



# Appraisal Environmental and Social Review Summary

## Appraisal Stage

### **(ESRS Appraisal Stage)**

Date Prepared/Updated: 01/26/2022 | Report No: ESRSA01836



**BASIC INFORMATION**

**A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
Bangladesh	SOUTH ASIA	P173312	
Project Name	Resilient Infrastructure for Adaptation and Vulnerability Reduction		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Urban, Resilience and Land	Investment Project Financing	1/10/2022	3/28/2022
Borrower(s)	Implementing Agency(ies)		
Ministry of Finance	Local Government Engineering Department		

**Proposed Development Objective**

To reduce the vulnerability of people in targeted communities to riverine and flash floods and improve the country’s capacity in disaster preparedness and response

Financing (in USD Million)	Amount
<b>Total Project Cost</b>	<b>509.00</b>

**B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?**

No

**C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]**

The proposed project will finance infrastructure and systems to increase the resilience of vulnerable populations in non-coastal areas of Bangladesh against riverine and flash floods through: (i) resilient flood shelters and community infrastructure and (ii) strengthening capacity for disaster preparedness and response of government agencies and communities. The project also aims to contribute to the COVID-19 recovery process by facilitating investments in public works, improving the communication, accessibility, and facilitating economic activities that provide local employment opportunities.

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#### D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The project area is spread over fourteen districts of Bangladesh, which fall in four different administrative Divisions of the country. All the project districts under Rangpur division fall in Tista floodplain, with high to medium high land coverage. The soil type is Sandy loam to Silty-clay-loam. Whereas, Barind tract dominates the area of Bogura, and Sirajganj and Pabna relates to two other floodplain areas. All the districts in Dhaka Division are part of Ganges floodplain, while the two districts in Sylhet Division falls in Sylhet Basin and partly in Old Meghan Estuarine Floodplain. The hydrology of the proposed project districts are inextricably related to the presence of some big rivers flowing across or through the areas. Among the districts, Rangpur is crisscrossed by the river Donai, Ghagat, Tista, and Brahmaputra-Jamuna, while Karatoya flows through the district Bogura, and the hydrology of Faridpur district is largely dependent on the flows of river-Padma, Kumar, Arial Khan and Banar. Pabna sees the presence of two mighty river system-Ganges-Padma and Brahmaputra-Jamuna. All these rivers contribute in replenishing the groundwater reserves in the districts as well as maintaining the total water budgeting that has a tremendous effect on local agricultural yields. Sunamganj, among all the 14 project districts is very rich in terms of having presence of large number of standing water bodies, especially haors and Beels, including Tanguar Haor, Kahabil Matin Haor, Banuar Haor and Sanir Haor. Habiganj also has got many of such kind of water bodies. Eklaipur Hazhagi Beel in Bogura and Kagdir Baor in Faridpur are also famous for their presence with affluent aquatic habitats including different varieties of fishes and other aquatic faunal species. Among the 14 project districts, highest number of population live in Sirajgonj, and the population density is highest in Sirajgong as per Population Census'2011. Madaripur, Nilphamari and Rangpur are the three major densely populated districts after Sirajgonj. However, Sunamgonj is the least densely populated district, followed by Kurigram. A large areas in Sunamgonj is occupied by a large numbers of haors, which narrows down the habitable places in Sunamgonj. Sirajgonj, being located close to the capital and having large urban population across the district, gets top ranking in educational attainment among all 14 districts. However, Lalmonirhat and Gaibandha also have very high literacy rate, more than 60%; though Lalmonirhat got much lesser number of schools than many other districts. Sunamgonj got the lowest literacy rate, followed by Habiganj. It is to be noted that however, none of the project areas of interventions contain any ecologically/ environmentally sensitive areas or important habitat.

