

SFG3122 V2

Export Competitiveness for Jobs Project

Social Management Framework

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Ministry of Commerce

Government of the People's Republic of Bangladesh

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Abbreviation

| | |
|--------|--|
| BTA | Bangladesh Tanners Association |
| BEIOA | Bangladesh Engineering Industry Owners Association |
| BEMMA | Bangladesh Electrical Merchandise Manufactures Association |
| BPGMEA | Bangladesh Plastic Goods Manufacturers & Exporters Association |
| BIDA | Bangladesh Investment Development Authority |
| BFLLEA | Bangladesh Finished Leather, Leather Goods and Footwear Exporters |
| CCS | Consultation and Communication Strategy |
| CUL | Compensation-Under-Law |
| DC | Deputy Commissioner |
| DP | Displaced Persons |
| EC4JP | Export Competitiveness for JOBs Project |
| FGD | Focused Group Discussion |
| GOB | Government of Bangladesh |
| GRC | Grievance Redress Committee |
| GIF | Gender and Inclusion Framework |
| HCG | House Construction Grant |
| HTG | House Transfer Grant |
| IDA | International Development Association |
| INGO | International non-government organizations |
| IP | Indigenous People |
| KII | Key Informants Interview |
| IPP | Indigenous Peoples Plan |
| LAP | Land Acquisition Proposal |
| MOC | Ministry of Commerce |
| NGO | Non-Government Organization |
| OP | Operation Policy |
| PIU | Program Implementation Unit |
| PCMU | Project Coordination and Monitoring Unit |
| RAP | Resettlement Action Plan |
| RPF | Resettlement Policy Framework |
| RPF | Resettlement Policy Framework |
| SA | Social Assessment |
| SEVCDF | Small, Ethnic and other Vulnerable Communities Development Framework |
| SIA | Social Impact Assessment |
| SMF | Social Management Framework |
| TOR | Terms of Reference |
| WB | World Bank |

Executive Summary

Introduction

This Social Management Framework (SMF) aims to resolve any anticipated social safeguard issues and impacts that may arise during implementation of the Export Competitiveness for Jobs (EC4J) project. Another purpose of this framework is to plan ahead the social development concerns that the project could address within its scope of works. The project is designed to help the Bangladesh private sectors mainly Leather and leather products, (leather and non-leather) footwear, plastics and light engineering sectors to increase its competitiveness in the global market by diversifying the country's export profile. Financing for the EC4J Project is provided by the International Development Association of the World Bank. The Ministry of Commerce (MoC) is responsible for overall implementation of the EC4J Project including the provisions of this SMF. *Separate SEVCDF and RPF have been prepared for this project.*

Project Background

Leather and leather products, (leather and non-leather) footwear, plastics and light engineering are labor-intensive growth sectors in which Bangladesh has a revealed several competitive advantages in a number of segments. The development of these sectors is held back due to market failures resulting from negative externalities, coordination challenges and information asymmetry. For example, side-effects of pollution in sectors like leather production is often best solved by investment in common goods, like common effluent treatment plants (CETPs), and public goods, like access roads to industrial parks. There are frequent coordination failures where market participants are poorly organized to effectively address issues of mutual interest, such as policy advocacy, articulation of demand for skills of labor, and agreeing on common criteria and needs for technology adoption. Buyers—from end consumers to multinationals in high-income markets—and regulators in key client markets require adherence to various standards and accreditations that change over time. There are serious concerns of information asymmetry between foreign buyers and Bangladeshi sellers. Sometimes the issue is about market signals not reaching prospective suppliers. While compliance may be essential to gain market access, markets for business development services and accreditation and testing mechanisms are underdeveloped. Some of these functions, including training institutes, are controlled by public institutions with poor governance that lack competition or incentives to perform.

Project Components and Objectives

The general objectives of the project are to increase employment through increased trade and private investment in leather, footwear, plastics and light engineering with export potential. Project has been structured with four components. Project components and specific objectives are given below:

Table EX-1: Project components and Objectives

| Components | Specific Objectives | Impact on LA and IR |
|---|---|--|
| <u>Component 1:</u> Market access support program | 1. Address critical constraints for four selected sectors 2. To access international markets 3. To integrate in global value chains | No, this is non-physical component which does not require any land acquisition |

| | | |
|--|---|---|
| | (GVCs) 4. Firm specific quality standards and accreditation support 5. To build capacity of public and/or public-private institutions 6. To identify and promote voluntary private solutions | |
| <u>Component 2:</u> Productivity Enhancement Program | 1.Skill formation and training 2.Technology adaptation and diffusion as crucial areas to raise productivity | Yes, RAP will be prepared. If ethnic communities are affected, SEVCDF will be prepared. |
| <u>Component 3:</u> Public Investment facility for infrastructure constrains | 1.To address adversely affected clusters of firms 2.To prevent transformative green field investments 3. To construct access road to the factories | Yes, RAP will be prepared. If ethnic communities are affected, SEVCDF will be prepared. |
| <u>Component 4:</u> Project Implementation, Monitoring and evaluation | 1.To support PIU for successful implementation of the project 2. To provide technical expertise and assistance to private firms. | RAP implementation will be monitored. |

Community Participation & Consultations:

Community/stakeholder consultations will be conducted throughout the project cycle, with varying focus on issues relating to the subproject activities and the people who may have stakes therein. More formal consultations, focus group discussions and interviews of knowledgeable local persons will start with feasibility study, social (and environmental) screening, PAP census and impact assessment, and preparation and implementation of the impact mitigation plans. Focus of consultations will generally shift from wider audience to specific groups who have direct stakes in the project.

