



**The World Bank**

Bangladesh Municipal Water Supply and Sanitation Project (P161227)

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## Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)

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Appraisal Stage | Date Prepared/Updated: 19-Oct-2018 | Report No: PIDISDSA23778



## BASIC INFORMATION

### A. Basic Project Data

Country Bangladesh	Project ID P161227	Project Name Bangladesh Municipal Water Supply and Sanitation Project	Parent Project ID (if any)
Region SOUTH ASIA	Estimated Appraisal Date 25-Sep-2018	Estimated Board Date 26-Feb-2019	Practice Area (Lead) Water
Financing Instrument Investment Project Financing	Borrower(s) People's Republic of Bangladesh	Implementing Agency Department of Public Health Engineering	

#### Proposed Development Objective(s)

The Project Development Objective (PDO) is to increase access to improved water supply and sanitation services in selected municipalities, and strengthen the municipalities' institutional capacities for delivering water and sanitation services.

#### Components

Sector Support and Capacity Strengthening  
Investment for Water Supply Infrastructure  
Improving Sanitation and Drainage  
Project Implementation and Management Support  
Contingent Emergency Response

## PROJECT FINANCING DATA (US\$, Millions)

### SUMMARY

Total Project Cost	212.29
Total Financing	212.29
of which IBRD/IDA	100.00
Financing Gap	0.00

### DETAILS

#### World Bank Group Financing



International Development Association (IDA)	100.00
IDA Credit	100.00

#### **Non-World Bank Group Financing**

Counterpart Funding	9.53
Borrowing Agency	9.53
Other Sources	100.00
Asian Infrastructure Investment Bank	100.00

Environmental Assessment Category

B-Partial Assessment

Decision

The review did authorize the team to appraise and negotiate

## **B. Introduction and Context**

### **Country Context**

1. Bangladesh is one of the world's most populous countries with an estimated 165 million people in a geographical area of about 144,415 sq. km. Per capita income stood at US\$ 1,480 in 2017, well above the lower middle-income country category threshold. The Gross Domestic Product (GDP) grew well above the average for developing countries, averaging 6.5 percent since 2010, with an officially projected growth of 7.65 percent in fiscal year (FY) 2018 (Government of Bangladesh, GOB). Progress on reducing extreme poverty and boosting shared prosperity through human development and employment generation has continued, with the poverty rate<sup>1</sup> declining from 48.9 percent in 2000 to 24 percent in 2016 (13.8 percent being extreme poor measured against international extreme poverty line). The pace of poverty reduction and the rate of job creation has slowed down since 2010. Deficits in infrastructure and services delivery pose a constraint to sustaining economic growth.

2. Bangladesh achieved its Millennium Development Goals (MDG) targets of halving the population without access to improved drinking water sources three years ahead of time – 84 percent households had access to safe water; and showed impressive progress in sanitation too with 57 percent households having access to safe sanitation, and open defecation reduced to three percent (UNICEF/WHO Joint Monitoring Programme, JMP, 2015). The GOB has committed to achieving the Sustainable Development Goal 6 (2016-30) target of "safe and sustainable sanitation, hygiene and drinking water used by all". Achieving the SDG 6 will pose a number of challenges: 20 percent of the urban population experiences arsenic contamination and 55 percent E. Coli contamination in their water supply. Bangladesh is rapidly urbanizing, yet only ten percent of the population has access to piped water supply, most of which is concentrated in the major cities. About 151 (of the 329)

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<sup>1</sup> Based on the international \$1.90 per capita per day poverty line, adjusted for purchasing power parity



municipalities have basic piped water systems, but these systems cover only a limited population residing in town centers. These systems suffer from maintenance and quality problems, small number of connections, high operational costs, poor service levels and low tariff recovery. Sanitation in municipalities mainly comprises household on-site pits and tanks that are cleaned infrequently and when cleaned, the fecal matter is dumped in drains and open lands posing a public health hazard. Solid waste, drainage and flooding are other common problems. Technical expertise for piped water supply and fecal sludge management are limited at all levels of government.

3. The progress made in poverty reduction and improved well-being could be reversed since Bangladesh is one of the economies most at risk to climate change impacts. With two-thirds of its land mass less than five meters above mean sea level, the country is very vulnerable to sea level rise, cyclones, increased precipitation, and storm-induced flooding<sup>2</sup>. The Bangladesh Climate Change Strategy and Action Plan 2009 identified inland monsoon flooding<sup>3</sup>, tropical cyclone and related storm-surges, and droughts as the three major climate hazards facing the country. A projected temperature-increase of 1-3 degree Celsius and an additional 20 percent monsoon rainfall by 2050, are predicted for the Ganga-Brahmaputra-Meghna basin, suggesting more severe inland flooding in Bangladesh. Moreover, the area at risk of inland monsoon inundation will rise by four percent, with higher inundation depths due to climate change<sup>4</sup>. While rainfall is predicted to become both higher and more erratic, the frequency and intensity of droughts are likely to increase, especially in the northern and western parts of the country. According to a World Bank study, 3.2 million of Bangladesh's poor will be exposed to the increased risk of inundation by 2050, compared to the two million poor people currently exposed to the risk. Studies also indicate that urban locations in coastal areas will be affected by shortage in the supply of fresh drinking water because of increased salinity due to climate change<sup>5</sup>.

#### Sectoral and Institutional Context

4. Institutionally, the Local Government Division (LGD) within the Ministry of Local Government, Rural Development and Cooperatives (MoLGRD&C) is responsible for the overall development of the water supply and sanitation (WSS) sector, as well as for regulating the municipalities' institutional and financial matters, including their staffing and finances. At the central level, the Department of Public Health Engineering (DPHE), under the MoLGRD&C, constructs water supply infrastructure that it hands over to the municipalities to operate and maintain. There is no separate regulatory body for the water and sanitation sector.

5. The Local Government Act 2010 has legally delegated the responsibility for provision of water and sanitation services to municipalities, but actual decentralization has been limited. Municipalities suffer from weak capacities, have a very small number of trained personnel, rudimentary systems, and small own-source revenues making them near-totally dependent on the government budgetary support. These impact the operational viability of service delivery to citizens. Therefore, municipalities will need to be supported in building capacities for carrying out their de jure roles in practice, i.e. managing the design and construction of water and sanitation systems, and strengthening their institutional and financial systems for operations and maintenance.

