



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

Appraisal Stage | Date Prepared/Updated: 30-Jan-2020 | Report No: PIDISDSA27764



**BASIC INFORMATION**

**A. Basic Project Data**

Country Bangladesh	Project ID P171779	Project Name Emergency Multi-Sector Rohingya Crisis Response Project Additional Financing	Parent Project ID (if any) P167762
Parent Project Name Emergency Multi-Sector Rohingya Crisis Response Project	Region SOUTH ASIA	Estimated Appraisal Date 28-Jan-2020	Estimated Board Date 19-Mar-2020
Practice Area (Lead) Urban, Resilience and Land	Financing Instrument Investment Project Financing	Borrower(s) People's Republic of Bangladesh	Implementing Agency Local Government Engineering Department, Ministry of Disaster Management and Relief, Department of Public Health Engineering

Proposed Development Objective(s) Parent

To strengthen the Government of Bangladesh systems to improve access to basic services and build disaster and social resilience of the displaced Rohingya population.

Proposed Development Objective(s) Additional Financing

To strengthen the Government of Bangladesh systems to improve access to basic services and build the disaster and social resilience of the population of Cox’s Bazar district.

Components

Component 1: Strengthening Delivery of Basic Services, Resilient Infrastructure, Emergency Response, and Gender-Based Violence Prevention

Component 2: Strengthening Community Resilience

Component 3: Strengthening Institutional Systems to Enhance Service Provision to the Displaced Rohingya Population

Component 4: Contingent Emergency Response Component (CERC)

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

**SUMMARY**

<b>Total Project Cost</b>	100.00
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<b>Total Financing</b>	100.00
<b>of which IBRD/IDA</b>	100.00
<b>Financing Gap</b>	0.00

**DETAILS**

**World Bank Group Financing**

International Development Association (IDA)	100.00
IDA Grant	100.00

Environmental Assessment Category

A-Full Assessment

Decision

The review did authorize the team to appraise and negotiate

**B. Introduction and Context**

Country Context

The proposed additional financing will support the Government of Bangladesh (GoB) in responding to an emergency in Cox’s Bazar District caused by an influx of Displaced Rohingya Population (DRP) from Myanmar. While the original project focuses on the DRP exclusively, the additional financing will support interventions for the host communities as well. The proposed grant of US\$100 million comprises of US\$83.33 million from the IDA-18 Regional Sub-Window for Refugees and Host Communities and US\$16.67 million from Bangladesh’s National Performance-Base Allocation (PBA).

Bangladesh is eligible to access financing under the IDA-18 Regional Sub-window for Refugees and Host Communities<sup>1</sup>. First, as of September 2019, Bangladesh is hosting an estimated 915,000 displaced Rohingya people and persons living in refugee-like situations from Myanmar’s Rohingya community<sup>2, 3</sup>. Second, the World Bank, in consultation with the United Nations High Commissioner for Refugees (UNHCR) and the United Nations (UN) Refugee Agency, has determined that Bangladesh adheres to a

<sup>1</sup> A country is eligible if: (i) the number of UNHCR-registered refugees, including persons in refugee-like situations, it hosts is at least 25,000 or 0.1 percent of the country’s population; (ii) the country adheres to an adequate framework for the protection of refugees; and (iii) the country has an action plan, strategy, or similar document that describes concrete steps, including possible policy reforms that the country will undertake towards long-term solutions that benefit refugees and host communities, consistent with the overall purpose of the window.

<sup>2</sup> The Government of Bangladesh uses the term “Forcibly Displaced Myanmar Nationals.”

<sup>3</sup> 914,998 refugees identified in camps according to the Refugee Relief & Repatriation Officer (RRRC) and UNHCR Registration (including 34,172 registered before August 31, 2017). 9,176 refugees estimated in host communities in Teknaf and Ukhiya upazilas (sub-districts) according to UNHCR Family Counting. UNHCR Operation Dashboard (September 2019) & Inter Sector Coordination Group (ISCG) Situation Report (September 2019).



framework for the protection of refugees that is adequate for the purpose of the IDA-18 Regional Sub-window for Refugees and Host Communities. The World Bank's assessment recognizes Bangladesh's ratification of a number of human rights instruments, its 2014 strategy covering humanitarian and repatriation issues, and the recent memorandum of understanding with the UNHCR, the UN Refugee Agency, on voluntary repatriation, which have provided the basis for the government's treatment the Rohingya since the start of the current crisis<sup>4</sup>. Third, in June 2018, the government shared with the World Bank a preliminary plan outlining a series of actions it intends to pursue to respond to the current crisis. The government developed a multi-sectoral coordination mechanism and is planning to adapt the action plan to respond to the situation as it evolves.