Grievance Redress Mechanism

The grievance mechanism is a locally based, project-specific extra-legal way to deal with and resolve complaints and grievances faster and thus enhance project performance standards in terms of social and resettlement management. World Bank has specific clauses/guidelines requiring the borrower/client to set up and maintain a grievance redress mechanism at the Project level. This mechanism does not replace donors’ accountability mechanism, but is intended to solve grievances at the local level. The GRC system established in this project is expected to be effective in resolving grievances related to compensation and relocation aspects. All affected persons will have full and free access to GRCs.

Grievance Redress Committee (GRC)

A two-tier bottom up GRC system will be established in this Project. First, there will be GRCs at the local level, hereafter called Local GRC (union/municipality level); and second, GRC at the project level to give room for grievances to be fairly reviewed. These GRCs will be established through gazette notifications from the Ministry. The APs will be informed through public consultation that they have a right to have their grievances redressed by the local committees as well as by the project management. The APs can also call upon the support of the implementing NGO (INGO) engaged to implement the RAP to assist them in presenting their grievances or queries to the GRC. Other than disputes relating to ownership right under the court of law, the GRC will review grievances involving all resettlement assistance, relocation and other support. The local GRCs (at the union/municipal level) will hear the grievances first. Only unresolved cases will be forwarded to the next tier – Project level GRC for further review and resolution. Grievances will be redressed within a month from the date of lodging the complaints. GRC decisions will be on a majority basis and will be disclosed and available for review by the stakeholders. If any disputant is unhappy or unsatisfied with the outcome of the Project level GRC, he/she may file cases in the court.

Institutional Arrangements

A Project Implementing Unit (PIU) will be established at the Ministry of Commerce. It will consist of a Project Director, technical staff, a Procurement Specialist, a Financial Management Specialist, a Safeguards Specialist and a Monitoring and Evaluation (M&E) Specialist. The PIU will rely on point persons in each industry association for coordination purposes and a firm will be hired under international competitive bidding, with a performance clause, to boost the technical capacity of the PIU for its daily work.

Implementation Arrangements

Implementation of the Resettlement Policy Framework (RPF) and Small, ethnic and other vulnerable communities' development framework (SEVCDF) requires a structure in the form of organizational requirements, training needs and plan, and information management system. The PIU as mentioned above will be primarily responsible for such implementation. An NGO will be hired to assist PIU implementing safeguard issues and to boost capacity of the PIU for its daily work.

As it is a private sector investment project, project might not acquire any land. If project acquire land for the implementation of the project, project must follow GoB policy guidelines and OP 4.12. The details on land acquisition and resettlement processes have been discussed in RPF.

Public Disclosure

Project will disclose SMF, SEVCDF and RPF to the public in Bangladesh by posting it in its website, and authorize the World Bank to disclose it at its Country Office Information Center and in its Infoshop. The Project will also ensure that copies of the translated document are made available at its headquarters and site offices established during the implementation period. As to disclosure, Project will inform the public through notification in two national newspapers (Bangla and English) about the EC4J project and where it could be accessed for review and comments.

Social Management Framework

Introduction:

1. This Social Management Framework (SMF) aims to resolve any anticipated social safeguard issues and impacts that may arise during implementation of the Export Competitiveness for Jobs (EC4J) project. Another purpose of this framework is to plan ahead the social development concerns that the project could address within its scope of works. The project is designed to help the Bangladesh private sectors mainly Leather and leather products, (leather and non-leather) footwear, plastics and light engineering sectors to increase its competitiveness in the global market by diversifying the country's export profile. Financing for the EC4J Project is provided by the International Development Association of the World Bank. The Ministry of Commerce (MoC) is responsible for overall implementation of the EC4J Project including the provisions of this SMF. *Separate SEVCDF and RPF have been prepared for this project.*
2. The provisions of this SMF are proposed in view of the World Bank's project financing policy that requires the borrowers to assess potential social safeguard issues and impacts in project preparation. Also, to adopt and implement appropriate measures to mitigate them, in compliance with the Bank Operational Policies (OP) 4.12 and 4.10. In this regard, since the locations and the nature and scale of safeguards impacts under the four sectors remain to be assessed, the issues and impacts addressed in the SMF are largely based on past experience with the Bank supported projects implemented by various agencies within the Bangladesh Government. Once the Administrative Boundaries (district, upazila, union, etc.) of project area is planned, the proposed SMF will provide the basis to select the exact site, assess the social safeguard issues and impacts, and prepare the necessary plans to mitigate any projected adverse impacts.

Project background:

3. Leather and leather products, (leather and non-leather) footwear, plastics and light engineering are labor-intensive growth sectors in which Bangladesh has a revealed several competitive advantages in a number of segments. The development of these sectors is held back due to market failures resulting from negative externalities, coordination challenges and information asymmetry. For example, side-effects of pollution in sectors like leather production is often best solved by investment in common goods, like common effluent treatment plants (CETPs), and public goods, like access roads to industrial parks. There are frequent coordination failures where market participants are poorly organized to effectively address issues of mutual interest, such as policy advocacy, articulation of demand for skills of labor, and agreeing on common criteria and needs for technology adoption. Buyers—from end consumers to multinationals in high-income markets—and regulators in key client markets require adherence to various standards and accreditations that change over time. There are serious concerns of information asymmetry between foreign buyers and Bangladeshi sellers. Sometimes the issue is about market signals not reaching prospective suppliers. While compliance may be essential to gain market access, markets for business development services and accreditation and testing mechanisms are underdeveloped. Some of these functions, including training institutes, are controlled by public institutions with poor governance that lack competition or incentives to perform.

