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Bangladesh Water Development Board
Bangladesh Inland Water Transport Authority
Insurance Development & Regulatory Authority



Jamuna River Sustainable Management Project-1



Stakeholder Engagement Plan

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Prepared By

C&GIS

Center for Environmental and Geographic Information Services

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Abbreviations

BDP	Bangladesh Delta Plan
BIWTA	Bangladesh Inland Water Transport Authority
BWDB	Bangladesh Water Development Board
CBO	Community Based Organization
CEGIS	Center for Environmental and Geographic Information Services
DoE	Department of Environment
EIA	Environmental Impact Assessment
E&S	Environmental & Social
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard of the 2018 World Bank ESF
FGD	Focus Group Discussion
GBM	Ganges, Brahmaputra, Meghna
GBV	Gender Based Violence
GM	General Manager
GoB	Government of Bangladesh
GPWM	Guidelines for the Participatory Water Management
GRC	Grievance Resolution Committee
GRM	Grievance redress mechanism
HHs	Households
H&S	Health and Safety
IDRA	Insurance Development and Regulatory Authority
JRSMP	Jamuna River Sustainable Management Program
KII	Key Informant Interview
LGI	Local Government Institutions
LMP	Labor management Plan
PD	Project Director
PIU	Project Implementation Unit
MCA	Multi Criteria Analysis
MIS	Management Information System
MoWR	Ministry of Water Resources
MoS	Ministry of Shipping
MPA	Multiphase Programmatic Approach

NGO	Non-Governmental Organization
PAP	Project-Affected Person (or Project-Affected Party)
PRA	Participatory Rural Appraisal
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
SEA-SH	Sexual Exploitation and Abuse – Sexual Harassment
SEP	Stakeholder Engagement Plan
SSNP	Social Safety Net Program
STD	Sexually Transmitted Diseases
TV	Television
WB	World Bank

Executive Summary

This Stakeholders Engagement Plan (SEP) has been prepared for stakeholder engagement in the planning and execution of the Project 1 of the Jamuna River Sustainable Management Program (JRSMP/Program). The Project will be implemented in a Series of Project (SOP) involving multiple components and interventions aimed at bank protection work and improved channel navigation to ultimately narrowing down the riverwidth and stabilize the Jamuna river system. The Bangladesh Water Development Board (BWDB), the Bangladesh Inland Water Transport Authority (BIWTA) and the Insurance Development and Regulatory Authority (IDRA) will be implementing agencies (IAs) .

The purpose of this Stakeholder Engagement Plan is to outline the various stakeholders (Project Affected and Interested Parties, and Vulnerable Groups) for this project and define how they will be engaged during the project life cycle to maintain a constructive relationship with them, The SEP also aims to assess the level of stakeholder interest and support for the JRSMP project and to enable stakeholders' views to be taken into account in project design and environmental and social performance. The SEP also lays out how project related information, especially issues that could potentially affect the stakeholders, would provide in a timely, understandable, accessible and appropriate manner and format as well as provide them with accessible and inclusive means to raise issues and grievances, and allow IAs to respond to and manage such grievances.

The SEP has been prepared in line with the Government of Bangladesh (GOB) regulations and the World Bank/ESS 10. The stakeholders have been broadly identified and consulted with to the extent possible under the continued COVID-19 pandemic and related constraints. The SEP outlines the ways in which the project will engage with all stakeholders– for example, national/regional stakeholders, project affected peoples, vulnerable communities, local community people, Non-Governmental Organizations different occupational groups including academia, women groups, labors, and contractors and provide them with a mechanism through which people can raise concerns, provide feedback, or make positive and negative complaints about the project related impacts and benefits. In sum, the SEP provides a plan to interact effectively with stakeholders to share information and seek their support for the project activities and their interests during Project 1.

Multiple methods have been used in preparing the SEP. These include informal group discussion in the project area, participatory rural appraisals, formal consultation meetings with local administration, focus group meetings with various occupational/interest groups, key informant interviews, and case studies. The results of the stakeholder consultation meetings are reported in the SEP, which includes (i) stakeholder identification and mapping; (ii) brief summary of past consultation activities; (iii) stakeholder engagement plan; (iv) roles, responsibilities and resources for stakeholder engagement; (v) grievances redress mechanisms, and (vi) SEP monitoring and reporting arrangements. Finally, the SEP will be periodically updated all through the implementation of the Phase 1 as needed the next stage of the project including organizational and staffing structure, for implementing the identified and/or ongoing and future engagement programs.

The management, coordination and implementation of the SEP and its integral tasks will be the responsibility of dedicated team members within the IAs PIU, its regional offices and local sub-contractors. The project will ensure necessary logistics and budget to implement the SEP. The stakeholder engagement activities will be incorporated into the project management system with the formation of PIU where one communication and GRM specialist, Design and Supervision consultancy firm will assist to implement the day-to-day activities.

A GRM has been designed, to be set up at each PIU, to address complaints and grievances throughout the lifecycle of the project that is intended to address issues and complaints in an efficient, timely, and cost-effective manner. Project-affected-people in the project and any other stakeholder may submit comments or complaints at any time by using the project's Grievance Redress Mechanism (GRM). Two tiers of GRM have been planned to include field level and Project Level, to delineate responsibilities in accordance with the nature and graveness of the complaints. Committees at various levels have been set to address and manage grievance cases. Besides two separate GRM on SEA/SH and Labor have also been prepared.

For reporting and monitoring purposes, monthly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/

preventative actions will be collated by responsible staff and referred to the senior management of the project. The summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner. The progress and results of the stakeholder engagement activities will be published locally and also be shared with the World Bank quarterly and annually where Stakeholder related activities will be described. These reports will also include detailed reports on the GRM effectiveness, including a list of grievances received, addressed and the pending ones.

স্টেকহোল্ডার এ্যানগেইজমেন্ট প্লান

সারসংক্ষেপ

যমুনা নদীর টেকসই ব্যবস্থাপনা প্রোগ্রাম (Jamuna River Sustainable Management Program) এর অধীন প্রকল্প-১ এর পরিকল্পনা ও বাস্তবায়নের প্রকল্পের স্টেকহোল্ডারদের অংশগ্রহণ নিশ্চিত করতে, এই স্টেকহোল্ডার এ্যানগেইজমেন্ট প্লানটি (SEP) তৈরি করা হয়েছে। প্রোগ্রামটি একাধিক প্রকল্পের মাধ্যমে বাস্তবায়িত হবে যার মধ্যে একাধিক কম্পোনেন্ট এবং ইন্টারভেনশন রয়েছে। যার উদ্দেশ্য হল যমুনা নদীর তীর রক্ষা এবং যমুনা নদীর প্রসঙ্গতা কমিয়ে সফল করা এবং নৌ পরিবহন উপযোগী করে তুলে যমুনা নদীকে স্থিতিশীল করা। বাংলাদেশ পানি উন্নয়ন বোর্ড, বাংলাদেশ অভ্যন্তরীণ নৌ কর্তৃপক্ষ এবং বীমা উন্নয়ন ও নিয়ন্ত্রণ মিলে এই প্রকল্পটি বাস্তবায়ন করবে।

এই স্টেকহোল্ডার এ্যানগেইজমেন্ট প্লানের উদ্দেশ্য হল, প্রকল্পের বিভিন্ন ধরনের স্টেকহোল্ডার যেমন, প্রকল্পের দ্বারা আক্রান্ত বা ক্ষতিগ্রস্ত, প্রকল্পে আগ্রহী এবং প্রকল্প এলাকার বিভিন্ন নাজুক (Vulnerable) জনগোষ্ঠী সনাক্ত করে তাদের সাথে একটি গঠনমূলক সম্পর্ক স্থাপন করা। এছাড়াও এই এসইপি (SEP) এর উদ্দেশ্য হল স্টেকহোল্ডারদের বিভিন্ন মতামতের ভিত্তিতে প্রকল্পের নকশা তৈরি করা এবং পরিবেশগত ও সামাজিক প্রভাব নিরূপণের বিষয় সমূহ।

এছাড়াও প্রকল্পের বিভিন্ন ধরনের তথ্য, বিশেষ করে যে সকল বিষয় স্টেকহোল্ডারদের ক্ষতিগ্রস্ত বা উপকৃত করতে পারে, সেগুলো তাদের সময়মত বোধগম্য আকারে এবং তাদের জন্য সহজপ্রাপ্য উপায়ে পৌঁছানোর প্লান করা হয়েছে। তারা যাতে তাদের যেকোন ধরনের সমস্যা বা ক্ষতি সহজে তুলে ধরতে পারে এবং প্রকল্প বাস্তবায়নকারী সংস্থাসমূহ যে সকল বিষয়ে সাড়া দিয়ে এসকল সমস্যা সমাধান করতে পারে তার দিক নির্দেশনা দেয়।

এসইপিটি (SEP) বাংলাদেশ সরকারের আইন এবং বিশ্ব ব্যাংকের ইএসএস-১০ (ESS-10) অনুযায়ী ফেইজ-১ এর কার্যক্রমের ভিত্তিতে তৈরি করা হয়েছে। এসইপিটি (SEP) তৈরি করার জন্য বিশদ আকারে স্টেকহোল্ডার নির্ণয় করে তাদের সাথে কনসালটেশন করা হয়েছে। কোভিড-১৯ পরিস্থিতির মধ্যে সকল প্রকার নীতিমালা মেনে যতটা সম্ভব কনসালটেশন করা হয়েছে। এটি প্রকল্পের সকল স্টেকহোল্ডার যেমন, জাতীয়/অঞ্চলিক পর্যায়ের স্টেকহোল্ডার, প্রকল্প আক্রান্ত ব্যক্তি, নাজুক/দুস্থ (Vulnerable) জনগোষ্ঠী, বিভিন্ন আগ্রহী দল, স্থানীয় জনগোষ্ঠী, বিভিন্ন কর্মজীবী দল ও নারীদের কিভাবে এর অন্তর্ভুক্ত করা হবে তার রূপরেখা প্রদান করেছে। একই সাথে তারা যাতে প্রকল্প সম্পর্কে তাদের যেকোন ধরনের মতামত, অভিযোগ, প্রকল্পের প্রভাব এবং উপকার তুলে ধরতে পারে তার একটি পদ্ধতিও তৈরি করেছে। এক কথায়, এসইপিটি প্রকল্প-১ চলাকালীন সময়ে এর স্টেকহোল্ডারদের সাথে কার্যকর যোগাযোগ রক্ষার জন্য একটি পরিকল্পনা প্রণয়ন করেছে যাতে করে প্রকল্পের সকল কার্যক্রম ঠিকভাবে চলমান থাকে।

একাধিক পদ্ধতি অবলম্বনে একটি এসইপিটি প্রস্তুত করা হয়েছে। এদের মধ্যে প্রকল্প এলাকার জনগণের সাথে দলগত আলোচনা, পিআরএ (PRA), স্থানীয় প্রশাসনের সাথে আনুষ্ঠানিক পরামর্শ সভা, বিভিন্ন পেশাগত দলের সাথে ফোকাস গ্রুপ মিটিং, কেআইআই (KII) ও কেইস স্ট্যাডি অন্যতম। স্টেকহোল্ডার কনসালটেশন সভার ফলাফল সমূহ এসইপিতে অন্তর্ভুক্ত করা হয়েছে, যার মধ্যে রয়েছে (১) স্টেকহোল্ডার নির্ণয় ও ম্যাপিং (২) পূর্ববর্তী সভা সমূহের সংক্ষিপ্ত বিবরণ (৩) স্টেকহোল্ডার এ্যানগেইজমেন্ট প্লান (৪) স্টেকহোল্ডার ব্যবস্থাপনার জন্য ভূমিকা, দায়িত্ব এবং রিসোর্স ব্যবস্থাপনা (৫) অভিযোগের প্রতিকার ব্যবস্থা এবং (৬) এসইপি পর্যবেক্ষণ ও রিপোর্টিং (Monitoring and Reporting) ব্যবস্থা, সর্বোপরি, যেহেতু কোভিড-১৯ মহামারির কারণে মাঠ পর্যায়ে পর্যাপ্ত সভা/কনসালটেশন করা সম্ভব হয়নি, সেহেতু এই এসইপিটি ফেইজ-১ চলাকালীন এবং প্রকল্পের পরবর্তী ধাপসমূহে পর্যায়ক্রমে হালনাগাদ করা হবে।

এসইপিটির সমন্বয়, ব্যবস্থাপনা এবং এর বাস্তবায়নের দায়িত্ব প্রকল্প বাস্তবায়ন সংস্থা সমূহের প্রকল্প বাস্তবায়ন ইউনিটের সদস্যদের, তারা স্থানীয় প্রকল্প অফিস ও সাব ঠিকাদার দের সহায়তায় এই ঋতু টি বাস্তবায়ন করবে। ঋতু টি বাস্তবায়নের জন্য প্রয়োজনীয় অর্থ প্রকল্প থেকে বরাদ্দ করা হবে। স্টেকহোল্ডার এ্যানগেইজমেন্ট কার্যাবলী প্রকল্প ব্যবস্থাপনা সিস্টেমের মধ্যে অন্তর্ভুক্ত থাকবে যা একজন কমিউনিকেশন ও জিআরএম (GRM) বিশেষজ্ঞ এবং একটা কনসালটেন্সি সংস্থার সহযোগিতায় বাস্তবায়ন করা হবে।

প্রকল্প চলাকালীন পুরো সময়ে যেকোন ধরনের সমস্যা ও অভিযোগ যাতে সময়মত দক্ষতার সাথে এবং সাশ্রয়ী উপায়ে সমাধান করা যায় তার জন্য একটি গ্রিভেন্স রিড্রেস ম্যাকানিজম তৈরি করা হয়েছে। প্রকল্প দ্বারা ক্ষতিগ্রস্ত ব্যক্তি এবং অন্য যেকোন স্টেকহোল্ডার যেকোন সময়ে গ্রিভেন্স রিড্রেস ম্যাকানিজমের মাধ্যমে প্রকল্প সম্পর্কে তাদের মতামত ও অভিযোগ প্রদান করতে পারবে। প্রকল্পটির জন্য দুই স্তর বিশিষ্ট (মাঠ পর্যায় ও প্রকল্প পর্যায়ে) GRM পরিকল্পনা করা হয়েছে। যেখানে দুইটি কমিটি গঠনের দিকনির্দেশনা সহ করণীয় ঠিক করে দেয়া হয়েছে। এছাড়াও SEA/SH এবং লেবার ব্যবস্থাপনার জন্য দুটি অলাদা GRM গঠন করা হয়েছে।

রিপোর্টিং এবং মনিটরিং এর উদ্দেশ্যে মাসিক সার সংক্ষেপ, জনসাধারণের অভিযোগ অনুসন্ধান এবং এ সংক্রান্ত ঘটনাবলির সংক্ষিপ্ত রিপোর্ট এবং একই সাথে সকল অভিযোগ সমাধানে গৃহীত পদক্ষেপ সমূহের অবস্থা বর্ণনা সহকারে প্রকল্পের উর্দ্বতন ম্যানেজম্যান্টের কাছে পাঠানো হবে। এটি অভিযোগের ধরণ ও সংখ্যা মূল্যায়নের জন্যও একটি প্রক্রিয়া নির্ণয় করবে। একই সাথে এটি অভিযোগগুলো সময়মত এবং কার্যকরভাবে সমাধানে প্রকল্পের সামর্থ্য যাচাই করবে। স্টেকহোল্ডার এ্যানগেইজমেন্টের কার্যক্রমের অগ্রগতি ও ফলাফল ত্রৈমাসিক ও বাৎসরিক ভিত্তিতে বিশ্বব্যাংকের সাথে শেয়ার করা হবে যেখানে স্টেকহোল্ডার সম্পর্কিত কার্যক্রমের বর্ণনাও থাকবে। এই সকল রিপোর্টের মধ্যে GRM সম্পর্কিত বিস্তারিত বর্ণনা রিপোর্টে থাকবে যেখানে কতগুলো অভিযোগ এসেছে ও কতগুলোর সমাধান করা হয়েছে এবং কতগুলো অবশিষ্ট রয়েছে তার একটি তালিকা প্রদান করা হবে।

1 Introduction and Project Description

1.1 The project and impacts

The proposed Jamuna River Sustainable Management Program has adopted a Series of Project approach. The Program (Phase 1 and Phase 2) will be executed in the approximately 200 km plus stretch of the Jamuna River.

