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**BANGLADESH**

**JAMUNA BRIDGE PROJECT  
(CR. 2569-BD)**

**MANAGEMENT RESPONSE  
TO  
INSPECTION PANEL**

**September 20, 1996**

## Abbreviations and Acronyms

ADB	-Asian Development Bank
BRAC	-an NGO in Bangladesh
BUET	-Bangladesh University of Engineering and Technology
CCL	-Cash Compensation under Law
CMC	-Cofinanciers Monitoring Committee
CSC	-Construction Supervision Consultant
DHI	-Danish Hydraulic Institute
EFP	-Erosion and Flood Policy
EMAP	-Environmental Management Action Plan
EGB	-East Guide Bund
EU	-Environmental Unit
GOB	-Government of Bangladesh
IDA	-International Development Association
IRP	-Independent Review Panel
JCIDP	-Jamuna Char Integrated Development Project
JMBA	-Jamuna Multipurpose Bridge Authority
JMBP	-Jamuna Multipurpose Bridge Project
LA	-Land Acquisition
MARV	-Maximum Allowable Replacement Value
MC	-Management Consultant
MDM	-Milestone Decision Meeting
NGO	-Non Governmental Organization
OECD	-Overseas Economic Cooperation Fund (Japan)
PAD	-Project Affected Dweller
PAP	-Project Affected Person
POE	-Panel of Experts
RDM	-an NGO in Bangladesh
RRAP	-Revised Resettlement Action Plan
RTW	-River Training Works
RU	-Resettlement Unit
SWMC	-Surface Water Modeling Center
TOR	-Terms of Reference
WB	-World Bank
WGB	-West Guide Bund

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EXECUTIVE SUMMARY

i. The Jamuna Bridge, financed by the Government, IDA, OECF of Japan and ADB, is probably the largest project that Bangladesh has ever undertaken. It represents the culmination of a long-held national vision of ending the isolation of the northwestern region with its 27 million people and vast growth potential by establishing a permanent transport link over the formidable Jamuna River. Successive governments have worked toward this goal through, *inter alia*, mobilizing since 1986 over US\$100 million through specific taxes and adopting a landmark resettlement policy that has become a model for other projects in Bangladesh. The project was approved by IDA's Board in February 1994, and the Credit became effective in August 1994.

ii. The concerns expressed to the Inspection Panel by the char dwellers through the Jamuna Char Integrated Development Project (JCIDP) have been IDA's as well for some time. An estimated two to four million Bangladeshi people live on chars which are sand bars, or temporary islands, created by seasonal flooding and unstable river paths. Many are inhabited. For the Jamuna river chars, about 500,000 dwellers are living, with a fraction of that estimated in the bridge impact area. Typically, char dwellers dismantle their homes and move during the annual rainy season (May through October) when the land floods, and find a completely new home several times in one generation when their land disappears altogether from erosion. In the project area, char income typically derives from agriculture and fishing, with the main harvest in March-June and a smaller harvest in November-December. Public services on chars are virtually non-existent. Char dwellers' protection and mutual assistance come through membership in groups with strong leaders who offer a degree of security in exchange for loyalty and tribute. The most important contribution to improving life for char dwellers would be to stabilize the chars, thus, increasing security. Although the Jamuna Bridge project studies indicate that some erosion is a likely result, the river training is likely to contribute to stabilizing some of the chars<sup>1</sup>. However, the JCIDP is concerned that these effects will exacerbate the already precarious existence of char dwellers, and this concern is at the heart of the Request.

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<sup>1</sup> Attached matrix, clause 4.

iii. The Request is based on the assumption that the char dwellers are not included in the Revised Resettlement Action Plan (RRAP)<sup>2</sup>. They are. The project has been based on a strategy of preparing in phases the detailed application of the RRAP to different affected groups. Phasing was required because given the ever-changing behavior of the Jamuna River, the location of the bridge structure and guide bunds could only be finalized during construction<sup>3</sup>. The locations were decided in October 1995 (west guide bund) and July 1996 (east guide bund). The first phase of the RRAP was defined in detail in 1994 and implemented to enable the river training works and east guide bund to be constructed. However, construction was delayed to October 1995 and it was decided to start with the west guide bund first. This constituted the second phase of the RRAP which permitted construction of the west guide bund from October 1995 to June 1996. The third phase will compensate riverbank and char dwellers who suffer losses according to the Erosion and Flood Policy (EFP) which is a landmark in Bangladesh.

iv. Project-induced effects on chars will begin to manifest themselves after the current flood season, sometime in October 1996. At that time, it will be possible to identify and compensate char dwellers. Since the agricultural cycle would not produce a major harvest before March-June 1997, we expect that dwellers will have their compensation in-hand before production/income losses occur.

v. A resettlement/compensation program for the char dwellers will be discussed with them as soon as they are identified. Representatives from the chars are expected to participate in the EFP plan committee<sup>4</sup>. There has been systematic local participation in the resettlement program, information campaigns and extensive work carried out by local NGOs. Consultation included visits to the project site and discussions with project-affected people (PADs) about their ideas for the project. Consultation programs have been carried out only in areas identified to be affected, and where there are identifiable legitimate stakeholders. To do otherwise would cause confusion, unrealistic expectations and exaggerated or false claims for compensation, as was experienced on a large scale in the second phase of the RRAP.

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<sup>2</sup> RRAP and SAR para. 4.39 and Section 1.1 of Annex 4.4 ("Resettlement").

<sup>3</sup> SAR, para. 4.33.

<sup>4</sup> Fax to JMBA dated September 9, 1996.

vi. The new resettlement policy adopted by the Government during project preparation is based upon the principle that project affected people should benefit from the project. The RRAP's key objectives are to minimize involuntary resettlement; carry out resettlement as development programs with particular attention to community participation and the needs of the weakest groups; compensate losses at full replacement cost; ensure that host communities benefit; and ensure that absence of legal title does not bar compensation. RRAP contains a matrix of categories of losses, definitions of entitlements, applications, additional services, implementation arrangements, and responsible agencies. Category 14 covers the rights of those affected by river erosion or flooding caused by the project<sup>5</sup>.

vii. The recently adopted EFP, which has been under preparation since 1994, is being translated into a detailed, third phase of the RRAP. The Policy provides that all persons, both owners and occupiers, on the riverbank and chars in the affected area who experience erosion for any reason will be compensated, and those affected by increased flooding due to the bridge will also be compensated. A program is being prepared to implement the policy, including specific guidelines and organizational arrangements.

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<sup>5</sup>

See Attachment 6.

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### JAMUNA BRIDGE PROJECT (CR. 2569-BD)

#### FACT SHEET ABOUT THE PROJECT

1. **Board Date:** 02/17/94    **Signing Date:** 02/25/94    **Effective Date:** 08/12/94
  
2. **Cost:** At present, the total project cost is estimated at \$ 743 million compared to the SAR estimate of \$ 696 million. The additional cost represents inflation and some extra cost due to soil instability problems.
  
3. **Financing:** Joint Financing: IDA, OECF of Japan and ADB, \$200 million each, the balance is to be funded by the Government of Bangladesh.
  
4. **Project Objectives:** The project aims at achieving the strategic objective of connecting the east and west parts of the country separated by the Jamuna River, thus stimulating economic growth and social well-being by facilitating inter-regional, cross river transport of passengers, freight and transmission of electricity more economically and efficiently.
  
5. **Summary of Project Components:** The project consists of: (a) construction of a 4-lane roadway bridge with shoulders and foundation adequate to carry a meter gauge railway line in the future; (b) construction of two end viaducts; (c) construction of two guide bunds (east and west of the river); (d) construction of east and west approach roads; (e) a program to mitigate project effects on the environment including resettlement; and (f) technical assistance and training.
  
6. **Implementation Status:**
  - \* The bridge piles are complete, and the superstructure is progressing 6 months behind schedule.
  - \* The west guide bund is complete.
  - \* The east guide bund location and shape is finalized; construction will start on October 15, 1996.
  - \* The approach roads construction is progressing about 8 months behind schedule.
  - \* The implementation of the Revised Resettlement Action Plan (RRAP) is progressing close to schedule (Plan was revised according to IDA's comments prior to project approval).
  - \* The implementation of the Environmental Management Action Plan (EMAP) is progressing with various delays from the modified schedule. However, the objective of the EMAP is expected to be achieved.
  - \* The technical assistance component is progressing on schedule.



7. **Project Monitoring and Supervision:** As per the SAR, the project has the following monitoring and supervision elements:

- \* The Engineer (Construction Supervision Consultants, CSC), Rendel Palmer and Tritton (UK), NEDECO (Netherlands) and Bangladesh Consultant Ltd., are responsible for project supervision and addressing technical issues, since they were the designers.
- \* The Management Consultants (MC), Sir William Halcrow and Partners are responsible for assisting the client in its role. They are mainly monitoring the resettlement and environmental components.
- \* Panel of Experts (POE) assists the borrower and the cofinanciers in technical and environmental monitoring of the project components. The Panel is composed of six internationally known experts and three local leading experts. The Panel oversaw the project during the design phase and continue to oversee it during the implementation phase.
- \* Project Monitoring Committee (PMC) is composed of the members from the Resident Missions of the three cofinanciers and the JMBA. The Committee meets on a monthly basis to follow-up on implementation issues.
- \* Milestone Decision Meetings (MDM): Due to the complexity of the project and the need to address issues in a timely manner, are a supervision feature adopted for this project in view of its complexity and the need to address issues in a timely manner. All major stakeholders (GOB, Contractors, Supervision and Management Consultants, Panel of Experts, IDA and the other Cofinanciers, as well as any needed experts for specific issues) meet frequently (there have been six MDMs so far) to review project status and to deal with current issues.