Project Components and Objectives:

4. The general objectives of the project are to increase employment through increased trade and private investment in leather, footwear, plastics and light engineering with export potential. Project has been structured with four components. Project components and specific objectives are given below:

Table1: Project components and Objectives

| Components | Specific Objectives | Impact on LA and IR |
|--|---|---|
| <u>Component 1:</u> Market access support program | 1. Address critical constraints for four selected sectors 2. To access international markets 3. To integrate in global value chains (GVCs) 4. Firm specific quality standards and accreditation support 5. To build capacity of public and/or public-private institutions 6. To identify and promote voluntary private solutions | No, this is non-physical component which does not require any land acquisition |
| <u>Component 2:</u> Productivity Enhancement Program | 1. Skill formation and training 2. Technology adaptation and diffusion as crucial areas to raise productivity | Yes, RAP will be prepared. If ethnic communities are affected, SEVCDF will be prepared. |
| <u>Component 3:</u> Public Investment facility for infrastructure constrains | 1. To address adversely affected clusters of firms 2. To prevent transformative green field investments 3. To construct access road to the factories | Yes, RAP will be prepared. If ethnic communities are affected, SEVCDF will be prepared. |
| <u>Component 4:</u> Project Implementation, Monitoring and evaluation | 1. To support PIU for successful implementation of the project 2. To provide technical expertise and assistance to private firms. | RAP implementation will be monitored. |

5. For implementing component 3, project might require some land. For construction of access road, project would always intend to find khas and other unused public land. But use of private land cannot be ruled out completely, especially where offsite infrastructures would also be developed to support the economic activities within the project area. If private land acquisition is absolutely required, project will follow RPF, SEVCDF and SMF.

6. On the positive side, the project is expected to benefit communities as well as the mainstream population. It will increase employment through trade and private investment in four sectors with export potential. The key results indicators for the project will be: Number of new jobs created, Value of private investment, Number of formal businesses registered in the targeted sectors and Number of beneficiaries (core), of which women or vulnerable (%).

Basic Planning Principles:

7. EC4J project would characteristically require small parcels of lands that may come from khas and other public lands, as well as from private ownerships. Khas and other public lands rarely remain found vacant; most often they are in use by private citizens with or without authorization. As to private lands, acquisition in large parcels (or ‘chunks’) may render some landowners completely landless -- which may even include homesteads -- unless their ownerships consist of good number scattered plots and some of them remain unaffected by the acquisition. Considering the potentials of such impacts associated with acquisition and displacement from private land for public activities, project will select the sites, and design and implement all off-site infrastructures required to support the economic activities within the project area, adhering to the following principles:
 - Prior to selection of specific sites, project will undertake community and stakeholder consultations about the objectives and the planned economic activities in the selected sectors, as well as the social impacts, especially those that would result from private land acquisition and displacement from khas and other public lands. Consultations will include, inter alia,
 - All formal/informal local entities, such as Union Parishads/Upazila Parishads and other local bodies with direct and indirect stakes in the project and are deemed key actors to influence availability of lands for the specific sector and design and implementation of the component.
 - Individuals, such as private landowners and those, especially the vulnerable who use public lands to live in and/or earn a living with or without authorization, as well as others who would be directly affected by the project.
 - Individuals, who would be affected indirectly in terms of loss of livelihood and/or access to common property resources which may have been a substantial support to their livelihood.
 - Unless absolutely required, project will do its best to avoid land acquisition from private ownerships and will always try to find khas and other public lands whenever it considers alternative sites in a given district, upazila, union or municipality.

8. Project will screen each site and its surroundings, and all physical works that might be undertaken to provide infrastructure support (e.g., access roads, electricity, water supply, etc.) to identify the associated safeguards issues and impacts, in order to determine applicability of the OP 4.12 and OP 4.10 and the required impact mitigation plans (a Screening Form is provided in Annex 1). Where land acquisition from private ownerships and displacement from public lands could not be avoided entirely, project will establish and build any required land-based infrastructure in accord with the following guidelines:
 - **Guidelines for Land Acquisition & Resettlement:** Contains principles, policies and guidelines for private land acquisition and use of khas and other public lands and adverse impact mitigation; mitigation measures; and implementation and monitoring arrangements for mitigation plans; A separate Resettlement Policy Framework (RPF) and Small, Ethnic and other vulnerable community’s development framework (SEVCDF) is prepared for this project.
 - **Direct Purchas:** Provides guidelines for purchase directly from the landowners, in situations where project urgently needs to use small amounts of private lands that may not have been included in the land acquisition proposals (LAPs) submitted to the Acquiring Body.
 - **Guidance Note for Integration of Gender Issues:** Intended to help selected sectors and other authorities to take into account social (non-safeguard) and gender issues into subproject selection, preparation and implementation.

Stakeholder Engagement

Community Participation & Consultations:

9. Community/stakeholder consultations will be conducted throughout the project cycle, with varying focus on issues relating to the subproject activities and the people who may have stakes therein. More formal consultations, focus group discussions and interviews of knowledgeable local persons will start with feasibility study, social (and environmental) screening, PAP census and impact assessment, and preparation and implementation of the impact mitigation plans. Focus of consultations will generally shift from wider audience to specific groups who have direct stakes in the project.