SOP-Project 1 aims to lay the foundation for the successful implementation of the Jamuna Program. Project 1 has funding around \$188.33M; of which \$75M goes to on-site innovative river-structures pilots, navigation RIS, pilot IWT terminals, Navigation Master Plan, all aimed to inform Phase 2 preparation. Combining Aids to Navigation, Level D+ RIS, with Riverbank Protection Structure is unprecedented in Bangladesh. The Project 1 is building on global experience in stabilizing braided rivers: Ayeyarwady, Rhine, Danube, Mississippi, Yellow Rivers. Introduction of “Dynamic Navigation” will rationalize needed dredging. The Project 1 will have four components -

- **Component 1: Flood and bank erosion management:** Activities include - construction and O&M of riverbank protection structures (integrated green & grey infrastructure) at 2-3 pilot sites; limited-scale dredging; preparatory activities for Phase 2 including preparation of a National Rivers Master Plan.
- **Component 2: Navigation channel development:** Activities include - Aids to Navigation, Level D+ hydrography & River Information Services (RIS); test out prototype navigation structures designed for Jamuna; institutional strengthening of navigation agency BIWTA; and preparatory activities for Phase 2 including a Navigation Master Plan.
- **Component 3: Financial protection of communities:** Activity include - Build capacity for Risk Preparedness & DRF (for River-wide scaling up in the next program phases); Pilot-level prearranged financial solutions (Insurance Facility & Community Protection Fund). A gender strategy will be prepared by the Insurance Development and Regulatory Authority (IDRA) to ensure women's access to disaster risk financing and relevant livelihood opportunities.
- **Component 4: Community engagement and project management:** Activity Include - Climate-Smart Decision Support System (Analytics Dashboards drawing from global, regional & national data services); Byous management; Kawakhola char development; Community Engagement in Disaster-Risk Awareness & Preparedness; CDDs and Project Management.
- **Component 5: Contingent emergency response component (CERC):** This will allow for rapid reallocation of loan proceeds from other project components during an emergency, including climate events, under streamlined procurement and disbursement procedures, and may also serve as a conduit for additional funds to be channeled to the project in such circumstances.

The perceived benefits include bank stabilization, land reclamation, better navigability, enhanced transboundary river management, and long-term economic growth. The broad objectives of the program are (i) boosting resilience against bank erosion and flooding; and (ii) improving river navigation capacity.¹ As such, at this point, the approach to environmental and social assessment is to cover all components and focus only on Phase 1 to mitigation and management of the potential negative impacts. However, the broader socio-economic issues arising out of river stabilization such as land reclamation and ownership, the improved legal framework regulating the reclaimed land, alternative employment, local economic diversification issues are critical as well, which affect the vulnerability of the floodplain population. Therefore, the socio-economic and environmental implications of the river stabilization must be understood broadly and holistically, leading to the promotion and management of all resources of the floodplain in local ecological and human development contexts.

¹ The Concept Note, World Bank

1.2 The project context and rationale

Bangladesh is a riverine country and the largest delta of the world (Islam and Rashid, 2011). It is said that the country lives at the mercy of the three major river systems - i.e. the Ganges locally called Padma, the Brahmaputra-Jamuna, and the Meghna, largely known as the GBM basins (Bormudoi et al., 2011). The Jamuna is a typical braided river with highly dynamic anabranch channels. Annual shifting of these channels ranges from few hundred meters to several kilometers. In plan form, the river typically shows two to three channels per cross-section and a total width of 8 to 18 km. The river carries huge volume of water every year in the country. In addition to that, it also carries a large number of sediments per year (EGIS, 2000; Sarker et al., 2003). These two facets considered as the agents of flooding and river bank erosion. In the active flood plains, the main rivers are constantly changing courses, leading to both riverbank erosion and accretion of new land (Haque and Zaman, 1989; Lein, 2000).

The Jamuna is dotted with various river islands many of which are currently inhabited and/or have agricultural croplands. During monsoon, the mighty river is most devastating often leading to bank erosion and flooding that causes irreparable damages to nearby communities. During the dry season, the water level recedes to meandering shallow channels and the vast tracts of fertile land that emerges, are used to produce various agricultural crops. The loss of valuable agricultural lands due to erosion brings hardship to millions of people in the floodplain. It was observed that left bank eroded more land than right bank for the observed time periods in this study reach. Highest erosion rate 3230 ha/year was observed during 1980-1989. Since then, erosion decreased along both banks, and it is only 970 ha/year in the recent decade. Comparatively, more land was accreted in left riverbank than right side. High rate of accretion has been observed at 2000-2010 and 1973-1980 time period and rate of accretion were 1300 ha/year and 1230 ha/year respectively.²

The river training work under the proposed project will ensure protection and bring some stability from future erosion. The threats of flood and endemic erosion disasters discouraged investments in the project area in the past leading to lower economic growth of riverine areas. Effective flood and riverbank erosion risk management is thus essential for the economic growth, livelihood improvement, and poverty reduction.

1.3 Project location and Profiles of the Project Area

The component 2 will be implemented along the 200 km reach of the Jamuna River. The location of installation of Navigation aids will be decided later. But the major interventions are to take place under the Component 1. Two sites – (i) Fulchari, Gaibandha and (ii) Kalihati, Tangail were selected for piloting of Top Blocked Permeable Groin. In addition, River bank protection by sand filled Geo-bags, canal re-excavation, flood shelter construction and CDD activities will be implemented in Kawakhola char under a sub-component of Component 1.

The Jamuna is a multi-channel braided river and is constantly shifting westward, making periodically multiple channels and streams where they did not exist before. The changes in the river courses cause loss of valuable cultivable lands, bank line settlements, river ports/markets, towns, displacing an estimated one million people annually.³ People living in the floodplain have historically made adjustments by adapting their agricultural practices, cropping patterns, and settlements to annual flooding. But the high or abnormal floods (*bonna*), associated with widespread damage to standing crops, properties, and loss of human lives are viewed as a calamity or disaster. As a result, those displaced migrate only short distance; a large majority of the displaced adapt to their river-dependent lives and livelihoods.⁴ However, the twin forces of

² Spatial assessment by CEGIS using Arc-GIS tool of Remote Sensing techniques, 2021

³ John Rogge and C.E Haque, Riverbank Erosion Hazards, Rural Population Displacement, and Institutional Responses and Policies in Bangladesh. Paper read at the Annual Meetings of the Association of American Geographers, Portland, Oregon (22-26 April) 1987.

⁴ C. E. Haque and M. Q. Zaman, Human Responses to Riverine Hazards in Bangladesh: A Consideration for Sustainable Floodplain Development. *World Development*, Vol. 21(1), 1993.

erosion and flooding have a toll on the floodplain people, who lead a poverty-stricken life, particularly those displaced and live-in chars and along the embankments.

The Jamuna chars, particularly the 200 km project stretch from Doikhowa to Sirajganj in Bangladesh, are inhabited by an estimated 6 million people. According to one source,⁵ the braided Jamuna has 56 large chars and 226 small sandy and vegetated chars. These chars continue to remain pockets of poverty in the country.⁶ Typically, char village settlements consist largely of in-migrants from neighboring chars or mainland villages displaced by erosion. Char dwellers, by and large, are extremely poor and highly vulnerable to natural hazards of flood and erosion. Of late, they are also threatened by increasing floods and erosion due to climate change impacts.

The Jamuna chars, particularly in the Kazipur-Sirajganj area, are largely island chars in between channels. However, there are many attached chars, which have appeared through new accretions and are now part of the mainland, particularly on the left bank of the Jamuna River. There are also what is called temporary chars or channel/sand bars that are visible during dry/winter season. The newly emerged chars are put to use immediately by people of neighboring chars or mainland, not without dispute over use and/or ownership rights. For people without land, the new chars are a means of survival and a source of living until they disappear again into the river.⁷ As a dynamic process, many of the sandbars or temporary chars continue to grow with additional accumulations of sands and silts over the years.

Many studies⁸ have reported on bank-line erosion in the Brahmaputra-Jamuna, caused by shifting of the river channels that remains a perennial problem for Bangladesh. The multi-channel braided Jamuna system is routinely creating and recreating numerous chars in the process of erosion and accretion. The entire stretch of the project length covering the districts of Kurigram, Gaibandha, Rangpur, Bogura, Jamalpur, Tangail, and Sirajganj are erosion prone districts. Sirajganj-Kazipur in the Brahmaputra-Jamuna floodplain is one of the most erosion prone areas of the country; nearly 50% of the land area of Kazipur Upazila (subdistrict) has been eroded over the last 40 years or so.⁹ Since the bank lines include much of the most densely populated land in the country, it is considered that somewhere between 10 and 15 percent of population of Bangladesh live in areas exposed to severe erosions.¹⁰ As a result, a large number of people in the country are continuously at the risk of displacement.

1.4 Environmental and Social Risks of the Project

The project includes several activities such as the construction of riverbank protection, limited dredging to manage riverbank erosion, installation of navigational aids, etc. which might involve hydro-morphological impact and/or risk. Various construction activities, such as installation of the groins, pile driving, dredging, and excavation work, and operation of heavy equipment will cause noise and vibration and can affect receptors near the construction sites. The vibration created from earthwork and the movement of the earth may affect the stability of nearby structures of the transportation routes.

The operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with the distance. Moreover, the operation of different types of fuel-burning machinery, and continuous emission of harmful and toxic gases such as Nitrogen Oxides (NO_x), Sulfur Oxides (SO_x), Carbon Monoxide (CO), and particulate matter (PM₁₀, PM_{2.5}) can cause air pollution which may travel further the project boundary following the wind. Riverbanks are common places for different

⁵ Chars in Bangladesh (<http://en.banglapedia.org/>)

⁶ Zaman, Mohammad and Mustafa Alam (eds.) *Living on the Edge: Char Dwellers in Bangladesh*. Springer 2021.

⁷ Zaman, Mohammad. River erosion and displacement: How to address the twin issues. *The Financial Times*, 23 June 2019.

⁸ Elahi, K. Maudood, K. Saleh Ahmed and M. Mofizuddin, eds. (1991) *Riverbank Erosion, Flood and Population Displacement in Bangladesh*. REIS Project, Jahangirnagar University, Savar, Dhaka.

⁹ Zaman, Mohammad. Life on the edge in island chars. *The Financial Express*, 06 April 2019.

¹⁰ Haque, C. Emdad (1988) *Impacts of Riverbank Erosion Hazard in the Brahmaputra-Jamuna Floodplain: A Study of Population Displacement and Response Strategies*. Unpublished PhD Dissertation, University of Manitoba, Canada.

species to live and wade especially, birds and turtles. Using of poor-quality fuel and technical faults of any equipment may cause greater emissions.

The impacts on the biodiversity of the Program would be mostly minimal to moderate. The site-specific impacts on biodiversity include disturbance of aquatic and terrestrial ecosystems, displacement of individuals and populations of species, alteration of habitats, alteration in population dynamics, changes in species composition, and isolation or fragmentation of habitats. Noise from pile driving and light generated during groin construction, installation of navigation aids, and vessel movement during operation may harm individual animals consequently affecting the feeding and breeding behaviors on long-term population levels. Furthermore, impacts on fisheries are anticipated because of changing water quality due to materials washing water at the construction site, mixing of suspended sediment and substrates in the water column, etc.

The construction of the proposed embankment and revetment work, crossbar/bund, and construction of flood shelter (Killa) would require around 128 acres of land to be acquired. These lands include the agricultural area as well. Besides, some standing crops might be damaged during construction activities and transportation of materials. This land acquisition, land taken by the negotiated settlement will dispossess landowners, and households. Moreover, the project implementation requires both local and outsider laborers, who are anticipated to work until the implementation period is over. The outsider laborers will, therefore, need to stay in the project area for a long time and to interact with the local community. The socio-cultural life in the project area is homogenous and because of this homogeneity, any outsiders can encounter socio-cultural shock in the host communities. Eventually, social tensions may arise in the project area. The vulnerable groups especially the people living in the char lands, displaced communities now living on embankments, the poor and landless, female-headed households and those under the poverty line, the elderly, and the char dwellers as tenant farmers, fishermen small landowners, etc. would be provided additional support as they have very limited scope to participate with very little capacity and power to get involved in the stakeholder engagement process which is always led by the implementing agencies and local elites. Although Project 1 activities are very limited in their ability to cause flooding downstream of the pilot sites, the risk of increased flooding cannot be eliminated. There is a risk of increased flooding in downstream areas due to the contraction of the floodplain and alluvial corridor. However, the potential environmental and social risk and impacts are presented below in bullet form-

Potential Environmental Risk and Impacts

- Changes in river Planform and Bankline
- Reduction of Floodplain and Alluvial Corridor within Project AOI
- Increase of Erosion Risk to the Downstream Areas
- Increase of erosion risk in Mechra due to Canal Re-excavation
- Contamination of water bodies by construction and dredging waste
- Increase of turbidity in river-water column due to dredging and re-excavation
- Risk of Degradation of water quality due to spillage of bilge water, oil, lubricant from the vessels (mostly nearby a terminal)
- Risk of Water pollution from improper waste management by the vessels and careless actions by the passengers (mostly nearby a terminal)
- The construction activities will cause noise and vibration and can affect receptors and structures near the construction sites.
- Pile driving can also generate high underwater and air noise levels that can affect hilsa migration, dolphins' vocalization and migratory birds' habitat
- Risk of disturbance to dolphins, and Gharial due to increased light and sound due to increased navigation post construction
- Risk of increasing disturbance and reduction of suitability in the natural habitats (river area, mudflats, chars) due to pollution (Noise, water pollution, etc.) from construction activities including dredging
- Loss/Turmoil of benthic and riverbed due to dredging
- Disturbance of nocturnal wildlife due to installation of navigational materials and devices

- Materials wash water from construction site may contaminate river water quality locally which may cause loss of fish habitat suitability.
- Degradation of fish habitat condition at the Jetty site due to throwing of plastic bottle, polythene and food packaging waste by the passengers

Potential Social risk and impacts

- Dispossession due to land acquisition and resettlement
- Income loss due to the acquisition and disturbance of cultivable land
- Land acquisition induced poverty may increase vulnerability of women and girls to SEA/SH
- Land acquisition induced poverty may increase the risk of child marriage and other SEA/SH due to displacement by land acquisition
- Socio-cultural shock and health hazard with the outside labourers and their movement in the community
- Increased demand of outsider (employees & visitors) may enhance the risk of SEA/SH
- Risk of rising False Sense of Security and therefore rising the risk of livelihood, asset and service loss due to bank failure from the failure of the groins

1.5 Project objectives and scope

The broad objective of the Project is to improve the national economic condition and achieving its Bangladesh Delta Plan 2100 (BDP2100) economic goals related to the Jamuna River, covering the river length of 200km starting from Doikhowa to Sirajganj with potential funding from the World Bank and Asian Infrastructure Investment Bank. The specific objectives of the project are to (i) Boosting resilience against riverbank erosion and flooding; (ii) Improving river navigation capacity; and (iii) Strengthening sector institutional capacity and collaboration. The Bangladesh Water Development Board (BWDB) and the Bangladesh Inland Water Transport Authority (BIWTA), respectively, under the Ministry of Water Resources (MoWR) and Ministry of Shipping (MoS), with the Insurance Development and Regulatory Authority (IDRA) under the Ministry of Finance (MoF) will be implementing agencies (IAs) for different civil works to achieve the objectives.