#### D. 2. Borrower's Institutional Capacity

The Local Government Engineering Department (LGED) under the Local Government Division (LGD) will be the Implementing Agency (IA). A Project Steering Committee (PSC) will guide LGED for ensuring the overall guidance, policy advice, and coordination of the project components. LGED has been hailed as one of the most reputed organizations for its remarkable working experience with the Development Partners (DP). Like the implementation process of other DP financed projects, the department will implement the project through a Project Implementation Unit (PIU). The PIU will be headed by Project Director (PD) who will be supported by a Deputy Project Director (DPD) and adequate technical and ES staff. To address ES issues the PD and DPD will also be supported by an Environmental Specialist, a Social Development Specialist and a Gender Specialist.

While a dedicated PIU will be set up at LGED headquarters in Dhaka, the local level implementation will mainly be supervised by the field level officers who will act as focal persons for their respective districts. To support the PIU and for the sake of smooth implementation of the project, a Design and Supervision firm will carry out the preparation of bidding documents (addressing ES aspects of the projects to be implemented by the Contractors) including the detailed designs of the civil works and will also supervise the implementation of various ES instruments. An M&E firm will be engaged to monitor progress and evaluate the project impacts.



The implementing agency has experience of managing environmental and social issues in World Bank supported projects including Rural Transport Improvement project (RTIP I & II), Emergency 2007 Cyclone Recovery and Restoration Project (ECRRP), Municipal Governance and Services Project (MGSP) and Multipurpose Disaster Shelter Project (MDSP) on provisioning of disaster shelters, access roads and other rural and urban infrastructure. LGED is familiar with the Bank’s safeguard policy and ESF having implemented projects covered by both policy regimes. Although LGED is used to get support from Environmental and Social Specialists hired under the PIU, a proposal to setup a Climate Change, Environment and Social Protection Wing has already been sent to Ministry of Public Administration for review and subsequent approval. This wing will have a Wing Headquarters, a Climate Change and Disaster Management Unit, a Social and Environmental Protection Unit and a Gender Development Unit with requisite experts and manpower.

Needless to say, that the LGED has narrow range of functions and still have capacity challenges in terms of ES assessment, management and implementation issues. Thus, the capacity building plan stated in ESCP has been designed not only to enable the program to meet World Bank ES Standards but also to develop institutionalized capacities for WB ESF. In essence, the capacity building program for RIVER would consist of provision of training needs assessment (TNA) and find the gaps in requisite expertise, development of ES module for training ES staffs and those responsible for day to day monitoring, support for development various ES instruments including bid document preparation and M&E functions to address ES issues to be implemented by the Contractors, assistance in recruitment process including the development of ToRs of ES staffs and Consultants. The staffing and capacity building needs are documented in the Environmental and Social Commitment Plan (ESCP).

**II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS**

**A. Environmental and Social Risk Classification (ESRC)**

Moderate

**Environmental Risk Rating**

Moderate

The environmental risk has been determined as Moderate based on the available information considering the type, scale of operation, nature and magnitude of potential environmental risks and impacts and client’s capacity. Project would support construction of climate-resilient flood shelters in targeted flood-prone areas in non-coastal districts. Land raising of school premises where shelters will be built (at a height of approximately one meter and the total volume being approximately 600 cubic meter per shelter) would also be supported. Moreover, construction and/or rehabilitation of associated climate resilient shelter connecting and community roads, and resilient infrastructure as identified by the community including climate resilient culverts and bridges, repair, rehabilitation of rural markets, repair and rehabilitation of landing stages (river jetties), and installation of solar powered streetlights will be supported through the project. These infrastructures would be spread across various locations and work at individual location would involve small scale construction work and are not supposed to have significant environmental impact. Also, the construction and project interventions will not include any areas of environmental and ecological sensitivity and important ecosystem which will be screened out during screening process. There would be some impact during construction phase which would be mostly temporary in nature and would be confined within the boundary of the project locations. The anticipated impacts may include drainage congestion and water logging during the construction period, temporary surface water and ground water pollution, construction

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related dust, air and noise pollution etc. As shelters will be constructed within the existing school premises, community health and safety, particularly of teachers and students near the construction area would be an issue during construction. There are also likelihood of some occupational health and safety risk of workers during construction phase. Construction/rehabilitation of rubber dam as planned during concept stage has now been excluded from the project design. As construction of the rubber dam was the main deciding factor for the environmental risk to be substantial during concept stage, the environmental risk rating has been scaled down to moderate during appraisal stage due to this exclusion. The construction, repair and rehabilitation of infrastructure conducted under this component will implement energy efficient practices and equipment to reduce GHG emissions associated with the project activities. Additionally, where possible, the activities will use locally sourced material to reduce GHG emissions associated with transportation for procurement.