Table 2: Consultation and Disclosure Roles and Responsibilities

| Project Phase | Activities | Details | Responsible Agency |
|--------------------------|--|--|---------------------------|
| Project Initiation Stage | -Subproject information dissemination on various components. -Disclosure of preliminary plans for proposed land acquisition. -Preliminary Information sharing about the tentative alignment/sites with the DPs in case of temporary impact on business, income and livelihood. | -Leaflets posted or distributed containing information on the project. -Public notice issued in public places including newspapers and direct consultation with DPs /DPs. | EA/IA |
| RAP Preparation Phase | Stakeholder consultations. | -Further consultations with DPs and households, titled and non-titled. -Summary RPF made available to all DPs at the convenient place which is easily accessible and should be in local language. | EA/IA |
| | Disclosure of final entitlements and rehabilitation packages and disclosure of draft RAP. | RAPs disclosed to all DPs in local language | EA/IA |
| | Finalization of RP. | -Review and approval of RAP by EA. -Review and clearance of RP by World Bank (prior to award of contract). Web disclosure of the RAP. Disclosure of the Final RP to DPs | EA/IA |
| RAP | Ongoing consultation | -Continued discussions and | EA/IA/Implementing |

| Project Phase | Activities | Details | Responsible Agency |
|----------------------|-------------------------------------|---|--------------------|
| Implementation Stage | with DPs during RAP implementation. | <p>information disclosure to DPs;</p> <p>-Payment of entitlements (all compensation must be paid before displacement occurs.</p> <p>-Grievance Redress Mechanism activated.</p> <p>-Written notification from EA/IA to WB that all compensation paid before displacement occurs. Construction can begin on sections where compensation is paid and community notified of start date of civil works.</p> <p>- DPs with unresolved grievances or disputes over land ownership, compensation amounts, etc. are notified of any compensation payments set aside by EA/IA in separate escrow accounts to be paid when disputes are resolved.</p> | NGO |

10. Community consultations will always include the following as they relate to project preparation and implementation:

- The objectives, scope and implications with respect to the project, socioeconomic impacts, as well as the adverse impacts that are likely to be caused on users of khas and other public lands and private landowners;
- Gather community inputs/feedbacks as to how adverse impacts could be minimized; and the rights and responsibilities on the parts of the communities themselves and the agencies involved in preparation and implementation, such as GOB, World Bank, the consultant, etc.
- Potential impacts and their sources relating to the location and scope of the civil works required to build infrastructures in order to support the various economic activities
- Inform the community about Grievance Redress Mechanism and the Grievance Redress Committee that would be constituted at the local level and project level, its membership composition, and explain its functions and limitations and how an aggrieved person could lodge complaints and grievances
- Project will hold separate consultations with women. The main objective is to explore the possibilities of introducing economic activity that would benefit the local women. (Recording and analysis of inputs/feedbacks and other information will always be gender disaggregated.)

Grievance Redress Mechanism

11. Grievances are issues, concerns, problems, or claims (perceived or actual) that individuals or community groups want to address and be resolved by the Project. The grievance mechanism is a

locally based, project-specific extra-legal way to deal with and resolve complaints and grievances faster and thus enhance project performance standards in terms of social and resettlement management.

12. World Bank has specific clauses/guidelines requiring the borrower/client to set up and maintain a grievance redress mechanism at the Project level. This mechanism does not replace donors' accountability mechanism, but is intended to solve grievances at the local level. If aggrieved, it is expected that affected people will first approach the local grievance mechanism before taking the issue to other forum. The GRC system established in this project is expected to be effective in resolving grievances related to compensation and relocation aspects. All affected persons will have full and free access to GRCs.

Grievance Redress Committee (GRC)

13. A two-tier bottom up GRC system will be established in this Project. First, there will be GRCs at the local level, hereafter called Local GRC (union/municipality level); and second, GRC at the project level to give room for grievances to be fairly reviewed. These GRCs will be established through gazette notifications from the Ministry. The APs will be informed through public consultation that they have a right to have their grievances redressed by the local committees as well as by the project management. The APs can also call upon the support of the implementing NGO (INGO) engaged to implement the RAP to assist them in presenting their grievances or queries to the GRC. Other than disputes relating to ownership right under the court of law, the GRC will review grievances involving all resettlement assistance, relocation and other support. The local GRCs (at the union/municipal level) will hear the grievances first. Only unresolved cases will be forwarded to the next tier – Project level GRC for further review and resolution. Grievances will be redressed within a month from the date of lodging the complaints. GRC decisions will be on a majority basis and will be disclosed and available for review by the stakeholders. If any disputant is unhappy or unsatisfied with the outcome of the Project level GRC, he/she may file cases in the court.
14. GRCs at the union/municipality level (community level) will be formed with representatives from Leather/Footwear/Plastic/Light engineering, local elected representatives from the Local Government Institutions (LGI), representatives of the affected persons (preferably women representative in case of women APs), and RAP implementing NGO.
15. The Project-Level GRC will review all unresolved cases forwarded to by Local GRCs. It will be headed by the Project Director (PD). The Project-level GRC with representation of member of MoC and civil society member will further establish fairness and transparency in the resolution of disputes or grievances. In specific cases, Project-level GRC may seek legal advice from the INGO Legal Advisor or any external legal advisor, if required.