The Program's MPA covers two phases, with the 1st phase over four years, and the subsequent second phase to start in the third year of the first phase, for five years (Total seven years). Phase wise project components and activities as summarized at Table 1.1.

Table 1.1: Project components and activities

Component(s)	Sub-Component(s)	Activities
Component 1: Flood and bank erosion management	1.1 Construction and O&M of river training structures	• finance capital expenditure for innovative river training structures at two pilot sites • design of transversal structures • longitudinal structures will be built • Civil works including cast-in-situ reinforced cement concrete (RCC) pile, permanent casing, RCC beam and slab, earthen embankment, bed protection, and turfing.
	1.2 Land acquisition and compensation	• BWDB will finance the costs for land acquisition • Compensation costs for the affected people
	1.3 Preparation for Phase 2	• Detailed design that considers climate change mitigation and adaptation impact; • E&S studies, including governance of reclaimed land; • Preparation of bid documents for more complex Phase 2 investments, including dredging for river training

	1.4 Institutional strengthening of the BWDB	• Develop the National River Management Master Plan • Capacity building of the BWDB staff • Community engagement • Project management
Component 2: Navigation channel development	2.1 Hydrography and RIS	• steps toward establishing safe and reliable year-round navigation channels • developing and operating an RIS system
	2.2 Prototype structures	• Testing of pilot structures
	2.3 Preparation for Phase 2	• Preparation of detailed design, E&S studies, and bid documents
	2.4 Institutional strengthening of the BIWTA	• Prepare Jamuna River Navigation Master Plan • The Resource Management and Operations Plan • Cross-border IWT dialogue • Capacity building of the BIWTA staff • Community engagement • Community engagement
Component 3: Financial Protection of Communities	3.1 Design and development of prearranged financial solutions	• Crop insurance • Farmer protection fund
	3.2 Institutional strengthening	• Ensure the instruments developed under Subcomponent 3.1 • Identify any gaps in the institutional and legislative environment • Prepare a Gender Strategy by the Insurance Development and Regulatory Authority (IDRA) to ensure women's access to disaster risk financing and relevant livelihood opportunities
Component 4: Community Engagement and Project Management	4.1 Community-driven development (CDD)	• Climate and disaster risk preparedness and response will be enhanced in select communities • WMGs will be formed in select communities to encourage their ownership of the asset and inform how villagers can avoid behaviors that may incur damages to buoys • Kawakhola <i>char</i> development will engage communities from planning and design stages
	4.2 Project management	• Support the BWDB, BIWTA, and IDRA's Project Implementation Units (PIUs) for implementing the Project • On E&S, relevant assessment on institutional capacity will be carried out • For BWDB, the current E&S unit will be further strengthened • PIUs will be staffed with qualified E&S, Gender, SEA-SH, OHS, and Stakeholder Engagement and Communication Specialists
Component 5: Contingent emergency response component (CERC)	A provisional zero amount component is included	• Allow for rapid reallocation of loan proceeds from other project components during an emergency, including climate events, under streamlined procurement and disbursement procedures • Serve as a conduit for additional funds to be channeled to the project in such circumstances

1.6 Objective of SEP

The Stakeholder Engagement Plan (SEP) is prepared for Phase 1 and it will be reviewed and updated periodically as a living document, as and when new information is generated. The overall objective of this SEP is to design a plan for stakeholder engagement, including public information disclosure and consultation, throughout the construction, other project activities, and operation of the proposed projects in Phase 1. The SEP outlines the ways in which the project will engage all stakeholders – for example, national/regional stakeholders, project affected peoples, vulnerable communities, local community people, different occupational groups, women groups, labors, contractors, and other interested groups, etc. and provide them with a mechanism through which people can raise concerns, provide feedback, or make positive and negative complaints about the project. In sum, the SEP is set to define a participatory approach to project design, implementation and monitoring.

The involvement of the local population and other stakeholders are essential to the success of the project in order to ensure smooth collaboration between IAs and local communities and to minimize and mitigate environmental and social risks related to the proposed project. Stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive and local ownership that are important for successful management of environmental and social risks identified in a project.¹¹ Communicating early, often, and clearly with stakeholders helps manage expectations and avoid risks, potential conflict, and project delays¹². In addition, the plan assists in managing stakeholder expectations, which will have a bearing throughout the lifespan of the project. Hence, this SEP provides a plan to interact effectively and meaningfully with stakeholders to support project activities and interests such as the following:

- Involves interactions between and among identified groups of people and provides stakeholders with an opportunity to raise their concerns and share their opinions and ensures that this information is taken into consideration when making decisions pertaining to the project,
- The SEP has identified the vulnerable and disadvantage groups and it includes specific provisions/mechanisms to ensure their engagement in section 5.4. Moreover, the local community people, occupational groups, and local govt. bodies also involved to discuss on their present situation, and process of engaging in future,
- Begins early during the project planning process to gather initial views on the project proposal and design,
- Encourages stakeholder's feedback, especially as a way of informing the project design and engagement by stakeholders in the identification and mitigation of environmental and social risks and impacts,
- Ensures prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultation with stakeholders in a culturally appropriate format and manner, in relevant local languages and is understandable to stakeholders,
- Considers and responds to feedback,
- Supports active and inclusive engagement with project affected parties, project beneficiary group,
- Ensures that implementation of the SEP will be documented and disclosed prior to project appraisal.

In addition, the SEP of the Project will endeavor to disclose information that will allow stakeholders to understand the risks and impacts of the project as well as potential opportunities. It will provide stakeholders with access to information, as early as possible before the Bank proceeds to project appraisal,

¹¹ The World Bank (2017), The World Bank Environmental and Social Framework

¹² Pollet., T (2014), A Strategic Approach to Early Stakeholder Engagement

and in a timeframe that enables meaningful consultations with stakeholders on project design. It will also include details of the stakeholder engagement activities through the project life cycle.

1.7 Stakeholder Consultation Methods and Outline of SEP

The preparation of the SEP started during the COVID pandemic and followed the WB COVID protocols and guidelines. At this preparatory stage while preparing the SEP, the implementing agencies/IAs (BWDB, BIWTA and IDRA) with help of ESIA team conducted local level public consultations in the project area/reach and along with two national level public consultations. Other than this, the IAs have also conducted three public consultations at Union Level, nine focus group discussions (FGD) and seven group discussions with various stakeholders. Additionally, five key informant interviews (KIIs) were also conducted during a short window of ease in the countrywide lockdown during the COVID in the past several months. Finally, a national level consultation was held on 17 April 2023 involving key government stakeholders, academia, civil society and media. Throughout the local and national consultations, the stakeholders were informed about the purpose of the SEP, and attempts have been made to involve the stakeholders in the process of stakeholder identification, mapping, and analysis. In addition, the detail of the stakeholder engagement process was discussed with the stakeholders, and the stakeholders gave their feedback to the proposed method of engagement. The overall consultation activities were assisted by CEGIS. However, the SEP will be a living document and will be periodically updated all through the implementation of the Phase 1 as needed.

Despite the limitations under the Covid-19 situations, the SEP for Stage 1 used multiple methods in preparing the documents. These include (i) informal group discussion in the project area; (ii) participatory rural appraisals, (iii) formal consultation meetings with local administration, (iv) focus group meetings with various occupational/interest groups, and (v) case studies, (vi) Key informant interviews. The use of a wide range of methods helped to involve all types of stakeholders and engage them in meaningful consultations. Some of the participatory rapid appraisal (PRA) tools used during community consultation meetings included group discussion, participatory mapping and seasonality (see Table 1.2).

Table 1.2: PRA tools used in group discussions, participatory mapping, seasonality

Tools	Methods
Group Discussion and Data Analysis	Project Data Review
	Local History, stories, local knowledge, social classification
	Direct and participant observation
	Analysis of group discussions
	Case studies
Participatory Mapping	Social Mapping
	Resource Mapping
Seasonality	Village Profile
	Seasonal activity and timeline
	Livelihood analysis
	Positive and negative impacts
	Potential mitigation measures

The results of the consultation meetings are presented here in the SEP. Chapter 2 describes the national regulations and WB requirements in setting up the framework for SEP. This is followed by a discussion on the stakeholder identification and mapping in Chapter 3. Chapter 4 presents the brief summary of previous stakeholder engagement activities. Stakeholder engagement plan and roles, responsibilities and resources for stakeholder engagement describes in Chapter 5 and Chapter-6. Chapter 7 presents the grievance redress mechanism (GRM) and finally, SEP monitoring and reporting arrangements are presented in Chapter 8. The list of participants in the interviews and FGDs and pictures taken during the meetings are in Annex C and D.

2 Legal Framework and ESF Requirements

The framework of the SEP is derived from GOB guidelines and the World Bank ESS 10 requirements. This is briefly presented in this chapter.

2.1 National requirements

Bangladesh has relevant and adequate law/regulation on right to information, information disclosure, transparency during decision making/public hearing, labor law etc. Relevant laws and regulations pertaining to these issues are given below:

2.1.1 EIA Guidelines for Industries (DoE)- 1997

The GoB place great importance on involving primary and secondary stakeholders for determining the environmental and social impacts associated with project implementation. The participation of the stakeholders is considered an integral part of the ESIA process to gather local knowledge for baseline conditions, understand perceptions of the community regarding impact significance, and propose meaningful mitigation measures. According to the EIA Guidelines of the DoE,¹³ public participation is obligatory for the EIAs of the Red Category projects.

2.1.2 Guidelines for the Participatory Water Management-2000

Public participation through consultations in the water sector project is also mandated according to the Guidelines for the Participatory Water Management (GPWM) of the BWDB.¹⁴

2.1.3 Acquisition and Requisition of Immovable Property Act, 2017

In 2018, following the 2017 Land Acquisition Law of the country (popularly known as ARIPA 2017¹⁵), the Government of Bangladesh adopted *National Guidelines on Resettlement of Project-Affected People*¹⁶ that clearly requires Initial Social Assessment (ISA) for risk assessments and consultation with stakeholders at all levels and covering all types of impacted people and engage the community and host population, particularly in resettlement and livelihood planning and implementation (Sections 5.1/5.2 and 6). The *Guidelines* also requires disclosures of project impact via Public Information Centers (PICs) at project sites. Further, establishment of project-specific GRM is also a requirement. In sum, stakeholder consultation and engagements are now required and constitute guiding principles for project planning and execution in Bangladesh.

2.1.4 Constitution of the People's Republic of Bangladesh

Article 36. Freedom of movement: Subject to any reasonable restrictions imposed by law in the public interest, every citizen shall have the right to move freely throughout Bangladesh, to reside and settle in any place therein and to leave and re-enter Bangladesh.

Article 37. Freedom of assembly: Every citizen shall have the right to assemble and to participate in public meetings and processions peacefully and without arms, subject to any reasonable restrictions imposed by law in the interests of public order health.

¹³ GOB. DoE, 1997, *EIA Guidelines for Industries*. Department of Environment (DoE), Dhaka, Bangladesh.

¹⁴ GOB, MoWR, 2000, Guidelines for the Participatory Water Management
<http://extwprlegs1.fao.org/docs/pdf/bgd197583.pdf>

¹⁵ *Acquisition and Requisition of Immovable Property Act, 2017*, Government of Bangladesh.

¹⁶ *National Guidelines for Resettlement of Project-Affected Population 2018*. Ministry of Land. GOB.

Article 38. Freedom of association: Every citizen shall have the right to form associations or unions, subject to any reasonable restrictions imposed by law in the interests of morality or public order;

Article 39. Freedom of thought and conscience, and of speech.

(1) Freedom of thought and conscience is guaranteed.

(2) Subject to any reasonable restrictions imposed by law in the interests of the security of the State, friendly relations with foreign states, public order, decency or morality, or in relation to contempt of court, defamation or incitement to an offence-

(a) the right of every citizen of freedom of speech and expression; and freedom of the press, are guaranteed.

Article 59. Local Government:

(1) Local Government in every administrative unit of the Republic shall be entrusted to bodies, composed of persons elected in accordance with law.

(2) Everybody such as is referred to in clause (1) shall, subject to this Constitution and any other law, perform within the appropriate administrative unit such functions as shall be prescribed by Act of Parliament, which may include functions relating to-

(a) Administration and the work of public officers.

(b) the maintenance of public order.

(c) the preparation and implementation of plans relating to public services and economic development.

Article 60. Powers of local government bodies: For the purpose of giving full effect to the provisions of article 59 Parliament shall, by law, confer powers on the local government bodies referred to in that article, including power to impose taxes for local purposes, to prepare their budgets and to maintain funds.

2.1.5 The Consumers' Right Protection Act, 2009

This Act aims at protection of the rights of the consumers, prevention of anti-consumer right practices and related matters connected therewith.

2.1.6 Right to Information Act (RTIA) 2009

The Act makes provisions for ensuring free flow of information and people's right to information. The freedom of thought, conscience and speech is recognized in the Constitution as a fundamental right and the right to information is an alienable part of it. The right to information shall ensure that transparency and accountability in all public, autonomous and statutory organizations and in private organizations run on government or foreign funding shall increase, corruption shall decrease, and good governance shall be established.

2.1.7 Law on Local Government.

Bangladesh is a democratic republic with two spheres of government: national and local. Local government is enshrined in the constitution (Chapter IV Articles 59 and 60) and the main legislative texts include the Acts covering zila parishads (2000), upazila parishads (1998, amended 2009), union parishads (2009), pourashavas (2009), city corporations (2009) and hill district councils (1989). The local government division within the Ministry of Local Government, Rural Development and Cooperatives is responsible for local government, with the exception of the hill district councils, which are under the Ministry of Hill Tract Affairs.

2.1.8 Bangladesh Labour Law, 2006 (Amended in 2013) and Labour Code 2015.

This Law pertains to the occupational rights and safety of workers and the provision of a comfortable work environment and reasonable working conditions.

The Labour Law of Bangladesh 2006 bans children under the age of 14 from working. Chapter III of the Act-3 under "**EMPLOYMENT OF ADOLESCENT WORKER**" puts restrictions on employment of children and adolescents as follows:

- (1) No child shall be employed or permitted to work in any occupation or establishment.
- (2) No adolescent shall be employed or permitted to work in any occupation or establishment, unless:
 - (a) A certificate of fitness in the form prescribed by rules, and granted to him by a registered medical practitioner is in the custody of the employer; and
 - (b) He/She carries, while at work, a token containing a reference to such certificate.

2.1.9 Legislative framework to address GBV/SEA/SH in Bangladesh

Bangladesh is party to international human rights instruments including Universal Declaration of Human Rights (UDHR) in 1948, the International Covenant on Economic, Social and Cultural Rights, 1966, the International Covenant on Civil and Political Rights, 1966, the Second Optional Protocol to the International Covenant on Civil and Political Rights, 1989, and the Convention on the Elimination of all forms of Discrimination Against Women (CEDAW), 1979. By ratifying these conventions, the Government of Bangladesh has committed to guaranteeing equality to both men and women in all spheres of their lives, which entails ensuring that they are not subject to sexual harassment.

Beyond these, Bangladesh, has already useful rules, regulations, and processes that can be used to mitigate hazards associated with SEA and SH. The following is a list of the protocols that Bangladesh has established in order to reduce the effects of SEA, SH, GBV, and VAC as well as to avoid their occurrence.