**Social Risk Rating**

Moderate

The project would entail employment of labor for the construction of various types of infrastructure and facilities. The employed labor will mostly be from local areas, thus the risk of labor influx is expected to be minimal. Some interventions may require the engagement of outside workers given their specialized nature. Potential Labor associated risks include OHS issues, working under COVID-19 situation, unscrupulous labor practices including discrimination on hiring and assignment, interaction with the localities and potential for GBV/SEA/SH. Community health and safety may be adversely affected by civil work related waste generation, traffic movement, air and water pollution emanating from construction site, spread of diseases etc. As per the GBV/SEA/SH risk rating tool the GBV/SEA/SH risk for the project has been rated as Moderate. The GBV/SEA/SH issues will be addressed through sensitization of PIUs, awareness raising of communities around project areas, mapping of GBV/SEA/SH service providers, training and signing of Code of Conduct (CoC) by workers, development of a GBV/SEA/SH Action Plan and ensuring that project GRM can address GBV/SEA/SH issues. The project is not anticipated to acquire private land and all construction activities are expected to be on public land. However, there may be informal settlers occupying public land that may require resettlement. There may also be the need to have temporary land requisition for project activities (to keep construction material and labor camps). as well as scope for voluntary land donation, which, if required, will be done as per the requirement of ESS5. The extent of such impact will be known upon the confirmation of specific location of subproject and screening of sites. A Resettlement Policy Framework (RPF) has been developed to provide guidelines for the preparation of subsequent Resettlement Action Plans (RAPs) or Abbreviated RAPs to address the issue of informal settlers resettlement, temporary land requisition etc.. Instances of small ethnic communities residing in the project areas and likely being affected by the project activities, both positively and negatively, is also possible. A Small Ethnic Community Development Planning Framework (SECDPF) has been developed to guide the development of specific plans to address issues of small ethnic communities present in the project areas. Project interventions and activities that may have impacts on small ethnic communities to the extent that Free, Prior, Informed Consent (FPIC) (for example land acquisition, resettlement of ethnic communities, loss of and affect on their cultural properties and system) has to be obtained will not be financed under the project. Given that subproject locations are not known yet, there is a likelihood of presence of cultural heritages (tangible, intangible etc) in the areas of interventions. Project activities will take into consideration the presence of such heritage and a Chance Finds Procedure will be required in all bidding and contract document so that impacts on heritages are addressed. In addition, stakeholder engagement process will also pay attention to identifying cultural heritage in collaboration with communities. The project intervention and activities have taken into consideration the concept of inclusion. As part of the participatory process, community members have already been included in decision-making on technical design features to be integrated (e.g. universal access features, gender-based conveniences) and the final design options, as well as providing inputs on site selection and

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construction planning. Given the project context, the capacity of the operating environment to mitigate social risk and the social risk profile, capacity of the Implementing Agency—the social risk rating has been determined as Moderate.

## B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

### B.1. General Assessment

#### ESS1 Assessment and Management of Environmental and Social Risks and Impacts

##### **Overview of the relevance of the Standard for the Project:**

The proposed project will mainly support construction and rehabilitation of multipurpose flood shelters in existing primary schools with access roads and adequate water, sanitation and hygiene (WASH), communal latrine, solar power and other ancillary facilities in the shelters so that flood affected people can stay there with their belongings during flood time. The project would also support construction of flood shelter cum school building and raise the land of the school premises so that this raised land can also be used as flood refuge for cattle / live stalk. Shelters will fulfill multipurpose uses, most notably as educational facilities for primary education. Project will also include rehabilitation and improvement of selected community infrastructure to increase flood resilience and are expected to include rehabilitation and improvement of roads, embankments, drainage, public buildings, and jetties. The new shelter/school building with access road will be constructed at the same premises of the existing schools. The environmental and social impacts of new construction, rehabilitation and improvement works are expected to be mostly observed during construction phase, temporary in nature and limited within the project boundary.