<sup>2</sup> Climate and Disaster Risk Screening Report for Bangladesh Municipal Water Supply and Sanitation Project

<sup>3</sup> River and rainwater flooding, caused by monsoons and cyclones, inland, and tidal flooding caused by storms in the lower lying coastal areas.

<sup>4</sup> Sarraf, Dasgupta, & Adams, 2011

<sup>5</sup> Dasgupta, Kamal, Khan, Choudhury & Nishat, 2014



6. For drinking water and sanitation, the GOB has approved: (i) a Sector Development Plan (SDP, 2011-2025) and (ii) a National Strategy for Water Supply and Sanitation (2014), and both have been aligned with the SDG 2030. The SDP target for piped water supply coverage by 2020 is 80 percent in large municipalities, and 70 percent in small municipalities, and by 2025, 90 percent and 85 percent, respectively. The Strategy addresses integrated resources management, water quality, fecal sludge management (FSM), response to urbanization, managing disasters and climate risks, etc.

7. Even though the SDP presents a sector investment plan for resources required over the next 5, 10 and 15 years, financial sustainability for the water supply and sanitation sector is not addressed in detail in either the SDP or the Strategy. At present, all capital assets for municipalities are provided by the GOB on a 100 percent grant basis via the Annual Development Programme (ADP), with no requirement of repayment of capital or interest. The GOB also provides part-salaries of municipalities but fiscal transfers for operational expenditures are very limited. Municipalities are expected to raise their own revenues to cover operating costs. Currently, most municipalities face annual deficits, primarily because of weak institutional capacity and vicious cycle of poor services provision, and poor tax and revenue collections. Thus, achieving financial sustainability will also be a significant challenge to establishing functional and sustainable municipal water supply and sanitation departments that manage piped water and improved sanitation systems.

8. Some of the recent Projects have shown that the private sector can play increasingly important roles in the sector, beyond implementing capital work contracts. The recently concluded Bangladesh Rural Water Supply and Sanitation Project (BRWSSP) for example, demonstrated that many private Operators are willing to come forward to manage water supply operations if their payment risks are mitigated. However, it also showed that the market is not yet ready to bring in equity investments. For sanitation, a few Non-Governmental Organizations (NGOs) have pioneered the fecal sludge treatment models and are possible candidates to operate fecal sludge treatment plants. During preparations, initial market assessments also confirmed the private sector interest in construction contracts and undertaking operations of WSS facilities in municipalities.

9. To assist the government in implementing the SDP, the Project will assist an initial selection of 30 municipalities to:

- Create a ring-fenced municipal water and sanitation unit;
- Install (or extend) piped water systems with private sector engagement;
- Collect tariffs for sustainable water supply operations and maintenance;
- Provide financial assistance for sanitation improvements for poor households, and reward municipalities for promoting improved sanitation access across all households; and support the construction and sustainable operations and management of public toilets;
- Support informal cleaning/emptying workers with equipment and training; and making disposal arrangements for fecal sludge in designated locations (and demonstrating fecal sludge treatment in select municipalities); and
- Invest in critical improvements in drainage to address flooding.

10. These 30 municipalities were selected based on their willingness to provide water and sanitation services in a ring-fenced manner, levy user charges and other eligibility criteria, such as availability of land, etc. Even with the selection of these better performing municipalities, the government has not underestimated the dual problems of: (i) establishing viable water supply and sanitation operational capacity where none currently exists, and (ii) achieving financial sustainability solely through customer charges.



## C. Proposed Development Objective(s)

### Development Objective(s) (From PAD)

11. The project development objective (PDO) is to increase access to improved water supply and sanitation services in selected municipalities, and strengthen the municipalities' institutional capacities for delivering water and sanitation services.

### Key Results

12. Given the very basic institutional capacity of the Project municipalities, the Project aims to address capacity deficits by: (i) infrastructure provision and operationally sustainable services delivery by private sector; (ii) institutional capacity strengthening of municipalities to enable them to play increasingly central roles in planning and supervision of services delivery by private sector; and (iii) strengthening DPHE to focus more on policy and facilitation roles (away from direct infrastructure provision). The Project's approach is part of the national law and policy to devolve water and sanitation responsibilities to the local governments in order to ensure sustainability and cost-effectiveness. It directly supports the SDP target of improved services (with piped water and fecal sludge management) in municipalities, along-side strengthening institutional capacities of municipalities to provide universal access to improved water and sanitation services in a financially sustainable manner. This involves changing mindsets and operating principles and developing the private sector. In addition, efforts will be made towards identifying opportunities for women to increase their participation in planning and implementation of water supply and sanitation services, expand their employment opportunities, and promote their safety. Long-term outcomes of the Project are likely to include the municipalities' greater ownership and sustainability of water, sanitation and drainage infrastructure and services delivery; greater sharing of benefits and inclusion; public health gains due to reduced untreated human excreta in the environment; and improved climate-resilience.

## D. Project Description

13. The Project components have been structured to reflect the twin objectives of institutional capacity building along with water and sanitation infrastructure and services provision.

14. **Component 1 – Sector Support and Capacity Strengthening (Total Cost US\$ 21.42 million including contingencies US\$ 0.42 million; IDA US\$ 10.69 million; GOB US\$ 0.04 million).** This component will comprise three sub-components: (i) building the institutional capacity of the municipalities to plan, regulate and monitor water supply and sanitation (WSS) services delivery by private sector; and capacity building of municipalities on gender, particularly in implementing gender action plans for women's participation in decision making and ensuring women's employment in service delivery; (ii) offering incentive grants to municipalities for institutional improvements and service delivery, and performance linked operation and maintenance (O & M) subsidy grants to promote user charge collection and household enrollment; and (iii) strengthening DPHE to execute sector management support. The total investment cost also includes price and physical contingencies accounted for separately, outside of the three sub-components below.