- The basis of Bangladeshi laws against gender-based violence and harassment in workplaces stems from the Constitution itself.
 - **Article 28** enshrines the ideal of equality and non-discrimination, and article 28(2) particularly states that "women must enjoy equal rights with males in all aspects of the State and of public life."
 - The Constitution also clearly stipulates positive discrimination towards women in **Article 28(4)**, which states that: "Nothing in this article shall prevent the State from making special provision in favor of women or children or for the advancement of any backward section of citizens." This provision reads as follows: "Nothing in this article shall prevent the State from making special provision in favor of women or children or for the advancement of any backward section of citizens."
 - Furthermore, **Article 19(3)** stipulates that as a fundamental concept of state policy, "The State shall endeavor to achieve equality of opportunity and involvement of women in all aspects of national life."
- The National Women's Development Policy (NWDP) of 2011 aims to reduce violence, eliminate discrimination, promote access to education, health, and employment, and meet the unique needs of older women, women with disabilities, and women from indigenous and marginalized communities.
- The government has adopted a number of strict laws and policies in addition to the National Women's Development Policy (NWDP), in order to protect men and especially women from gender-based violence (GBV), which includes sexual exploitation and abuse as well as sexual harassment (SEA/SH): The Criminal Procedure Code, 1889; the Penal Code, 1860; the Evidence Act, 1972; the Child Marriage Restraint Act, 1929; the Citizenship Act, 1951 (as amended in 2009); the Muslim Family Laws Ordinance 1961; the Dowry Prohibition Act 1980; the Immigration Ordinance, 1982; the Family Court Ordinance 1985; the Women and Children Repression Prevention Act, 2000 (2003); the Acid Crime Prevention Act, 2002; the Bangladesh Labor Act, 2006; the Domestic Violence (Prevention and Protection.
- At the beginning of 2017, the Parliament of Bangladesh reexamined the Child Marriage Restraint Act 2016 in order to make it possible for females under the age of 18 to get married in "exceptional circumstances." Women's groups and legal non-governmental organizations (NGOs) active in the country have expressed deep concerns in response to this development.

- A High Court decision declared in 2009 that the sexual harassment of girls and women is illegal and issued a set of guidelines defining sexual delinquency to prevent any kind of physical, mental or sexual harassment of women, girls and children at their workplaces, educational institutions and other public places including roads across the country.
- Bangladesh legislated an 'ICT Act' in 2006 to combat cybercrime and online harassments. However, the provisions of this Act are quite insufficient to undertake legal measures appropriately as it does not address gender-based violence online in a clear and effective manner. The country has also formed a 'Cybercrime Tribunal' that addresses cyber violence.
- The Government of Bangladesh and the Government of Denmark are implementing the Multi-Sectoral Program on Violence against Women (MSPVAW) under the Ministry of Women and Children Affairs. The Ministry of Law, Justice, and Parliamentary Affairs, the Ministry of Information, the Ministry of Social Welfare, the Ministry of Home Affairs, the Ministry of Health and Family Welfare, the Ministry of Education, the Ministry of Religious Affairs, the Ministry of Youth and Sports, and the Ministry of Local Government, Rural Development, and Cooperative are collaborating on the project. The OCC in Medical College Hospitals is one of the most important components of the curriculum (MCHs). The OCCs offer health care, police help, DNA testing, social services, legal aid, psychological counseling, and housing services, among others. For OCC personnel, teachers, students, health assistants, and family planning officers, among others, a training package for fighting VAW has been designed. The MSPVAW has established the National Helpline Center for violence against women, a 24-hour helpline that can be accessed by landlines and cell phones.

2.2 World Bank requirements

The World Bank's Environmental and Social Framework (ESF) came into effect on October 1, 2018. The Framework includes Environmental and Social Standard (ESS) 10, "Stakeholder Engagement and Information Disclosure", which recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice". ESS10 emphasizes that effective stakeholder engagement can significantly improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. As defined by ESS10, stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. Key elements of ESS10 include:

- Stakeholder engagement is most effective when initiated at an early stage of the project development process, and is an integral part of early project decisions and the assessment, management and monitoring of the project.
- Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS:
 - (i) Stakeholder identification and analysis.
 - (ii) Planning how the engagement with stakeholders will take place.

- (iii) Disclosure of information.
- (iv) Consultation with stakeholders.
- (v) Addressing and responding to grievances; and
- (vi) Reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.

Accordingly, the SEP has been prepared in compliance of the GOB regulations and WB ESS 10 for Phase 1 activities which will be further reviewed and updated as needed during implementation. The stakeholders have been broadly identified and consulted with to the extent possible under the COVID environment. As per the Bank requirement, the IAs will disclose the SEP for public review and comment at the early stage of the project preparation.

2.3 Comparison of ESF and National Guidelines and how to fill the gaps

Table 2.1: Comparison between ESF and National Regulatory Framework

Environmental and Social Standards (ESS)	Relevant to Project (Yes/No)	Main requirements of ESS	Relevant National Laws and Guidelines	Gaps and how to address them
ESS10 – Stakeholder Engagement and Information Disclosure	Yes	- Engage with stakeholders in meaningful consultations during the project life cycle, commencing as early as the project development stage to get information on the project design. The nature, scope, and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts. - Borrowers will provide stakeholders with timely, relevant, and accessible information and consult with them in a culturally appropriate manner, free of manipulation, interference, coercion, discrimination, and intimidation. - The process of stakeholder engagement will involve (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders. - The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not being considered.	Environmental conservation Rules, 1997 and subsequent amendments Environmental Conservation Act (ECA) 1995 Noise Pollution Rules (2006) Bangladesh Water Act, 2013 Participatory Water Management Rules, 2014 Guideline for Environmental Assessment for Water Sector Project Article 36,37, 38, 59,60 of Constitution of the People's Republic of Bangladesh The Consumers' Right Protection Act, 2009 Right to Information Act (RTIA) 2009.	In case of water management project, it is required by the Rules (Water Act 2013, Participatory Water Management Rules 2014 and the Guideline for EA) to engage the local people and relevant stakeholders in project planning, construction and operation. The ECR 1997 allows for public consultation as part of the preparation of ESIA reports. The constitution of Bangladesh has provided freedom of movement, assembly, and freedom of thought, conscience and speech. However, there is a gap in systematic engagement of the people throughout the project life cycle as it has been illustrated by ESS10. Under this project, a Stakeholder Engagement Plan (SEP) has been prepared to ensure such engagement with stakeholders and information disclosure to stakeholders occurs at various stages of the Program / Project.

Environmental and Social Standards (ESS)	Relevant to Project (Yes/No)	Main requirements of ESS	Relevant National Laws and Guidelines	Gaps and how to address them
ESS2 – Labor and Working Conditions	Yes	- The Borrower will develop and implement Labour Management Procedures applicable to the project. - The Borrower will identify potential risks of child labor, forced labor, and severe safety issues related to primary suppliers. A child under the minimum age will not be employed or engaged in connection with the project. - Measures relating to occupational health and safety will be applied to the project. The OHS measures will include the requirements of ESS2. They will consider the General Environmental Health and Safety Guidelines (EHSGs) and, as appropriate, the industry-specific EHSGs and other GIIP. The OHS measures will be designed and implemented to address (a) identification of hazards, (b) provision of preventive and protective measures, (c) training of project workers, (d) documentation, reporting, and remedies of occupational incidents, and (e) emergency response arrangements. - The Borrower will make reasonable efforts to ascertain that third parties who engage contracted workers are legitimate and reliable entities and have in place labor-management procedures applicable to the project that will allow them to operate. - The Borrower will require measures to be implemented to ascertain that community workers are provided voluntarily as an outcome of individual or community agreement. - Ensure a working environment where there is zero tolerance to SEASH.	Bangladesh Labor Act, 2006 (amended in 2013, 2015, and 2018)	(i) The Bangladesh Labor Act does not make it mandatory for development interventions to be assessed and reviewed in labor and working conditions, including OHS, during construction. An OHS plan is prepared to comply with ESS2, which will be further extended during Stage 2 and the Contractors' construction stage. (ii) The labor act does not require development projects to prepare labor management plans/procedures. This ESIA prepared a labor-management procedure to comply with ESS2 covering direct, contracted, community, primary supply workers, and government civil servants. The procedure also covered management of worker relations, including workers specific GRM, terms and conditions of employment, non-discrimination and equal opportunity, protection of workforce, and prohibition.

Environmental and Social Standards (ESS)	Relevant to Project (Yes/No)	Main requirements of ESS	Relevant National Laws and Guidelines	Gaps and how to address them
		• Ensure Codes of Conduct signed and understood by the contractor, labors and other officials • Establish an effective grievance redress mechanism (GRM) with multiple channels to complaints about SEA/SH and establish SEA/SH allegations reporting channels • Awareness raising and sensitization on GBV for all stakeholders including the community and vulnerable populations, • GBV service provider mapping to refer incidents of GBV from the GRM or any other reporting mechanism that may be established through the project. • Receive and refer GBV complaints to GBV service providers and check if the case is closed and/or follow up on action taken by the contractor against any worker who has violated the codes of conduct.		

3 Stakeholder Identification and Analysis

3.1 Stakeholder Categorization

According to the ESS guideline a “stakeholder” refers to individuals or groups who: (i) are affected or likely to be affected by the project (project-affected parties) (ii) may have interest in the project (other interested parties) and (iii) the vulnerable groups. The stakeholders for Phase 1 potentially include groups and individuals from diverse backgrounds. These are discussed below.

3.1.1 *Project-affected parties*

Persons, groups and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.

Project will affect different stakeholders positively in different ways. First of all, the community people, their life and livelihood will be saved from the curse of river erosion. Furthermore, job opportunity will be created for the local community people during construction. On the other hand, the development of sustainable management of the Jamuna River will enhance the business opportunity for the local traders and businessman. Beside the above-mentioned positive impacts, construction of groins and other river training works may have some negative impacts.

Affected Parties include local communities, project beneficiaries, PAPs, community members and other parties including local businessmen that may be subject to direct impacts from the Project during construction phase. Specifically, the following individuals and groups fall within this category:

- People and households who will lose their land, assets and properties and displaced as a result of land acquisition;
- Informal occupants who will be displaced and face loss of livelihoods as a result of involuntary resettlement or other interventions of the project;
- Businesses, traders, small shop owners who face disruptions in their income and livelihood from project interventions or land acquisition;
- Beneficiaries under component 3: financial protection of the communities; and (5) COVID-19 affected people as a result of the project or using project facilities or services

Local NGOs and initiative/advocacy groups represent the considerable capacity that the project may tap for disseminating the information and raising awareness of the planned activities among the potentially affected communities in the project area. NGOs typically have well established network with the local communities, who are able to propose the most effective and culturally appropriate methods of liaising based on the local customary norms and prevailing means of communication and possess the facilitation skills that may be utilized as part of the project’s consultations. In addition, NGOs may lend assistance in disseminating information about the proposed project(s) to the local communities, including in the remote areas (e.g. by placing information materials about the project in their offices, distributing the project information lists during events that they are organizing), and provide venues for the engagement activities such as focus-group discussions.

3.1.2 Other interested parties

Individuals/groups/entities that may not experience direct impact from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and also who has interest in the project outcome(s) the process of its implementation in some way.

The project has limited construction activities in Phase 1 but the Program (including Phase 1) has high visibility and potential long-term impact throughout the program duration. Therefore, different Government and private organization, civil society and media including contractors, sub-contractors will have interest in this project. Moreover, Local government Institutions (LGI) and DoE will have strong regulatory influence, by providing/denying construction related clearance and continuation of environmental clearance. Local businessmen and the inhabitants will have positive interest in the project as it would generate economic activities in the construction sites and create few jobs at the local level due to the project activities. Furthermore, a few local shops are anticipated to be developed and local business opportunity will be enhanced to meet the daily necessities of incoming laborers. Local landowners would benefit from the increased price of their land owing to being saved from river erosion. Businessmen/traders involved with construction material (MS Rod, Cement, Sand, Bricks, other elements etc.) would be interested to have a share from the project. Transport agencies would also be part of this group.

The project will require mostly the low-skilled local labors in Phase-1; therefore, the local community leaders and local administration would influence the local people in securing jobs in the project and also in the GRM. They may also negatively influence the local community for vested financial gains/interest. Due to the construction activities the construction firms and local contractors will also compete to secure the project work. Local NGOs, civic organizations and the members of the print and electronic media may follow up the project regularly with a positive view. But they also take critical look on the project activities to identify the gaps and short coming (if any) of the project. The Academia and research institutions may have the same attitude about the project

The projects' stakeholders also include parties other than the directly affected communities, including:

- Residents of the nearby rural settlements within the project area that can benefit from employment and training opportunities stemming from the project;
- Civil society groups and NGOs on the regional, national and local levels, which pursue environmental and socio-economic interests and may become partners of the project. Organizations within this group are likely to be located outside the project's Direct Area of Influence;
- Community-based groups and Non-Governmental Organizations (NGOs) working on labor, or gender issues including sexual exploitation and abuse (SEA) and sexual harassment (SH) in the locality and act on their behalf;
- Business owners and providers of services, goods and materials that will be involved in the project's wider supply chain and transportation business or may be considered for the role of project's suppliers in the future;
- The Export Processing Zones and Exclusive Economic Zones are also considered as interested party
- Mass media and associated interested groups including District and local Press Club, local, regional and national print and broadcasting media, digital/web-based entities, and their associations;

3.1.3 Disadvantaged/vulnerable individuals or groups

Persons or groups who may be disproportionately impacted or further disadvantaged by the project(s) as compared with any other groups due to their vulnerable status¹⁷, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. Engagement with all identified stakeholders will help ensure the greatest possible contribution from the stakeholder parties toward the successful implementation of the project and will enable the project to draw on their pre-existing expertise, networks and agendas. It will also facilitate both the community's and institutional endorsement of the project by various parties. Access to the local knowledge and experience also becomes possible through the active involvement of stakeholders.

Vulnerability has multifaceted dimensions and may stem from person's origin, gender, age, health condition, economic deficiency and financial insecurity, ethnicity, disadvantaged status in the community (e.g. minorities or fringe groups), dependence on other individuals or natural resources, etc. The aim of the SEP has been to establish an inclusive approach and establish a public consultation and engagement forum for all stakeholders and safeguard their rights and to secure their interest in the project.

The project Implementing Agencies (IAs) will take special measures to ensure that disadvantaged and vulnerable groups have equal opportunity to access of information, participate in the engagement activities, provide feedback, and submit grievances. The PIUs through their dedicated staff will help to ensure proactive outreach to all population groups, and they will make a special effort to engage with those identified as vulnerable or disadvantaged. If necessary, will provide transport to public meetings for vulnerable people, and will also deliver brochures and informational material to such households in the m appropriate. Dedicated efforts will be taken by the PIU to reach out to the disadvantaged and vulnerable groups. The vulnerable groups may include, but not limited to the following:

- Women and poor street vendors who may face dislocations due to land acquisition or civil construction;
- Small-scale fishers who depend for livelihood around the river,
- Low-income families dependent on social safety net program allowance in the project AOI;
- Landless and small/marginal land holders, particularly in the char areas;
- Poorest households whose livelihood are likely to be disrupted due to civil works or land acquisition;
- Women-headed households who face displacement from land acquisition;
- Slum/tenement dwellers around/nearby the sites who face displacement or disruptions of income due to civil works or land acquisition
- Local communities who may face temporary or permanent disruption of income or livelihood from civil works .
- Internally displaced people due to river erosion and flood affected people
- Char dwellers, particularly those who don't have any tenurial security of their land
- Elderly people, especially if they are living alone;
- Persons with physical and mental disabilities and their care givers;
- Children and adolescent girls
- Unemployed persons (men and women);

It is anticipated that, the unemployed persons who are in the working age group will be interested and employed in the construction and other project activities and as well as serve as suppliers of goods and services.

¹⁷ Vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

Preferential employment of vulnerable people from the area of influence will be ensured through local hiring for construction work. Equal remuneration for the male and female workers for similar types of work will be ensured through the LMP. A labor specific and Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) responsive GRM will be set up. Because of the added risk that is associated with community trainings and other similar activities, the HD note GPN will have to be applied to the project. Although only minor civil works in the rural areas are anticipated in the Project, SEA/SH risk is assessed as substantial because a major labor influx from outside the communities will have an adverse impact, particularly on women.¹⁸ As such, stakeholders will be engaged throughout the project life cycle to determine prevention and mitigation measures for SEA/SH risks, which will be detailed in an SEA/SH Action Plan, ESCP and ESMP. Social inclusion and protection against SEA/SH will lead to awareness and can benefit the poor women, particularly adolescent girls.