Project coverage area of fourteen districts have been chosen from the high flood prone areas along the major river systems, but the exact locations of the project activities in those districts will be finalized during implementation stage. Therefore, a framework approach has been adopted for proper environmental and social risk assessment and management. An Environmental and Social Management Framework (ESMF) has been prepared covering different typologies of sub-projects in consultation with all the stakeholders based on the experience of preparation and implementation of ESMF of MDSP, the predecessor of RIVER prepared under the old safeguard policy. The ESMF includes a screening criteria and a negative list (including screening out ecologically sensitive areas and important ecosystem such as habitat of Ganges river dolphin , activities needing FPIC from small ethnic communities and land acquisition etc.) based on which sub-projects would be screened and the level of due diligence and mitigation measures required will be identified i.e environmental and social assessment (ESA), developing ESMPs and ES Codes of Practice (ESCoPs) etc. ES screening and preparation of ESA/ESMP would be undertaken as soon as project location and design are known and completed before the bidding process. A Small Ethnic Community Development Planning Framework (SECDPF) has been prepared to guide the development of SEC specific plans to address any issues with small ethnic communities, who are sporadically present in 11 of 14 districts under project interventions. Since the GBV/SEA/SH risk is rated as Moderate, a GBV/SEA/SH Action Plan has already been developed. The project has identified vulnerable and disadvantaged groups and individuals from the target areas (including women, children, person with disabilities, boatmen, household likely to be affected by flood, ethnic communities, boatmen etc) and will devise opportunities for their participation in project activities and employment in the project civil works on a priority basis. The employment and other interventions to address their issues have been appended in the SEP. Client has also prepared a Labor Management Procedure (LMP) to address labor related issues and a Stakeholder Engagement Plan (SEP) to identify various stakeholders and to ensure participation of stakeholders during the full



lifecycle of the project. A Resettlement Policy Framework (RPF) has also been prepared to address the issue of informal settlers and need for temporary land requisition and land donation for subprojects, following the principles of ESS5 and Acquisition and Requisition of Immovable Property Act (ARIPA 2017). An environmental and social commitment plan (ESCP) has also been prepared which documents all the agreed actions by the the Bank and the Client for assessing and managing environmental and social risks during project implementation. The ESMF, RPF, LMP, SEP, SECDPF, GBV/SEA/SH Action Plan and ESCP will be disclosed prior to appraisal of the project.

### **ESS10 Stakeholder Engagement and Information Disclosure**

The project design is consultation-centric. The selection and design of infrastructures will be done through adequate citizen and stakeholder engagement, especially shelters (subcomponent 1A), operations and maintenance of shelters by SMC and community representatives (subcomponent 1A), participatory planning for determination of communal roads, development of subproject siting, strategies to avoid elite capture and involvement of disadvantaged and the vulnerable groups.

Stakeholders of the project include the diverse local communities, school committees, teachers, students, local and regional contractors, suppliers, farmers, media, NGOs, Bangladesh Water Development Board (BWDB), Department of Disaster Management (DDM), local administration, local elected representatives, women and child rights groups, and others. With the outbreak of COVID-19 across the country, Department of Health personnel, Upazila Hospital and Union health clinics are also needed to be involved in the COVID-19 response process in the process of civil works construction. LGED has prepared a Stakeholder Engagement Plan (SEP), identifying various stakeholders including Affected People (for example Local boatmen, market goers, businessmen who ferry, population including students, teachers, and commuters living in project areas), Interested Parties (Media, Academia, NGOs, civil society groups, School Management Committee (SMC), Community-based groups, various ministries, international and national Organizations etc) and the Vulnerable groups (women, female headed households, elderly, ethnic minorities, sick people, households continuously affected by floods etc), outlining general principles and a collaborative strategy and plan for an engagement process in accordance with this standard. Meaningful consultations with local communities on the shelter selection, designs, operation and maintenance will be done adequately throughout the lifecycle of the project. Local communities, including women, persons with disability, disadvantaged group and the vulnerable will be consulted through door to door visits, focus group discussions (FGD), SMS, community meetings etc and feedback will be considered while finalizing the selection and design options. The SEP describes how local communities including vulnerable groups and individuals will be engaged in this process of consultation at various stages of project preparation and implementation so that feedback loop is completed, putting their inputs in the project design. If small ethnic communities are present in the project areas and confirmed through screening, the stakeholder engagement strategy developed for this group will be implemented and such a requirement has already been reflected in the ESCP.