15. **Sub-component 1.1 - Strengthening Institutional Capacity of Municipalities to Manage WSS (Total US\$ 2.52 million; IDA US\$ 1.25 million; GOB US\$ 0.03 million; excluding contingencies).** This sub-component will



provide hand-holding implementation support to municipalities across three dimensions: a) citizen participation and interface for activities such as implementing mobile and IT enabled complaint redressal systems, and annual citizen surveys; b) WSS institutional capacity improvements such as disseminating model municipality bye-laws for WSS, WSS accounting systems, audit, IT systems, and MIS; c) service delivery parameters such as water quality monitoring and expansion of fecal sludge treatment to all municipalities including co-composting with solid waste to ensure safe collection and treatment of fecal sludge. This sub-component will develop contract management capacities to procure and supervise Private Operators. This component will also finance capacity building of municipalities on gender, especially developing and implementing gender action plans in municipalities, and enhancing the technical capacity on the safe disposal and treatment of fecal sludge and the implications on the quality of water in the absence thereof in the event of flooding or drought. Other gender actions will be incorporated in sub-components on sanitation (3.1).

**16. Sub-component 1.2 - Support for Institutional and Operational Sustainability (Total US\$ 15.60 million; IDA US\$ 7.80 million; excluding contingencies).** The Project will provide a) support for institutional improvements and service delivery and b) support to promote user charge collection and household enrollment.

*17. Support for institutional improvements and service delivery:* The Project will measure the performance of municipalities on institutional actions and service delivery through predetermined indicators (citizen engagement, financial management, revenue systems, WSS organization, water supply coverage, water quality, number of hours of supply, complaint redressal, sanitation coverage, solid waste collection, containment structures in households, gender action plan implementation, etc.). The includes indicators on sanitation coverage, solid waste collection and co-composting, preparation of sanitation action plans, etc. all measure the contribution to fecal sludge management and the full suite of activities leads to the reduction of GHG emissions as elaborated under sub-component 3.1. An annual performance scorecard for each municipality will be calculated through a third-party agency. Each municipality would receive an average of BDT 18 million (or US\$ 225,000) based on its score. The support is on per capita basis and therefore larger municipalities will receive a larger amount. About 10 percent of the support will be provided in the initial two years of the Project to incentivize institutional actions early in the Project and to provide an early demonstration of benefits to the municipality. The municipality will be able to utilize all the additional cash-based support towards ensuring expansion of fecal sludge treatment including co-composting, and drainage improvements that are in compliance with the climate-change sensitive designs as determined by the engineer. The total outlay for this support is US\$ 6.8 million. A Performance Scorecard manual has been prepared detailing the indicators, process of scoring and computing rewards annually. This will form a part of the Project Implementation Manual (PIM).

*18. Household enrollment conditions and Operational Expenditure support to promote user charge collection:* A minimum of 50 percent enrollment (with cash deposit) of households (of the relevant distribution phase planned) will be required for Municipalities to prove before approving construction, and a minimum 75 percent enrollment will be needed before commencing operations. The Project will provide subsidy grant support to each municipality to meet operational expenditures during the first three years of operations (first two years will be the construction period), as they ramp up their revenue collection to becoming financially sustainable. Adequate O&M subsidy will be available to guarantee that all 30 systems will cover O&M costs while the Project is under implementation – about US\$ 7.89 million is allocated toward this.

*19. In selected municipalities where Fecal Sludge Treatment Plants are implemented, the Project will provide operations support for FSTP operations for up to three years. This will afford time for the Operator to improve operational efficiencies and develop compost products for the market; and for the municipality to levy*



sanitation-related taxes and charges from citizens. It is expected that this time period will be sufficient for FSTP operations becoming financially sustainable beyond the Project and setting examples for other municipalities to emulate. About US\$ 0.9 million is allocated for this.

**20. Sub-component 1.3 - Strengthening of DPHE for Water and Sanitation Sector Roles (Total US\$ 2.88 million; IDA US\$ 1.43 million; GOB US\$ 0.01 million; excluding contingencies).** DPHE will be supported to strengthen greater sector support roles by financing consultancies that will assist DPHE in: (i) establishing and adapting technical standards, standard operating procedures and manuals on technical, operational, and financial management including instituting Geographic Information System (GIS) and IT-enabled systems (this will also include monitor and control system for water loss reduction and leakage detection to make it more resilient against climate induced threats); (ii) strengthening DPHE's water quality monitoring and surveillance systems to monitor and prevent bacteriological contamination of water (including contamination due to inland flooding and increased salinity due to climate change); (iii) establishment of national water and sanitation sector Management Information System (MIS), which will facilitate water quality monitoring, waste reduction, and surveillance of and efficient water resources management; (iv) training and capacity building, including module development, training delivery and exposure visits for DPHE and Municipality staff to improve operational efficiencies in water and sanitation systems including the use of energy-efficient pumps to reduce water loss especially in the municipalities at risk of drought, new IT-enabled systems, inclusion and gender-focus in the Project, and improve awareness around and response to climate resilience-related challenges and rapid-onset emergencies<sup>6</sup>; (v) Private Sector Participation and regulation guidelines for the water and sanitation sector in municipalities (incl. FSM); and (vi) development of policies that adopt climate change-relevant technical guidelines and standards in relation to water supply and sanitation. The Project will support the creation and running of a Municipality Support Unit within DPHE that shall provide coordination and hand-holding support to municipalities as a one-stop window on water and sanitation support services for the sector in the future including measures and technologies to combat climate change and improve resilience. Thus, the Project will provide initial support to the DPHE in strengthening its systems to be implemented on a sector-wide basis, beyond the Project municipalities.

**21. Component 2 – Investment for Water Supply Infrastructure (Total Cost US\$ 116.83 million including contingencies US\$ 4.2 million; IDA US\$ 54.68 million; GOB US\$ 7.47 million).** This component comprises: (i) infrastructure investments for the installation of piped water supply systems in each municipality, comprising bulk water intake and treatment systems, and piped water distribution systems; and (ii) immediate response facility to cope with disasters and climate-induced emergencies. The total investment costs include land acquisition and development<sup>7</sup>, as well as physical and price contingencies not included in the sub-components below. Piped water supply systems are expected to improve efficiency for the municipalities by diversifying delivery systems away from tube-wells without regard for groundwater management, to sourcing surface water or from aquifers that lie at a depth of at least 300 m rather than shallow aquifers. The latter are more susceptible to salinity intrusion and possible contamination from unsafe disposal of fecal waste, especially if urban flooding occurs frequently.