GRM Documentation and Monitoring

16. To ensure impartiality and transparency, hearings on complaints at the GRC level will remain open to the public. The GRC will record the details of the complaints and their resolution in a register, including intake details, resolution process, and the closing procedures. PMU consultant will maintain the following three GRM Books:
17. **Opening Book:** (1) Case no., (2) Date and channel of receipt, (3) Name of complainant, (4) Gender, (5) Father or husband, (6) Complete address, (7) Main objection (loss of land/property or entitlements), (8) Complainants' story and expectation with evidence, and (8) Previous records of similar grievances.

18. **Resolution Book:** (1) Serial no., (2) Case no., (3) Name of complainant, (4) Complainant's story and expectation, (5) Date of hearing, (6) Date of field investigation (if any), (7) Results of hearing and field investigation, (8) Decision of GRC, (9) Progress (pending, solved), and (10) Agreements or commitments.
19. **Closing Book:** (1) Serial no. (2) Case no., (3) Name of complainant, (4) Decisions and response to complainants, (5) Mode and medium of communication, (6) Date of closing, (7) Confirmation of complainants' satisfaction, and (8) Management actions to avoid recurrence.
20. The GRC will also prepare periodic reports on the grievance resolution process and publish these on their websites. PMU will consolidate reports from the GRCs on GRM and post in their website. A grievance Redress flowchart is given below.

