 and 2) to undertake critical repairs to this identified damaged infrastructure. Moreover, about US\$8.0 million equivalent was cancelled from the IDA Credit to support emergency repairs to non-embankment infrastructure (e.g. roads, schools). An additional re-allocation was also made to the FDR component after the 2009 Cyclone (Aila) (US\$6.4 million) to address similar additional damaged infrastructure. These reallocations at the time were deemed a priority for the Government of Bangladesh given the emergency nature of these works.

In summary, the types of rehabilitation works for the flood damage rehabilitation will be similar to components 1 and 2 and since the nature of the civil works remain the same (all improvements to existing water infrastructure and so land acquisition is not likely), the various resettlement, social and environment issues are unchanged. That is, the existing

resettlement policy framework and environment and social management framework remain operationally relevant and do not require any alteration for the restructuring. Please refer to the original ISDS for more details about the remaining project components.

#### **4. Project Location and salient physical characteristics relevant to the safeguard analysis**

The locations and salient physical characteristics of the schemes taken up under the restructuring are the same as in the original project design. Please refer to the original ISDS for more details about the nature of these works.

#### **5. Environmental and Social Safeguards Specialists**

Mr Shakil Ahmed Ferdausi (SASDI)

Ms Sabah Moyeen (SASDS)

Mr Md. Akhtaruzzaman (SASDT)

<b>6. Safeguard Policies Triggered</b>	<b>Yes</b>	<b>No</b>
<b>Environmental Assessment (OP/BP 4.01)</b>	<b>X</b>	
<b>Natural Habitats (OP/BP 4.04)</b>	<b>X</b>	
<b>Forests (OP/BP 4.36)</b>		<b>X</b>
<b>Pest Management (OP 4.09)</b>	<b>X</b>	
<b>Physical Cultural Resources (OP/BP 4.11)</b>		<b>X</b>
<b>Indigenous Peoples (OP/BP 4.10)</b>		<b>X</b>
<b>Involuntary Resettlement (OP/BP 4.12)</b>	<b>X</b>	
<b>Safety of Dams (OP/BP 4.37)</b>		<b>X</b>
<b>Projects on International Waterways (OP/BP 7.50)</b>	<b>X</b>	
<b>Projects in Disputed Areas (OP/BP 7.60)</b>		<b>X</b>

## **II. Key Safeguard Policy Issues and Their Management**

### **A. Summary of Key Safeguard Issues**

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts: The key safeguard policies triggered are unchanged by the restructuring. In the original project, an Environmental Management Framework (EMF) was prepared which requires an Environmental Impact Assessment (EIA) and Environment Management Plan (EMP) for the large-scale subprojects and environmental screening and initial environmental examination for small FCD/FCDI schemes with participatory mitigation planning and implementation. The environmental management is an integral part of the participatory scheme cycle management (PSM) to ensure that the principles will be addressed throughout the implementation process and not as a separate exercise. The Center for Environmental and Geographic Information Services (CEGIS) is working as the consultant to the Borrower to provide an environmental audit and screening of schemes under the project. At present, CEGIS has conducted environmental screenings for 333 schemes and prioritized 133 of these for implementation. CEGIS has also developed an Environmental Impact Assessment (EIA) report template which includes an

Environmental Management Plan (EMP) for each scheme which would be used for obtaining environmental clearance from the Department of Environment (DOE) for each batch of works. No EMPs have yet to be completed for Component 1 and 2 schemes which have yet to be finalized. Emergency Flood Damage Rehabilitation (FDR) schemes were selected on the basis of having no major environmental and social issues. In the proposed restructuring, since the types and nature of rehabilitation works for Components 1 and 2 and the Flood Damage Rehabilitation Works (FDR) remain the same (all improvements to existing water infrastructure and so land acquisition is not likely), the environment issues are unchanged and the original EMP will still be operationally valid.

A Resettlement Policy Framework (RPF) was prepared to deal with the potential adverse impacts of land acquisition and displacement of people for rehabilitation and improvement of the selected schemes. According to the RPF, social impact assessment and screening of rehabilitation works (Components 1 and 2 and FDR) will be designed and conducted to assess project impacts including benefits and adverse impacts (e.g. land acquisition or displacement of people). If any such adverse impacts are identified, the Borrower will conduct a Social Impact Assessment and prepare a Resettlement Action Plan (RAP) where requirements are scaled to the magnitude and extent of impacts. This will include surveys of affected people, establishment of the replacement/market value for the affected lands/property and disturbances and livelihood impacts (permanent and temporary), following the RPF, which will be consulted and reconciled with the Water Management Organizations (WMOs). The RAPs where relevant will include, among other things, the scope of land acquisition and resettlement, details of impacts and mitigation measures and budget and implementation arrangements. The design approach is supposed to be such that land acquisition and displacement of people are avoided or minimized. A number of participatory rapid appraisals (PRAs) have been completed so far for components 1 & 2 which provide preliminary information on social aspects as part of the initial screening for potential schemes. Since land acquisition or any major adverse impacts have been avoided for FDF works, no resettlement action plans (RAPs) were prepared or implemented. Due diligence will be taken on social safeguards for all schemes under civil works construction as per the RPF. For Components 1 and 2, social impact assessments will be furthered during feasibility study, design and planning. If social safeguards compliance issues are identified, mitigation measures will be put in place through preparing and implementing RAPs for work packages. Because the types of works included in the restructuring are unchanged (i.e. rehabilitation of existing FCD/FCDI schemes) the RPF remains unaffected and operationally valid.