8. **The Independent Review Panel (IRP):** The cofinanciers decided during the Fourth Milestone Meeting to form an international Independent Review Panel to review the status of the RRAP and EMAP and to advise the cofinanciers on the adequacy of the measures taken according to international standards. The IRP includes two leading Japanese social and environmental experts and another two from the UK and Canada. The IRP started working in the field on August 20, 1996 and is expected to submit their report by end of October 1996. Meanwhile, their preliminary report was received after meeting the Requester (at his request)<sup>6</sup>.

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<sup>6</sup> IRP Preliminary Report (Attachment 21).

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**Introduction**

1. On August 26, 1996, the Inspection Panel registered a Request for Inspection (the Request) from the "Jamuna Char Integrated Development Project" (JCIDP), a Bangladeshi NGO. Although the Request states many allegations, all of which are addressed in the attached matrix, the thrust of JCIDP's concern is that by failing to address the project's effects on char dwellers, OD4.30 (Involuntary Resettlement) is not being complied with. In accordance with the Inspection Panel's procedures, a response from IDA's Management is to be provided to the Panel by September 25, 1996. This is Management's Response, explaining how IDA's policies and procedures have been followed and that the subject matter of the Request is being dealt with appropriately<sup>1</sup>.

2. The following paragraphs document IDA's compliance with the relevant policies and procedures.

**The Chars**

3. The islands in the Jamuna river (called Chars in Bengali) are sand bars (shoals), or temporary islands, created by seasonal flooding and unstable river paths. The chars change their form over the years, and migrate laterally and longitudinally according to the level of the flood each year. The Jamuna river flow is seasonal, with the flood season from May to October each year. Chars appear and disappear as a natural phenomenon in the river, mainly during the flood season. Hundreds of chars exist in the Jamuna river, over a length of more than 400 kms, with their inhabitants estimated at about 500,000<sup>2</sup>. Only a small fraction of those chars (to be determined after the current flood season) are in the bridge impact area (about 18 kms, see para. 6). The attached satellite images from 1978-1995 give an indication of the vast changes involved<sup>3</sup>.

4. Until the specific construction sites for the bridge and ancillary works were decided (in October 1995 and July 1996, para. 15), individual chars could not be

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<sup>1</sup> See para. 33 of Inspection Panel's Operating procedures.

<sup>2</sup> Attachment 1: Paper by Dr. Suzanne Hanchett, October 29, 1993.

<sup>3</sup> Attachment 2: Satellite images from 1978-1995.

identified for monitoring for possible construction impacts, although a broad area up and downstream of the likely construction site has been under surveillance through satellite imagery for many years. A complicating factor is that construction of the guide bunds and the bridge foundation can be implemented only in the dry season (from October to May of the following year) for technical reasons<sup>4</sup>. This means erosion impacts, if any, would occur during the rainy season following the relevant construction, and such effects would be observable mainly after the rainy season flood waters recede. The west guide bund and the bridge pile foundation were built during the last dry season (October 1995 to May 1996), the east guide bund will be built next dry season (October 1996 to May 1997). As a result, JMBA will soon (November 1996) be in a position to determine, what chars have actually been affected (this could not have been done sooner because the water level is too high). A physical model has been built in Dhaka, and a mathematical model has been completed to forecast the erosion pattern of the river shores with and without the bridge, using historical floods<sup>5</sup>. The model is being expanded<sup>6</sup> to determine the effects on the chars using historical flood data for calibration.

### **Revised Resettlement Action Plan (RRAP) Consistent with OD 4.30**

5. The Jamuna Bridge Project is the first major project in Bangladesh for which a comprehensive resettlement policy has been developed. GOB has agreed to a policy framework which is consistent with the principles of OD 4.30. This policy framework was submitted to IDA as part of the RRAP in October 1993, and approved by IDA with some minor adjustments<sup>7</sup>. It is now being implemented.

6. The approach adopted views resettlement as a development program, with particular attention to the needs of the weakest groups. All affected persons should benefit from the project, or at least maintain their standard of living<sup>8</sup>. Compensation levels have been set equal to the replacement value of land and other assets, instead of the arbitrarily fixed compensation levels previously used in cases of eminent domain and land expropriation. The important principle of according entitlements to users of resources and not just legal owners has also been established in the RRAP, for the first time in Bangladesh. The RRAP further includes guidelines for public consultation and participation, as well as grievance mechanisms in cases of disagreements over compensation.

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<sup>4</sup> Dredging can only be carried out in the dry season, and the same for driving the foundation piles.

<sup>5</sup> Attachment 3: Mathematical Model Reports for August 1996. The model is capable of forecasting erosion based upon historical floods. For any individual year, however, it is necessary to know the specific flood characteristics of that year through the end of the flood season.

<sup>6</sup> Attachment 4: IDA's fax to JMBA dated April 8, 1996 and JMBA's response.

<sup>7</sup> SAR paras. 4.36 and 4.37, and OD4.30.

<sup>8</sup> Attachment 5: Revised Resettlement Action Plan.

7. The various categories of losses, affected persons, and entitlements have been set out in a detailed matrix, with categories of losses and entitlements. However, it is important to note that the final designs of the bridge and its location were not known at the time the plan was prepared and approved. A phased approach was therefore adopted. The RRAP included a comprehensive and detailed program for the first phase, land acquisition in the eastern bridge end area. Further studies of impacts were to be undertaken once the relevant designs were finalized<sup>9</sup>. Accordingly, the last category in the entitlement matrix, Category 14, safeguards the rights of affected persons not yet identified. The possibility of losses occurring as a result of project induced erosion or flooding was envisaged, and Category 14 mentions this likelihood. This issue, and the situation of the char dwellers, was raised informally by some of the Executive Directors before the project was approved by IDA's Board with the staff<sup>10</sup>.

8. During supervision missions, meetings and correspondence, the possibility of project induced erosion and flooding has been discussed further<sup>11</sup>. IDA first requested that the Government move ahead and approve a formal EFP under the project in 1994, to detail the entitlements under Category 14 of the RRAP. Such a policy would acknowledge Government responsibility for project-induced losses of land and other resources, even if these losses were not caused by formal land acquisition. This policy would apply primarily to the char dwellers, but also to the people living along the river banks.

9. The policy has now been approved, and implementation will start immediately after the water level recedes, in November 1996. Consultation with affected people will start immediately after their identification by the end of the current flood season.

### **The Erosion Policy**

10. For generations, monsoon and river-induced erosion and flooding have been an accepted and commonplace feature of riverine life in Bangladesh. People who lived in areas subject to these phenomena adapted their lifestyles and culture to it. The Government did not assume liability for this annual event. With the advent of the Jamuna Bridge Project and the compensation requirements of IDA and the other Cofinanciers, however, that needed to change. The completely new concept of compensating project-induced erosion and flooding raised complex political and technical issues and led to substantial debate and controversy. This came to a head starting in

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<sup>9</sup> SAR, page 86: "Consecutive resettlement actions related to other components of this project will be derived by analogy from this RRAP".

<sup>10</sup> Attachment 6: ASTHR note of February 1994.

<sup>11</sup> Attachment 7: Missions' Aide Memoires of 1994, 1995 and 1996, excerpts from the Aide Memoires and correspondence with JMBA.

October 1994 when IDA and the other Cofinanciers requested at the Second Milestone Meeting that the Government prepare and adopt a suitable policy in this regard<sup>12</sup>. The first policy was reviewed by IDA in July 1995. Debate on it continued, with a six-month hiatus in the first half of 1996 due to security problems related to pre-election political turmoil in the country which also affected the bridge construction. A policy was finally approved on September 7, 1996<sup>13</sup>.

11. The policy adopted (Erosion and Flood Policy, EFP) is generous and simple. It represents a new era in environmental legislation and practice in Bangladesh. The EFP includes compensation for all erosion in the bridge impact area, whether due to bridge impact or any other factor. Increased flooding that adversely affects crops would also be compensated. The EFP defines the bridge area of impact on erosion to include 10 kms downstream and 8 kms upstream. For flooding effects, the EFP defines 12 kms upstream of the bridge as the possible impact distance. The EFP is time-bound for 5 years after construction of the closure dam on the west in 1995, based on expert estimates of the time required for morphological changes in the river to stabilize. This means that erosion and/or flooding impacts could occur for up to 5 years after construction starts, and that affected people would be correspondingly compensated. IDA would request that this time span be reviewed in light of actual data, as needed, in the future. The EFP provides for compensation of affected char dwellers and flood plain occupants, as soon as they are identified.

12. Two elements need to be in place before a socio-economic survey to determine the number of persons affected by project-related erosion or flooding, and their location, can be carried out. The first element is a policy defining impact area and compensation parameters, which has now been adopted. The second element is that the flood waters of the May-October 1996, monsoon season need to recede so that its physical impacts can be identified. This will occur by November 1996, and the socio-economic survey of affected persons will begin in that month. Thus, affected persons including char dwellers will benefit from the project in line with IDA's OD4.30. The full effect of the bridge will occur during the 1997 high water season (May to October 1997), after the east guide bund is constructed during the next dry season from October 1996 to May 1997. The affected persons, after the current season and after each of the next four years floods, will be identified annually and compensated according to the EFP even if compensated for previous losses. Work still remains to be done before this policy is made operational. More specific guidelines need to be worked out, by JMBA, as well as the organizational

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<sup>12</sup> Attachment 8: Second Milestone Decision Meeting Minutes and Aide Memoire, September 1994.

Milestone Meetings are a supervision feature adopted for this project in view of its size and complexity. GOB, Contractors, Supervision and Management Consultants, and Cofinanciers meet to review project status and to deal with current issues. They take place when major decisions on remedial actions are needed.