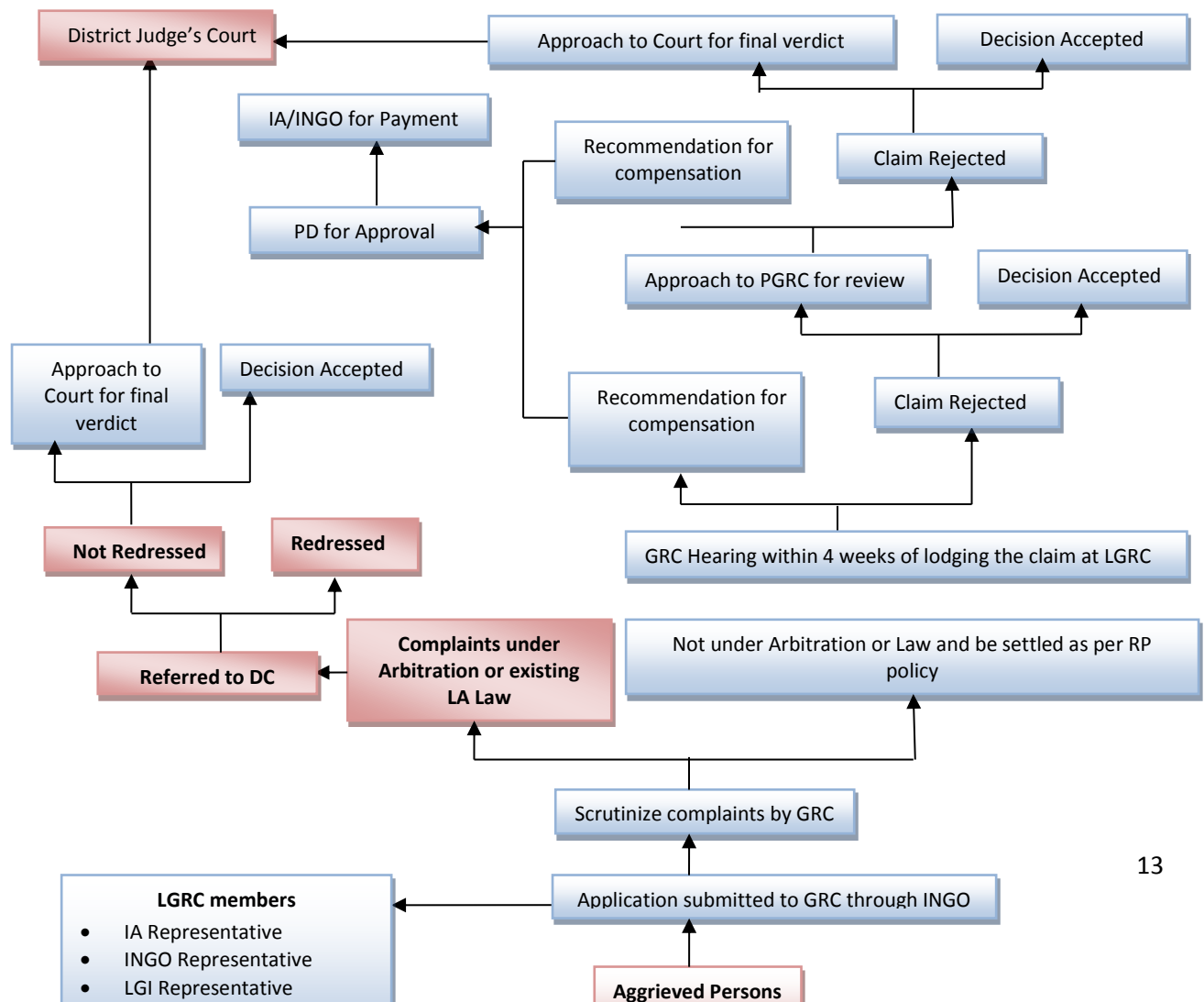


Figure 01: A Grievance Redress Flowchart

Institutional Arrangements

21. A Project Implementing Unit (PIU) will be established at the Ministry of Commerce. It will consist of a Project Director, technical staff, a Procurement Specialist, a Financial Management Specialist, a Safeguards Specialist and a Monitoring and Evaluation (M&E) Specialist. The PIU will rely on point persons in each industry association for coordination purposes and a firm will be hired under international competitive bidding, with a performance clause, to boost the technical capacity of the PIU for its daily work.
22. The PIU will report on a quarterly basis to a Project Steering Committee chaired by the Minister of Commerce and including representatives from the Ministry of Industries, Ministry of Labour and Employment, Ministry of Textiles and Jute, and the Bangladesh Investment Development Authority (BIDA) in addition to the Chairmen of the Bangladesh Finished Leather, Leather Goods and Footwear Exporters Association (BFLLEA), Leather Goods & Footwear Manufacturers & Exporters Association of Bangladesh (LFMEAB), the Bangladesh Tanners Association (BTA), the Bangladesh Engineering Industry Owners Association (BEIOA), the Bangladesh Electrical Merchandise Manufacturers Association (BEMMA), and the Bangladesh Plastic Goods Manufacturers & Exporters Association (BPGMEA).
23. The M&E activities will be aided by an enterprise survey covering the four target sectors that is funded by the Bangladesh Let's Work Partnership program and that will produce baseline data. The survey will be replicated at the end of the project and financed by the IDA credit in order to produce an impact evaluation.

Implementation Arrangements

Project Level

24. A central Project Steering Committee (PSC) will take the lead in overseeing and monitoring of the implementation of components and this unit will periodically supervise and monitor the safeguard implementation performance and include the progress/results in the Project Progress Report. The PSC will provide an apex platform/forum for overall guidance, policy advice/decision, and coordination of project activities addressing inter-agency issues that may arise during project implementation. The PSC will oversee,
 - (a) Compliance with measures agreed with the World Bank on the basis of the findings and results of the Screening, as set out in the project documents;
 - (b) The status of mitigation measures; and
 - (c) The findings of monitoring programs.

The Safeguard Specialist will provide support to the PIU throughout the EA (Each industry association) process with advice, training, dissemination of good practice, and operational support.

Component Level

25. During project implementation, Project Implementation Units (PIU) responsible for each Component will be responsible for ensuring effective implementation of safeguard measures in close consultation with local authorities and local communities. The PIU will assign at least one full time staff as the safeguard focal person to be responsible for forging effective implementation of safeguard activities in each of the project locations. Each industry association will select one focal person to coordinate with PIU. The PIU will be responsible for incorporating social considerations in bidding and contractual documents. During implementation, the PIU will assign local officials to be responsible to monitor safeguard issues. The results will be part of the component progress report and the safeguard focal point will be responsible for ensuring proper documentation of safeguard activities.

The organizational flowchart is shown in Figure 2,

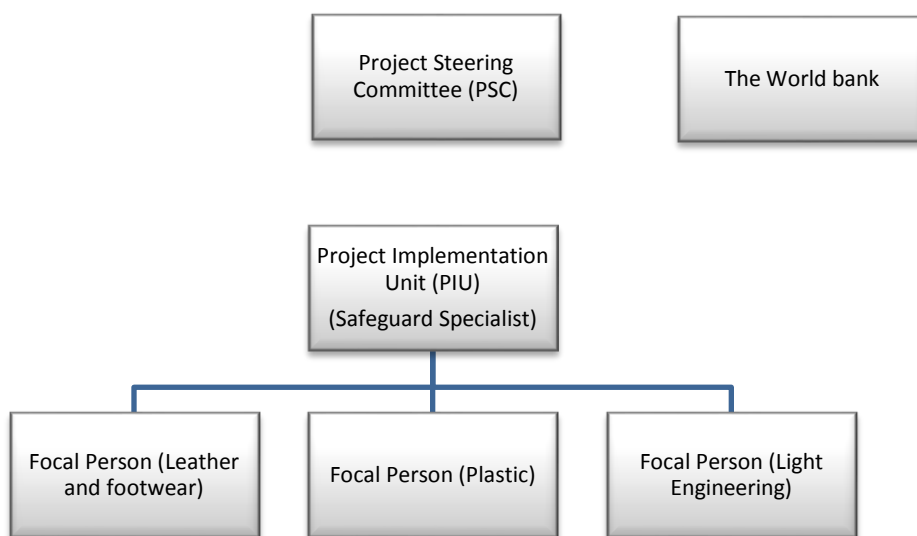


Figure 2: Implementation Arrangement

Table 3: Roles and responsibilities of project implementation team

| Responsible Unit | Major Activities | Output | Action Frame | Time |
|----------------------------------|--|--|-------------------------------|------|
| Project Steering Committee (PSC) | Guide overall Safeguard Performance of the project | Oversight and monitoring Obtain safeguard Clearance from World Bank | Throughout project life cycle | |
| Safeguard Specialist, PIU | Monitor key activities and track performance. Identify and correct problems. Keep adequate records of performance. | Instructions to PIU | Throughout project life cycle | |

| Responsible Unit | Major Activities | Output | Action Frame | Time |
|------------------|---|--------|--------------|------|
| | Conduct periodic safeguard management system audits Capacity development of PIU and professionals of implementing agencies | | | |

Institutional Capacity Building

26. The project has strong social development focus and the implementation of the project interventions with social compliance requires institutional capacity building in this area. It is therefore proposed to include Social Development Specialist in Project Implementation Unit under the project which should later be institutionalized in the organizational setup.
27. Institutional capacity building will also include various short and long training and awareness raising program. All such training and awareness raising program must include social development aspects such as resettlement, special assistance to small ethnic and vulnerable communities and disadvantaged groups, inclusiveness, participation besides technical and environmental aspects and overall enhancement of disaster management capacity of the concerned organizations and the project in general.