### Sectoral and Institutional Context

Since August 2017, over 700,000 people have crossed into Bangladesh from Myanmar, most taking shelter in congested camps, with some living among host communities. They join over 200,000 people displaced from Myanmar in previous years, for a total displaced population of around one million in Cox's Bazar District of Bangladesh. This population has enormous needs, stressing an already resource-constrained service delivery system. Given uncertainties and expected delays in repatriation, the GoB will continue to deliver humanitarian aid directly and through UN agencies and local/international non-governmental organizations (NGOs/INGOs).

Almost all the Rohingya are hosted along Bangladesh's border with Myanmar, in the Cox's Bazar District. They live in highly congested conditions, including in the Kutupalong "mega-camp," which has de facto become the largest and most densely populated refugee settlement in the world. The Rohingya account for about three-quarters of the combined total population in the Ukhiya and Teknaf *upazilas* or sub-districts of Cox's Bazar- a region that was already densely populated and facing severe development challenges. The incidence of poverty in the area is above the national average, and the region is prone to natural disasters, especially cyclones and floods.

The most immediate risk facing the Rohingya in Bangladesh today is the onset of the cyclone and monsoon seasons (from April to November), putting approximately 200,000 Rohingya at substantial risk of floods and landslides. Last year, the Government relocated 30,000 Rohingya with support from UN agencies and NGOs out of high-risk areas.

Despite the considerable progress that Bangladesh has made in adaptation, climate-related natural disasters and extreme events pose increasing challenges. The longitudinal position of Bangladesh, combined with its proximity to the Bay of Bengal and the Indian Ocean, generate a tropical monsoon-type climate, prone to cyclones, and flooding. Bangladesh is one of the most vulnerable countries in the world to natural calamities like cyclones and floods – 60 percent of the worldwide deaths caused by cyclones in the last 20 years occurred in Bangladesh. Climate change may increase the frequency, peak intensity of cyclones and precipitation rates. Also, cyclone-induced storm surges are likely to be exacerbated by a potential rise in sea level. Once every three to five years, up to two-thirds of Bangladesh is inundated by floods. In the Kutupalong/Balukhali camp extensions sites, a high percentage of the land is unsuitable for human settlement as risks of flooding and landslides are high and are further aggravated by the

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<sup>4</sup> Adequacy is determined based on adherence to international or regional instruments such as the 1951 Refugee Convention or its 1967 Protocol, or the adoption of national policies and/or practices consistent with international refugee protection standards.



congestion and extensive terracing of the hills. The population density is 28 sqm per person (approx. 36,000 person/sqkm), compared to the UNHCR camp planning international standard of 45 sqm per person. The effects of a cyclone could be devastating given the amount of people, difficult access, and insufficient places for safe shelter.

The proposed AF for EMCRP will support the GoB in enhancing the displaced Rohingya population's and host communities' resilience to extreme events and increasing access to energy, water, and sanitation. In view of the emergency situation, the proposed AF has been prepared under the processing requirements covered by paragraph 12 of Section III of the Investment Project Financing (IPF) Policy (Projects in Situations of Urgent Need of Assistance or Capacity Constraints) of the World Bank. Due to the urgency of the situation, the activities under Additional Financing will focus on mitigating the mid-term impact of the situation on refugees and host communities. As the situation evolves, the Bank's support will adapt to remain flexible and responsive to the situation.

The overall objective of the WBG Rohingya support program is to complement humanitarian efforts and assist the GoB in developing a broader strategic response to the ongoing crisis. The WBG's response is adopting an integrated and phased approach, balancing the need for immediate response with the need to mitigate the medium-term impact of the situation on refugees and host communities.

Given the evolving nature of the refugee crisis, the World Bank response took a phased approach. Under phase I, the Bank, through the IDA 18 Regional Sub-window for Refugees and Host Communities<sup>5</sup>, is focusing on early recovery interventions and resilience building activities for DRPs. These interventions consist of two ongoing AF projects in the health and education sectors (US\$50 million and US\$25 million respectively), and a dedicated Emergency Multi-Sector Rohingya Crisis Response Project (US\$165 million) to improve disaster and social resilience of DRPs. Going forward, under phase II, the Bank support will adopt a regional development approach to cover the whole of Cox's Bazar district, focusing on three areas: strengthening Cox's Bazar economy; improving productivity and human capital of both refugees and host communities; and improving social cohesion between DRPs and host communities. The proposed US\$100 million AF Emergency Multi-Sector Rohingya Crisis Response Project is one of three operations to be financed in Phase II from the IDA 18 regional sub-window for refugees and host communities. The other two operations will focus on social protection (AF to the Social Safety Nets for the Poorest Project covering the whole of Cox's Bazar District US\$100 million), and health and gender support (Health project with a focus on gender-based violence covering the whole of Cox's Bazar District US\$100 million).