Since the SEP is a living document, vulnerable groups within the community affected by the project will be further reviewed, revised and consulted with, as appropriate. Similarly, methods of engagement that will be undertaken by the project will also be periodically reviewed and revised. Further, the IAs will take following steps to provide support vulnerable peoples in collaboration with the EPC contractors:

- BWDB, BIWTA and IDRA will give priority to vulnerable family members to provide skills development training and on successful completion would provide jobs on priority basis.
- BWDB, BIWTA and IDRA will create and ensure jobs for women-headed households as well as low-income families and persons with disabilities
- BWDB, BIWTA and IDRA will ensure active participation of all stakeholders including the vulnerable groups in the project-related decision-making consultation meetings during implementation.

3.2 Stakeholder Mapping

Stakeholder mapping, illustrated in table 3.1, was undertaken to identify the level of engagement required during the ESIA and future phases for each group of stakeholders based on their level of interest and level of impact. The stakeholders were mapped firstly by component and then by types. Table 3.1 and 3.2 provides a broad overview of the level of stakeholder groups' interest and potential influence in the project.

Table 3.1: Project Components & Component wise Stakeholder Groups' interest and influence

Project Component	Key Stakeholders	Interest	Influence
Component 1: Flood and bank erosion management	People potentially affected by land acquisition	H	L
	People residing in project area	H	L
	Displaced group and land owners of flood plain and bank line	H	L
	Char land and river bank communities	H	L
	Vulnerable households due to river erosion and flooding	H	L
	Local Government Institutions (LGI)	H	H
	Local leadership	H	H
	Squatters and petty businessmen around the Approach Road	H	L
	Local laborer's to be engaged in the project work	H	L
	Contractors, sub-contractors	H	M
	Transport owners & workers	H	L
	Land owners and farmers of spoil dumping sites	H	L

¹⁸ For instance, the skilled labor influx could potentially increase the gender-based violence (GBV) related risks, including forced marriage to an employed man because it might be seen as the best livelihood strategy for an adolescent girl in a rural area. The construction activities that may take place along roads that lead to schools or near pedestrian access that women and girls use for their daily activities may increase inappropriate and criminal behaviors, such as sexual harassment of women and girls, exploitative sexual relations, and illicit sexual relations with minors from the local community.

Project Component	Key Stakeholders	Interest	Influence
Component 2: Navigation channel development	Char land communities	H	L
	Fishermen communities	H	L
	River transports associations (vessel owners)	H	M
	Boat/trawlers' owners and associations	M	L
	Local Administration	M	H
	Local Government bodies/institutions	H	H
Component 3: Financial Protection of Communities	Vulnerable farmers	H	L
	Implementing Agencies (BWDB, BIWTA, IDRA)	H	H
Component 4: Community Engagement and Project Management	Bangladesh Water Development Board	H	H
	Local Government Institutions (LGI)	H	H
	Local laborer's to be engaged in the project work	H	L
	Local communities, vulnerable groups specially women	H	L
<i>Definitions:</i> H= High (The peak level of interest and as per the law the highest power of influence, M= Moderate (Greater than normal/usual level of power and interest, L= Low (No/Less than the normal/usual level of interest and power)			

A schematic view of types of stakeholders' interest and influence concerning the project is presented in the following table

Table 3.2 A schematic view of types of stakeholders' interest and influence concerning the project

Type of Stakeholder	Key Stakeholders	Interest (High/Low)	Influence/Power (High/Low)	Role during project implementation
Project Affected Parties	People potentially affected by land acquisition	Can get benefit from employment and training opportunities stemming from the project	May be impacted but have limited power and influence over the project	They will be consulted, and plans (i.e. RAP) will be prepared based on their need, lawful demand and related contexts. As per the provisions of RPF/RAP they will receive remedies as spelled out in the RAP. The process will be facilitated by the Project in coordination with relevant government agencies. Vulnerable groups will receive additional support from the Project as required.
	Land owners and farmers of spoil dumping sites	Can get benefit from employment and training opportunities stemming from the project	May be impacted but have limited power and influence over the project	
	Fishermen communities	Can get benefit from employment and training opportunities stemming from the project	May be impacted but have limited power and influence over the project	
	Displaced group and land owners of flood plain and bank line	Can get benefit from employment and training opportunities stemming from the project. Moreover, will be benefitted from the bank protection work and flooding	May be impacted but have limited power and influence over the project	
	Char land and river bank communities	Can get benefit from employment and training opportunities stemming from the project. Moreover, will be benefitted	May be impacted but have limited power and influence over the project	

Type of Stakeholder	Key Stakeholders	Interest (High/Low)	Influence/Power (High/Low)	Role during project implementation
		from the bank protection work and flooding		
	Vulnerable households	Can get benefit from employment and training opportunities stemming from the project. Moreover, will be benefitted from the bank protection work and flooding	May be impacted but have limited power and influence over the project	
	Squatters and petty businessmen around the Approach Road	Can get benefit from small business opportunity and loss of business during construction	May be impacted but have limited power and influence over the project	
	River transports associations (vessel owners)	Have high interest due to the development of corridor	May be impacted but have high power and influence over the project	
	Boat/trawlers' owners and associations	Have high interest because of getting benefit from river dredging and channelization of the river but income will be impacted temporarily	May be impacted but have limited power and influence over the project	
	Implementing Agencies (BWDB, BIWTA, IDRA)	Have high interest	High power to influence the project.	
Interested parties	Residents of the other rural settlements within the project area	Can get benefit from employment and training opportunities stemming from the project	May be impacted but have limited power and influence over the project	They will be included in the consultation process during the implementation periodically by the Project. They would play the role of a watchdog securing rights and entitlements of the PAPs. They will report anomalies, if there happens any to the PIU and if required to the Bank.
	NGOs at the international, regional, national and local levels with environmental, socio-economic, HR and gender related interests	Likely be interested to have a say in the project.	Organizations within this group are likely to be located outside the project's direct area of influence	
	Civil society	Likely to be interested to have a say in the project.	Organizations within this group are likely to be located outside the project's Direct Area of Influence	
	Locally influential people (political leaders, Community leaders)	Interested to have a say in the project.	Have highest level of influence in the community	
	Traders and trade bodies both at local and national level	Would be interested to benefit from project construction. Transport agencies	Business owners and providers of services, goods and materials within the project area that will be involved in	

Type of Stakeholder	Key Stakeholders	Interest (High/Low)	Influence/Power (High/Low)	Role during project implementation
		would also be part of this group	the project's wider supply chain	
	Mass media and associated interest groups, including local, regional and national printed and broadcasting media, digital/web-based entities, and their associations	Likely be interested to know about project planning and implementation activities.	Can influence the project activity by publishing news on project implementation activities.	
	Different Government Bodies (permitting and regulatory agencies at the national and regional levels) government officials, LGI	May be interested to have a say in the project.	Have the power and influence of permitting and regulatory issues including environmental, technical, social protection and labor authorities	
	The Export Processing Zones and Exclusive Economic Zones	Would be interested to benefit from project by developing the economic corridor	Companies and investors of the economic zones that will be involved in the project's wider supply chain	
	Local Government Institutions	May be interested to have a say in the project.	Have the power and influence of permitting and regulatory issues including environmental, technical, social protection and labor authorities	
Vulnerable Groups	Squatters and <i>Uthulis</i> (persons staying on others land with permission)	Can get benefit from employment and training opportunities stemming from the project. Moreover, will be benefitted from the bank protection work and flooding	May be impacted but have limited power and influence over the project	Special attention and care would be given to these groups. The PIU in coordination with the field team members would make sure that they are included in the RAP, and additional supports are provided to them during the RAP implementation, primarily.
	Internally displaced people due to river erosion and flood affected people	Can get benefit from employment and training opportunities stemming from the project. Moreover, will be benefitted from the bank	May be impacted but have limited power and influence over the project	

Type of Stakeholder	Key Stakeholders	Interest (High/Low)	Influence/Power (High/Low)	Role during project implementation
		protection work and flooding		During the project implementation if there is/are any issue arise/s that may affect the lives and livelihood of these groups, then first they would be consulted, and then as per the law and the scope of the Project necessary measures would be taken. They should be engaged in all consultative process during the Project period, and should be able to express their opinions. PIU would put in place mechanisms to ensure that this happens.
	Impoverished land-owners of eroded land	Can get benefit from employment and training opportunities stemming from the project. Moreover, will be benefitted from the bank protection work and flooding	May be impacted but have limited power and influence over the project	
	Landless and Sharecroppers	Can get benefit from employment and training opportunities stemming from the project. Moreover, will be benefitted from the bank protection work and flooding	May be impacted but have limited power and influence over the project	
	Char dwellers, particularly those who don't have any tenurial security of their land	Can get benefit from employment and training opportunities stemming from the project. Moreover, will be benefitted from the bank protection work and flooding	May be impacted but have limited power and influence over the project	
	Small/marginal landholders' poor farmers	Can get benefit from employment and training opportunities stemming from the project. Moreover, will be benefitted from the bank protection work and flooding	May be impacted but have limited power and influence over the project	
	Women-headed households or single mothers with underage children, adolescent girls	Can get benefit from employment and training opportunities stemming from the project. Moreover, will be benefitted from the bank protection work and flooding	May be impacted but have limited power and influence over the project	
	Unemployed persons (men and women)	Can get benefit from employment and training opportunities stemming from the project. Moreover,	May be impacted but have limited power and influence over the project	

Type of Stakeholder	Key Stakeholders	Interest (High/Low)	Influence/Power (High/Low)	Role during project implementation
		will be benefitted from the bank protection work and flooding		
	Small Fishers	Can get benefit from employment and training opportunities stemming from the project. Moreover, will be benefitted from the bank protection work and flooding	May be impacted but have limited power and influence over the project	
	Minority/transgender community (if any) within the area of influence of the project area	Can get benefit from employment and training opportunities stemming from the project. Moreover, will be benefitted from the bank protection work and flooding	May be impacted but have limited power and influence over the project	
	Low-income families' dependent on Social Safety Net Program (SSNP) allowance in the project AOI	Can get benefit from employment and training opportunities stemming from the project. Moreover, will be benefitted from the bank protection work and flooding	May be impacted but have limited power and influence over the project	

3.1 Summary of the stakeholders' perception and communication needs

As noted earlier, several field level consultation meetings were held with various stakeholder groups in June 2021 on both sides of the Jamuna River reach within the program area and in November 2021 consultation was conducted at the selected pilot sites. This section summarizes the findings. In the consultation meetings, people were informed about the project objectives and components, timeline, adverse and beneficial impacts, opportunities of the local people for preferential employment, equal salaries for similar types of works irrespective of gender, GRM, and SEA/SH risks and mitigation measures. The importance of local inputs and involvement by the stakeholders were underscored in those consultation meetings. Table 3.3 presents a summary of the consultation meetings and summary of stakeholder needs for communication for engaging in project activities in future.

Table 3.3: Summary of stakeholder needs for communication for engaging in project activities

Location	Stakeholder Group	Key Characteristics/ Perception	Language Needs	Preferred notification means (e-mail, phone, radio, letter, etc.)	Specific needs (accessibility, large print, child care, daytime meetings, etc.)
Consultation conducted in June 2021.					
Chikajani Union Parishad	Local Government Institution	Have influence in the project	English/Bengali	Phone, Letter	Daytime meetings
Char Halka Haowaibari, Chukaibari Union,	Char People	Vulnerable to erosion; displaced many times by erosion	Bengali	Mobile Phone	Accessibility, daytime meetings
Kholabari, Chikajani Union,	Fishing community	At risk for loss of livelihood	Bengali	Mobile Phone	Accessibility, daytime meetings
Kholabari, Chikajani Union	Agricultural group	Susceptible to be affected by the project (loss of land)	Bengali	Mobile Phone	Accessibility, daytime meetings
2 No. Kholabari, Chikajani Union	Displaced People	Vulnerable to erosion and several times displaced from erosion	Bengali	Mobile Phone	Accessibility, daytime meetings
Gobindashi union Parishad	Local Government Institution	Have influence in the project	English/Bengali	Phone, Letter	Daytime meetings
Patitapara, Nikrail Union	Agricultural Group	Likely to be affected by the project (loss of land)	Bengali	Mobile Phone	Accessibility, daytime meetings
Dovaya, Nikrail Union	Displaced People	Vulnerable to erosion and several times displaced from erosion	Bengali	Mobile Phone	Accessibility, daytime meetings
Gandhail Union Parishad,	Local Government Institution	Have influence in the project	English/Bengali	Phone, Letter	Daytime meetings
Purbo khuksia, Gandhail Union	Agricultural Group	Susceptible to be affected by the project (loss of land)	Bengali	Mobile Phone	Accessibility, daytime meetings
Shingrabari, Kazipur Union	Fisherman Group	Susceptible for loss of livelihood	Bengali	Mobile Phone	Accessibility, daytime meetings
Baropakhia, Shonaton Union	FGD with Char People	Vulnerable to erosion and several times displaced from erosion	Bengali	Mobile Phone	Accessibility, daytime meetings
Consultation meetings conducted in September and November 2021					
Pingna, Sharishabari, Jamalpur	Agricultural group	Vulnerable to erosion; displaced many times by erosion	Bengali	Mobile Phone	Accessibility, daytime meetings

Location	Stakeholder Group	Key Characteristics/ Perception	Language Needs	Preferred notification means (e-mail, phone, radio, letter, etc.)	Specific needs (accessibility, large print, child care, daytime meetings, etc.)
Krishnapur, Bhuapur, Tangail	Community people	Vulnerable to erosion.	Bengali	Mobile Phone	Accessibility, daytime meetings
Pachthakuri, Kazipur, Sirajganj	Community people	Vulnerable to erosion and several times displaced from erosion.	Bengali	Mobile Phone	Accessibility, daytime meetings
Katadara, Fulchhari, Gaibandha	Community people	Vulnerable to erosion and several times displaced from erosion.	Bengali	Mobile Phone	Accessibility, daytime meetings
Gohalabari Union Parishad, Kalihati, Tangail	Local Government Institution	Have influence in the project	English/Bengali	Phone, Letter	Daytime meetings
Char Mouli Bazar, Kakua Union, Tangail Sadar Chukaibari Union,	Agricultural group	Vulnerable to erosion; displaced many times by erosion	Bengali	Mobile Phone	Accessibility, daytime meetings
Alipur, Gohalabari Union Parishad, Kalihati, Tangail	Local elite with community people	Vulnerable to erosion and several times displaced from erosion, Susceptible to be affected by the project (loss of land).	Bengali	Mobile Phone	Accessibility, daytime meetings
Alipur Moddhopara, Gohalabari Union Parishad, Kalihati, Tangail	Community people	Vulnerable to erosion and several times displaced from erosion.	Bengali	Mobile Phone	Accessibility, daytime meetings
Consultation meeting at Kaoakola Site					
Katanga Primary School, Kaoakola Char, Sirajganj	Local People, Union Council, BWDB	Vulnerable to flooding and erosion	English, Bengali	Letter, Mobile Phone	Accessibility, daytime meetings
Barni Char, Shirajganj	Community people	Vulnerable to flooding and erosion	Bengali	Mobile Phone	Accessibility, daytime meetings
Boroitola Ghat, Kaoakola Char, Sirajganj	Community people	Vulnerable to flooding and erosion	Bengali	Mobile Phone	Accessibility, daytime meetings
Mechrapara, Kazir hat, Shirajganj	Community people	Vulnerable to flooding and erosion	Bengali	Mobile Phone	Accessibility, daytime meetings
Consultation meeting at Uria Union, Fulchori, Gaibandha					
Sadek Khaner Bazar	Community People	At present there is no erosion but	Bengali	Mobile Phone	Accessibility, daytime meetings

Location	Stakeholder Group	Key Characteristics/ Perception	Language Needs	Preferred notification means (e-mail, phone, radio, letter, etc.)	Specific needs (accessibility, large print, child care, daytime meetings, etc.)
(Kabilpur), 9 No. Ward, Uria Union, Fulchori	including, farmers, small business holders	susceptible to erosion and displaced couple of time due to bank erosion.			
Ratonpur, 5 No. Ward, Uria Union, Fulchori	Community People including, Farmers and seasonal fisherman	In the opposite downstream of the project site and susceptible to erosion due to project implementation	Bengali	Mobile Phone	Accessibility, daytime meetings
Uria Union Parishad, Fulchori, Gaibandha	Local Government Bodies, Civil Society representatives, Women Group	Have influence in the project	English/Bengali	Phone, Letter	Daytime meetings

As evident from the Table, the stakeholders at the meeting reported potential impacts and losses, including livelihoods due to project intervention. However, a sense of security and relief was noticed during the meeting with the proposal for bank protection to reduce erosion and displacement. It was also revealed that local affected and beneficiary people prefer communications about the project via mobile phone over other media. Also, daytime meeting is preferred option for the stakeholders.