Monitoring and Evaluation

Indicators for Monitoring and Evaluation:

28. Impacts of the proposed subcomponents on physical, socioeconomic and cultural environment will be monitored on the basis of a scheduled plan. Frequency of monitoring will depend on size, location and magnitude of the project parameters. The PIU is responsible to adhere with monitoring parameters, locations, schedule and responsibilities. Impact monitoring will be carried out through internal monitoring system. Likewise, two-time impact evaluation will be carried out: mid-term evaluation in two years; and final evaluation in four years.

Stages of Monitoring and Evaluation

29. Monitoring and evaluation process will be focused on indicators specific to process by PIU and outcomes at three consecutive stages of RAP implementation (if required): RAP preparatory stage, relocation stage and rehabilitation stage. Viewpoint of M&E at these stages will be as follows:

M&E at Preparatory Stage

32. Monitoring is concerned with administrative issues for the period of the pre-relocation phase of the resettlement process such as, establishment of resettlement unit, budget management, and requirement for further land acquisition, consultation with DPs in the preparation of resettlement plan and their participation in the implementation process, information dissemination on payments of entitlement due, grievance redress, and so on. The major issues for monitoring will be to:

- Conduct additional baseline survey, if required;
- Consultations;
- Identify DPs and their numbers;

- Identification of different categories of DPs and entitlements of individuals;
- Collection of gender disaggregated data and preferences of women;
- Establish Inventory of losses;
- Ascertain Entitlements;
- Valuation of different assets not covered by PAVC;
- Budget delivery;
- Information dissemination;
- Institutional capacity assessment;

M&E at Rehabilitation Stage

Once the DPs have resettled at new self-relocated sites, the focus of monitoring will shift to issues of livelihood restoration. The key issue of monitoring will be:

- Initiation of livelihood restoration activities;
- Consultations;
- Assistance to enhance the livelihood and quality of life

Public Disclosure

30. Project will disclose SMF, SEVCDF and RPF to the public in Bangladesh by posting it in its website, and authorize the World Bank to disclose it at its Country Office Information Center and in its Infoshop. Project will also ensure that copies of the translated document are made available at its headquarters and site offices established during the implementation period. As to disclosure, Project will inform the public through notification in two national newspapers (Bangla and English) about the EC4J project and where it could be accessed for review and comments

Survey and Documentation:

Preliminary Screening

34. During the identification and preliminary stages of project preparation, PIU will undertake a preliminary Land Acquisition Assessment to identify the types, degree, and scale of potential social impacts of the project. To correctly identify the relevant social issues and to assess the type and level of information required during subsequent field investigations, particular attention will be paid to adverse impacts to the affected community, such as loss of land and other fixed assets and the number of persons marginally or severely affected and the types of vulnerable groups affected.

Project Preparation

35. PIU with the help of consultants will be responsible for carrying out all necessary surveys, field studies and investigations, as identified during the screening. Prior to undertaking the survey PIU will conduct a public consultation campaign to describe the project components, types of impacts, content and schedule for the census and inventory or other background surveys to the key stakeholders.

36. At least three basic types of surveys will be needed: a census; an inventory of affected assets and other losses; and a socio-economic baseline survey. The census and the inventory of affected assets will cover all PAPs, regardless of entitlement or land ownership. Criteria for vulnerability of PAPs should be paid particular attention in order to provide additional assistance.

Public Consultation and Participation

37. PIU will employ numerous consultation and communication methodologies during the preparation and implementation of the project. Participatory workshops, household surveys, focus groups, etc. will be used to inform communities about possible project impacts, proposed mitigation measures, and to receive their feedback on their priorities and concerns, which in turn, will be used as key inputs for the preparation of the RAPs. Focus groups will discuss gender issues, children and schooling, health, land and security, access to places of employment, livelihood generation issues, among others.

38. PIU will carry out consultations at various stages of the preparation of the RAPs and the key stakeholders will be invited to participate in the deliberations for the formulation of the Resettlement and Rehabilitation (R&R) plans. The consultations will start with the reconnaissance level surveys followed by scoping workshops, focus group meetings, and follow up consultations. The opinions of stakeholders will be documented and incorporated in the R&R planning as well as in designing socially acceptable mitigation measures.

39. The public consultation exercises undertaken during the preparation of RAPs involve information dissemination – i.e., informing the target audience about the details of the project intervention in question and inviting their comments before finalizing the R&R design. The consultations will be carried out with individuals during the screening survey stage and with both individuals and groups during the detailed social impact surveys. Based on preliminary social assessments, scoping and initial field appraisals, participatory strategies will be devised to ensure the participation of the affected populations in the RAP preparation. This approach will help identifying social sensitivities and concerns so as to suitably modify the design and planning of the project intervention; review measures to avoid, reduce or mitigate adverse impacts and minimize displacement; explain principles and procedures and significance of land acquisition, resettlement and rehabilitation compensations and assistance to PAPs. Public participation is performed and information will be made available during preparation and implementation of the resettlement plan and will include, at a minimum, community meetings and focus-group discussions.

Social and Gender Issues:

43. This guidance note on gender integration is intended to make project authorities aware of the World Bank's concerns for gender-based inequalities and indignities prevalent in workplaces where men and women work together. It is observed that development effectiveness of projects can be enhanced by addressing such gender issues that are considered serious obstacles to inclusive and sustainable development. In this regard, the Bank considers it most important that development programs and projects should always explore feasible alternatives to enable the disadvantaged, especially women, to share in the benefits generated by the projects it supports. And it is expected that EC4J and industrial authorities will most certainly explore all feasible alternatives in the design and implementation of all components and sub-components.