<sup>6</sup> These could enable undertaking climate change adaptations to prevent flood-induced bacteriological contamination of surface water resulting in limited availability of drinking water, waterlogging etc. These measures could include systematic stocktaking of available data, establishing clear responsibilities within DPHE to identify and tackle possible problem areas by deploying appropriate personnel, and specifying key actions, milestones and outputs that help build resilience.

<sup>7</sup> Land acquisition and development to be financed by government's own contribution to the Project



**22. Sub-component 2.1 – Infrastructure investments for the installation of piped water system. (Total US\$ 103.00 million; IDA US\$ 51.50 million; excluding contingencies).** This will comprise (i) surface or groundwater in-take facility depending on source assessment and sustainability; (ii) water treatment facility based on raw water quality; (iii) water storage; (iv) transmission and distribution pipe network; (v) house connections including meters; and (vi) related appurtenances of the water supply system. The basic principles of the system design will be based on a realistic assessment of demand, responsiveness to inland flooding or salinity-induced corrosion of infrastructure or other climate change-induced threats as determined by the design engineers such as raised platform or foundation for installations to respond to flooding, and a phased approach so that as more demand emerges for services, and additional infrastructure can be created. Investments covered under the Project will be sized according to the design of individual components (like pump houses, pipelines, overhead tanks, etc.) and confirmation of demand from consumers. The provision of energy-efficient pumps has been expressly stipulated to ensure minimal water loss for a given amount of energy used. This arrangement is to ensure that municipalities at risk of drought due to climate change and even those at risk of flooding are able to efficiently allocate their fresh water resources with minimum wastage.

23. Water provisioning is unbundled into two components due to the distinct and specialized operations and maintenance needs that would influence sustainability, viz.: (i) bulk treated supply, which include the intake structures, the treatment plant, storage system of treated water, take-off point, and related pipes and appurtenances; and (ii) the distribution system, which include transmission and distribution pipelines, service connections and relevant appurtenances.

24. For the distribution system, the Project will promote the mobilization of demand from households by the municipality right from preparation stages. To ensure that experienced contractors provide connections without delay, and households do not have to arrange for personnel and material to get connected, the scheme designs will cover right up to service connections including meters. As an eligibility condition, the Project will require each municipality to elicit the commitment of a minimum number of connections by enrolling at least 50 percent of potential customer households from the relevant phase of the distribution system and collecting enrollment deposits from them before according approval to bid out the distribution package. At least 75 percent enrollment will be needed before commissioning the system. The distribution infrastructure in the Project is targeted to cover those areas of the municipality that satisfy the conditions of high enrollment and saturation (and need not necessarily be in the “core” central areas only). These distribution packages are estimated to be eventually covering an average of about 55 percent of the households in the municipality. However, the intention is to saturate 100 percent of the target package area. A higher connection achievement will be rewarded to municipalities under component 1.2.

25. According to the GHG accounting, the net emissions for all of Component 2.1 are estimated to be -562,414 tCO<sub>2</sub>-eq for this component’s 20-year life, resulting in net emissions reductions largely due to ending the use of overhead pumps. For the water supply activities, the net emissions from each step are as follows: 37,285 tCO<sub>2</sub>-eq due to source extraction, 730 tCO<sub>2</sub>-eq from source conveyance, 43,124 tCO<sub>2</sub>-eq from potable water treatment, 31,145 tCO<sub>2</sub>-eq from piped water distribution, and -674,697 tCO<sub>2</sub>-eq from ending the use of overhead pumps.

**26. Sub-component 2.2 – Immediate response facility for disasters and climate-induced Emergencies (Total US\$ 2.17 million; IDA US\$ 1.08 million; excluding contingencies).** The DPHE does not have emergency response goods and equipment that can immediately mobilize and support the WSS needs of natural disaster affected municipalities across the country. As noted earlier, tropical cyclones and increased inland flooding due to



heavier monsoons are expected to increase. These may cause not only damage to water supply infrastructure or contamination of drinking water or both but may also result in residents switching away from piped service due to interruption in service or lack of discernible difference in quality between piped water and that from tube-wells. A financial allocation to support DPHE in building up its quick response system will thus be provisioned that will allow the Project municipalities to repair their WSS system or to take measures to avoid further deterioration.

**27. Component 3 – Improving Sanitation and Drainage (Total Cost US\$ 61.33 million including contingencies US\$ 2.30 million; IDA US\$ 30.67 million).** This component comprises behavior change communications to raise awareness and motivate households to improve household sanitation (insanitary toilet), included in Component 4 (see below); (3.1): (i) financial assistance to poor households for upgrading to improved toilets and reward municipalities for improvements in sanitation access; (ii) Public Toilets construction and operations management; (iii) Support to informal cleaning workers with equipment and training; (iv) Safe disposal arrangements for fecal sludge in designated locations, and in select municipalities, pilot demonstrations for fecal sludge treatment; and (3.2): Critical drainage investments to manage climate-change induced flooding. The total investment cost also includes price and physical contingencies accounted for separately, outside of the two sub-components below.

**28. Sub-component 3.1 – Improving Sanitation and Septage Management (Total US\$ 29.13 million; IDA US\$ 14.57 million; excluding contingencies).** For total sanitation improvement of the municipalities, the Project will support all elements of the sanitation service delivery chain. Unlike water supply service that will concentrate on specific areas of the municipality where there is demonstrated demand, the scope of sanitation service improvement will entail the entire municipality covering all households. Improved sanitation and septage management will reduce the contamination of surface and groundwater and increase the available water supply, thereby helping alleviate water stress, especially in the coastal areas of Bangladesh (which are affected by salination) and areas affected by drought. The Municipality Sanitation Support Consultants financed by the Project, will provide planning and hand-holding implementation support to the municipalities to help to develop appropriate and sustainable septage management model, as explained in the Implementation Arrangements (see below). The model will be developed considering the population, economic status of household, type and accessibility of containment systems, availability or lack of service providers for emptying, availability of land for the treatment facility, risk of inland flooding due to climate change, policy / regulation and affordability of service. The Project has made provisions and budget allocations for landfill development, waste bins etc. which will improve upon Solid Waste Management capacities of the municipalities and help reduce disease vectors especially in cases of climate change induced flooding.