Issues that were raised during these consultations, and suggestions that were derived are incorporated in the relevant E&S documents (e.g., RAP, LMP, SEA/SH-AP), as appropriate. This process will be continued during the implementation phase of the project with periodic activities as drawn by the PIU in the ESCP. This would also be reflected in the relevant C-ESMPs and their respective Code of Conducts. The Project M&E process would document and record these interactions/dialogues for record and reference.

4 Stakeholders Consultation Activities and Plan

4.1 Background

In 2014, BWDB had conducted extensive stakeholder consultation meeting for the Riverbank Improvement Program within the same project reach.¹⁹ The local stakeholders extended full support to the Project²⁰ and still await bankline protection to get relief from the curse of the riverbank erosion in the project area. Under JRSMP Project 1, two pilot sites have been selected for river training and protection works. The C1 Consultants responsible for the technical design of the sub-project conducted public consultation meetings at each site, giving due attention to social and environmental considerations. In addition, the ESIA team members for social baseline, gender/SEA-SH, stakeholder consultation, and resettlement conducted weeklong consultation meetings in June 2021 in the program/project area. Further consultation meetings were held on site in September and November 2021 and in January 2022. The detailed outcomes of the consultation are presented in the main SEP report. The team as noted earlier conducted some virtual meetings through video conferences, using Zoom and other platforms, particularly with IA officials.

4.2 Stakeholders Consultation Activities – June, September & November 2021 and January 2022 and National consultation on 17 April 2023.

Table 4.1 presents a summary of the stakeholder consultation meetings held in the program areas in June and September & November 2021, and January, February and July of 2022 and finally, the national consultation held on 17 April 2023. Meetings were held along the Program reach in shortlisted sites (by C1 consultants), in adjacent char settlements, and finally the two selected pilot sites in Fulchori, and Alipur located in Gaibandha and Tangail district. **Annex A** contains full details (i.e., types of consultation meetings, issues discussed, and key points raised) in a matrix form.

A separate team has worked to identify the SEA/SH risks and its impacts over the community. Moreover, the ESIA team also identified a number of SEA/SH risk associated with the Phase 1 activities. These risks are mostly related with the land acquisition, labor influx, and induced development. The details of the Gender and SEA/SH risk and impact assessment are provided in the Gender and Sexual Exploitation & Abuse/Sexual Harassment Risk Mitigation and Response Action Plan report.

The stakeholders were informed about the E&S risks that will come out of construction, dredging and excavating activities such as noise & air pollution, generation of wastes and biohazards during the consultation meetings. The ESIA team has also informed the stakeholders that appropriate mitigation measure will be taken to reduce the E&S risks and proper management plan will be taken.

In all, 29 consultation, meetings, besides the above-mentioned national level consultation on 17 April 2023, were held in which a total of 581 persons (526 male and 55 females)²¹ attended. Key concerns raised during the meetings are (i) continued erosion and loss of land; (ii) lack of appropriate measures for bank protection and river stabilization; (iii) lack of support and/or policy to assist those who are displaced by the erosion processes; (iv) loss of livelihood and limited alternative sources for support and survival; (v) project induced environmental risks; and (vi) poverty and marginalization among the displaced and vulnerable groups.

¹⁹ The RMIP was later dropped by the Government of Bangladesh due to lack of, among others, adequate dredging program for improving the navigability of the Jamuna channels.

²⁰ RMIP/Social Action Plan Vol. 3 *Public Consultation and Participation Plan*, Nov 2014.

²¹ Separate meeting with women's groups were held in the program area by the gender specialist. See GAP and SEA/SH Report.

4.3 Strategies to be Adopted for Stakeholders Engagement during Implementation

In order to overcome the situations enforced by the COVID pandemic and also given short time span of Phase 1 to prepare the E&S documents as reflected in the TORs, this SEP will be revised and updated all through the implementation of the Phase 1 to further enhance consultation and engagement with the stakeholders. The following strategies, derived from ESS10, will be followed.

4.3.1 Project-cycle approach

Additional stakeholders meeting will be arranged throughout the project cycles. However, due to the onset of the pandemic in Bangladesh and uncertainty surrounding how long it will last, new methods of engagement have to be put in place and applied like using digital technology or audio, traditional methods like TV, newspaper, radio, public announcement and mail (see Table 4.2). Over the course of the project cycles, additional stakeholders will be identified, and after they have been identified, those stakeholders will be integrated into the project.

Table 4.2: SEP Techniques to be applied during Implementation

Engagement Techniques	Appropriate application of the technique
Correspondences (Phone, Emails, Text, instant messaging)	- Distribute information to Ministries, BWDB, BIWTA and IDRA officials of different government agencies, NGOs, Local Government, and organizations/agencies, - Invite stakeholders to meetings and follow-up
Key Informant Interviews	- Seeking views and opinions - Enable stakeholder to speak freely about sensitive issues - Build personal relationships
Public meetings/workshop and Focus Group Discussion	- Present Project information to a large group of stakeholders, especially communities - Discuss all project components - Allow the group to provide their views and opinions - Build relationship with the communities, especially those impacted - Distribute non-technical information - Facilitate meetings with Maps and project briefs etc. - Record discussions, comments, questions.
Project on website/Information Centre/information Boards	- Establish Information Board in each project area - Present project information and progress updates - Disclose ESMF, ESCP, ESIA, ESMP, SEP, LMP, RPF and relevant project documentation - Disclose component wise project activities
Direct communication with affected people through physical meeting, emailing, telephonic conversation	- Share information on timing of project activities - Collect the opinion about the project
Radio/TV emissions/media	Arrange for broadcast Radio/TV emissions and local/national newspaper to bring the project to large public awareness.
Project leaflet	- Brief project information to provide regular update - Site specific project information in local language
Surveys	- Gather opinions and views from individual stakeholders - Gather baseline data and develop database for monitoring impacts - Record data and analysis
Techniques to be used in case of continued COVID-19 pandemic	
Video Conference, Virtual	Video Conference, Virtual
Workshops/Phone Calls for all appropriate meetings- Focus Group, Interviews	- Collect the opinion about the project - Discuss all project components - Allow the group to provide their views and opinions

(Zoom, Microsoft Teams, Skype, and in low ICT capacity situations, audio meetings and preferred virtual channel by the stakeholders)	• Build relationship with the communities, especially those impacted • Distribute non-technical information • Record discussions, comments, questions. Allow small groups of people (women, youth, vulnerable people, disabled people, etc.) to provide their views and opinions • Facilitate meetings with presentations, PowerPoint, posters, etc. • All channels of communication need to clearly specify how stakeholders can provide their feedback and suggestions. The following procedures will be followed: • Participants can register online through a dedicated platform • Distribution of workshop materials to participants, including agenda, project documents, presentations, questionnaires, and discussion topics: These can be distributed online to participants. • Participants can be organized and assigned to different topic groups, teams or virtual “tables” provided they agree to this. Group, team, and table discussions can be organized through social media means, such as, Skype, Zoom, Microsoft Teams, or through written feedback in the form of an electronic questionnaire or feedback forms that can be emailed back. • The chair of the workshop will summarize the virtual workshop discussion, formulate conclusions, and share electronically with all participants.
COVID- 19 Guidelines for Face to Face Meetings	Overarching principles • To maintain the safety, it is important that Government requirements are followed. These include: ➢ physically distance (1.5m) from others to the extent possible; ➢ wear a face mask when unable to maintain physical distancing or as required by current Government directions; ➢ maintaining high levels of personal hygiene; • Not attending in the meeting if: ○ if you have any COVID-19 like symptoms; ○ unwell; ○ waiting on COVID-19 test results (PCR or Rapid Antigen Test (RAT)); ○ diagnosed with COVID-19 or have been instructed to self-isolate ○ are a close contact of a diagnosed case known and your symptoms have resolved; • Get vaccinated. Meeting Protocols • Wear a face mask if unable to maintain physical distancing. • Utilize online meeting tools (MS Teams, Zoom) to reduce number of participants required in person. • Avoid shaking hands or sharing equipment (pens, notebooks, etc.) • Minimize the duration of face-to-face meetings as much as reasonably practicable. • Wipe down the meeting table and any shared equipment (keyboard, mouse, and microphone) between meetings or between users.

4.3.2 Informed participation and feedback

Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders’ feedback for analyzing and addressing comments and concerns to close the feedback loop. The SEP provides guidance and timelines for the related activities such as information campaign, compensation types and levels, entitlements, relocation sites and schedules and established GRM. Annual and quarterly reports on the feedback will also be shared with stakeholders.

4.3.3 Inclusiveness and sensitivity

Stakeholder identifications are undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders always are encouraged to be involved in the consultation process through phone, mail or personal contract. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders’ needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women, youth, elderly including diverse ethnic groups.

5 Disclosure and Communication Plan

5.1 Purpose and timing of stakeholder engagement program

The main goal of the stakeholder engagement program is (i) building and maintaining a constructive relationship with various stakeholders identified; (ii) assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design, and environmental and social performance; (iii) to inform stakeholders of the project related information especially issues that could potentially affect them in a timely, understandable, accessible and appropriate manner and format; (iv) to provide them with accessible and inclusive means to raise issues and grievances, and allow IA to respond to and manage such grievance.

5.2 Information disclosure and Communication Plan

As a standard practice, the IAs should develop a Communication Strategy/Plan within six (6) months of the beginning of the implementation of Phase 1 and will implement this Plan. In this regard, the project materials (ESMF, ESIA/ESMP, SEP, RPF/RAP, GAP, LMP, ESCP, Gender Action Plan, SEA/SH Action Plan) will be made available to the public through the project office and dedicated public information centers (PICs) to be established at project sites. There will be comments register book for comments and suggestions from the stakeholders that will be subsequently documented by the PIU in a formal manner. The PIU will continue applying the similar approach to disclosure for any additional E&S appraisal materials that will be prepared as part of the project development.

The ESMF, ESIA, SEP and the other E&S documents will be disclosed in Bangla as well.. The SEP will be released in the public domain simultaneously along with the E&S documents including ESIA and ESMP. Free printed booklet, project summary/brief copies of the ESMF/ESMPs and the SEP in Bangla and English will be made accessible for the general public at various public locations, such as:

- The Project headquarter office in Dhaka
- Regional and Local project office
- The District Administration office
- Upazila Headquarters
- Union Parishad Office
- Other designated public locations to ensure wide dissemination of the materials
- Newspapers, posters, radio, television
- Information centers and exhibitions or other visual displays
- Brochures, leaflets, posters, nontechnical summary documents and reports;
- Official correspondence, meetings

Electronic copies of the E&S documents (ESIA, ESMP, LMP, RPF/RAP, ESCP, etc.) along with Bangla translations of the executive summaries will be placed on the project website. This will allow stakeholders with access to Internet to view the information about the planned development and to initiate their involvement in the public consultation process. The website will be equipped with an on-line feedback feature that will enable readers to leave their comments in relation to the disclosed materials.

The mechanisms which will be used for facilitating input from stakeholders will include press releases and announcements in the media, notifications of the aforementioned disclosed materials to local, regional and national NGOs as well as other interested parties.

Table 5.1 provides a summary of the schedule for the proposed stakeholder activities during the various stages of the project life (preparation, construction and operation phases)

Table 5.1: Information Disclosure Mechanism

Project stage	Information to be disclosed	Proposed Methods	Timetable: Locations/Dates	Target stakeholders	Stakeholders Engagement Mechanism	Responsibilities
Project Preparation Phase	- SEP, LMP, ESCP, ESIA/ESMP, BMP	- BWDB, IDRA and BIWTA websites, - Newspaper advertisement, - District and Upazila administration notice board Project field offices	As soon as the concerned documents are uploaded in the website/published. The ESIA will be uploaded 120 days prior to WB Board meeting.	- Expert in the field of E&S, - Journalists - NGOS/CBOs - PAPs - Local stakeholders and beneficiaries	- Information will be disseminated to all level stakeholders through consultation, - Announcement in printed/ electronic media, brochure, leaflet, - Feedback will be obtained from the stakeholders through email, letter and phone call/SMS, etc. and documented accordingly, - Opinions will be reflected in the safeguard documents.	BWDB/BIWTA/IDRA/ PD/PIU designated staff/ Specialist
Construction	- Compensation Payment Plan, - Traffic management plan, - Labor Management Plan, - Implementation Progress report, - Site specific construction information including OHS Plan	- BWDB, IDRA and BIWTA websites - Signboard - Brochures - Project field offices	-Monthly meeting -Signboard, -Brochures -Consultation and FGDS	- Contractors, Suppliers, Villagers, and drivers - Local and Migrant Workers of the project Journalists - NGOS/CBOs - PAPs - Local stakeholders and beneficiaries	- Poster, information brochure, leaflet etc. will be circulated and displayed in the public palaces - Consultation and group discussion will also be held, - Feedback will be obtained in written or verbal form and documented accordingly.	PIU designated staff/ /Asst. Engineer /EPC Contractor

Project stage	Information to be disclosed	Proposed Methods	Timetable: Locations/Dates	Target stakeholders	Stakeholders Engagement Mechanism	Responsibilities
Operation	- Environment and Social Commitment Plan, - Labor Management Plan, - Skills development program	- Meeting - Brochures - FGD	Monthly or as per need	- Contractor, Sub-Contractor, Suppliers, PAPs, - Local communities - Transporters, traders and businesses - Youth and Women	- Information will be disseminated to all level stakeholders through consultation, - Announcement in printed/ electronic media, brochure, leaflet, - Feedback will be obtained from the stakeholders through email, letter and phone call/SMS, etc. and documented accordingly, - Opinions will be reflected in the safeguard documents.	PIU designated staff/specialist /Asst. Engineer DS farm

5.3 Strategies for stakeholder engagement

This section describes stakeholder engagement activities that will be implemented by IAs (i.e., BWDB, BIWTA and IDRA) through the respective PIU offices, including activities tailored to the specific project phases/developments as well as the on-going routine engagement. Due to the nature of the activities, the project intends to utilize various methods of engagement that will be used by as part of its continuous interaction with the stakeholders. Therefore, during the consultation if any new stakeholders are found in post-pandemic period and/or during project implementation period using various methods, including liaising with the local communities and interested groups, they will be incorporated into the stakeholder list.

Stakeholder engagement activities will provide stakeholder groups with relevant information and opportunities to voice their views on issues that matter to them/affect them. Table 5.2 presents the stakeholder engagement activities that the IAs/PIUs will undertake for their project(s) which also includes how people would be made aware and opportunities for participation including location and frequency. The activity types and their frequency are adapted to the three main project stages: project preparation (including design, procurement of contractors and supplies), construction, and operation and maintenance.