44. With regard to gender-related concerns, Bangladesh has gained a great deal of knowledge and experience about various issues associated with the employment and treatment of women. On the positive side, various manufacturing units established in the Export Processing Zones (EPZs) and those outside these enclaves have brought about a profound socioeconomic change in the lives of millions of poor men and women by creating work opportunities that have also immensely benefited the country in terms foreign trade and export income. EC4J project is aimed at expanding and distributing work opportunities in different parts of the country and facilitating diversification in domestic and foreign investments. But there are still a lot of issues regarding gender-based disparities and unfair treatment that continue to remain unaddressed.

45. The following are widely known issues that are to be addressed for fair treatment of workers in general and the female workers in particular.

- **Women workers** – especially unskilled and lowly skilled -- are particularly vulnerable to discrimination and abuse. In a situation where the wages are already very low and considered far less than living wage, female workers are known to be paid at considerably lower rates than the males for similar jobs.
- **Sexual harassment and indignities**, which range from verbal abuse to “touching” are rarely talked about -- but goes on quietly. Physical assault of workers is not too rare.
- **Freedom of association and collective bargaining** are still not allowed in all factories. (After years of rallies and agitations, which often turned violent, workers' unions are allowed in some of the privately-run factories. It is still not allowed in some enterprises where investments are mostly foreign.
- Lack of safety in the factories, which has been widely known and caused hundreds of deaths over the years, due to fire and structurally unsafe buildings that housed many of the factories.

46. Benefiting the local communities and workers at this level will require careful analyses of the current situation which may vary from one industry to another. Gender analysis at this level would help project to adopt appropriate guidelines to ensure gender integration into the economic activities selected to locate in industries that are aimed at improving the local economies. This will require analyzing the existing economic and socio-demographic conditions that will indicate economic characteristics and vulnerability of the different community groups, including women; social acceptance of women working outside the households; education that may make an important difference when it comes to suitability for particular jobs, including ease in training to perform particular tasks that the enterprises may require; and other factors that would enable project and the investors to make decisions about the kinds of industrial activities they want to undertake in a particular component. Analysis may include, but not limited to, the following information.

- Project location, describing physical characteristics (topography and other physical features) of the individual industries; proximity to existing urban centers; accessibility to the project site; existing/potential transport networks; power and water supply; and others that are usually considered important for setting up manufacturing enterprises.
- Community consultations, including women, about objectives of the project and the kinds of enterprises, with job prospects for men and women, which would be set up in the individual industry. Project will consider all inputs and feedbacks received from the communities, and record and analyze all information in terms of gender -- men and women. (Depending on local custom, consultations with women may have to be conducted separately.)
- Community profile, indicating population size; ethnicity; education and related facilities; prevalence/practice of gender differentiation; major economic activities; availability and use of common property resources; occupational groups; formal/informal institutions and rules and behavior that may influence gender integration into the industrial activities; and any other information relevant to particular activities identified for the individual industries’.
- Social acceptability, existing and potential issues and concerns related to the roles women play in the household and the prospects that they could work outside the households, without causing social conflicts.

Annex-1: Social Safeguard Screening for EC4J Project

[To be filled in for each community jointly by Project Proponent(s) and consultants. Where private lands are to be acquired or public lands are to be resumed from authorized and unauthorized private users, census of affected persons and inventory of losses to be carried out.]

INVOLUNTARY RESETTLEMENT IMPACT CATEGORIZATION CHECKLIST

| Probable Involuntary Resettlement Effects | Yes | No | Not Known | Remarks |
|--|------------|-----------|------------------|----------------|
| Involuntary Acquisition of Land | | | | |
| 1. Will there be land acquisition? | | | | |
| 2. Is the site for land acquisition known? | | | | |
| 3. Is the ownership status and current usage of land to be acquired known? | | | | |
| 4. Will easement be utilized within an existing Right of Way (ROW)? | | | | |
| 5. Will there be loss of shelter and residential land due to land acquisition? | | | | |
| 6. Will there be loss of agricultural and other productive assets due to land acquisition? | | | | |
| 7. Will there be losses of crops, trees, and fixed assets due to land acquisition? | | | | |
| 8. Will there be loss of businesses or enterprises due to land acquisition? | | | | |
| 9. Will there be loss of income sources and means of livelihoods due to land acquisition? | | | | |
| Involuntary restrictions on land use or on access to legally designated parks and protected areas | | | | |
| 10. Will people lose access to natural resources, communal facilities and services? | | | | |
| 11. If land use is changed, will it have an adverse impact on social and economic activities? | | | | |

| | | | | |
|--|-----------------------------|------------------------------|--|--|
| 12. Will access to land and resources owned communally or by the state be restricted? | | | | |
| Information on Displaced Persons: | | | | |
| Any estimate of the likely number of persons that will be displaced by the Project? If yes, approximately how many? | <input type="checkbox"/> No | <input type="checkbox"/> Yes | | |
| Are any of them poor, female-heads of households, or vulnerable to poverty risks? | <input type="checkbox"/> No | <input type="checkbox"/> Yes | | |
| Are any displaced persons from indigenous or ethnic minority groups? | <input type="checkbox"/> No | <input type="checkbox"/> Yes | | |

Note: The project team may attach additional information on the project, as necessary.