To address concerns and complaints, a multi level project level GRM has been designed through the SEP so that concerns and complaints can be raised through multiple channels and addressed in a timebound fashion throughout the lifecycle of the project. The GRM is intended to address issues and complaints in an efficient, timely, and cost-effective manner. PIU staffs will be trained on addressing grievances including those that will be assigned in the grievance redress committees (GRC). A separate GRM will be available for labor related issues under contractors and



sub-contractors. Project-affected-people in the project and any other stakeholder may submit comments or complaints at any time by using the project’s Grievance Redress Mechanism (GRM). The GRM is designed to address issues related to GBV/SEA/SH and those that relate to small ethnic communities (SECs). The SEP is a living document and will continuously be updated throughout the life cycle of the project. The GRM will be in place three months after effectiveness and well before any project activities begin.

## **B.2. Specific Risks and Impacts**

**A brief description of the potential environmental and social risks and impacts relevant to the Project.**

### **ESS2 Labor and Working Conditions**

The project will involve Direct Workers (consultants and PIU staffs appointed by the implementing agency at all levels) and Contracted Workers to carry out small scale to medium-sized civil works. Primary supply workers are likely not to be involved given the size of the works and the sources of materials are likely from existing commercial stores that have the necessary permits and clearances. During construction there maybe some health and safety issues but risks and impacts on these are likely to be low to moderate given the size of the works and small number of workers involved. The likelihood of labor influx is expected to be minimal since most of the labors will be recruited locally. A Labor Management procedure (LMP) has already been developed and a standalone worker-specific GRM (for direct and contracted workers) has been planned. The LMP has identified labor requirements (how different categories of workers will be managed, in accordance with the requirements of national laws and ESS2) and labor-related risks associated with the project as well as mitigation measures. There are a number of gaps between Bangladesh Labor Law and ESS2 which has been addressed through the LMP. The LMP has been prepared as per the requirement of ESS2 which is not mandatory under the Labor Law. The LMP also makes it mandatory to include OHS analysis for labors before any project implementation which the current Labor Law and practice do not specify stringently. Various types of labors (Contracted, Direct etc) have been explicitly cited in the LMP which is more inclusive than the definition illustrated in the Labor Law. In contrast with the Labor Law, the LMP includes non-discrimination provisions to protect disadvantaged or vulnerable individuals (including women workers, persons with disability workers etc) or groups, and to allow them to access employment opportunity and equality in terms of opportunity, payment and other labor issues. The LMP also establishes the requirement for a grievance mechanism separately for workers as opposed other stakeholders of the Project which is not mandatory under the Labor Law. As the project might require procurement of solar panels, special precautions to be taken while selecting vendors for such goods to ensure that the companies are not associated with abuse/exploitation of labor and do not use child or forced labor. The suppliers will provide written confirmation as to their employment criteria that screens out any child or forced labor. A background check of the vendors will be made before assigning contract. This issue will also be addressed while preparing the bidding document. The LMP has stipulated that no one below 18 will be assigned by the project and no use of trafficked or forced labor will be allowed. Continuous monitoring by the Client will be made to ensure that child and forced labor restrictions are adhered to in the field. Age verification mechanism will also be implemented by checking government provided documents and medical inspections.

To ensure the health and safety of workers during the construction and operation phases, the PIU will require to incorporate the OHS requirements in the ES specification of the bidding document based on the site specific ESMPs. The client would also ensure procedures on incident investigation and reporting (including Root Cause Analysis),



recording and reporting of non-conformances, emergency preparedness and response procedures, and continuous worker training/awareness.