<sup>13</sup> Attachment 9: Approved EFP dated September 7, 1996.

framework. An IDA/OECF mission is currently in Bangladesh discussing these issues with GOB.

13. If GOB has approved the EFP sooner, it would have given more time for working out an entitlement framework and its implementation as well as for preparing for the unique challenges of dealing with the char dwellers. In addition to the uncertain physical situation of the chars, providing assistance to the char dwellers is likely to mean working through existing group formations rather than directly with individual entitled persons, as for other categories of entitled persons under the RRAP. These groups are dominated by local strong men, who typically control and allocate access to land and other resources through patron-client type relationships. Disputes are common, as is violence in competing for the scarce resources. Ensuring that the full amount of assistance is provided to entitled persons in a transparent manner will require sensitivity, knowledge of local conditions, and good organizational arrangements. While the late approval of the erosion policy has put the work behind schedule, every effort is now being made to make the policy operational at the end of the current flood season, and we anticipate that this will be achieved. Since the agricultural cycle on the chars would not produce a major harvest before March-June 1997, we expect that dwellers will have their compensation in-hand before production/income losses occur (para. 30).

#### **Why the Final Location of the Bridge Could Not Be Determined Earlier**

14. The Jamuna River is a braided river, characterized by continuous shifting of its channels and the movement of its course in a lateral direction<sup>14</sup>. At any point along its course, neither the overall width of the river nor its location stays the same for a long period of time. The tendency for individual river channels as well as the whole river course to shift must be impeded locally for the river to continue to flow under the new bridge structure and individual river channels have to be prevented from attacking approach embankments. This requires works to protect bridge abutments and approach viaducts and embankments from the erosive force of shifting river channels.

15. Due to the shifting nature of the river, the final location of the Jamuna bridge could not be determined before start of construction. The location of the east guide bund was determined in October 1994. Due to delays in starting the project there was not enough time for mobilization during the 1994-95 dry season. A decision was taken during the Second Milestone Decision Meeting to postpone bund construction and to start with the west guide bund instead during the 1995-96 dry season, to be followed by construction of the east guide bund starting in October 1996. The west guide bund was built on a char in the river, 4.8 kms from the location of the eastern one. There had been a provision in the project to lengthen the bridge by 500m (to a total of 5.3 kms) so that, if

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<sup>14</sup> SAR, para. 4.2.

the char disappeared in the 1995 flood season, the west guide bund could be built on the western flood plain. Fortunately, the char did not disappear. The bridge contractor also started driving the piles in the water, starting from the east, in October 1995 and the piling was completed in July 1996. Hence, there were no effects on the chars as a result of bridge construction before May 1996, the start of the rainy season. Such effects will only be known when the water level starts receding in October 1996.

### **Timing of the Chars Survey and Survey of Affected Dwellers**

16. The bridge axis was tentatively fixed in October 1994, subject to the final location of the west guide bund. The west guide bund's final location was determined on October 15, 1995<sup>15</sup>. In July 1996, the shape, length, and location of the east guide bund were finalized<sup>16</sup>. The contract for the mathematical model was signed in July 1995 with the Danish Hydraulic Institute (DHI), in association with the Bangladesh Surface Water Modeling Center (SWMC), and preparations started as soon as the location and shape of the west guide bund was determined. At present, the model is complete and running.

17. The survey of project affected dwellers (PADs) can be started once the current flood season ends and the affected chars and banks are visible. Only at that time, can the new topography of the chars and banks be determined, with any degree of confidence, and surveyed. At present, the model is only capable of forecasting what would happen to the chars and banks if the 1995 flood recurs in 1996, or any other historical flood. In order to determine the actual effects, the characteristics of the present flood have to be known and applied to the model. The model would verify the impact area determined using the characteristics of the current flood season and historical floods. It would also determine the effect of the bridge on the water levels in the impact area. Subsequently, before the end of 1996, surveys of char and bankline PADs would be conducted.

### **Water Level Change Due to the Bridge Constriction**

18. The rise in the water level due to the bridge constriction of the river upstream of the bridge is estimated not to exceed 0.30m at the peak of the 100 year flood<sup>17</sup>. The maximum rise in water level would be at the bridge site. Water level rise would decrease rapidly with distance upstream, to the extent that within a few kms it is reduced to 0.1/1.15m. Jamuna river water is heavily laden with sediment during the flood season, and this rise of water level would cause increased sedimentation on the chars affected, thus raising their level. Therefore, after the flood recedes, people on the chars would hardly

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<sup>15</sup> Attachment 10: 4th Milestone Decision Meeting Minutes and Aide Memoire, October 1995.

<sup>16</sup> Attachment 11: 6th Milestone Decision Meeting Minutes and Aide Memoire, July 1996.

<sup>17</sup> Attachment 12: Feasibility Study's forecast of water level change due to the bridge.

be affected by this water level rise<sup>18</sup>. The only expected effects would be to change the pattern of erosion and accretion, mainly downstream, compensation for which is included in the EFP in line with IDA policies and procedures. The positive effect of the bridge, however, is that it is expected to stabilize the river's lateral migration and thus the large lateral erosive patterns associated with this migration. It is also expected that some of the chars, particularly south of the bridge and to the west, would be stabilized.

19. In November 1994 the contractor closed the northern entrance of the Dhaleswari river, a small tributary of the Jamuna river in the east floodplain. The river spontaneously opened another channel south of the bridge location that substituted most of required water and fish from the north intake. At the peak of the flood, the Dhaleswari northern intake used to deliver a discharge of about 400 cu. sec., while the Jamuna discharge is between 65, 000 to 91,000 cu. secs., depending on the level of each flood (see footnote 14). Therefore, closing the northern intake of the Dhaleswari could not have raised the water level in Jamuna by more than a few millimeters, which would not have had any tangible effects on the chars. The new southern channel did, however, cause some erosion on its shores and people were paid to stabilize them and the affected persons will be compensated as provided under the EFP.

#### **Addressing Specific Concerns Regarding RRAP and Chars**

20. The major concerns raised by the Requester are discussed below and a detailed response to each allegation included in the attached matrix.

21. **Allegation: Char people have not been included in the RRAP:** As a group, households and people living on the chars and riverbanks who may be affected by the project have been included as PADs to be identified and their individual entitlements determined, once such impacts are known. It has been clear all along that the people living on the chars, who would be affected by the project, are particularly vulnerable and that they should be compensated, and that efforts should be made so that they benefit from the project. This was stated clearly in the RRAP as "Coordinate with JMBA-EU (Environmental Unit) regarding possible adverse impact on population because of the changed river regime and where necessary assist JMBA-EU to design and carry out mitigatory measures (page 36)". This will be done, in accordance with OD4.30 and the EFP as soon as these PADs are identified.

22. The EFP will be implemented following the recession of the water after this year's rainy season (October/November 1996). This implementation will be closely monitored by IDA (see para.31). Determining to what extent there has been erosion in the chars and riverbanks in the project-affected area, and to what extent the project has caused changes in water levels of the riverbanks and chars will be surveyed and analyzed

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<sup>18</sup> Attachment 13: Memo from the designer of the River Training dated September 1996.



by an expert panel, using the aforementioned hydrological and mathematical models, as well as satellite imagery with historical comparisons. In cases where it is determined that there have been negative impacts due to erosion or flooding, the people living there will be surveyed and incorporated into the RRAP as PADs, in line with the policy guidelines. Extension services and assistance to PADs will be coordinated by the JMBA's Resettlement Unit. The RRAP sets out guidelines on implementation of such work by local NGO's, in partnership with project authorities.

23. **Allegation: Lack of participation and information among people.** Information campaigns, group formation, and participation have been undertaken among those identified as affected so far; both people whose land would be acquired, and members of host communities in cases of resettlement<sup>19</sup>. This has been spelled out in the RRAP, page 70. Until now, specific groups of char dwellers have not been identified as PADs, as discussed above. Until a clear erosion policy was approved, the design and location of the bridge finalized, and information available about impacts, consultation with large numbers of people would have caused confusion, raised unrealistic expectations, and possibly caused exaggerated or false claims for compensation, as occurred in other parts of the project. On the west bank, thousands of structures were erected in an attempt to obtain unlawful gains in 1994/95. A special law had to be enacted to deal with this issue and set out criteria to distinguish between genuine and unlawful structures<sup>20</sup>. As an example, out of 2,600 houses surveyed by the District Commissioner in July 1995, and after applying the new law, only about 600 were judged genuine structures<sup>21</sup>. Unfortunately, the people with unlawful intentions were well organized and powerfully connected, which meant that considerable Government and IDA effort and time was required to resolve the issue. It would be prudent to avoid similar episodes. For these reasons, it was agreed to defer consultations with char dwellers.

24. **Allegation: The Requester is dissatisfied with the response he received when he first contacted the Bank.**

A record of the correspondence between the Requester and the Resident Mission in Bangladesh (RMB) is attached and is more extensive than that submitted by the Requester<sup>22</sup>. Until early 1996, communications to RMB dealt with accounts and records rather than the issues raised in the August 18 Request for Inspection. In addition to meeting with JCIDP, RMB organized a meeting for them with the Secretary of JMBA to discuss the issues. The Requester unfortunately declined to participate in this meeting.

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<sup>19</sup> Attachment 14: Excerpts from RDM (NGO) Report dated December 15, 1994, carrying out the information and participation campaigns.

<sup>20</sup> Attachment 15: Law differentiating between genuine and unlawful PADs, and criteria for making that distinction.

<sup>21</sup> Attachment 16: Example of unlawful claims determined according to the new law.

<sup>22</sup> Attachment 17: Record of correspondence between RMB and the Requester.