**29. In summary, the Project will finance the following under this component:**

- Preparation of municipality sanitation plans and implementation support consultancy that will provide support in developing sustainable septage management model
- Subsidy grant to the poor households for toilet improvements to move up the ladder from unsanitary toilets
- Reward to municipalities for sanitation access improvements (in sub-component 1.2)
- Construction of public toilets, and operational models to help floating populations, informal workers etc. access improved toilets
- Equipment including vacutugs/trucks and safety gear for emptying Operators for fecal sludge management;



- Training and capacity building of informal workers, women's groups, etc. for fecal sludge management;
- Basic infrastructure for safe disposal locations for septage in 27 municipalities;
- Pilot Fecal Sludge Treatment Plants in three municipalities, and O&M expenses for the first three years to permit stabilization of the business model

30. The fecal sludge collection and treatment activities under Component 3.1 have estimated net emissions of -171,055 tCO<sub>2</sub>-eq, which represent net emission reductions due to the upgrading of latrine conditions, while also treating septage and latrine waste that would otherwise go untreated. The net emissions for each step of the septage treatment activities break down as follows: 428 tCO<sub>2</sub>-eq from the use of trucks for septage collection, 0 tCO<sub>2</sub>-eq from septic tanks use, 3,870 tCO<sub>2</sub>-eq process N<sub>2</sub>O emissions from fecal sludge treatment, and -175,353 tCO<sub>2</sub>-eq from the combination of improvements to latrines and removing latrine waste for disposal and treatment. It should be noted that the changes in the Methane Correction Factor (MCF) for latrines is part of the IPCC 2006 guidance on wastewater<sup>8</sup>, which helps sets the standard for GHG accounting in wastewater and fecal sludge collection and treatment activities. The entire financed system from latrine upgrades, fecal sludge collection, and aerobic treatment work together to produce these estimated net emissions reductions.

31. **Sub-component 3.2 - Drainage Improvements (Total US\$ 29.9 million; IDA US\$ 14.95 million; excluding contingencies).** This investment will contribute to the municipalities' climate change-induced adaptation measures as urban flooding and inundation is one of the main climate change risks identified, and now experienced in Bangladesh. Drainage improvements are thus crucial to addressing climate change through this Project, with flooding becoming more common across the country. From the existing Drainage Master Plan that each municipality has, with the help of TSU Consultants, the drainage action plan will identify critical areas in the municipalities that will be increasingly prone to storm-water flooding exacerbated by climate change, and build resilience among them by adopting measures to reduce flooding. Drainage plans will include management and basic treatment of grey-water **and** using appropriate measures to prevent contamination of freshwater flows in the event of inland flooding, thus preventing a public health hazard. The Project will only finance investments in critical drainage infrastructure to reduce such flooding in the municipalities – not the whole drainage master plan. The Municipality will prioritize those capital works that can be swiftly implemented as soon as they become eligible. The critical drainage construction items will be developed into a bid document and put out for bidding.

32. **Component 4 - Project Implementation and Management Support (Total Cost US\$ 9.95 million including contingencies US\$ 0.08 million; IDA US\$ 3.96 million; GOB US\$ 2.03 million).** This component will support key Project management activities ensuring gender and social inclusion to enable DPHE in coordinating and implementing Project activities at the national, regional (division/ district) and municipality levels, including complying with the Bank fiduciary procedures and safeguards. It will also contribute to the acquisition of equipment and the Project team's operating costs, as well as: (i) finance selected individual consultants, consulting firms, training and exposure visits (for different contract packages for water, sanitation, as well as institutional strengthening, etc.) to ensure efficient Project implementation; (ii) finance the carrying out of audits of Project internal processes; (iii) support sound environmental and social management of the Project, including gender focus, climate induced risk considerations as outlined in previous components, the preparation

<sup>8</sup> IPCC, "Chapter 6: Wastewater Treatment and Discharge," 2006, [https://www.ipcc-nccciges.or.jp/public/2006gl/pdf/5\\_Volume5/V5\\_6\\_Ch6\\_Wastewater.pdf](https://www.ipcc-nccciges.or.jp/public/2006gl/pdf/5_Volume5/V5_6_Ch6_Wastewater.pdf).



of safeguard documents and their monitoring, as well as financing of compensation, if required; (iv) finance and manage the conduct of third-party institutional performance audits and sample citizens' surveys; (v) support Project communications including awareness generation about the Project, campaigns to mobilize households to take piped water connections, regular payment of tariffs, raising awareness to report system leaks, salinity issues in water, and other water infrastructure breakdowns, behavior change communications for sanitation (component 3.1), linkages of water quality and sanitation to health outcomes, inclusion and citizens engagement, etc.; and (vi) carry out Project reporting. A National level Project Management Unit (PMU) for the Project will be housed in the DPHE. The PMU will be supported by Regional Technical Support Units (TSUs) and personnel placed in municipalities and in regional clusters as provisioned under this component.

**33. Component 5 – Contingent Emergency Response (Total Cost US\$ 0 million; IDA US\$ 0 million).** A provisional zero amount component is included under this Project that will allow for rapid reallocation of loan proceeds during an emergency, under streamlined procurement and disbursement procedures. In addition to reallocation of funds from other Project components, the contingent component may also serve as a conduit for additional funds to be channeled to the Project in the event of an emergency.

**34. Financial Sustainability challenges and remedies.** The 30 municipalities have only rudimentary systems and personnel, and very few own revenue sources. Thus, the financial sustainability of the water supply operations will need to be achieved by enrolling a good customer base at affordable tariffs, maximizing operating efficiencies, and following financial discipline in setting and collecting tariffs. The Project seeks to set the municipalities on a path to financial sustainability by imposing minimum enrollment as a pre-condition for participation, rationalizing scheme design to be responsive to demand, harnessing efficiencies of Private Operators, incentivizing practices to promote financial sustainability, and providing operational subsidy grants till operations ramp-up and stabilize. It is expected that these measures shall provide the momentum to municipalities to sustain the systems financially beyond the Project. (Please see Section C. on sustainability below for details.)

**35. Urban Poor and Affordability.** In Bangladesh, about 18.9 percent of the urban population is classified as poor (HIES, 2016-17). Hence, ensuring that the poor households fully benefit from water and sanitation investments, will be a key feature of the Project. For example, the Project costs will finance connections up to the household level that will encourage municipalities to connect poor households free or at affordable connection fees. In addition, the Project will also provide subsidy grants to support operations that municipalities may choose to charge lower tariffs from poor households. The Project will provide financial assistance to poor households to build improved toilets. The Project will also encourage municipalities to charge low income households affordable tank/pit emptying charges.