Please see the original ISDS for more details concerning the safeguard issues associated with these project works.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:

This is the same as the original ISDS. Original ISDS reads:

The project is likely to have potentially positive impacts since it is designed to mitigate past adverse environmental impacts as well as enhance the role of local communities in the rehabilitation and O&M of FCD/FCDI schemes.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.

An Environmental Management Framework (EMF) has been prepared to guide scheme (sub-project) screening, assessment (where required) and participatory mitigation planning and implementation. The Environmental Impact Assessment (EIA) along with Environmental Management Plan (EMP) for larger scale sub-project and Initial Environmental Examination with participatory mitigation planning for medium scale sub-projects include alternative analysis during planning phase. The EA and EMP have been made an integral part of the participatory scheme cycle management (PSM) to ensure that the principles will be addressed throughout the implementation process and not as a separate exercise.

Rehabilitation and improvement works in some of the existing FCD/FCDI schemes may require a moderate amount of private land and cause displacement of squatters, if any, from the embankments. Although the impact details will not be known until the specific schemes are selected, a Resettlement Policy Framework (RPF) has been prepared to deal with the potential adverse impacts of land acquisition and displacement, by following the Bank's OP 4.12 on Involuntary Resettlement. While the RPF will apply to the entire project, separate Resettlement Action Plan (RAP) will be prepared for each yearly civil works program as the selection of FCD/FCDI schemes and design of the rehabilitation and improvements proceed. In preparing the RAPs, alternative designs will be considered to minimize requirements for additional land and physical relocation by taking into account direct inputs from WMOs, landowners and other stakeholders, which will be generated through the PSM cycle.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described. This is the same as the original ISDS. Original ISDS reads:

An overall EMF has been prepared and fully integrated into the entire participatory scheme cycle management process (PSM) both at the Government and community levels. This will include a screening and mitigation framework and corresponding institutional framework, to be in place during selection, implementation and monitoring and evaluation of the diverse investments.

The EIA guidelines prepared by WARPO for large FCDI schemes will be applied for the rehabilitation of schemes between 5000 ha to 15,000 ha in size. EA will be conducted for each medium sized sub-project by the WMO and BWDB and the mitigation activities agreed upon in a MOU. Based on the EA, an EMP will be prepared and customized for each type, location and scale of activity. The guidelines of community level EA have been prepared by IUCN and already field tested.

Monitoring of the impacts during the project will be conducted by a "monitoring team" comprising of selected WMO members, officials from BWDB, DAE, DOF, DOE and LGI. A record of the EAs will be kept in BWDB and WARPO. Training will be given to the monitoring team members and appropriate members of their agencies to ensure the proper implementation of the EMF, EIA and EMP. BWDB has made provisions to increase the number of environmental staff in BWDB to ensure sustainability of the environmental capacity of BWDB.

With respect to actions to address specific environmental safeguard issues, any potential cumulative impact will be addressed at the initial screening of the schemes, and any scheme that may cause adverse impacts will not be included in the project. The potential impact to natural habitat will be mitigated through appropriate design of the sluice gates and management of related water infrastructure. The potential use of pesticides will be mitigated through the already on-going Government IPM program which will also be implemented through the PSM program.

The Resettlement Policy Framework (RPF), contains a legal framework outlining the principles and guidelines for land acquisition; impact mitigation principles and measures; implementation mechanisms; monitoring and evaluation arrangements; and others to provide the bases to plan and implement activities required to mitigate the project's adverse impacts. The RPF draws substantially on the resettlement programs executed by BWDB under the Bank-supported River Bank Protection Project (RBPP: Cr. 2791-BD), Coastal Embankment Rehabilitation Project (CERP: Cr.2783-BD), and several other projects in Bangladesh. With this RPF in place and progress in design of the rehabilitation/improvements on the selected FCD schemes, separate Resettlement Action Plans (RAPs) will be prepared for the yearly physical works program, and will generally contain needs for any additional land; other impact details under each scheme undertaken for rehabilitation and improvement; implementation budget and time-schedule.

A notification exemption has been approved by the Regional Vice President for OP/BP 7.50.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.

This is the same as the original ISDS. Original ISDS reads:

Key project objectives and activities are to increase stakeholder participation in water resources management, including transfer of selected water management functions to local communities. The 'Guidelines for Participatory Water Management' provides the operational framework to include local stakeholders in water resources management. These Guidelines provide for participation of various categories of stakeholders (farmers, fishermen, small traders, craftsmen, boatmen, landless people, destitute women, NGOs, etc), including their mobilization and organization into WMOs and their constituent management associations and groups. The focus of the Guidelines is on stakeholder participation in the entire water management cycle (identification, planning, design, rehabilitation/improvement of FCDs/FCDIs, O&M, and monitoring and evaluation). The

project would support implementation of participatory water management using these Guidelines as also using the experience of several similar projects implemented by BWDB and other GOB agencies with support from other donors, such as CIDA, ADB and the Government of Netherlands.