An Independent Review Panel (IRP), commissioned June 20, 1996, by IDA and the other Cofinanciers to investigate and evaluate the project's environmental and resettlement programs, commented in its preliminary report that JCIDP had approached the Bank's Inspection Panel as a first rather than last resort for its concerns (see para.32 and Attachment 21).

### **Addressing Allegations not pertaining to char dwellers**

25. The above addressed the concerns of the Requester as representing char dwellers. The issues raised below do not pertain to char dwellers. Nevertheless, we wish to address them and set the record straight.

26. **Allegation: People are not receiving full compensation.**

- (i) The Requester argues that project affected people (PADs) are not receiving the full value of the compensation they are entitled to. This allegation refers to people already included in the resettlement program. The strategy is to give the PADs the means to find land elsewhere and disperse over a wide area. Land acquired in such a way is released voluntarily by the owners and allows PADs to settle in an area of their personal choice. This is consistent with OD4.30, and the principle of "Land for Land". Ensuring that people are compensated at replacement cost is critical in a project of this magnitude. Under the Bangladesh Law a local GOB official (Deputy Commissioner, DC) pays the basic compensation people are eligible for under the law, and JMBA pays the balance to cover the differential between basic compensation and replacement cost. There have been numerous delays and difficulties related to replacement cost compensation, and it has been a subject of continuous discussion between IDA and JMBA<sup>23</sup>. Many delays are caused by incomplete and inaccurate land records. Some of the problems of valuation and compensation are discussed in the RRAP, page 69f.
- (ii) Land market surveys have been undertaken to establish the level of compensation, based on the concept of maximum allowable replacement value of land (MARV). The SAR states that Replacement value would be determined on a phased basis, and the compensation level will be adjusted throughout the project<sup>24</sup>, JMBA is revising the MARV this year with another market survey. IDA recognizes that compensation levels, as actually implemented, have in many cases been inadequate, because of delays and illegal activities, and has addressed this systematically during monitoring and supervision. Recently, the Bank suggested to JMBA that closer involvement

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<sup>23</sup> Resettlement Missions Aide Memoires, see Attachment 7  
also refer to the letter of June 3, 1996 (Attachment 18).

<sup>24</sup> SAR page 94.

of responsible local NGOs and independent groups to monitor payments, would allow greater accountability and transparency, and bring greater pressure on local officials and project authorities to ensure that compensation is paid in full<sup>25</sup>. This is currently under discussion with a joint IDA/OECF mission in the field.

27. **Allegation: The resettlement site represents an inferior living situation.** The Requester argues that moving to a resettlement site represents a deterioration in quality of life for rural farmers. This argument seems to be based on a misunderstanding, since it implies that a main objective of the resettlement policy is to move people to a resettlement site. A key feature of the RRAP is the exact opposite, to provide incentives for people to resettle themselves on farmland and continue with their way of life. Resettlement sites are to be much smaller than originally envisaged and will be provided in a surplus area within the East Bridge End envelope or otherwise in smaller units scattered over the immediate surroundings of the PAD area. There are improvements to be found in resettlement sites for groups such as squatters and utulis, but there are doubts whether people who owned homestead land would find resettlement sites an attractive option. It has been recognized that high density resettlement sites can become centers of social friction due to complex social patterns that get interwoven rather quickly. The original concept of a large resettlement site of 131 ha. on the east bank has consequently been abandoned and only a small site is envisaged under the RRAP. There is also no intention to make this resettlement site so attractive that it distracts PADs from getting homestead land elsewhere.

### **Environmental Management Action Plan**

28. An Environmental Management Action Plan (EMAP) was prepared by the Bangladesh University of Engineering and Technology (BUET) in January 1995<sup>26</sup>. The plan was approved by IDA. The plan makes provisions for monitoring, control, and mitigation of environmental problems associated with construction works and closure of the Dhaleswari intake. The plan provides financial resources for a wildlife management program, fisheries' development, agricultural productivity improvements, reforestation works, training, and erosion control in the project area. The plan makes explicit reference to JMBA's intention to use local NGO's and consultants, which has been done, to facilitate public consultations, surveys and interviews, and other information dissemination procedures. It mandates and provides resources for monitoring of surface hydrology and erosion through the project area. All this work is under implementation albeit with some starting delays.

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<sup>25</sup> Attachment 18: Fax letter from SA11N to JMBA dated June 3, 1996.

<sup>26</sup> Attachment 19: Environmental Management Action Plan (EMAP) dated January 1995.

29. The project has received a lot of media attention, and views both in support and against the project have been expressed. Substantial public consultation and involvement has taken place during the EA and other planning studies, especially during the socio-economic/population surveys. Consultation included visits to the project sites and discussions with PADs about their ideas for the project. Responses of the PADs were noted, analyzed and used for the preparation of the Resettlement Action Plan<sup>27</sup>. Local public involvement will be a continuous process. In addition, the Jamuna Bridge tax has insured public awareness of the project at the national level.

30. Since project effectiveness, IDA and the GOB have aggressively pursued the implementation of the EMAP. IDA has received frequent updates on the implementation status of all EMAP components and, though there were initially some delays, the goals of the EMAP sub-components remain relevant and attainable throughout the project area. IDA has supported a number of technical field missions involving environmental and fisheries specialists and was instrumental in establishing the Independent Review Panel which would provide direct assistance in strengthening the EMAP and the RRAP. The active level of involvement during project implementation indicates IDA's continued and strong commitment to achieving the objectives of the EMAP.

### **Implementation of the Erosion Policy**

31. Implementation of the following action plan by JMBA was approved by them on September 18, 1996 as follows<sup>28</sup>.

* Finalize and approve the Erosion Policy	September 07, 1996(Actual)
* Collect Satellite Imagery for October 1996 and January 1997	November 1996/ February 1997
* Carry out Aerial Photography of the affected area	November 1996
* Carryout socio-economic surveys of PADs affected by erosion and flooding	Start: November 1996 Complete: January 1997
* Determine affected chars and banks from Imagery and Aerial Photos	December 1996
* Determine chars and bank erosion and flooding effects and verify by land surveys	February 1997

<sup>27</sup> Report by ADB, dated October 14, 1994 (Appraisal Report).

<sup>28</sup> Attachment 20: JMBA's approval of the Implementation Action Plan

- \* Device plan to assist char dwellers in the affected area, in education, health, agriculture, based on workshop with char dwellers and its recommendations March 1997
- \* National experts, legal social, and environmental experts, including relevant NGOs will be invited to the workshop March 1997
- \* Disbursement of compensation to affected PADs April 1997

32. The action plan will be closely monitored by supervision missions during this period. A joint IDA/OECF mission is in the field now and others are planned for January 1997 and April 1997. Those missions would consist mainly of social scientists and environmentalists who would monitor implementation of the action plan and assist in overcoming any problems which may arise, to help ensure that affected people receive adequate compensation in a timely manner. The experience gained during this first year is expected to simplify replication of the EFP program in following years.

#### **Independent Review Panel (IRP)**

33. During the October 1995 - Fourth Milestone Meeting, the Cofinanciers of the project agreed to convene an International Independent Review Panel to review the quality of implementation of the RRAP and EMAP. The IRP was formed earlier this year and started field work on August 20, 1996, under TOR approved by GOB and the Cofinanciers. The Requester had a meeting with the IRP in response to his request to them, and the IRP comments are attached<sup>29</sup>.

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<sup>29</sup> Attachment 21: Independent Review Panel.

**BANGLADESH**

**Jamuna Bridge Project (Cr. 2569-BD)**

**Request to the Inspection Panel**

**List of allegations from the Request\***

ALLEGATION	GOB'S RESPONSE <sup>1</sup>	IDA MANAGEMENT'S RESPONSE	CSC Comments <sup>2</sup>	POE Response <sup>3</sup>
<p>1. The rise in the water level in Jamuna River will displace thousands of people from their forefathers' land;</p>	<p>Not correct.</p> <p>1. The initially elevated water level of a major (1:100 year) flood will rapidly decline to a residual rise of about 30 cm at the bridge and will be negligible 12 km north of the bridge.</p> <p>2. The rise will be largely confined to the monsoon period and in most years will have no noticeable effect on people living on the banks or chars upstream of the bridge.</p> <p>3. The peaks within a monsoon flood last only a few days.</p> <p>4. There will be no rise downstream of the bridge.</p> <p>5. Char people rarely settle in one location from generation to generation and usually vacate the chars during flood periods.</p> <p>6. It follows that the rise in water will not displace thousands of people.</p> <p>See also comments under item 43.</p>	<p>The rise in the water level upstream due to the bridge constriction will be marginal and is hardly expected to have any effect on chars.</p>	<p>Complaint not agreed.</p> <p>1. The backwater effect caused by the constriction of the bridge will result in a permanent increase of up to 0.3 m in water level at the bridge in a 1:100 year flood.</p> <p>2. This increase may be initially higher (c.0.75 m) but will decline during a single monsoon period due to scouring.</p> <p>3. In 95% of the years, the backwater effect will have no noticeable effect on the chars.</p>	<p>The rise of the water level due to the backwater effect of the bridge has been repeatedly studied, not only by the Consultants, but in a parallel study for the Flood Action Plan. These found a rise of 0.3m adjacent to the bridge, reducing to 0.1 m at Sirajganj, during the 100 year flood. During normal years, the rise is expected to be about one-half of the above.</p>

\* A list of Acronyms and Abbreviations is attached at the beginning.

<sup>1</sup> GOB: Government of Bangladesh

<sup>2</sup> CSC: Construction Supervision Consultant, and the designers of the Project, Rendel Palmer and Tritton (UK), NEDECO (Netherlands) and Bangladesh Consultants Ltd.