In parallel, several ongoing Bank projects with national scope, have a footprint in Cox's Bazar region<sup>6</sup>, among them: (i) the Multi-Purpose Disaster Shelter Project (MDSP), supporting disaster preparedness across coastal Bangladesh; (ii) the Municipal Governance and Services Project (MGSP), aimed at improving municipal governance and basic urban services; and (iii) the Sustainable Forests and Livelihoods Project that aims to improve forest management and increase benefits for forest-dependent communities in targeted sites. In addition, prior analytical work was undertaken to help ensure the effectiveness of the socio-economic dialogue and design of projects: Rapid Impact, Vulnerability, and Needs Assessment (RIVNA), also, there is ongoing analytical work in place that will inform the medium-term planning process.

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<sup>5</sup> The Bank made available about half a billion dollars in grant-based support on an exceptional basis

<sup>6</sup> These projects provide capacity and financial support to local governments, not specifically focusing on the DRP



### C. Proposed Development Objective(s)

#### Original PDO

To strengthen the Government of Bangladesh systems to improve access to basic services and build disaster and social resilience of the displaced Rohingya population.

#### Current PDO

To strengthen the Government of Bangladesh systems to improve access to basic services and build the disaster and social resilience of the population of Cox's Bazar district.

#### Key Results

### D. Project Description

The EMCRP supports the GOB's preliminary action plan to provide basic services and to strengthen its capacity to respond to the DRP crisis. The GoB has outlined a series of actions to scale up the delivery of basic services for the DRP and the management of the crisis. The engagement also builds on the GoB's commitment to further develop its strategic plan as the situation evolves. The EMCRP supports the government's plan through three components: (a) strengthening delivery of basic services, resilient infrastructure, emergency response, and gender-based violence prevention; (b) strengthening community resilience; and (c) strengthening institutional systems to enhance service provision to the Displaced Rohingya Population. The EMCRP was approved by the IDA Board of Executive Directors on March 7, 2019, with a closing date of March 5, 2022.

The EMCRP's PDO is to strengthen the Government of Bangladesh's systems to improve access to basic services and enhance the disaster and social resilience of the displaced Rohingya population.

The EMCRP is financed by an IDA grant of US\$165 million, of which US\$137.5 million is from the IDA 18 Regional Sub-Window for Refugees and Host Communities. With the AF of US\$100 million, the total project amount will increase to US\$265 million.

The EMCRP includes the following components and sub-components:

**Component 1: Strengthening Delivery of Basic Services, Resilient Infrastructure, Emergency Response and Gender-Based Violence (GBV) Prevention (US\$120 million)**

Subcomponent 1.A: Resilient Water, Sanitation and Hygiene (US\$30 million)

Subcomponent 1.B: Basic Services, Resilient Infrastructure, Emergency Response and GBV Prevention (US\$90 million)

**Component 2: Strengthening Community Resilience (US\$35 million)**

Subcomponent 2.A: Community Services (US\$21 million)

Subcomponent 2.B: Community Workfare (US\$14 million)

**Component 3: Strengthening Institutional Systems to Enhance Service Provision to the Displaced Rohingya Population (US\$10 million)**

Subcomponent 3.A: Strengthening MoDMR, NTF, RRRC, CiC, and Line Ministry Systems (US\$5 million)



Subcomponent 3.B: Strengthening LGED, DPHE, and GBV Services (US\$5 million)

**Component 4: Contingent Emergency Response Component (CERC) (US\$0 million)**

The proposed additional financing will support scaled-up activities for the displaced Rohingya population and, in addition, the host communities, especially in terms of physical infrastructure to enhance resilience to extreme events and access to energy, water, and sanitation. This additional financing will directly support the GoB’s preliminary action plan shared with the World Bank, which outlines a series of actions it intends to pursue to respond to the current crisis. The government has noted that diplomatic discussions with Myanmar to enable a rapid process of safe, dignified, and voluntary repatriation remains its highest priority. The program is indicative and may be adjusted in consultation with the government and key partners as the situation evolves.

**Project Component Nomenclature**

The nomenclature of the project components 1, 2, and 4 remain unchanged from the parent project. While the parent project’s Component 3 was Strengthening Institutional Systems to Enhance Service Provision to the Displaced Rohingya Population, as the component has been expanded to include the surrounding host communities, along with the displaced Rohingya population, Component 3 is now named as Strengthening Institutional Systems to Enhance Service Provision.

The AF project cost is US\$100 million. Total project cost of the original parent project and the proposed AF are estimated at US\$265 million. The table below provides an overview of the costs by component and sources of funding.

Project Component	Parent Project US\$ million	AF Project US\$ million	Original and AF (Cumulative) US\$ million
1. Strengthening Delivery of Basic Services, Resilient Infrastructure, Emergency Response and Gender-Based Violence (GBV) Prevention			
1.A: Resilient Water, Sanitation, and Hygiene	30	37	67
1.B: Basic Services, Resilient Infrastructure, Emergency Response and GBV Prevention	90	57	147
2. Strengthening Community Resilience			
2.A: Community Services	21	-	21
2.B: Community Workfare	14	-	14
3. Strengthening Institutional Systems to Enhance Service Provision			
3.A: Strengthening MoDMR, NTF, RRRC, CiC, and Line Ministry Systems	5	-	5
3.B: Strengthening LGED, DPHE, and GBV Services	5	6	11
4. Contingent Emergency Response Component (CERC)	0	0	0
<b>Total</b>	<b>165</b>	<b>100</b>	<b>265</b>

It was discussed that KfW will provide a grant of Euro 7.0 million as parallel-financing to subcomponent 1.B. The KfW Grant will be used to finance construction of climate resilient multi-purpose disaster



shelters/primary schools, including rainwater harvesting systems, solar-powered lighting, and climate-resilient access roads.