During project preparation, scoping sessions were carried out with various stakeholder groups to better understand the users' perspective on rehabilitation/improvement needs, problems and potential solutions, and arrangements for project implementation, and operation and maintenance. Consultation and discussion sessions were held during the Environmental Assessment/Environmental Management Plan preparation process wherein safeguard policies of the Bank relevant to the project were explicitly elaborated. A workshop was also held to provide information to, understand views of, and discuss collaboration arrangements with, various stakeholders on the project.

The TOR for the EMF and EA/EMP guidelines was formulated after consultation with various parties involved in environmental issues in Bangladesh. Extensive consultations with stakeholders, who may be either adversely or positively impacted from an environmental viewpoint, were held during the preparation of the EMF and EA/EMP guidelines.

In line with the provisions of PSM cycle, the RPF requires direct involvement of WMOs, affected landowners and other stakeholders in all aspects of the land acquisition and resettlement processes, including compensation, grievance redress, implementation, and monitoring and evaluation. Yearly RAPs will likewise be prepared with direct participation of WMOs and landowners in process tasks like census, determination of replacement value/market prices of affected assets, and implementation and monitoring of the mitigation measures.

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### ***B. Disclosure Requirements Date***

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#### **Environmental Assessment/Audit/Management Plan/Other:**

Was the document disclosed <b>prior to appraisal?</b>	Yes
Date of receipt by the Bank	02/07/2004
Date of "in-country" disclosure	02/08/2004
Date of submission to InfoShop	02/09/2004
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	

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#### **Resettlement Action Plan/Framework/Policy Process:**

Was the document disclosed <b>prior to appraisal?</b>	Yes
Date of receipt by the Bank	02/07/2004
Date of "in-country" disclosure	02/08/2004
Date of submission to InfoShop	02/09/2004

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#### **Indigenous Peoples Plan/Planning Framework:**

Was the document disclosed <b>prior to appraisal?</b>	
Date of receipt by the Bank	

Date of "in-country" disclosure  
Date of submission to InfoShop

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**Pest Management Plan:**

Was the document disclosed <b>prior to appraisal?</b>	N/A	
Date of receipt by the Bank		N/A
Date of "in-country" disclosure		N/A
Date of submission to InfoShop		N/A

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**\* If the project triggers the Pest Management and/or Physical Cultural Resources, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.**

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**If in-country disclosure of any of the above documents is not expected, please explain why:**

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*C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting)*

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**OP/BP/GP 4.01 - Environment Assessment**

Does the project require a stand-alone EA (including EMP) report?	Yes
If yes, then did the Regional Environment Unit or Sector Manager (SM) review and approve the EA report?	Yes
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?	Yes

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**OP/BP 4.04 - Natural Habitats**

Would the project result in any significant conversion or degradation of critical natural habitats?	No
If the project would result in significant conversion or degradation of other (non-critical) natural habitats, does the project include mitigation measures acceptable to the Bank?	N/A

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**OP 4.09 - Pest Management**

Does the EA adequately address the pest management issues?	Yes
Is a separate PMP required?	N/A
If yes, has the PMP been reviewed and approved by a safeguards specialist or SM? Are PMP requirements included in project design? If yes, does the project team include a Pest Management Specialist?	N/A

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**OP/BP 4.12 - Involuntary Resettlement**

Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?	Yes
If yes, then did the Regional unit responsible for safeguards or Sector Manager review the plan?	Yes

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**OP 7.50 - Projects on International Waterways**

Have the other riparians been notified of the project?	No
If the project falls under one of the exceptions to the notification requirement, has this been cleared with the Legal Department, and the memo to the RVP prepared and sent?	Yes

Has the RVP approved such an exception?	Yes
<b>The World Bank Policy on Disclosure of Information</b>	
Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	Yes
Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?	Yes
<b>All Safeguard Policies</b>	
Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?	Yes
Have costs related to safeguard policy measures been included in the project cost?	Yes
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?	Yes
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?	Yes

#### ***D. Approvals***

<b><i>Signed and submitted by:</i></b>	<b><i>Name</i></b>	<b><i>Date</i></b>
Task Team Leader:	Mr Winston Yu	06/28/2011
Environmental Specialist:	Mr Shakil Ahmed Ferdausi	06/28/2011
Social Development Specialist	Ms Sabah Moyeen	06/28/2011
Additional Environmental and/or Social Development Specialist(s):	Mr Md. Akhtaruzzaman	06/28/2011
<b><i>Approved by:</i></b>		
Regional Safeguards Coordinator:	Mr Sanjay Srivastava	06/28/2011
Comments:		
Sector Manager:	Mr Simeon Kacou Ehui	06/28/2011
Comments:		