<sup>3</sup> POE: Panel of Experts, Internationally recognized experts in the fields of Bridge design, River Engineering, Construction, Environment.

ALLEGATION	GOB'S RESPONSE	IDA MANAGEMENT'S RESPONSE	CSC Comments <sup>2</sup>	POE Response <sup>3</sup>
<p>2. The people whose lands have been submerged due to the construction have not been incorporated in the mitigation plan;</p>	<p>Not correct.</p> <ol style="list-style-type: none"> <li>1. The feasibility studies recognized that char people would be affected.</li> <li>2. The JMBA RRAP provides an entry for mitigating flood affected persons under Entitlement 14 of the RRAP Policy Matrix.</li> <li>3. The approved EFP compensation guidelines provide the mechanisms to implement this mitigation.</li> </ol>	<p>No chars have been affected by the project until the current flood season (May-October 1996). The effects will be observable when the flood recedes, October/November 1996</p>	<p>From the above, it follows that the number of people affected as a consequence of rising water levels is rather small. Only the people who used to live in the area behind the guide bunds directly upstream of the bridge are affected by higher water levels. These people are included in the RRAP.</p>	
<p>3. Even the people of the acquired land have not received proper compensation yet, in many cases;</p>	<p>Not correct.</p> <ol style="list-style-type: none"> <li>1. Of the 65 cases of LA, all but 5 cases have received the proper compensation.</li> <li>2. The remaining 5 cases have received provisional payments of 90% of the proper compensation pending resolution of CCL assessments.</li> </ol>	<p>As per GOB's response, with which we agree.</p>		

ALLEGATION	GOB'S RESPONSE	IDA MANAGEMENT'S RESPONSE	CSC Comments <sup>2</sup>	POE Response <sup>3</sup>
<p>4. The inundation of the agricultural land and homestead, intensified scouring in the char, the increased water level in the river Jamuna as result of the closure of the northern intake of the Dhaleswari and above all, the changes in the river morphology will substantially be detrimental to the char dwellers;</p>	<ol style="list-style-type: none"> <li>1. Inundation effects will be small. See comments under item 1 above.</li> <li>2. Intensified scouring will be limited to the char free area between the guide bunds and for a limited distance downstream.</li> <li>3. Increases in the Jamuna River as a result of the Dhaleswari River will be negligible and in any event, the Dhaleswari has been reopened and investigations are in hand to stabilize it and to protect the banks from erosion.</li> <li>4. Changes in morphology will tend to be advantageous rather than detrimental because the upstream chars will grow under the marginally raised water levels.</li> <li>5. Notwithstanding the foregoing, the approved EFP compensation guidelines will mitigate detrimental effects.</li> </ol>	<p>Closure of the northern intake of the Dhaleswari (400 cu. secs. at the flood peak) would not cause what is mentioned. The Jamuna river discharge (65,000 - 91,000 cu. secs.) would be affected negligibly. Closure of the Dhaleswari Northern Intake would hardly have any effect on chars.</p>	<ol style="list-style-type: none"> <li>1. Inundation of agricultural land and homesteads: See 1 &amp; 2 above. Also note increase in agricultural land behind guide bunds and downstream of bridge due to protection of guide bunds.</li> <li>2. Intensified scouring of chars: Only the acquired land between the guide bunds and the chars in the main channel for 5 km downstream will be affected. Very few of these are either inhabited or old enough to cultivate.</li> <li>3. Increased water level in Jamuna as a result of Dhaleswari closure: The Dhaleswari took 3-4% of the total Jamuna flow. The northern intake alone took less than 1%. The temporary closure did not increase water levels in Jamuna. The new intake restored 70% of flow to Dhaleswari in 1995 and has since been enlarged.</li> <li>4. Changes in river morphology: A backwater curve upstream of the bridge tends to decrease current velocities and therefore results in more sedimentation and therefore in larger higher chars.</li> </ol>	<p>Intensified scouring is anticipated only along the flood plain on the East side, downstream of the bridge. This has already been identified by the mathematical model studies currently underway. The closure of the northern intake of the Dhaleswari has been studied and found not to cause any additional scour nor changes in the river morphology nor rise in water level.</p>



ALLEGATION	GOB'S RESPONSE <sup>1</sup>	IDA MANAGEMENT'S RESPONSE	CSC Comments <sup>2</sup>	POE Response <sup>3</sup>
<p>5. Local law not being followed;</p>	<p>1. JMBA has at all time acted entirely within the laws of Bangladesh.  2. There is no existing law for compensating erosion or flood affected people.  3. JMBA has therefore developed its own EFP compensation guidelines to provide for the absence of such laws</p>	<p>Issues of compliance with national law should be determined by the appropriate judicial bodies.</p>	<p>No comment.</p>	
<p>6. The parameters and perspectives used in ascertaining the number of population to be affected is based on the shallow understanding of the gravity of the problem;</p>	<p>Not correct.  1. The parameters were formulated by JMBA in consultation with IDA, ADB, OECF and others and were quantified by the BRAC Socio-economic survey. All possible categories of PAPs have been identified.  2. State of the art physical and mathematical models have been used and are still being used to determine the extent of flooding and erosion.  3. The EFP compensation guidelines provide for a special survey of EFPs.</p>	<p>The methods used to identify project-affected persons were based upon extensive consultation with national and international experts in this field. To provide the levels of compensation and development assistance recommended by them, the Government adopted a new, broader-based compensation policy and its first policy for compensation for project-related erosion and flood impacts.</p>	<p>No comment.</p>	
<p>7. Lack of participation of people;</p>	<p>Not correct.  1. JMBA is a project approved by national consensus through Parliament.  2. The RRAP was developed in direct consultation with PAPs.  3. JMBA appointed an NGO to undertake a public information campaign which has been underway since Jan 1993, and is on-going.  4. JMBA have also set up host community committees and grievance redressal committee. Allegation #14 and following ones suggest extensive participation.</p>	<p>People affected by land acquisition have been identified through information campaigns arranged by JMBA, which is a continuous process. Char dwellers have not yet been included because they have not yet been affected or identified. Once they are identified, consultation campaigns and information plans, as stated in the RRAP will be implemented by JMBA.</p>	<p>No comment.</p>	

ALLEGATION	GOB'S RESPONSE <sup>1</sup>	IDA MANAGEMENT'S RESPONSE	CSC Comments <sup>2</sup>	POE Response <sup>3</sup>
<p>8. Aggrieved persons are entitled to get relief under the Law called "Specific Relief Act";</p>	<p>Not correct.</p> <ol style="list-style-type: none"> <li>1. The Ministry of Relief &amp; Rehabilitation advise that <u>there is no such law</u>.</li> <li>2. A number of Standing Orders for Disaster Management are in operation and are being compiled for publication.</li> <li>3. Relief for natural calamities (floods and erosion etc.) is handled by assigned agencies (e.g. Ministry of relief).</li> <li>4. The RRAP and EFP guidelines contain procedures for LA and EFP compensation and for grievance redressal.</li> </ol>	<p>Unclear what law is meant; perhaps it means "The National Disaster and Relief Act", which provides for disaster-related assistance, which is not applicable to bridge effects.</p>	<p>No comment.</p>	
<p>9. The destruction of the char shows clearly the bridge authority has not devised a comprehensive plan for the construction of the bridge;</p>	<p>Not correct.</p> <ol style="list-style-type: none"> <li>1. The feasibility and modelling studies, Project Proforma, EMAP and RRAP developed prior to implementation of the project form a comprehensive plan.</li> <li>2. Physical and mathematical models have been and are still being employed to forecast morphodynamic changes.</li> <li>3. The reshaping of the char on which the WGB is built is an integral part of the bridge construction. Neither it nor any other char has been destroyed.</li> </ol>	<p>Char dwellers affected during the current season would be compensated according to the EFP.</p>	<p>Writers of complaint appear unaware of large number of surveys, studies and model tests carried out prior to implementation of the project. Studies show that by adopting [a construction of] 4,000m or more [for the] bridge and introducing river training works and hard points, the effect of the bridge on its riverine environment would be minor. It is definitely not so that the chars (outside the immediate vicinity) are destroyed by the bridge. Satellite photography between 1978 and 1996 clearly indicates magnitude of (natural) char movement, accretion and erosion.</p>	<p>I am not aware of any char which has been destroyed by the construction of the bridge. Item 14 refers to the char of Boro Peari.</p>

ALLEGATION	GOB'S RESPONSE <sup>1</sup>	IDA MANAGEMENT'S RESPONSE	CSC Comments <sup>2</sup>	POE Response <sup>3</sup>
<p>10. People expressed their worry about erosion and destruction of char;</p>	<p>1. It is quite possible that people are concerned. All developments have side effects. 2. It is precisely to off-set such side effects and concerns that JMBA have set up and are implementing the RRAP and have approved the EFP compensation guidelines.</p>	<p>Information and consultation will begin in October/November to address worries.</p>	<p>No comment.</p>	
<p>11. The steps taken by the bank to ascertain the resettlement potentials only dealt with the people whose land have been acquired but did not consider the thousands of people who would be evicted from their land as consequence of the construction of the bridge system and will be turned into environmental refugees;</p>	<p>Not correct. 1. The WB expressed concern over the EFPs at the 1st Milestone Meeting in October 1994. 2. The RRAP provides an entry for the char people under Entitlement 14. 3. The JMBA has approved the EFP compensation guidelines. 4. See also comments under item 2 above.</p>	<p>The RRAP covers all project-affected people, not just those affected by land acquisition. The recently-adopted EFP provides a specific framework for compensating the effects of erosion and flooding. IDA will monitor closely the Borrower's implementation of both the RRAP and EFP.</p>	<p>RRAP has a much wider definition of PAPs.</p>	
<p>12. The bank at the early project cycle did not include the char people in its resettlement plan;</p>	<p>Not correct. 1. See comments under items 2 and 11 above.</p>	<p>The plan could not include specific provisions for effects that could not be forecast nor for people who could not be identified at that time. Phased elaboration of compensation programs was the project strategy from the beginning. As a group, char dwellers are included in Category 14 of RRAP and EFP.</p>	<p>JMBA to reply.</p>	