## E. Implementation

### Institutional and Implementation Arrangements

36. The DPHE will be the nodal agency responsible for the overall Project implementation. At the national level, a Project Steering Committee (PSC) will be established in the Local Government Division (LGD), chaired by the Secretary of LGD, to provide overall guidance and policy direction. The PSC will meet every quarter, or more frequently if required, to take stock of Project progress and make course corrections. Apart from overall Project management, DPHE will be responsible for design and construction of bulk water supply production and treatment (Sub-component 2.1); sanitation infrastructure planning and design, including FSM services (Sub-



component 3.1); and Institutional capacity strengthening of municipalities and DPHE (Sub-components 1.1, 1.2 and 1.3). The Project Management Unit (PMU) will be set up in DPHE with key professionals and staff to spearhead the Project implementation. The PMU will comprise a full-time Project Director and Deputy Project Director, and other personnel with specialization in requisite disciplines<sup>9</sup> at DPHE headquarters, posted from within DPHE and recruited from the open market. Under Component 4, DPHE will also be responsible for technical assistance, and selecting and managing consultants particularly (i) the Technical Support Unit (TSU) to provide support to municipalities; and (ii) third-party institutional performance audits and sample citizens' surveys in each of the participating municipalities. The TSU consultancy will place multi-disciplinary teams to support municipalities in implementation of Project activities and building their capacities. The Project Communication package will build awareness and target messages to households and other stakeholders.

37. Municipalities, at the local level, will engage private sector for the construction of the water supply distribution system (Sub-component 2.1). Municipalities shall engage a Private Operator to manage the operations of the entire water supply system (bulk and distribution). On a pilot basis, the Project will also explore the possibility of bundling the contracts for constructing water supply distribution, and the operations of the entire system, in the same contract package. Private Operators shall also be brought in for the operations and maintenance of all sanitation facilities. Municipalities will be responsible for design, procurement, implementation and maintenance management of critical drainage infrastructure (Sub-component 3.2). Municipalities will make land available for construction of water supply and sanitation facilities, set up a ring-fenced WSS department with a separate bank account, dedicated personnel as per standard organogram (taking into consideration private contracts for operation and maintenance), setting cost recovery tariffs, providing separate accounting, and the regular disclosure of water and sanitation services performance. In preparation for the Project, the municipalities shall collect advance enrollment fees (at least 50 percent of design Phase 1 of the distribution system) from consumer households and establishments. Water supply operations will commence after 75 percent enrollment is ensured. Municipalities will be responsible for monitoring the service standards, particularly ensuring the quantity and hours of supply as agreed with the Private Operator through a service contract. Since the municipality will be responsible for the bulk production asset O&M as well, they will be involved in the supervision of the construction of the bulk production systems. On the other hand, DPHE will be involved in the procurement and construction supervision of the distribution system, given municipalities' weak capacities.

38. Considering the limited experience of the municipalities in the full chain of sanitation, the Project will provide a Sanitation Support Consultant (firm) that will first assist the municipality in preparing the municipality sanitation action plan. The consultants will then hand-hold municipalities in implementation of each of the elements in the sanitation plan including helping households upgrade toilets, public toilets operations, service contracts with private informal sector cleaning workers for pit emptying, transportation, and safe disposal of fecal sludge, developing and implementing business models, training and capacity building of women's self-help groups, and cleaning workers, developing and implementing cost recovery plans, etc. The Sanitation Support consultants will assist groups of 8-9 municipalities in phases, and for three municipalities, they will assist with the establishment of fecal sludge treatment facility along with operational plans.

39. The Project includes multiple activities to be implemented at the national level, as well as in each of the 30 municipalities. This poses risks of sequence of events and delays. Therefore, a phased approach is being

<sup>9</sup> including water and sanitary engineering, financial management, Information Technology, M&E, environment, social development, procurement, hydrogeologist/water quality/environmentalist, etc.



adopted – during Project preparations, the first group of 15 municipalities' bulk water systems have been planned, and institutional agreements, etc. secured so that implementation can immediately commence on Project effectiveness. Plans for the second group of municipalities will be finalized in parallel. Similarly, sanitation plans, and their implementation will be carried out in phases.

40. To formalize the roles and responsibilities of municipalities, each of the 30 municipalities will sign an Implementation Partnership Agreement (IPA) with DPHE.

#### **F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)**

BMWSSP will be implemented in 30 municipalities in 19 districts as selected using criteria like commercial importance and population size etc. Presently, none of these municipalities has a piped water supply system that is noteworthy. As to sanitation, absence of Fecal Sludge Management (FSM) services cause severe environmental pollution, affecting both public health and the local economies. The emptied fecal sludge is often disposed in nearby drains, sewers, or water bodies like rivers. Indiscriminate discharge of untreated sludge and sewage poses serious risks of polluting drinking water from surface and underground sources. Considering the prevailing situation, it is assumed that the project activities are not expected to cause any long-term or irreversible environmental impact. Social safeguard issues are likely to vary across the selected municipalities, depending on geographical locations; water sources - surface and underground; existing facilities for water supply and sanitation; and, more importantly, availability of lands under their ownership, or unused public lands within and outside the municipality jurisdiction. But it is likely that other than causing temporary construction-related inconveniences to the residents and roadside commercial activities, social safeguard issues may or may not arise where municipalities would build networks of underground water supply pipelines as well as surface drains that are expected to follow the existing road networks. However, it is possible that small amounts of private lands or the lands used by people of Small Ethnic Communities (SECs - as IPs in OP 4.10) might be required to build the treatment facilities for raw water treatment and reservoirs for treated water, as well as those for fecal sludge. Given the possibility, the project has triggered OP/BP 4.10 on Indigenous Peoples and OP/BP 4.12 on Involuntary Resettlement. For safeguard management, DPHE adopted a framework approach, since various physical activities related to water supply and fecal management were to be designed and impacts could not be assessed - all at a time. The borrower has already prepared Environmental Management Framework (EMF), Resettlement and Social Management Framework (RSMF) and Small Ethnic Community Planning Framework (SECPF) with guidelines to prepare and implement safeguards plan as and when required to deal with environmental and social issues in individual municipalities.