The proposed AF of EMCRP includes the following components and sub-components:

**Component 1: Strengthening Delivery of Basic Services, Resilient Infrastructure, Emergency Response and Gender-Based Violence (GBV) Prevention (US\$94 million)**

Subcomponent 1.A: Resilient Water, Sanitation and Hygiene (US\$37 million)

Subcomponent 1.B: Basic Services, Resilient Infrastructure, Emergency Response and GBV Prevention (US\$57 million)

**Component 2: Strengthening Community Resilience (US\$0)**

Subcomponent 3.A: Strengthening MoDMR, NTF, RRRRC, CiC, Line Ministry Systems (US\$0 million)

Subcomponent 3.B: Strengthening LGED, DPHE, and GBV Services (US\$6 million)

**Component 3: Strengthening Institutional Systems to Enhance Service Provision (US\$6 million)**

**Component 4: Contingent Emergency Response Component (CERC) (US\$0 million).**

The proposed AF will scale up activities under the Parent Project's Component 1: Strengthening Delivery of Basic Services, Resilient Infrastructure, Emergency Response and Gender-Based Violence (GBV) Prevention and Component 3: Strengthening Institutional Systems to Enhance Service Provision.

*Subcomponent 1.A: Resilient Water, Sanitation, and Hygiene (US\$37 million)*

The objective of this subcomponent is to enhance access to safe water and sanitation with climate resilient features to reduce the risks to climate vulnerability and disasters. This subcomponent will also foster hygiene promotion in a gender and socially inclusive manner for both the DRP and the host communities.

This subcomponent will establish improved water supply systems with a combination of (i) resilient mini-piped water supply schemes (connected with solar powered photovoltaic (PV) pumping systems with elevated platforms above flood level); (ii) resilient tube wells (with elevated platforms above flood level); (iii) resilient rainwater harvesting systems (with resilient superstructure and elevated platforms above flood level); and (iv) water resource mapping and water quality monitoring, including water resource availability considering climate vulnerability and extreme weather conditions. These facilities will serve the DRP camps and surrounding communities through house and/or shared connections and community standpoints, and the exact locations will be identified based on a combination of needs and technical feasibility. For the operations and maintenance (O&M) of resilient mini piped water schemes, a critical factor in ensuring the sustainability of these interventions, the private sector will be engaged through competitive bidding to own and operate these assets on behalf of the Union Parishads (UPs) in host communities. In contrast, the deep tube wells will be operated and maintained by the communities using their own funds after the project period. These interventions are expected to improve the overall quality,





resilience, and sustainability of water services and reduce water losses for the DRP and host communities.

This subcomponent will also improve access to resilient and eco-friendly sanitation systems. It will finance safe and acceptable sanitation services through a combination of: (i) improved climate-resilient household, and community toilets designed with measures for gender segregation and safety considerations; and bathing and clothes washing facilities, including water sources, septic tanks and solar lighting systems, with resilient superstructures and raised platforms above flood level to enhance resilience against heavy rain and flooding; (ii) hygiene promotion, sanitation and safe water use awareness and advocacy programs, and training on operations and maintenance (O&M) of the WASH interventions, including climate vulnerability and disaster risks;. Community mobilization and stakeholder buy-in will be critical for behavioral change and adequate O&M of the facilities. In the host communities, the sanitation facilities will cover the poorest households (about 12% of the total population) through grants. Other households will be encouraged to shift from existing to improved sanitation facilities through awareness campaigns and sanitation marketing aimed at both informing people about the public health benefits of proper sanitation practices and creating demand for sanitation services. These interventions will contribute to improving hygiene and sanitation practices in both the DRP camps and surrounding host communities.

In addition to the parent project providing access to improved water sources for 170,000 people and access to improved sanitation for 56,700 people, the proposed AF for this subcomponent is expected to provide access to improved water sources for 195,800 people and access to improved sanitation for 115,100 people, through the installation of 38 mini-piped water supply schemes and 200 rainwater harvesting systems, along with over 13,800 household toilets including 2,000 bio-fill toilet, and 20 community toilets in the Cox's Bazar district.

*Subcomponent 1.B: Basic Services, Resilient Infrastructure, Emergency Response and GBV Prevention (US\$57 million)*

The objective of this subcomponent is to support improved access to basic services, climate-resilient infrastructure, and emergency response services in a gender and socially inclusive manner. In addition, the disaster risk profile of the area will be incorporated in the design and execution of the activities to enhance the sustainability and resilience of the purported interventions.