The methods used would vary according to the target audience and would include: (i) Public/community meetings, separate meetings for women and vulnerable groups; (ii) Face-to-face meetings; (iii) Focus Group Discussions; (iv) Workshop by experts; (v) periodic surveys/interviews with stakeholders; (vi) Disclosure of written information: brochures, posters, flyers, website Information boards or desks at various sites where project work is ongoing; (vii) GRM; and (viii) BWDB/BIWTA/IDRA newsletters and websites.

Table 5.2: Stakeholder Engagement Strategy

Project stage	Target stakeholders	Topic of engagement	Method to be used	Location/ Frequency	Responsibilities
Stage 1: Project preparation (Project design, Scoping, Resettlement Planning, etc.)	Project Affected People: • People potentially affected by land acquisition • People residing in project area • Squatters and petty businessmen around the Approach Road • Local administration and local leadership • Beneficiary Groups • Workers engaged in the project work • Suppliers and service providers • Contractors, sub-contractors • Transport owners & workers	• Project scope and rationale • ESMF, ESIA, RPF, SEP, RAP, SEA/SH Action Plan disclosures • Land acquisition process • E&S Risks • Assistance in gathering official documents for authorized land uses • Compensation rates, methodology, • Compensation packages • Project scope and rationale • Project E&S principles • Resettlement and livelihood restoration options • GRM process • SEA/SH Risks	• Public meetings, • Face-to-face meetings • Mass/social media communication (as needed) • Disclosure of written information: brochures, posters, flyers, website • Information boards or desks • GRM • Local newspaper	• In respective Upazila for disclosure of Drafts ESMF, ESIA, SEP, RAP • At the beginning of construction that would affect the area • Continuous communication through mass/social media and routine interactions • Throughout RAP preparation and implementation as needed	• BWDB IDRA and BIWTA responsible for land acquisition • Safeguard consultants
	Disadvantaged and Vulnerable Groups • Disabled Individuals • Elderly people, especially if they are living alone; • Persons with physical and mental disabilities and their caregivers; • Low-income families' dependent on Social Safety Net Program (SSNP) allowance; • Women-headed households or single mothers with underage children, adolescent girls; • Children and adolescent girls • Unemployed persons (men and women); • Squatters and <i>Uthulies</i>	• Project scope and rationale • ESMF, ESIA/ESMP, RPF, SEP, RAP, SEA/SH Action Plan disclosures • Land acquisition process • E&S Risks • Assistance in gathering official documents for authorized land uses • Compensation rates, methodology, • Compensation packages • Project scope and rationale • Project E&S principles • Resettlement and livelihood restoration options • GRM	• Separate, targeted consultations • Engagement with local organizations representing the interests of persons with disabilities • Face-to-face meetings • Provision of transportation or transportation cost • Disclosure of written information in local language • Information boards or desks • GRM • Honorarium for the participant and the care giver (if any) • Ensure their voice during meeting • Local newspaper	• In respective Upazila for disclosure of Drafts ESMF, ESIA, SEP, RAP • At the beginning of construction that would affect the area • Continuous communication through mobile/letter and routine interactions • Throughout RAP preparation and implementation as needed	• BWDB, IDRA and BIWTA responsible for land acquisition • Safeguard consultants

Project stage	Target stakeholders	Topic of engagement	Method to be used	Location/ Frequency	Responsibilities
	- Internally displaced group due to river erosion and flood affected people - Impoverished land owners of eroded land - Landless and Sharecroppers - Small/marginal landholders' poor farmers and - Small Fishers fishermen - Char dwellers - Minority/transgender community (if any) within the area of influence of the project area				
	Other Interested Parties (External) - Respective Upazila Parishads - Representatives in village	- Project scope, rationale and E&S principles - ESMF, ESIA/ESMP, RPF, SEP, RAP disclosures - Land acquisition process - Identification of land plots and uses - Resettlement and livelihood restoration options (if needed) - GRM process	- Face-to-face meetings - Joint public/community meetings with PAPs - Public Disclosure	- Throughout SEP preparation and implementation as needed - Project launch meetings in respected Upazilas - Quarterly meetings in affected villages and or as when demanded by the affected community - Disclosure meetings in nearby area	- E&S Team & management - BWDB, IDRA and BIWTA - Specialists responsible for land acquisition, when needed - RAP consultant
	Other Interested Parties (External) - Press and media - NGOs - Businesses and business organizations - Workers' organizations - Women's NGO's and organizations - Academic institutions - National Government Ministries	- ESMF, ESIA/ESMP, RPF, SEP, RAP, SEA/SH Action Plan disclosures - Land acquisition process - Identification of land plots and uses - Resettlement and livelihood restoration options - Project scope, rationale and E&S principles - GRM process	- Public meetings, trainings/workshops (separate meetings specifically for women and vulnerable as needed) - Mass/social media communication - Disclosure of written information: Brochures, posters, flyers, website - Information boards or desks in respective local project office	- Throughout RAP preparation and implementation as needed - Project launch meetings at BWDB and BIWTA - Quarterly meetings in affected villages and affected communities - Disclosure meetings in local and national	- E&S Team & management - BWDB, IDRA and BIWTA - Specialists responsible for land acquisition, when needed - RAP consultant

Project stage	Target stakeholders	Topic of engagement	Method to be used	Location/ Frequency	Responsibilities
	- Respective Upazila Government Departments - General public, tourists, jobseekers		Notice board for employment recruitment	- Communication through mass/social media (as needed) - Information desks with brochures/posters in affected villages (continuous)	
	Other Interested Parties (External): - Other Government Departments including DoE from which permissions/clearances are required; - Other project developers, donors	- Legal compliance issues - Project information scope and rationale and E&S principles - Coordination activities - Land acquisition process - GRM process - ESMF/ESMP/RPF/SEP disclosures	- Face-to-face meetings - Invitations to public/community meetings - Submission of required reports	- Disclosure meetings - Reports as required	- E&S Team & management BWDB, IDRA and BIWTA - Specialists responsible for land acquisition RAP consultant
	Other Interested Parties (Internal): - Other project staff - Supervision Consultants - Supervision contractors, sub-contractors, service providers, suppliers, and their workers	- Project information: scope and rationale and E&S principles - Training ESMF/ESMP requirements and other management plans - GRM process - E&S requirements - Feedback on consultant/contractor reports	- Face-to-face meetings - Trainings/workshops - Invitations to public/community meetings	As needed	- E&S Team & management BWDB, IDRA and BIWTA - Specialists responsible for land acquisition RAP consultant
STAGE 2: Construction and Mobilization Phase	Project Affected People: - People potentially affected by land acquisition - People residing in project area - Benefited Group - Local laborer's to be engaged in the project work - Suppliers and service providers - Contractors, sub-contractors - Transport owners & workers	- GRM - SEA/SH Risks - E&S Risks - Health and safety impacts (EMF, community H&S, community concerns) - Employment opportunities - Project status	- Public meetings, open houses, trainings/workshops; - Individual outreach to PAPs as needed; - Disclosure of written information: brochures, posters, flyers, website - Information boards in BWDB, IDRA and BIWTA - Notice board(s) at construction sites, - Grievance mechanism GRM and as guided with ESF	- Quarterly meetings during construction seasons - Communication through mass/social media as needed - Notice boards updated weekly - Routine interactions - Brochures in local offices	- E&S Team & management BWDB, IDRA and BIWTA - Specialists responsible for land acquisition RAP consultant

Project stage	Target stakeholders	Topic of engagement	Method to be used	Location/ Frequency	Responsibilities
	Disadvantaged and Vulnerable Groups • Disabled Individuals • Elderly people, especially if they are living alone; • Persons with physical and mental disabilities and their care givers; • Low-income families dependent on SSNP allowance; • Women-headed households or single mothers with underage children, adolescent girls; • Children and adolescent girls • Squatters and <i>Utholies</i> • Internally displaced group due to river erosion & flood affected people • Impoverished land owners of eroded land • Landless and Sharecroppers • Small/marginal landholders • Small Fishers • Char dwellers Minority/transgender community (if any) within the area of influence of the project area	• Project scope and rationale • ESMF, ESI, RPF, SEP, RAP, SEA/SH Action Plan disclosures • Land acquisition process • E&S Risks • Assistance in gathering official documents for authorized land uses • Compensation rates, methodology, • Compensation packages • Project scope and rationale • Project E&S principles • Resettlement and livelihood restoration options • GRM process • SEA/SH Risks	documents mainly RPF and ESMF. • Separate, targeted consultations for persons with disabilities. • Engagement with local organizations representing the interests of persons with disabilities • Face-to-face meetings • Resources allocation towards local administration representatives • Provision of transportation or transportation cost • Disclosure of written information in locally understandable language • Information boards or desks • GRM • Local newspaper	• In respective Upazila for disclosure of Drafts ESMF, ESIA, SEP, RAP • At the beginning of construction that would affect the area • Continuous communication through mobile/letter and routine interactions • Throughout RAP preparation and implementation as needed	• BWDB , IDRA and BIWTA responsible for land acquisition • Safeguard consultants
	Other Interested Parties (External): • Governmental committees for land use and compensation (MBC) • Respective Upazila and representatives in villages	• Project scope, rationale and E&S principles • GRM process • Project status • World Bank compensation requirements	• Face-to-face meetings • Joint public/community meetings with PAPs	• As needed (monthly during construction season)	• E&S Team & management BWDB, IDRA and BIWTA • Specialists responsible for land acquisition RAP consultant
	Other Interested Parties (External): • Press and media	• Project information - scope and rationale and E&S principles	• Public meetings, open houses, trainings/workshops	• Same as for PAPs	• E&S Team & management

Project stage	Target stakeholders	Topic of engagement	Method to be used	Location/ Frequency	Responsibilities
	• NGOs • Businesses and business organizations • Workers' organizations • Women's NGO's and organizations • Academic institutions • National Government Ministries • Respective Upazila Government Departments • General public, tourists, jobseekers	• Project status Health and safety impacts • Employment opportunities • Environmental concerns • GRM process	• Disclosure of written information: brochures, posters, flyers, website, • Information boards, notice board(s) at construction sites • GRM		BWDB, IDRA and BIWTA • Specialists responsible for land acquisition RAP consultant
	Other Interested Parties (Internal): • Other project staff • Supervision Consultants • Supervision contractors, sub-contractors, service providers, suppliers, and their workers	• Project information: scope and rationale and E&S principles • Training on ESMF/ESMP requirements and other sub management plans • Worker GRM	• Face-to-face meetings • Trainings/workshops • Invitations to public/community meetings	• Daily, as needed	E&S Team & management BWDB, IDRA and BIWTA • Specialists responsible for land acquisition RAP consultant
STAGE 3: Operation and Maintenance	Project Affected People: • People residing in project area	• Satisfaction with engagement activities and • GRM process • Damage claim process	• Outreach to individual PAPs • BWDB, IDRA and BIWTA websites • GRM	• Outreach as needed • Meetings in affected people and villages (as needed/requested) • Monthly (newsletter)	E&S Team & management BWDB, IDRA and BIWTA • Specialists responsible for land acquisition RAP consultant
	Disadvantaged and Vulnerable Groups • Elderly people, especially if they are living alone; • Persons with physical and mental disabilities and their care givers; • Low-income families dependent on SSNP allowance; • Women-headed households or single mothers with underage children, adolescent girls;	• Satisfaction with engagement activities • E&S Risks • GRM process and • Damage claim process	• Outreach to individual PAPs • Separate, targeted consultations • Face-to-face meetings • GRM •	• Outreach as needed • Meetings in affected villages (as needed/requested) • Monthly (newsletter)	E&S Team & management BWDB, IDRA and BIWTA • Specialists responsible for land acquisition RAP consultant

Project stage	Target stakeholders	Topic of engagement	Method to be used	Location/ Frequency	Responsibilities
	• Children and adolescent girls • Squatters and <i>Uthulies</i> • Internally displaced group due to river erosion & flood affected people • Impoverished land owners of eroded land • Landless and Sharecroppers • Small/marginal landholders • Small Fishers • Char dwellers • Minority/transgender community (if any) within the area of influence of the project area				
	Other Interested Parties (External): • Press and media • NGOs • Businesses and business organizations • Workers' organizations • Academic institutions • National Government Ministries • Respective Upazila Government Departments • General public, tourists, jobseekers	• GRM process • Issues of concern Status and compliance reports	• GRM • BWDB, IDRA and BIWTA websites • Face-to-face meetings • Submission of reports as required	• As and when required	• IAs/PIUs • Specialists responsible for land acquisition

5.4 Strategies to encourage and ensure participation by vulnerable groups

Ensuring the participation of disadvantaged/vulnerable individuals/groups in the project activities may require the implementation of tailored techniques. Since their vulnerable status may lead to people's indifference and reluctance or physical incapacity to participate in large-scale community meetings, visiting such individuals/ families at their homes or holding separate small group discussions with them at an easily accessible venue is a way for the project to reach out to the groups who, under standard circumstances, are likely to be insufficiently represented at community gatherings. The following modes to be adopted specifically for the disadvantaged and vulnerable groups/individuals:

- Robust engagement with local community-based organizations
- Communication of key risks including E&S and SEA/SH
- Communication of the GRM (including GBV-responsive GRM) process
- The project would arrange separate consultation sessions for different target groups
- Resources allocation towards local administration representatives and councilors
- Provision of transportation or transportation cost particularly for the disabled, marginalized and the elderly ones including women
- More information dissemination through the local FM radio, where available
- Engagement of local NGO's and CBO's who work with vulnerable people at the community level to help disseminate information and organize consultations
- Separate consultation with men and women
- Manageable and gendered FGDs at project sites so that women can speak freely
- Adequate means to reach the disabled ones in the community and their residences, if needed

5.5 Information Disclosure Strategies Considering COVID-19

Given the COVID-19 pandemic situation, managing public consultation and stakeholder engagement in the Project needs to be given to national requirements and any updated guidance issued by WHO. It is important that the alternative ways of managing consultation and stakeholder engagement discussed with clients are in accordance with the local applicable laws and policies, especially those related to media and communication. Therefore, distribution of the disclosure materials will be through making them available online under the COVID-19 situation. Upon improvement of the situation, distributions of the disclosure materials will be through making them available at venues and locations frequented by the community and places to which the public has unhindered access in the usual manner. Free printed copies of the ESMF/ESMPs and the SEP in Bangla and English will be made accessible to the general public at the locations described in section 5.2. Moreover, further stakeholder consultation and engagement of stakeholders for information disclosure should follow the COVID-19 protocols described in Table 4.2.

5.6 Gender and SEA/SH-Oriented Information Disclosure

The IAs and the contractors should strictly follow the gender and SEA/SH protocols and guidelines to disclose any kind of information described in the Gender Action Plan, SEA/SH Action Plan and in the ESMP. Moreover, the stakeholders must be informed about the grievance redress mechanism process and ensure that stakeholders especially women are aware of the process including SEA/SH GRM.

5.7 Review of Comments and closing the feedback loop

The comments will be gathered (written and oral comments) and reviewed, and reported back to stakeholders on the following process:

- Comments received from stakeholders orally or in the written form at the project level
- The Social Development Officer/responsible officer would summarize the comments and bring to the notice of the Project Director (PD)
- The Social Specialist on his behalf the PD would respond to the comments by oral or written means at the project level (If the comments are in the written form, then the answer will be also in the written form)
- The PD may also himself organize the meeting with respective stakeholders
- The Social Development Officer will share the summary of the comments to stakeholders in every level.
- A written record of all these will be kept and maintained and uploaded in the relevant website for easy access of all.

In the Phase 1 of JRSMP, BWDB, IDRA and BIWTA shall welcome suggestion and comments from the stakeholders e.g. the local people are solicited to provide feedback/comments to the project management dredging the river and other river training work to protect the river erosion. Based on suggestions from the local peoples and elected representatives, BWDB, IDRA and BIWTA will took necessary action.