#### **G. Environmental and Social Safeguards Specialists on the Team**

Sabah Moyeen, Social Specialist

Iqbal Ahmed, Environmental Specialist

**SAFEGUARD POLICIES THAT MIGHT APPLY**

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	<p>The proposed project aims to enhance and strengthen the water supply network and sanitation system in the different municipalities to improve the health and living standard. The Project is classified as Environmental Category B in accordance with OP 4.01 due to the nature and scale of the planned civil works and assessed impacts. The Project does not envisage any significant or irreversible environmental/social impact. Key environmental management issue would be the contamination of water and, discharge of sludge and untreated sewage if not properly designed as well as the construction related impact on air, noise and water if management plan not followed. However, the expected environmental and social impacts can be mitigated through implementation of appropriate environmental code of practice and environmental management plan, social management plans. The Environmental Management Framework (EMF) and the Resettlement and Social Management Framework (RSMF) have been prepared for the project. The EMF and RSMF fully incorporated and analyzed the potential environment and social issues envisaged by the project including labor influx and gender. However, only the local labor will be involved in the construction work. The environmental/social screening/assessment with environmental management plan (EMP)/ social management plan(SMP) for each subproject (based on exact routes and locations of the pipe network) will be carried out during the implementation stage in accordance with the EMF and RSMF. Also, the Environmental, Health, and Safety (EHS) Guidelines of the World Bank Group is applicable to the Project.</p> <p>Private sector involvement in the project is limited to bidding on public contracts. The responsibilities for identifying, assessing and managing environmental and social risks and impacts are fully entrusted on Public Entity.</p>
Performance Standards for Private Sector Activities OP/BP 4.03	No	



Natural Habitats OP/BP 4.04	Yes	As a precautionary approach, it is triggered though it is highly unlikely that any natural habitat formed largely by native plant and animal species will be affected or modified due to the Project activities.
Forests OP/BP 4.36	No	The Project is not expected to have any impacts on the management, protection, or utilization of natural forests or plantations. As such, the policy has not been triggered.
Pest Management OP 4.09	No	The Project is not expected to finance any synthetic chemical pesticides activities and the policy has not been triggered.
Physical Cultural Resources OP/BP 4.11	Yes	<p>The policy is triggered, although it is very unlikely that water supply network may impact the physical cultural resources. Chance finds may be encountered in the EMP and special precautions will need to be taken to avoid damaging cultural heritage sites and property.</p> <p>None of the 30 selected municipalities has been selected from the 3 districts of the Chittagong Hill Tracts (CHT), which have the largest concentration of people who belong to the Small Ethnic Communities (SECs). However, there are also a considerable number of districts in the plains which also have SECs in small proportions, who live in settlements among the mainstream people.</p> <p>Whether or not, or how the people of SECs would be affected in any of selected municipalities will remain largely unknown until the ongoing Social Impact Assessments (SIAs) are completed. Where peoples of SECs are among the municipal residents, they would be affected by the pipeline networks and other physical works in the same manner as the mainstream people. People of SECs are more likely to be affected outside the municipal jurisdiction.</p> <p>Where the municipalities will use water from surface sources like rivers, there would be a need for building treatment facilities for raw water and reservoirs for the treated water. The treatment facilities for fecal sludge will also be built away from the residential areas, which could be outside the municipality jurisdiction. Where they do not have lands of their own, the municipalities will look for public lands that could be used for free. If there are SECs in the vicinities, the lands that they use for living and livelihood are likely to be under customary</p>
Indigenous Peoples OP/BP 4.10	Yes	



		tenure without legal titles. These lands are recorded in the land administration system as khas or public. In a situation like the people of SECs could be affected if the municipalities decide to use such lands to build the treatment facilities for fecal sludge, as well as those for surface waters. Considering the possibility DPHE has prepared a standalone Small Ethnic Community Planning Framework (SECPF) with principles and guidelines consistent with the Bank's OP/BP 4.10 on Indigenous People. The SECPF will be used to prepare and implement impact mitigation plans as and when people of SECs are affected by the project.
Involuntary Resettlement OP/BP 4.12	Yes	Applicability of OP/BP 4.12 on Involuntary Resettlement will depend on geographical locations, existing water supply and sanitation facilities and, more importantly, availability of lands under ownership of the selected municipalities. Other than causing temporary inconveniences to the residents and businesses/trading activities along the roads, social safeguard issues may or may not arise where municipalities would build networks of underground water supply pipelines that are expected to follow the existing road networks. However, building facilities for treatment of surface waters and fecal sludge may require small amounts of private lands which are likely to be away from the residential areas -- possibly outside the municipality jurisdiction. Where they don't have suitable lands of their own, the municipalities may use small amounts of private lands. Completion of the SIAs that have been underway would offer more concrete information on nature and scale of the potential safeguard impacts. As decided at concept review stage, DPHE has already prepared Resettlement and Social Management Framework (RSMF), with principles, policies and guidelines for preparation and implementation of municipality-specific mitigation plans like RPs / ARPs.
Safety of Dams OP/BP 4.37	No	The Project will not finance any dams, nor do project activities depend on any existing dams.
Projects on International Waterways OP/BP 7.50	Yes	The Project activities will take place along international waterways which are shared with Riparian countries.



Projects in Disputed Areas OP/BP 7.60	No	There are no disputed areas in the Project area of influence.
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## 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 proposed project aims to enhance and strengthen the water supply network and sanitation system in the different municipalities to improve the health and living standard. The Project does not envisage any significant or irreversible environmental/social impact. Key environmental management issue would be the contamination of water and discharge of sludge and untreated sewage if not properly designed as well as the construction related impact on air, noise and water if management plan not followed.