The LMP includes a workers Grievance Redress Mechanism (GRM) through which workers can raise issues and concerns with working conditions etc. The GBV/SEA/SH risk rating is Moderate and the labor induced potential GBV/SEA/SH issues will be addressed through sensitization of Contractors and Facility Operators, training and signing of Code of Conduct by workers etc. The Contractors will train the workers on OHS, Code of Conduct and GBV/SEA/SH, incident reporting, COVID-19 Protocols, interaction with communities etc.

### **ESS3 Resource Efficiency and Pollution Prevention and Management**

Impact on physical environment from the construction of shelter, access road, land raising, and rehabilitation and improvement of community infrastructure such as rehabilitation and improvement of roads, embankments, drainage, public buildings and jetties are not likely to be significant and mostly contained within the construction phase. These might include air emissions from exhaust from vehicles and machinery and fugitive dust generated by construction activities. Those most likely to be affected are people living within the proximity of the construction sites. The implementation of mitigation measures such as dust suppression and vehicle maintenance will need to be applied to minimize the impact of air emissions during construction, and residual impacts are expected to be limited in scope and duration. Surface water might be contaminated from construction activities. As the civil construction to be supported through this project will be small to medium scale in nature, requirements for construction materials will not be significant at individual site. Volume of soil/sand for land raising at individual location would be small and land raising would be done within the boundary of the school premises where shelters will be built (at a height of approximately one meter and the total volume being approximately 600 cubic meter per shelter would also be supported). An assessment of source of such material would be done before starting of the construction work and any source which might have negative impact on environment or on any sensitive eco-system would be excluded. Noise pollution might also be an issue particularly when there would be sensitive environmental receptors near the project locations such as existing schools, hospitals etc. Necessary precautions to minimize such impact need to be undertaken.

Use of renewable energy will be encouraged in the flood shelters such as rainwater harvesting, use of solar powered light, fan and water pumps. Solar power would be particularly helpful as disruption of electricity during flood time is very likely. Solar powered water pump can also be used to raise ground water where suitable ground water is available. These provisions would be explored and incorporated during design and implementation of the sub-projects.

Shelter premises will also be equipped with adequate WASH facilities including water purification and filtration methods for prolonged usage during flood events as well as throughout the year to ensure regular maintenance and longevity of the systems. This will provide a safe space and shelters to the vulnerable people in flood-prone areas as well as their cattle.



### **ESS4 Community Health and Safety**

Community health and safety concerns are associated with labor influx, movement of vehicles and construction materials, spread of contagious diseases, especially COVID-19, waste generation and other construction related risks and impacts etc. The labor will mostly be recruited from the local area and hence labor influx issues will be minimal. Traffic issues will also not be very significant because of the size of the construction and sparse location of the shelters and other facilities. However, working in the pandemic environment may give rise to the spread of the disease and hence the adoption of COVID-19 protocol, social distancing and use of PPE are of importance.

Shelter design will follow the Bangladesh National Building Code (BNBC) which includes universal accessibility. These shelters will be multipurpose, functioning primarily as Primary Schools.

The construction of new shelters would take place within the existing school premises and likely to occur when schools are in session. All measures will be taken to ensure the health and safety of the students and teachers attending the school such as putting physical barriers to separate the construction area. Construction materials such as rods, aggregates, steels etc. should be properly stored so that these do not pose any safety threat to the students or local community. Sand and other construction material has the potential of polluting air and has to be appropriately covered.

Given that project labors will be locally recruited and the civil works are not very significant, the GBV/SEA/SH risk is rated as Moderate. A GBV/SEA/SH action Plan has been developed. Contractor's Code of Conduct by workers and training of workers on GBV/SEA/SH issues will also be undertaken to address issues related to GBV/SEA/SH.

As flood shelters might be surrounded by flood water during flood time, engineering drawing and designs will include walls, railings, frames and other safety features to address the probability of drowning of children in the flood water.