This subcomponent will finance the following interventions in both DRP camps and host community areas: (i) climate-resilient all-weather access and evacuation roads (sealing the surface of the roads) to increase readiness and resilience to natural hazard events, including associated stormwater drainage networks and slope protective works to reduce the risk of landslides; (ii) climate-resilient rubber dams to enhance resilience against flooding from the increase surface run-off from extreme precipitation and irrigation purposes; (iii) repair and rehabilitation of existing jetties and construction of new climate-resilient jetties to provide anchorage to fishing and other boats during cyclones, storm surge and high winds; (iv) installation of solar-powered street lights to improve energy efficiency and increase public safety, particularly for woman and children; (v) installation of lightning protection systems to reduce risks from lightning strikes resulting from extreme hydrometeorological events (vi) support distributed renewable energy system using solar photovoltaic nano-grid schemes to increase access to clean and sustainable electricity to energy-poor households and shared facilities like health centers and learning centers; and



(vii) support afforestation and environmental protection activities to reduce the effects of climate change and biodiversity loss in the DRP camps and surrounding areas.

This subcomponent will also finance the construction of climate resilient multi-purpose disaster shelters/primary schools and climate resilient multi-purpose disaster shelters/community service centers that include rainwater harvesting systems, solar-powered lighting, and climate-resilient access roads (built above flood level) to reduce risks and provide shelter from cyclones, storm surges, strong winds, and other extreme climate events.

This subcomponent will support improved emergency response services to better prepare for catastrophic events, including natural disasters and extreme climate events with the following interventions: (i) contingency planning for emergency preparedness and evacuations; (ii) strengthening community based early-warning systems for hydrometeorological hazards; (iii) construction of Emergency Operation Centers (EOC) for strategic coordination and decision-making capacities during natural disasters, extreme climate events and emergencies; and (iv) improved search & rescue operations through ensuring adequate equipment, facilities, and training of the first responders and the Fire Service and Civil Defense (FSCD) in the onset of extreme hydrometeorological events and geophysical hazards.

To ensure that the benefits of the project reach everyone in an inclusive manner, a concerted effort will be made to: (i) design services in a gender-informed manner and reach women and girls through appropriate targeting approaches; (ii) promote differently-abled approaches to service delivery; (iii) mobilize local communities to ensure the participation and inclusion of the most vulnerable groups through the use of community organizations and volunteers; (iv) formation of water and sanitation committees for O&M, and (v) adoption of resilient and climate-friendly features to reduce heavily female-dependent labor, such as collection of firewood for household fuels.

In addition to the parent project providing access to improved disaster risk reduction infrastructure for 532,000 people, the proposed AF for this subcomponent is expected to provide access to improved infrastructure for an additional 108,000 Rohingya community members, through the installation of 3 rubber dams, 30 climate-resilient multi-purpose disaster shelters, 50 km of access and evacuation roads, 600 lightning protection systems, and 2,500 street lights in the Cox's Bazar district.

#### *Component 2: Strengthening Community Resilience (US\$0)*

Component 2 will remain unchanged as per the parent project. This component will address economic and social resilience of the vulnerable through their engagement in community services and workfare schemes. Under this component, DRP households will participate in subprojects and activities intended to enhance community services for the vulnerable (woman, children, disabled and elderly); strengthen their engagement mechanisms (through mobilization, outreach and GRM activities); contribute to climate and environment risk mitigation; improve camp living conditions through cleaner environments, and prevent anti-social behavior.

#### *Component 3: Strengthening Institutional Systems to Enhance Service Provision (US\$6 million)*



Component 3.A will remain unchanged as per the parent project. Component 3.B: Strengthening LGED, DPHE, and GBV Services will strengthen the capacity of government agencies (DPHE and LGED) to provide essential services to the DRP and surrounding host communities and respond effectively to emergencies and extreme hydrometeorological events, particularly in the Cox's Bazar area.

DPHE is the lead agency responsible for drinking water supply and sanitation systems in the country, except within the jurisdiction of Water and Sewerage Authority (WASA) of Dhaka, Chittagong, and Khulna. This component will enhance the institutional capacity of DPHE to provide services to the DRP and host communities through: (i) construction of climate resilient WASH training facilities to withstand earthquake, storm surge and high wind (considering that climate change may further increase future risks) as well as enable reduction of energy consumption including provision for solar power and energy efficiency improvement in lighting, appliances, and equipment; (ii) technical training of DPHE staff and front line public health workers, particularly on the impact of climate vulnerability and disaster risks on safe water, sanitation, and fecal sludge management; and (iii) community WASH management training during disasters and extreme climate events.