Potential social safeguard issues may relate to temporary inconveniences that would be caused to the residents in general and to the businesses/trading activities that are operated along the road networks -- which will also be used to lay the water supply pipelines and construct surface drains. Although this will vary across the 30 selected municipalities depending on prevailing conditions on the ground, some of them may have to use small amounts of private lands where they don't have lands of their own to build the treatment facilities for treatment of raw waters and reservoirs for treated waters. The same may also happen for fecal sludge treatment facilities, which will be built away from the residential areas, possibly outside the municipality jurisdiction. In a situation where they do not have lands under their ownership, the municipalities would look for lands that are recorded as khas or public. If there are people who belong to SECs in the vicinities, they would be easily affected, because the lands they use for living and livelihood under customary tenure are recorded as khas in the land administration system.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:  
The proposed project will improve the water supply network and sanitation system, which may contribute to localized air pollution and water pollution challenges if not properly designed and managed. On the other hand, improved road surface will reduce accident hazard, traffic delay as well as dust and vehicular emission. The residents of the 30 selected municipalities would use piped waters for the first time. Other than causing temporary inconveniences and use of small amounts of private lands (for which impact mitigation measures are already identified in the RSMF and SECPF), the project activities are most unlikely to cause any long-term adverse impacts. As the municipalities have been given the responsibility to provide water supply and sanitation (WSS) services, the project can serve as a learning exercise for further improvements in the future. Any lessons learned from the project could also be effectively utilized in other municipalities.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.  
The safeguard instruments have suggested some alternatives to minimize the project's adverse impacts and maximize those that are beneficial. All project activities within and outside municipality jurisdiction will be screened to identify any feasible alternatives that could be implemented to minimize social safeguard impacts. In addressing the corporate requirements, project design has a strong focus on gender issues that include, among other concerns, identifying the existing gender gaps in WSS services. The project will prepare a Gender Action Plan to reduce the gaps.



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.

Department of Public Health Engineering (DPHE) will be the nodal agency for implementation of the project, while at the local level the project will be implemented by the participating municipalities. DPHE has prior experience in implementing IDA funded projects. Although no safeguards issues were reported in those projects, but overall the agency lacks professional staff to oversee the proper compliance of the environmental and social safeguards requirements. Presently, there is one Assistant Engineer and 2 to 3 Sub-assistant Engineers in each municipality, who are responsible for operation, maintenance and safeguards of the water supply and sanitation facilities. But capacity constraints remain in the field to monitor the development programs at grassroots level. In this regard, project-based field staff will supplement the existing DPHE set up in the field to execute and monitor the proposed project. A project specific PMU at the central level and regional technical support teams will be set up with key staffing including the safeguards staff for providing implementation and coordination support to the municipalities. Also, DPHE shall keep the provision of short and long-term training courses for their concerned officials as well as municipality staff on environmental and social management for the institutional capacity building. The Environmental Management Framework (EMF) and the Resettlement and Social Management Framework (RSMF) have been prepared for the project. The EMF and RSMF fully incorporated and analyzed the potential environment and social issues envisaged by the project including labor influx and gender. However, only the local labor will be involved in the construction work. The environmental/social screening/assessment with Environmental Management Plan (EMP) / Social Management Plan (SMP) for each subproject (based on exact routes and locations of the pipe network) will be carried out during the implementation stage in accordance with the EMF and RSMF. Also, the Environmental, Health, and Safety (EHS) Guidelines of the World Bank Group is applicable to the Project.

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

During the preparation of the project, DPHE and its District and Sub-district level officials had been in close contact with the municipalities. However, formal consultations have been carried out with each selected municipalities during environment and social assessment. These consultation meetings were open to all and carried out in an environment where people of all walks of life, including women joined and freely expressed their opinions. Separate consultations and focus group discussions were also carried out with women, including those who head poor households (female-headed), key institutional stakeholders and local individuals who could play important roles in project design and implementation. The social screening instruments, which are suggested in SECPF and RSMF, have also been designed to include municipality residents, irrespective of socioeconomic status.

At municipality level, the key stakeholders are the residents who would use piped water supply and the sanitation services as proposed under the project; the individuals who operate commercial activities along the roads that would also be used to lay the water supply pipelines and construct surface drains, which may cause temporary inconveniences to their operations; and vehicular and pedestrian traffic. The institutional stakeholders at this level are the elected officials, such as the Mayor and Ward Commissioners; Municipality Secretary, and the staff who are responsible for operation and maintenance of water supply and sanitation (WSS) services; civil society organizations (CSOs) which may have been working in the WSS sector. Outside the municipality, the DPHE officials at the Sub-district, District and HQ levels would oversee, coordinate and guide the municipalities to ensure compliance with the environmental and social safeguards requirements.

The EMF and the RSMF have been disclosed by the DPHE on their website and hardcopies are also available at DPHE headquarters and district offices (project area). Advertisement requesting public comments have been published in two daily Newspapers (English and Bangla). The EMF and the RSMF have also been disclosed in World Bank website



before appraisal.

**B. Disclosure Requirements****Environmental Assessment/Audit/Management Plan/Other**

Date of receipt by the Bank	Date of submission for disclosure	For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors
01-Aug-2018	29-Aug-2018	

**"In country" Disclosure**

Bangladesh  
29-Aug-2018

Comments

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

Date of receipt by the Bank	Date of submission for disclosure
16-Aug-2018	10-Sep-2018

**"In country" Disclosure**

Bangladesh  
10-Sep-2018

Comments

**Indigenous Peoples Development Plan/Framework**

Date of receipt by the Bank	Date of submission for disclosure
16-Aug-2018	10-Sep-2018

**"In country" Disclosure**

Bangladesh  
10-Sep-2018

Comments

**C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting)****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 Practice Manager (PM) review and approve the EA report?

Yes

Are the cost and the accountabilities for the EMP incorporated in the credit/loan?

Yes

**OP/BP 4.04 - Natural Habitats**

Would the project result in any significant conversion or degradation of critical natural habitats?

Yes

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?

Yes

**OP/BP 4.11 - Physical Cultural Resources**

Does the EA include adequate measures related to cultural property?

Yes

Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?

Yes

**OP/BP 4.10 - Indigenous Peoples**

Has a separate Indigenous Peoples Plan/Planning Framework (as appropriate) been prepared in consultation with affected Indigenous Peoples?

Yes

If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?

Yes

If the whole project is designed to benefit IP, has the design been reviewed and approved by the Regional Social Development Unit or Practice Manager?

Yes

**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 Practice Manager review the plan?



Yes

**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

**The World Bank Policy on Disclosure of Information**

Have relevant safeguard policies documents been sent to the World Bank for disclosure?

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

**All Safeguard Policies**

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

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**APPROVAL**

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**Approved By**

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Country Director:	Rajashree S. Paralkar	19-Oct-2018