ALLEGATION	GOB'S RESPONSE <sup>1</sup>	IDA MANAGEMENT'S RESPONSE	CSC Comments <sup>2</sup>	POE Response <sup>3</sup>
<p>13. The bank has not taken into account the potential threat of the displacement of the char people;</p>	<p>Not correct. 1. See comments under items 2, 11 and 12 above.</p>	<p>The intent to address potential impacts on char dwellers is reflected in development of the RRAP, and in the mathematical model for erosion/flooding and the EFP. The specific compensation program related to the foregoing is now being readied for consultation and implementation.</p>	<p>JMBA to reply.</p>	
<p>14. During participatory discussion the people of Boro Peari had taken a critical look to the bridge;</p>	<p>Quite possible. 1. Note that this statement suggests that, contrary to the statement in item 7, there was participation by the char people.</p>	<p>The allegation needs to be clarified.</p>		
<p>15. The fact that the chars would not exist at all;</p>	<p>1. This is an unsubstantiated statement regarding an unspecified char. 2. The approved EFP guidelines will verify the facts and, if true, will provide compensation.</p>	<p>This is not a substantiated statement.</p>		<p>We will need to have a map to locate Boro Peari, Dorota, and Boro Koira. [See also Allegations #16 and 18.]</p>
<p>16. In Dorota during discussion more than one participant said that the char would not exist as a result of building the bridge, and that there was no way they continued living there;</p>	<p>Not correct. 1. The opinions of non-technical persons do not provide a suitable basis for technical decisions. 2. Model studies do not indicate the destruction of any chars by the bridge. 3. If erosion is proven, compensation will be provided under the EFP guidelines.</p>	<p>Discussions may have taken place. All affected dwellers will be compensated under the EFP.</p>	<p>Opinions of non-technical outsiders should always be listened to carefully but such opinions are not necessarily correct and cannot be the basis of decision taking.</p>	
<p>17. They have lost the right to fish near the bridge site as per instructions issued by JMBA;</p>	<p>Not correct. 1. JMBA have issued no such instructions. 2. For reasons of safety of fishermen, fishing in the immediate vicinity of construction is not encouraged, but neither is it banned.</p>	<p>Only in the construction navigation channels, for the fishermen's safety. This is a very small area.</p>	<p>In fact, fishing has been on-going in the bridge area. Neither CSC nor the contractors have prevented this unless nets are placed in construction navigation channels.</p>	

ALLEGATION	GOB'S RESPONSE <sup>1</sup>	IDA MANAGEMENT'S RESPONSE	CSC Comments <sup>2</sup>	POE Response <sup>3</sup>
<p>18. On the impact of the bridge the people of Boro Koira said that closure of two tributaries in the Saidabad area would cause a rise in water level, which would mean their houses and lands would go under water;</p>	<p>Not correct. 1. See comments under item 1 above. 2. Subject to verification of the exact location, if this is the case, losses will be covered by the EFP compensation guidelines.</p>	<p>If this happens in the impact area, which is covered by the EFP, dwellers affected will be compensated according to the RRAP and EFP.</p>	<p>To be replied to when locations of villages are known.</p>	<p>We will need the map to identify the "tributaries in the Saidabad area". We are not aware that the construction closed any tributary streams other than the Dhaleswari.</p>
<p>19. The people of Govindapur said that once completed, it could seriously affect them;</p>	<p>1. Location of village and nature of effect needs defining before commenting. 2. Subject to verification of the exact location, if this is the case, losses will be covered by the EFP compensation guidelines.</p>	<p>To be determined; if people are affected negatively they will be compensated according to RRAP and EFP.</p>	<p>To be replied to when locations of villages are known.</p>	
<p>20. (a) They pointed out that water would flow down the channels of Louhajang, Dhaleswari, Saidabad and Katakhal during floods, but now, with the narrowing or closing of these channels, water would overflow tremendously.</p>	<p>See comments under item 19 above.</p>	<p>If there is a rise in the water level due to bridge, its effects would be compensated according to EFP. This is not expected to occur.</p>	<p>No channels have been narrowed or closed which could affect flow in the Dhaleswari, Louhajang. The effect of the closure of the Saidabad (=western) channel is discussed in item 1.</p>	
<p>(b) Another person said that their would be guide bunds on both sides of the Jamuna, and those of us living in chars and falling outside the Bund area will just go under water;</p>	<p>Not correct. 1. See comments under items 1, 4 and 19 above.</p>	<p>See response under 19 above.</p>	<p>Not agreed. See items 1 and 4.</p>	
<p>21. In Chandgorj the participants said that the guide bunds being built on both sides of the Jamuna would do most of the damage for the char people;</p>	<p>Not correct. 1. See comments under items 1, 4 and 19 above.</p>	<p>Negative impacts on the char people will be compensated according to the RRAP and EFP.</p>	<p>See item 4</p>	<p>The guide bunds themselves will not cause significant raise in water level, but rather will create a deeper and more uniform passage of the river between them.</p>

ALLEGATION	GOB'S RESPONSE <sup>1</sup>	IDA MANAGEMENT'S RESPONSE	CSC Comments <sup>2</sup>	POE Response <sup>3</sup>
<p>22. An overwhelming 74% of the respondents (1150) said there had been no official attempt to inform them about the plans undertaken by the authority having direct impact on their lives and livelihood;</p>	<p>This statement needs to be substantiated.  1. See also comments under item 7 above.  2. EFP compensation guidelines provide for information campaign aimed specifically at bank and char people.</p>	<p>JMBA did not know, and will not know, until the current flood recedes, who will be affected and the extent of the effects. PADs will be consulted on their needs once they are determined.</p>		
<p>23. While the 75 chars within ten km of the bridge site alone has a population of 76,000 persons distributed over 13,000 households;</p>	<ol style="list-style-type: none"> <li>This suggests an average population density of about 2,000 per sq. km. on banks and chars which seems exaggerated.</li> <li>The stated number of chars seems also very exaggerated.</li> <li>Registration survey in EFP compensation guidelines will verify the facts.</li> </ol>	<p>Irrespective of numbers, all PADs will be covered by the EFP.</p>	<p>The numbers have to be checked. They seem to be very much exaggerated (up to 500%).</p>	
<p>24. The existing chars will be washed away. Already 16 chars underwent severe erosion;</p>	<ol style="list-style-type: none"> <li>This is an un-substantiated statement which can be verified by modelling and field surveys under the approved EFP guidelines.</li> <li>Any erosion which has occurred prior to the 1996 monsoon is unrelated to the bridge because the WGB construction did not start until after the 1995 monsoon.</li> <li>Char erosion is continuous and its cause unpredictable.</li> <li>EFP compensation guidelines provide for annual survey of chars to establish the facts.</li> </ol>	<p>Any effects on the chars due to bridge will be surveyed and compensated according to EFP.</p>	<p>There is no proof so far that erosion of chars is in any way more severe after start of bridge construction than before. Only careful monitoring during a number of years will demonstrate whether downstream chars in the direct vicinity of the bridge are more easily eroded than others.</p>	<p>Construction of the western guide bund and closure of the western channel has merely restored a condition and configuration of the river similar to that existing in 1990.</p>
<p>25. The people of Boro Peari said if the char did not exist, they would lose everything, all sources of earning a living-agriculture or fishing;</p>	<p>Not correct.  1. There is no evidence to suggest the char will disappear.  2. If the char is eroded or submerged, and subject to verification of the exact location, the people will be compensated under the EFP guidelines.</p>	<p>If this happens and it is due to the bridge, PADs will be compensated. They will also be consulted on their preferences.</p>	<p>No comment.</p>	

ALLEGATION	GOB'S RESPONSE <sup>1</sup>	IDA MANAGEMENT'S RESPONSE	CSC Comments <sup>2</sup>	POE Response <sup>3</sup>
<p>26. In Chandgonj much of their land in part had gone under water in recent times;</p>	<p>1. If this is correct, and it needs verifying, it cannot have been caused by the bridge because the 1995 monsoon was before construction started and the 1996 monsoon was not high enough.  2. In any event, the EFP compensation guidelines will provide for any legitimate losses.  3. See also comments under item 1 above.  See comments under item 26 above.</p>	<p>We agree with GOB's response.</p>	<p>Unclear statement. The allegation of inundation is not necessarily the consequence of bridge construction.</p>	<p>Based on the satellite photos which I have reviewed, there are no semi-permanent chars.</p>
<p>27. The Char Alipur is rich in agriculture, with plenty of trees. Agricultural production has also been disrupted in this area due to unusual increase in water;</p>	<p>See response under item 26 above.</p>	<p>See response under 26 (above).</p>	<p>As above.</p>	
<p>28. Panchasona is a permanent char in the heart of the Jamuna, which only gets submerged during floods but does not erode. But now, with the dredging of a new channel as a component of the bridge project, the vast char with an area of 50 square miles has been divided into two;</p>	<p>Not correct.  1. All chars erode naturally and continuously. Few if any are permanent.  2. There is no evidence that this char is or was inhabited; it is too new.  3. Experience on the bridge to date indicates that dredged channels silt up naturally very quickly.</p>	<p>See GOB, CSC and POE responses, with which we agree.</p>	<p>Satellite photographs shows there are no permanent chars in the bridge area. One of the main reasons for selecting the bridge site was precisely the presence of one main channel without permanent mid-channel chars. Any new channel which has been dredged across the (non-permanent) char in the east-west direction will silt up in one flood season.</p>	<p>If this refers to the cross-channel built to facilitate the closure of the western channel, this has been done so as to restore the downstream portion of the western channel to an elevation approaching its elevation before closure. It is, however, still lower than when the western channel was open.</p>