LGED is the lead agency in developing rural and urban infrastructure, as well as small-scale water systems. This component will enhance the capacity of LGED's staff working in and around the DRP camps through: (i) construction of climate resilient training facilities to withstand earthquake, storm surge and high wind (considering that climate change may further increase future risks) as well as enable reduction of energy consumption including provision for solar power and energy efficiency improvement in lighting, appliances, and equipment (ii) technical training of LGED staff, particularly in developing and evaluating measures for roads and drainage networks to enhance resilience to geohazards and hydrometeorological events; (iii) technical assistance to support identifying the necessary infrastructure and site plans for service delivery to DRP and host communities, such as roads, solar street lights, lightning protection systems, and drainage systems; and (iv) trainings on the climate vulnerability and disaster risks of the Cox's Bazar district to ensure climate and disaster considerations are incorporated into LGED projects.

## **E. Implementation**

### **Institutional and Implementation Arrangements**

As with the parent project, the Government will have overall responsibility for project management and coordination through its Ministry of Local Government, Rural Development, and Cooperatives (MoLGRD&C) and the Ministry of Disaster Management and Relief (MoDMR). Project Steering Committees (PSC) will provide overall project oversight and policy direction.

The project will continue to be implemented by the two agencies for their respective components, LGED and DPHE with separate Project Implementation Units (PIU), Designated Accounts, and respective Procuring Authority. The project will continue with the two Project Directors (PD) for LGED and DPHE.

Under the AF, Component 1a will be implemented by DPHE and Component 1b will be implemented by LGED. Component 3 will be implemented by LGED and DPHE. All other implementation and institutional arrangements will continue as per the parent project's agreements.



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

The project activities will be primarily concentrated in Cox’s Bazar district, which are the southernmost upazilas of the country. Deforestation and forest degradation have taken place concurrently as forest resource extraction has become a secondary occupation for coastal households. The region, now a degraded forest land, includes three Ecologically Critical Areas - the western, coastal zone of Teknaf Peninsula, St Martin's Island, and Sonadia Island, and two Protected Areas - the Himchari National Park and the Teknaf Wildlife Sanctuary. Camps are surrounded by an important habitat of critically endangered Asian Elephant in Bangladesh and also fall within active elephant migration routes. The area of the camps has a history of occurrence of landslides, earthquakes, flash floods and tidal surges. Although the main area of the DRP camps is located outside of the flood zone, the camps are vulnerable to extreme weather events such as cyclones and landslides. The steep slopes may become unstable in the monsoon seasons and cause landslides. This situation has aggravated due to clearance of the vegetation cover to accommodate DRP camp. In fact, with the advent of monsoon, several small-scale landslides have occurred in the camps and the general vicinity. Some settlements have been moved from the most precarious slopes to a new extension area (Camp 4 extension). In general, neither the structures in the DRP camps nor those in the makeshift settlements are able to withstand cyclones or floods. The main registered camp at Kutupalong is entirely on public land (various entities including Department of Forest), some of the unregistered camps in Teknaf are on private lands (needs further assessments to ascertain the amount of private land, specific ownership types, number of DRPs in the different camps). DRPs are in some cases paying nominal rent for staying on these lands. The situation within the camps is extremely congested. All aid workers are required to leave the premises by 5:00 pm. There are significant risks associated with gender based violence, trafficking, safety of adolescents and children, inclusion of vulnerable groups such as the latter and the elderly and people with disabilities (many DRPs came in seriously injured state).

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

Sabah Moyeen, Social Specialist  
Nadia Sharmin, Environmental Specialist

**SAFEGUARD POLICIES THAT MIGHT APPLY**

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	



Performance Standards for Private Sector Activities OP/BP 4.03	No
Natural Habitats OP/BP 4.04	Yes
Forests OP/BP 4.36	Yes
Pest Management OP 4.09	No
Physical Cultural Resources OP/BP 4.11	Yes
Indigenous Peoples OP/BP 4.10	No
Involuntary Resettlement OP/BP 4.12	Yes
Safety of Dams OP/BP 4.37	No
Projects on International Waterways OP/BP 7.50	Yes
Projects in Disputed Areas OP/BP 7.60	No

**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 project will trigger Environmental Assessment (OP/BP 4.01), Natural Habitat (OP/BP 4.04), Forest (OP/BP 4.36), Physical Cultural Resources (OP/BP 4.11), Involuntary Resettlement OP/BP 4.12. There is no change in the triggered policies from the original project.

With regards to OP 4.09 Pest Management, although the project will support production of agricultural fertilizer and/or renewable energy from human waste (as mentioned in description of Component .1.A), it will be used for household level vegetable or plantation purposes. There is no plan or indication that the fertilizer will be used extensive agriculture production. Therefore the policy has not been triggered.

OP 4.37 is not triggered as there are no agriculture related sub-projects. Also, termites issue not expected for the types of sub-projects proposed under AF. The rubber dams will be seasonal and less than 15m height.