### **ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

The construction/ rehabilitation of the flood shelters will be on existing land occupied by primary schools and the selection of sites will follow the MDSP model, prioritizing primary schools and avoiding the need for land acquisition or resettlement. The location of sites for flood shelter, access road, high ground for flood refuge, and river jetties; the type and current use of land required for their construction will be identified during the implementation stage. The project, however, has chosen to use public lands currently in use and designated legally for community use including existing schools, playgrounds, access roads, canals/rivers and riverbanks. The project will screen out involuntary acquisition of private lands and physical displacement of people through a negative list. However, the presence of informal settlers in the proposed land cannot be ruled out and will be confirmed upon screening. Schools will continue to operate during construction of shelters, which will predominantly be in rented premises. Temporary lands through requisition may be required to keep construction material and establishment of labor camps. However, such requisitions will avoid removal of properties, tress and corps as well as any resettlement. The scope of land donation, in some cases may also be accepted on voluntary basis, which will strictly follow the procedure under ESS5. A Resettlement Planning Framework (RPF) has been prepared to guide site-specific Resettlement Action Plans (RAPs) or abbreviated RAP should the need arise to address temporary land requisition, voluntary land donation and informal settler issues, following the principles of ESS5 and ARIPA 2017.



**ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

Although the length of the shelter access roads would be short and mostly an existing alignment is already there, there is possibility of cutting down trees and destroy habitats of flora and fauna depending on the location of such roads. This aspect will be addressed in the screening process following procedure set out in the ESMF. The project will exclude any subproject that will have significant impacts on biodiversity.

**ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities**

There are presence of ethnic communities spread around 11 of 14 districts in the project area of intervention. They may be present in the subproject areas as well. However, the exact location of various activities (shelters, roads, markets etc) will confirm the presence of the ethnic minorities meeting the criteria of ESS7. If there are any SECs in project intervention areas, they will be consulted as per their cultural and social norms the modalities of which have been detailed in the Small Ethnic Community Development Planning Framework (SECDPF). A Small Ethnic Community Plan will be developed as soon as the site location, presence of ethnic communities and the impact on them are known. The project will exclude any activities that may warrant obtaining free, prior and informed consent (FPIC) from the SECs.

**ESS8 Cultural Heritage**

Given all the locations of subprojects are yet to be identified, the presence of various types of cultural heritage (tangible, intangible, movable, static, location specific etc) cannot be ruled out. Therefore, a Chance Finds Procedure, depicting actions to be taken upon the discovery of cultural heritage will be included in all bid documents and contract agreement and the Contractors will be legally bound to implement specifics of the procedure. Further, the stakeholder engagement process will pay special attention to identifying cultural heritage in collaboration with the communities.

**ESS9 Financial Intermediaries**

Not relevant.

**C. Legal Operational Policies that Apply**

**OP 7.50 Projects on International Waterways**

Yes

The OP 7.50 is triggered since it will rely on water from Teesta-Brahmaputra-Jamuna, Padma, and Surma-Meghna river systems, which are considered as international waterways as defined in paragraph 1 of the Policy as part of rehabilitation and improvement of water-related community infrastructure comprising of storm-water drainage, culverts, and landing stages. These interventions will not adversely change the quality or quantity of water flows to other riparian and will not be adversely affected by other riparian’s possible water use, therefore [TO BE UPDATED an approval for exception to riparian notification was obtained from Regional Vice President of the Bank on XXX].

**OP 7.60 Projects in Disputed Areas**

No

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**B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts**

**Is this project being prepared for use of Borrower Framework?**

No

**Areas where “Use of Borrower Framework” is being considered:**

Borrower Framework will not be used.

**IV. CONTACT POINTS**

**World Bank**

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**Borrower/Client/Recipient**

Borrower: Ministry of Finance

**Implementing Agency(ies)**

Implementing Agency: Local Government Engineering Department

**V. FOR MORE INFORMATION CONTACT**

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**VI. APPROVAL**

Task Team Leader(s): Swarna Kazi, Ignacio M. Urrutia Duarte

Practice Manager (ENR/Social) Christophe Crepin Cleared on 06-Jan-2022 at 06:51:5 GMT-05:00