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ALLEGATION	GOB'S RESPONSE <sup>1</sup>	IDA MANAGEMENT'S RESPONSE	CSC Comments <sup>2</sup>	POE Response <sup>3</sup>
<p>29. Destruction of the social support system. This is unique for the char areas that the people cannot withstand the stress events caused by erosion and flood without being dependent on the kinship and social relations. The people in the char regions had to shift their homestead several times in a year. The identity of the people lies with the previous villages;</p>	<p>1. This statement supports the fact that the char people always have been and always will be subject to the vagaries of the mighty River Jamuna and have developed a social support system to help cope with continuous erosion and flooding.  2. The bridge construction will in no way change this situation.  3. The EFP compensation guidelines is designed to help and support the existing social support system.</p>	<p>The RRAP is designed to minimize hardships.</p>	<p>The statements do not appear to be based on facts.</p>	
<p>30. During October-November (Ashwin-Kartik) the char people face food shortage;</p>	<p>Any food shortage which the char people faced last year could not have been caused by the bridge since its effects could not have been felt until the current flood season.</p>	<p>Food shortages could not have been due to the bridge in prior years.</p>	<p>The statements do not appear to be based on facts.</p>	
<p>31. The resettlement site is planned and developed in urban density in a rural setting. In the absence of adequate environmental consideration it will turn into an urban slum having an environmental quality inferior to that they enjoyed in their previous homestead;</p>	<p>Not correct.  1. The density of the resettlement sites is similar to that of the villages, albeit on a larger scale.  2. Environmental amenities (potable water, sanitation, etc.) have been provided in the resettlement site to a much higher standard than exist in the villages.</p>	<p>Resettlement sites were designed as social safety nets for landless people. Living conditions there are better than previously enjoyed by such people.</p>	<p>The statements do not appear to be based on facts.</p>	



ALLEGATION	GOB'S RESPONSE <sup>1</sup>	IDA MANAGEMENT'S RESPONSE	CSC Comments <sup>2</sup>	POE Response <sup>3</sup>
<p>32. It is not only the environmental quality that is inferior but the whole quality of life is degraded in the resettlement plan;</p>	<p>Not correct. 1. The resettlement sites have been prepared under expert supervision both national and international.</p>	<p>Quality of life is a complex concept. However, the physical environment and social services in the resettlement site are better than previously enjoyed by landless people. In addition to environmental amenities, they have their own school and mosque, as well as other social services.</p>	<p>The statements do not appear to be based on facts.</p>	
<p>33. The inhabitants of the char areas were disliking the idea of living at the resettlement site because they thought they would loose life style they were accustomed to since long;</p>	<p>Quite possible. 1. In recognition of this, JMBA has developed the resettlement sites only as a last resort. 2. PAPs are encouraged to resettle, with JMBA assistance, to locations of their own choice outside the resettlement sites. 3. It is not mandatory to relocate to the resettlement sites and those who chose to do so may select their own site and neighbors.</p>	<p>See IDA management's responses numbers 29 and 30.</p>		
<p>34. 45% of people had clearly expressed their worry concerning the social disintegration as an inevitable outcome of the after-effects of bridge construction;</p>	<p>1. It is not a foregone conclusion that social disintegration is inevitable. 2. Every effort has been made by JMBA to sustain the social system enjoyed by the char people. 3. The majority, 55%, have not expressed any concern and most people actively support the project.</p>	<p>People's concerns will be addressed during the forthcoming information and consultation campaigns.</p>		
<p>35. The attached data sheet will provide a clear picture of agriculture in the char areas- this need to be checked by JMBA;</p>	<p>1. The approved EFP compensation guidelines include surveys which will identify agricultural land use. 2. Consideration is being given to amend the EMAP to include char land cropping monitoring.</p>	<p>If the stated areas are affected, they will be compensated according to EFP.</p>		

ALLEGATION	GOB'S RESPONSE <sup>1</sup>	IDA MANAGEMENT'S RESPONSE	CSC Comments <sup>2</sup>	POE Response <sup>3</sup>
<p>36. The sense of loss of people has been multiplied as the many chars get submerged by the surging waters of the river. They said if we were displaced we would lose the land to cultivate-leading to the destruction of our food security system;</p>	<ol style="list-style-type: none"> <li>1. Surging waters are a natural seasonal event.</li> <li>2. Prior to the end of 1995, the bridge had no effect on water levels and the 1996 monsoon was not sufficiently major to have a significant impact.</li> <li>3. The approved EFP compensation guidelines provide for legitimate losses.</li> </ol>	<p>No chars have been submerged due to the bridge prior to current flood. Any char dwellers who would lose their land due to the bridge will be compensated, according to the EFP.</p>	<p>The statements made are not based on facts as explained earlier.</p>	
<p>37. In analyzing the appendix mentioned (Appendix-B-5.3) it is clear that the existing char lands will be seriously affected by the strong currents due to constructural effects of the Bridge system;</p>	<ol style="list-style-type: none"> <li>1. Where chars are known to be directly affected by the bridge construction they are being protected e.g. WGB.</li> <li>2. Elsewhere, it is not possible to predict whether on-going char erosion is caused by the bridge or by nature but forecast erosion is being further studied and monitored by on-going modelling.</li> </ol>	<p>Investigations indicated that there will be no strong currents due to the bridge. Any erosion in the bridge impact area will be compensated, according to the EFP.</p>	<p>Not known what Appendix is meant.</p>	
<p>38. The leading experts of the country are of opinion that the river training of a very active river like Jamuna, bridge has not been done in appropriate method and the whole nation will have to bear the responsibility of the irresponsible decision of the government;</p>	<p>Not correct.</p> <ol style="list-style-type: none"> <li>1. The leading experts of the country have been engaged by JMBA to advise on the RTW.</li> <li>2. Leading international experts from USA, Europe and Japan have also been engaged by JMBA to provide advice on the RTW.</li> <li>3. The RTW are being built based on this advice and are entirely appropriate.</li> </ol>	<p>Bridge and guide bunds have been designed and are being implemented according to the highest international standards, and in consultation with local experts.</p>	<p>The leading experts of the country have all been consulted as regards river training and approved the method adopted.</p>	

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ALLEGATION	GOB'S RESPONSE <sup>1</sup>	IDA MANAGEMENT'S RESPONSE	CSC Comments <sup>2</sup>	POE Response <sup>3</sup>
<p>39. May 19, hundreds of homesteads were washed away into the river as the surging waves of the Jamuna invaded into 11 villages of the char. People from about 400 homesteads were homeless in the villages of Chundri, Madhurabari, Boro Peari, Choto Peari, Hari Bhanga and Dorota under the district of Sirajganj.</p>	<ol style="list-style-type: none"> <li>1. The circumstances and accuracy of this report are being investigated.</li> <li>2. It is re-emphasized that until the beginning of the 1996 monsoon, the project did not affect the natural flow of the Jamuna.</li> <li>3. The EFP compensation guidelines will provide for bona fide claimants.</li> </ol>	<p>See GOB's response, with which we agree.</p>	<p>Without knowing where these villages are located it is impossible to comment. However, it is very unlikely that the inundation/erosion as stated has anything to do with the Jamuna project.</p>	
<p>40. Local people said that digging a new channel to divert the Jamuna current and construction of embankments along both banks of the river caused a rise in water level. The overflowing water, backed by the strong current, did the destruction of the char villages;</p>	<ol style="list-style-type: none"> <li>1. It is assumed that this allegation refers to the link channel dredged to facilitate the closure of the western channel.</li> <li>2. If this is the case, some local erosion was caused, but not increased water levels.</li> <li>3. Those affected will be compensated under the EFP guidelines.</li> <li>4. See also comments under item 1 above and 48 below.</li> </ol>	<p>See GOB's response, with which we agree.</p>	<p>Not clear what is meant; the cross river channel for piling purposes or the link channel, probably the latter. This has been investigated by modelling. The model indicates the link channel would have developed naturally anyway. The channel will (locally) increase erosion on the west bank and reduce erosion on the east bank.</p>	

ALLEGATION	GOB'S RESPONSE <sup>1</sup>	IDA MANAGEMENT'S RESPONSE	CSC Comments <sup>2</sup>	POE Response <sup>3</sup>
<p>41. About 2750 people, including women and children, from the 11 char villages moved out to different directions for shelter. They demand that the authorities set up camps to refuge the victims. These people, rendered homeless because of the bridge project, also demand compensation from the government;</p>	<p>See comments under items 39 and 40.</p>	<p>See GOB's response, with which we agree.</p>	<p>JMBA to reply. See also item 39.</p>	
<p>42. (a) Chars are at stake, specially in the Jamuna region, owing to the changes to the river channel as well as river morphology caused by the Jamuna bridge project.</p> <p>(b) The very process of the construction of the bridge, particularly the noise pollution deafen the ear of our children, deform the yet-unborn and rob the hard-earned sleep at the end of a long back-breaking day;</p>	<p>1. Not correct, other than in immediate vicinity of the bridge where the chars are unstable anyway.</p> <p>2. Other than increased water levels upstream of the bridge, there is no way of differentiating between changes caused by the bridge and naturally occurring changes.</p> <p>3. Nevertheless, state of the art mathematical modelling is being carried out to monitor morphology and erosion.</p> <p>1. The accuracy of this report needs to be verified by medical experts but is extremely unlikely.</p> <p>2. No adverse medical effects have been reported by construction workers or staff living on site.</p>	<p>See GOB's response, with which we agree.</p> <p>Noise pollution was included in the EMAP, and guidelines for mitigation were adopted early in the project by the Engineer and are being implemented.</p>	<p>See earlier comments.</p> <p>Allegations regarding noise pollution rejected. Construction related noise is relatively small and due to the size and rural/riverine environment will rapidly dampen to acceptable levels.</p>	
<p>43. Our existence is rooted in the process of erosion and accretion, appearance and disappearance of chars;</p>	<p>Agreed.</p> <p>1. This only corroborates the unstable nature of the chars in a river system like the Jamuna and the capacity of the char people to adjust to the changes.</p>	<p>See responses of GOB and CSC, with which we agree.</p>	<p>Statement makes it clear that char dwellers are used to the process of erosion and accretion, appearance and disappearance of chars. The bridge does not change this situation.</p>	