Like the original project, the AF will involve small scale civil works. The activities of the AF will be piped water supply schemes, rainwater harvesting systems, construction of toilets, integrated fecal sludge and solid waste management system, construction of drainage, rubber dams for irrigation, jetty rehabilitation, climate-resilient primary schools/disaster shelters, and climate-resilient community service centers/disaster shelters, climate-resilient access and evacuation roads and footpaths, awareness program for sanitation etc. Additionally, project will support construction of lightning protection systems, solar street lights, nano-grids, firefighting/search and rescue warehouses which will benefit both Host and DRP communities to reduce the vulnerability. As part of the capacity building, different training programs will be arranged including for the unskilled labors. Training will involve social safeguard compliances, working condition of the labors and labor influx management, occupational health and safety etc.



Most of the activities do not envisage large scale, significant environmental impacts. However, considering potential significant environmental and social risks associated with the project areas such as disturbance of the forest areas, Human Elephant Conflict (HWC), ecological impact due to rubber dams, GBV, voluntary shifting/land donation and relationship between DRPs and host communities, the project will remain classified as environmental Category A. As the project activities will be taken place within important forest landscape, OP 4.04 Natural habitat and OP 4.36 Forests are triggered. The project area is situated adjacent to critical habitat for wildlife, including the migration route of critically endangered Asian Elephant and there are evidences of active HWC around the camps with unfortunate loss of human lives. As a result, it is imperative to carefully screen the potential locations of all physical investments to avoid the elephant migration routes and any clearance of the remaining forests, and to propose any necessary mitigation measures. IUCN Bangladesh has already produced a map of all elephant migration routes for the area and this map will be used as a basis for the screening, which has been defined in ESMF, to avoid possible conflicts. All the physical investments will continue to be subject to environmental and social screening during selection in order to prevent any significant negative environmental and social impacts. The environmental and social screening format has been updated based on the lessons learnt from the original project.

The proposed activities will take place within and outside the camp sites which will include the wider host communities. Acquisition of land under any circumstances, is not allowed in the AF. However, World Bank safeguard policy OP 4.12 on involuntary resettlement is triggered, as precaution, to ensure that any land use (if required) is facilitated through voluntary land donation by local land owners with informed consent; and any involuntary resettlement having physical or economic (assets and livelihoods) displacement is avoided as much as possible, and all requisite consultations in this regard are implemented and documented as per Bank policy . The risk of social conflicts remains high between DRPs and host communities under the AF and that the project will have continuous consultations and engagements with stakeholders and maintain the four-tier robust grievance redress mechanism.

The ESMF has been prepared based on detailed baseline assessments and consultations in both the host communities and the DRPs in the camps, as well as the private owners who will be identified as per official records (including details of titleship, nature of ownership etc.). The ESMF will provides guidance for any resettlement related activity as identified through the assessments, as well as providing guidance for consultations and documentation for any voluntary shifting or permission to use that may be required. The ESMF is fully cognizant of the significant accessibility and social inclusion issues, not only in terms of ensuring that all the infrastructure developed under the project are accessible to persons with disabilities, and inclusive towards women and children and other more vulnerable people within the DRPs, but also that they have adequate voice in the consultations feeding into the design of the project and access to the Grievance Redress Mechanism (GRM) being developed for the project (consultants have been hired to help design the GRM based on assessments of existing systems, local/informal structures and community based approaches within the camps, which are working. The firm will demonstrate what is working and can be leveraged/enhanced, and what is not, so as to avoid duplication and confusion amongst the DRPs).

The proposed project will also create positive environmental impacts through implementation of a series of activities. The construction of latrines, fecal management systems and composting and biogas plants under subcomponent 1a will contribute to improve inadequate sanitary and hygiene conditions in the camps and soil and water contamination due to untreated fecal discharge to the environment, and to produce agricultural fertilizer and a clean renewable energy source for community use. The subcomponent 1b will benefit to reduce soil erosion and surface water contamination and improve hygiene condition in the camp and outside camp through provision of basic infrastructure such as sealing the surface of roads, stormwater drainage network, slope protective works.

The overall project has mainstreamed gender but also added a specific gender intervention focusing on GBV. The





project has conducted GBV risk rating screening and rating is " Substantial risk". GBV specific activities that are ongoing includes the establishment and operation of gender-friendly spaces which would be a safe space for women and adolescent girls, provide some immediate GBV response services, and be linked to the larger GBV referral pathway.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area: Given the nature of the project, the project itself is not expected to entail potential indirect or long-term impacts ensuring screening, consultation, grievance handling and inclusive monitoring to address GBV.

However, there are existing and planned activities to establish/improve basic services and infrastructure for DRP carried out by UN agencies (e.g. WFP, WHO, UNICEF, UNFPA, UNHCR, UNDP, IOM), humanitarian financiers (e.g. ECHO), key bilaterals, government and international and local NGOs. These include the areas of food security, nutrition, health, shelter, education, WASH and social protection. While potential impacts from such individual activities are mostly insignificant, the large number of small scale activities would result in potential cumulative environmental and social impacts as a whole. Therefore, the original project will conduct a Cumulative Environmental and Social Impact Assessment (CESIA) to assess the incremental and combined effects caused by the existing and planned development in and around the camp sites, and to propose the necessary management measures during the project implementation. The CESIA consultant will be on board soon. The Bank will recommend to consider the AF activities during conducting the CESIA.

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

There are no relevant alternatives that could be considered at the project level. Alternatives including technical specification and location will be considered through the environmental and social screening process of each investment.

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.

The Project is processed as per emergency procedures defined by IPF Policy paragraph 12. Therefore, a Safeguard Action Plan (SAP) was developed by Appraisal to provide a detailed timetable with sequential steps for preparing the relevant safeguards instruments, and the preparation of the safeguard instruments are deferred to the project implementation. Since exact location and design of each investment is unknown, in order to ensure the proper management of potential environmental impacts from the Project activities, an the Environmental and Social Management Framework (ESMF) prepared for the original project has been updated and revised based on the lessons learnt from the original project, consulted on both with DRP, host communities, relevant stakeholders, and disclosed in country and on the World Bank's external website before the project Effectiveness. The ESMF has recommended specific mitigation measures for potential environmental and social impacts from Project activities, based on the result of environmental and social screening against each investment. In addition, environmental and social assessment instruments will be prepared and implemented, if required, before the commencement of any physical activities.

DPHE and LGED are implementing the parent project and are well familiar with the Bank safeguards policies, and implementation procedures. The Bank has delivered several field and home based training sessions on the aforementioned policies, and specific safeguards topics (environmental and social) to the said agencies. During implementation of this AF, several safeguard training workshop will be conducted in presence of local government, NGO's, UN agencies and host communities etc. The contents of the safeguard training workshop include: (1) implementation of ESMF requirements (2) site selection procedures (3) screening procedures, documentation and



reporting (4) consultation (5) labor management (6) grievance handling mechanism and documentation etc. Agencies must ensure screening of all sub-projects; consultation; recipient of grievances, resolve and document; intensive monitoring and supervisor to avoid any GBV related incidents, etc.

DPHE have already hired full-time safeguards consultants to support PIU. They have been involved in screening of the sub-projects. The specialists have been given training by WB staff on specific safeguards issues. The PIU Specialists have also conducted training of contractors that will work in the parent project.

LGED have also hired full-time PIU Safeguards support specialists. They are currently screening proposed sub-projects.

ESMF and RPF has been updated by DPHE and LGED based on the AF activities in consultation with host communities, local government and administrative bodies, RRRC, UNHCR, relevant UN agencies, NGO's, WASH sector, forest department etc. Both documents will be disclosed to the agencies and Bank websites in English and local language. Based on the screening outcomes, if require agencies will prepare Resettlement Action Plans and follow the same disclosure procedures. During field level consultation, Bank safeguard policies and ESMF/RPF requirement has been disclosed among the host communities and relevant stakeholders as well.

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

Key stakeholders include project beneficiaries, Government entities, development partners as well as NGOs and community based organizations. Several field trips and many rounds of consultations have taken place with all the aforementioned stakeholders on the needs assessment that precedes the project design and also the project design, situation analysis etc. There is clearly a critical need for the activities envisioned under the project. For Component 1, the proposed activities are indicative and may be adjusted in consultation with these key stakeholders as the situation evolves. In addition, sentiments of distrust and tension between the host population and the DRP may build up in the region, and concerns of subsequent radicalization are running high, the project integrates measures to avoid aggravating conflict as a consequence of the project interventions, while also addressing the drivers of conflict through community consultation and participation which have proven to help support social cohesion and foster inclusion of marginalized groups, including women, DRPs and minority clans. The Project thereby will employ consultative approaches for determining beneficiaries, and in implementing other aspects of the project in collaboration with local stakeholders, district-level authorities and civil society organizations.

PIUs have conducted initial consultation with beneficiaries, host communities and development partners. Overall, their reactions to the project is positive. The project is expected to improve the access to the basic services supplementing the supports which have been provided by the other organizations and to strengthen the disaster and social resilience of DRP. The importance of the coordination of activities was raised from the development partners. The project will utilize the existing implementation arrangements of the GoB and project activities will be coordinated through the existing government's coordination mechanism.

GRM has been established as a part of Component 3 on the basis of the existing governing mechanisms in the camps as much as possible. The CIC office will periodically consolidate and register the grievance cases including environmental and social safeguard related complaints. A Camp-level Grievance Redress Committee (CL-GRC) will be set up in each camp and will be responsible for reviewing each case and providing a resolution. If a case is not resolved at a camp-level, these will be remitted to the RRRC Grievance Redress Committee (RRRC-GRC) which will be at district level.





**B. Disclosure Requirements (N.B. The sections below appear only if corresponding safeguard policy is triggered)**

Environmental Assessment/Audit/Management Plan/Other

Resettlement Action Plan/Framework/Policy Process

**C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting) (N.B. The sections below appear only if corresponding safeguard policy is triggered)**

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