ALLEGATION	GOB'S RESPONSE <sup>1</sup>	IDA MANAGEMENT'S RESPONSE	CSC Comments <sup>2</sup>	POE Response <sup>3</sup>
<p>44. We, the char people, who have acquired the knowledge from experience through ages and apply those in every step of our life, clearly understand that we and our nature around us have become undue victims of the bridge project.</p>	<p>Not correct.                      1. See comments under item 2 and elsewhere above.                      2. Char people adversely affected by the project will be compensated under the EFP guidelines.</p>	<p>People affected by the bridge, including char dwellers, will be compensated according to RRAP and EFP.</p>	<p>Earlier comments make it clear that this statement cannot be agreed.</p>	
<p>45. (a) Examples sighted: Boro Peari and its adjacent chars and flood-prone areas had nothing to boast other than three schools, five mosques and 7-8 small shops as community entitlement. A village called dash chars is separated from Boro Peari by a nearly dry river. The Bridge project devoured much of their cultivable lands for which they had not been compensated as yet.                      (b) People in the area had registered claims several months ago but were yet to receive any response from the authorities;</p>	<p>Noted.                      1. The surveys provided for in the approved EFP compensation guidelines will enable these examples to be checked.                      2. The approved EFP guidelines provide for compensation for bona fide people affected.</p>	<p>(a) Once the socio-economic survey is done, and claims are verified, they will be compensated.                      (b) One complaint was sent to JMBA and copied to IDA. IDA asked JMBA to resolve it, and an IDA mission is in the field following up on it.</p>	<p>No comment required by CSC.</p>	

ALLEGATION	GOB'S RESPONSE <sup>1</sup>	IDA MANAGEMENT'S RESPONSE	CSC Comments <sup>2</sup>	POE Response <sup>3</sup>
<p>46. Dorota char is roughly two and a half km of the bridge site. People there live under the constant threat of being devoured by the mighty Jamuna. Last year, floods swept a substantial part of their lands, and the area is threatened with more damage;</p>	<p>1. As noted earlier, bridge induced erosion was unlikely to be felt before the closure of the western channel in January 1996.</p>	<p>Before the damming of the western channel, there were no bridge effects. Moreover, the channel was closed in the dry season when there were no effects from bridge or otherwise.</p>	<p>No comment required by CSC.</p>	
<p>47. The people of Alipur char mostly came from the Singuli char. Their own lands had been devoured by the Jamuna;</p>	<p>1. When was Singuli Char devoured? 2. The August 1993 bankline survey shows that the Alipur Char was eroding prior to 1993.</p>	<p>If this happened, the bridge was not the culprit.</p>	<p>No comment required by CSC.</p>	
<p>48. The inhabitants of the Alipur char believe that damming up the Dhaleswari as part of the bridge project has caused a big erosion in Belatia, in which about 100-150 homesteads went under water. The villagers said that the Jamuna had made a dent of about 150 feet in the west during last year's floods. They believe that flood water would have much greater strength this year and continue to cause damages to the western side of the char. They said that closure of Saidabad channel had already started causing problems for them;</p>	<p>1. It is true that the natural development of the new intake of the Dhaleswari caused erosion in the vicinity of Belatia. 2. Those affected will be compensated under the approved EFP guidelines. 3. Further measures are under consideration to stabilize the new intake and prevent erosion. 4. The development of the western link channel (see item 40) will actually reduce the amount of erosion on the east bank from what might otherwise have occurred.</p>	<p>Compensation of PADs was delayed due to differences in expert opinion whether this effect was natural or due to closure of Dhaleswari northern intake. With the approved erosion policy this distinction is now immaterial. PADs will be compensated in accordance with the EFP.</p>	<p>See comments under item 4 above. It is the firm opinion of CSC that, except for some local erosion (see item 40) the closure of the western (Saidabad) channel has stopped all erosion along the western banks over a distance of 5-10 km.</p>	

ALLEGATION	GOB'S RESPONSE <sup>1</sup>	IDA MANAGEMENT'S RESPONSE	CSC Comments <sup>2</sup>	POE Response <sup>3</sup>
<p>49. The current in the river would have its speed strengthened 3-4 times and the chars on the southern side of the bridge would just perish under the water. The char in the east would also confront the current and might face the similar fate. Already, these chars are burdened with extra population from chars at the mid point which got dissolved into the river;</p>	<p>Not correct.</p> <ol style="list-style-type: none"> <li>1. The current will not be increased 3-4 times. Hydraulic studies and models can verify the actual increase which is very small.</li> <li>2. Visual observations do not indicate large numbers of people on chars in vicinity of bridge corridor.</li> </ol>	<p>Studies indicate that expected current increase is small. Any erosion resulting from the increase will be compensated according to EFP.</p>	<p>Allegation makes no distinction between flood plains and chars; it only speaks of chars. However, DHI model indicates there is no difference in bank erosion with and without project except on east bank some 5 km south of bridge. Increase of current velocity of 3-4 times is not physically possible. Chars (=flood plains) are not burdened with extra population because dissolved chars were not inhabited.</p>	<p>The current in the river will not be measurably increased except adjacent to the upper noses of the guide bunds. Above the bridge site, the currents will be less, while below the bridge site, they will be somewhat greater probably a maximum of 10%.</p>
<p>50. The area stretching 10-12 miles towards the north and 5-7 miles towards the south as the most vulnerable. Excess water would cause flooding in the north, while people in south would be forced to shift to other places in the face of the devastating erosion. There would be acute unemployment as their land has already gone under water. An estimated 4-5 thousand families would be homeless and without any source of earning;</p>	<p>Not correct.</p> <ol style="list-style-type: none"> <li>1. Affected areas as established by model studies are 12 km (7.5 miles) north for increased water levels and 10 km (6.2 miles) south for increased erosion.</li> <li>2. "Excess" water will not cause significant additional flooding in the north. See comments under item 1 above.</li> <li>3. Erosion in the south will not be "Devastating" and will be limited in extent. See comments under 4a above.</li> <li>4. Unemployment will not be "acute" and bona fide cases will be compensated under the EFP guidelines.</li> </ol>	<p>See GOB's response, with which we agree.</p>	<p>See earlier comments. Statements not in accordance with the facts and the expected flooding/erosion as described is not expected.</p>	

ALLEGATION	GOB'S RESPONSE <sup>1</sup>	IDA MANAGEMENT'S RESPONSE	CSC Comments <sup>2</sup>	POE Response <sup>3</sup>
<p>51. The bank has not taken into consideration the miseries of the char people during drawing up the resettlement action plan;</p>	<p>Not correct. 1. See comments under items 2, 11 and 12.</p>	<p>RRAP takes those affected by the bridge into consideration. In addition to the specific categories of PAPs identified in the RRAP, Category 14 of the entitlement matrix covers those people who may be affected by the bridge but who have not yet been identified.</p>	<p>No comment by CSC required.</p>	
<p>52. During discussions with RMB the bank officials failed to take cognizance of the fact that the Jamuna contains charlands not only water channels and the chars are no barren lands, they shelter hundreds of thousands of people with legal entitlement;</p>	<p>Not correct. 1. See comments under items 2, 11 and 12 2. Even JCIDP's own greatly exaggerated estimate is only 76,000 and a more realistic estimate would be a few tens of thousands not "hundreds of thousands".</p>	<p>RMB made every effort to be responsive to JCIDP's concerns. RMB provided the requested documentation (see attachment 17).</p>	<p>Though it is agreed in general that many chars in the Jamuna are inhabited this was not the situation at the bridge site at the start of construction in 1994. During 1987-1994 the main river channels have shifted continuously. This led to on-going bank erosion and chars continuously appearing and disappearing. As a result there were no chars in the bridge area in 1994 which were inhabited.</p>	
<p>53. The bank had not launched any effective process to settle the matters. The bank refused to supply us the documents without permission from JMBA though there is no indication that there is any bar to public access to such documents;</p>	<p>Not correct. 1. World Bank has launched an effective process to settle matters (see comments under items 2, 11 and 12). 2. JCIDP appear to have obtained documents anyway, with or without JMBA permission.</p>	<p>See IDA's response No.52.</p>	<p>No comment by CSC required.</p>	



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ALLEGATION	GOB'S RESPONSE <sup>1</sup>	IDA MANAGEMENT'S RESPONSE	CSC Comments <sup>2</sup>	POE Response <sup>3</sup>
54. The interaction process with the Bank did not yield optimum results.	Not clear. Optimum for whom? 1. JCIDP's intervention has only served to distract attention from the actions already initiated by World Bank and JMBA with respect to the development and approval of the EFP compensation guidelines.	See IDA responses to allegations #52 and 53.	No comment by CSC required.	

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