6 Roles, Responsibilities and Resources for Stakeholder Engagement

6.1 Resources

The management, coordination and implementation of the SEP will be the responsibility IAs/PIUs, with support from the contractors/local sub-contractors as well. Proper contact address (see Table 6.1) will be provided so that members of various stakeholder groups can contact project officials. The format for project information will be followed by BWDB/BIWTA/IDRA.

Table 6.1 Sample for contact details

Description	Contact details
Company	
To	
Address	
Email	
Phone	

A tentative budget for implementing this SEP is included below for each individual IAs. The budget accounts for all of the activities that are associated with the project's stakeholder engagement plan. It also includes a wide variety of activities, some of which may be referenced but not duplicated in the budgets for other project documents and instruments (such as the RAP, EMP, ESMP, SMP, etc.). This budget will be annually reviewed by IA's; and if found necessary, will be revised and adjusted. The budget as approved by the IAs (BWDB, BIWTA, and IDRA) for the Project is provided at Table 6.2 below (all figures are in USD):

Table 6.2: Tentative budget for implementation of SEP for Each IA

SL	Items	Quantity	Unit Cost (USD)	Month	Total Cost (USD)
1	SEP Experts for Project Implementation Unit				
1.1	Communication & GRM Expert	1	1500	42	63000
1.2	Communication and GRM Field Officer	1	800	42	33600
Sub-total					96600
2	Stakeholder Engagement Activities				
2.1	Travel expenses	2	100	42	8400
2.2	Stakeholder/Community/Sensitization meeting	30	120	-	3600
2.3	Meeting with Union Parishad and Upazila Administration	30	235	-	7050
2.4	Meeting with District Administration	2	1000	-	2000
2.5	Communication Materials (Posters; Brochure, Flyers, Billboard uploading information in website etc.)	Lump sum	-	-	1000
2.6	Training on Social and Environmental issues (Batch, per batch 20 persons)	4	4000	-	16000
2.7	Travel Expenses for Senior staffs of Ministry/BWDB/BIWTA/IDRA/Others	4	2500		10000
Sub-total					48050
3	Grievance Redress Activities				
3.1	Communication Materials	Lump sum	10000		10000
3.2	GRM Guidebook	1	1000		1000
3.3	Suggestions Box	20	100		2000
3.4	Training of GRM Committees and Contractor staff	3	5000	-	15000
3.5	Honorarium for committees	Lump sum		10000	10000

SL	Items	Quantity	Unit Cost (USD)	Month	Total Cost (USD)
Sub-total					38000
Total					182,650

6.2 Management functions and responsibilities

The stakeholder engagement activities will be incorporated into the project management system with the formation of PIU where one Communication & GRM Specialist Design and Supervision consultancy firm will assist to implement the day-to-day activities. The roles and responsibilities, and the internal coordination and communication arrangements are summarized below:

Table 6.3: Roles and responsibilities of the stakeholder

Actor/ Stakeholder	Responsibilities
PIU	- The PIU will be responsible for the preparation and physical implementation of the project; - Organize regular meeting with stakeholders - The PD would oversee the activities of the Project Social Development Specialist and monitor the ongoing activities
Communication and GRM Specialist	- Review all present and past material generated by the project in developing the communication strategy (determine areas for integration with other existing strategies); - Develop and update regularly the communications a strategy - Undertake consultations with the management to assess the internal and external communications needs as will be required in the development of the projects communication plan; - Coordinate and manage the preparation, publication and dissemination of information of the project in coordination and collaboration with PIU. This shall include helping to determine the best medium and communication tools to be used to achieve dissemination goals and target audiences. - Develop, implement and monitor all stakeholder engagement strategies/plans for the Project/ESIA; - Oversee all stakeholder engagement related activities for the Project; - Manage the grievance redress mechanism process; ensure stakeholders are aware of the process including labor and SEA/SH GRM - Ensure gender concerns are taken into consideration for stakeholder engagement related activities for the project - Liaise with the project director to ensure that stakeholder engagement requirements/protocols are understood; and - Proactively identify stakeholders, project risks and opportunities and inform the PD/senior management to ensure that the necessary planning can be done to either mitigate risk or exploit opportunities.
Communication and GRM Field Officer	- Support to Communication and GRM Specialist to develop, implement and monitor all stakeholder engagement strategies/plans for the Project/ESIA; - Support to Communication and GRM Specialist to oversee all stakeholder engagement related activities for the Project; - Manage the grievance mechanism; - Interact with related and complementary support activities that require ad hoc or intensive stakeholder engagement (community development and land acquisition/resettlement planning and implementation);
Design and Supervision Consultant	- Supervision/monitoring of contractor; - Management of engagement activities during the construction phase; - Support to Social Specialist to develop, implement and monitor all stakeholder engagement strategies/plans for the Project/ESIA; - Support to Social Specialist to oversee all stakeholder engagement related activities for the Project

Actor/ Stakeholder	Responsibilities
Other government departments and stakeholder	• Supervision/monitoring of contractor o Management of engagement activities during the construction phase; • Support to Social Specialist to develop, implement and monitor all stakeholder engagement strategies/plans for the Project/ESIA; • Support to Social Specialist to oversee all stakeholder engagement related activities for the Project.

6.3 Communication and Awareness Campaign activities by IAs

The IAs (BWDB, BIWTA and IDRA) will establish separate Project Implementation Unit (PIU) and will include Environmental and Social unit (ESU) to monitor the activities of the Design and Supervision Consultant. The ESU will be responsible for overseeing the monitoring activities conducted by the CSC on behalf of IAS. It will also be monitoring the activities of the contractor through the activities of PIU. The activities that need to be performed by the IAs with regard to environmental and social safeguards are:

- The IAs may develop a Communication Strategy/Plan prior to or at the beginning of the implementation of Phase 1 and will implement this Plan.
- Inform stakeholders of the project related information especially issues that could potentially affect them in a timely, understandable, accessible and appropriate manner and format
- In this regard, the project materials (ESMF, ESIA/ESMP, SEP, RPF/RAP, GAP, LMP, ESCP, Gender Action Plan, SEA/SH Action Plan) will be made available to the public through the project office and dedicated public information centers (PICs) to be established at project sites.
- All the E&S documents will be made available in Bangla for public review by the IAs.
- The SEP will be released in the public domain simultaneously along with the E&S documents including ESIA and ESMP.
- Free printed booklet, project summary/brief copies of the ESMF/ESMPs and the SEP in Bangla and English will be made accessible for the general public at various public locations.
- Electronic copies of the E&S documents along with Bangla translations of the executive summaries will be placed on the project website along with BWDB, IDRA and BIWTA websites
- Distribution of brochures, and flyers among the stakeholders for awareness campaign in the project AOI
- Mass/social media communication (as needed) for public awareness
- Set up of Information boards, Signboards at project site containing project related information
- GRM
- Advertisement in local newspaper and publishing posters for people's awareness about project activity

7 Grievance Redress Mechanism

Considering the overall need for the total project period, IA's will establish individual GRM to address complaints and grievances in Phase 1 of the project. The GRM is intended to address issues and complaints in an efficient, timely, and cost-effective manner. The mechanism will, however, not bar an aggrieved person to go to the courts of law. Separate GRM will be available for labor and SEA/SH related issues under contractors and sub-contractors respectively. Project-affected-people in the project and any other stakeholder may submit comments or complaints at any time by using the project's GRM.

Grievances in the project may range from disputes over ownership and inheritance of the acquired lands to affected persons and assets missed by the censuses; less valuation of the affected assets; delay in compensation payment; adverse effect on the squatters and their livelihood, effect on the society and the local community due to construction related activities leading to noise, light and dust pollution, conduct of the migrant workers, local workers and the contractor, and SEA-SH during the operational stage grievances of the workforce against project management, water pollution, mismanagement in operation and maintenance of riverbank protection structures and the like.

The Objectives of the GRM are to:

- Provide a transparent process for timely identification and resolution of issues affecting the project and people, including issues related to the environmental impact, resettlement and compensation program.
- Assist stakeholders/PAP in resolving and clarifying project issues (such as complaints) by providing information on matters that may be unclear to them.

7.1 GRM Structure

The purpose of the GRM is to record and address any issue that may arise during the life cycle of the project period effectively and efficiently. Two tier GRM is designed to address concerns and complaints promptly and transparently with no impacts (cost, discrimination) for any reports made by project affected people (PAPs) and the complainants. The GRM will provide opportunity to resolve grievances at the local and project level. Necessary sign posting/billboard would be placed at the central places/places where people gather for sharing detailed information of the GRCs at every level. The structure of Grievance redress mechanism is presented in Figure 7.1.



Figure 7.1: The structure of Grievance redress mechanism

7.1.1 Field level GRM

The objective of the field level GRM is to resolve issues at the first instance. However, issues that are not resolved at field level will be referred to the project level GRC. The field level GRC shall carry out the following as regard to redressing grievances: a) Hear the grievances, and provide an early and mutually satisfactory solution to those; b) Immediately bring to the notice of the Project unit or Social Standards Officer/Industry Leadership any serious matter that may have arisen/complaint received; c) Inform the aggrieved parties about

the progress of actions of their grievances and decisions. The field level Grievance Redress Committee (GRC) shall have the following members:

Table 7.1: GRC membership at Field Level

SI	Name/Person	Designation
1	Assistant Engineer (BWDB/BIWTA) and in the case of IDRA a due representative	Convener
2	Safeguard Specialist of the Implementing Consulting Firm	Member Secretary
4	A Representative of the PAPs/ workers	Member
5	Representative of an NGO working in the area on Social Development /Gender/SEA/SH and labor issues	Member
6	A female representative from the Local Government	Member

The field level GRC shall resolve or reach a decision fifteen (15) days from the date the complaint is received. The chairperson of the GRC shall communicate the committee's decision to the aggrieved PAPs in writing and maintain a record of all decisions related to each case. In addition, local communities have existing traditional and cultural GRMs. It is expected that some disputes at the field level may be resolved using these mechanisms, without the involvement of the contractor(s), and or Government representatives at the local level.

7.1.2 Project Level GRM

If the resolution attempt at the field level fails, the GRC will refer the complaint with the minutes of the hearings of the field GRC to project level for further review. With active assistance from the safeguard specialist of implementation support unit, the committee will make a decision and communicate it to the concerned GRC. The PIU will make periodic visit to the subproject sites, interact with the communities and affected persons, and pick up issues of concerns, complaints and suggestions to register with the GRM books. The decisions on unresolved cases will be communicated to the GRC within one week of the complaint receipt and shall carry out the following as regard to redressing grievances:

- Hear the grievances of the PAPs/staffs and workers, and provide an early and mutually satisfactory solution to those.
- Immediately bring to the notice of the Project unit or Social Standards Officer/Industry Leadership any serious matter that may have arisen/complaint received.
- Inform the aggrieved parties about.

The project level GRM shall have the following Grievance Redress Committee (GRC) members: -

Table 7.2: GRC Membership at Project Level

SI	Name/Person	Designation
1	Project Director	Convener
2	Safeguard Specialist at PIU	Member Secretary
3	An Elected Member of the Respective Local Government	Member
4	A Representative of the PAPs/ workers	Member
5	Representative of an NGO working in the area on Social Development /Gender/GBV and labor issues	Member

The members of the GRCs will be responsible for ensuring that complaints and grievances are presented in an appropriate manner, ensuring impartial hearings and investigations are conducted, and also transparent decisions are made. Where grievances are among the affected persons, the membership composition of the GRCs will take into account any traditional conflict resolution arrangements that communities may practice. If the aggrieved person is a female, PIU will ask the concerned female UP Member or Municipal Ward Councilor to participate in the hearings. All cases at the project level will be heard within four weeks of their receipt.

Grievances received through any channel will be registered and a notification of receipt with assurance of necessary review and resolution given in writing to the aggrieved persons.

A decision agreed with the aggrieved person(s) at any level of hearing will be binding upon BWDB/BIWTA/IDRA. The SEP budget has made provisions for related costs for local, project and ministry level GRC activities. To ensure that grievance redress decisions are made in formal hearings and in a transparent manner, the Convener will apply the following guidelines:

- Reject the application for grievance redress if it contains any recommendations written on it by a member of the GRC or by anyone else, including politicians and other powerful persons. For example, the application will be denied if the aggrieved party submits it with a recommendation for any project related issue with any of the above-mentioned people in the hopes of receiving any kind of favor from the GRC.
- In addition, if a person submits a separate recommendation letter along with their application for grievance redress, the recommendation letter will be removed from the application as soon as possible in order to ensure that the Grievance Redress Committee is able to make a decision without being influenced by any bias.
- Disqualify a GRC member who has made a recommendation on the application or separately before the formal hearing: Where a GRC member is removed, appoint another person in consultation with the Project Director.
- The Convener will also ensure strict adherence to the impact mitigation policies and guidelines adopted in the ESF documents and the mitigation standards, such as compensation rates established through market price surveys.

The affected persons and their communities will be informed of the project's grievance redress mechanism in open meetings at important locations and in PAP group meetings. Bangla translations of the summary SEP in the form of information brochures will be distributed among the affected persons. The PAPs will also be briefed on the scope of the GRC, the procedure for lodging grievances cases and the procedure of grievance resolution at the project level.

7.2 GRM Intake Channels/GRC

IAS will publicize the GRM as part of the initial disclosure consultations in the participating Upazila, union and villages. Brochures will be distributed during consultations and public meetings, and posters will be displayed in public places such as in government offices, project offices, village notice boards, community centers, etc. Information about the GRM will also be posted online on the BWDB/BIWTA/IDRA websites.

The overall process for the GRM includes six steps and described below:

- **Step 1: Uptake.** Project stakeholders will be able to provide feedback and report complaints through several channels: in person at offices (village/mahalla, Union, project, and Upazila offices) and at project sites, and by mail, telephone, and email.
- **Step 2: Sorting and processing.** Complaints and feedback will be compiled by the Assistant Manager/Social Development Officer and recorded in a register. Submissions related to the resettlement and compensation program will be referred to the planning department for processing and resolution.
- **Step 3: Acknowledgement and follow-up.** Within seven (7) days of the date a complaint is submitted, the responsible person will communicate with the complainant and provide information on the likely course of action and the anticipated timeframe for resolution of the complaint.

- **Step 4: Verification, investigation and action.** This step involves gathering information about the grievance to determine the facts surrounding the issue and verifying the complaint's validity, and then developing a proposed resolution, which could include changes of decisions concerning eligibility for compensation, additional compensation or assistance, changes in the program itself, other actions, or no actions. Depending on the nature of the complaint, the process can include site visits, document reviews, a meeting with the complainant (if known and willing to engage), and meetings with others (both those associated with the project and outside) who may have knowledge or can otherwise help resolve the issue. It is expected that many or most grievances would be resolved at this stage. All activities taken during this and the other steps will be fully documented, and any resolution logged in the register.
- **Step 5: Monitoring and evaluation.** Monitoring refers to the process of tracking grievances and assessing the progress that has been toward resolution. The Planning Department will be responsible for consolidating, monitoring, and reporting on complaints, enquiries and other feedback that have been received, resolved, or pending. This will be accomplished by maintaining the grievance register and records of all steps taken to resolve grievances or otherwise respond to feedback and questions.
- **Step 6: Providing Feedback.** This step involves informing those to submit complaints, feedback, and questions about how issues were resolved, or providing answers to questions. Whenever possible, complainants should be informed of the proposed resolution in person. If the complainant is not satisfied with the resolution, he or she will be informed of further options, which would include pursuing remedies through the World Bank, or through avenues afforded by the Bangladesh legal system.

Throughout the entire process, BWDB/BIWTA/IDRA will maintain detailed record of all deliberations, investigations, findings, and actions, and will maintain a summary log that tracks the overall process.

7.3 Grievance Registry, Referral, Resolution and Appeals Process

To ensure impartiality and transparency, hearings on complaints will remain open to the public. The GRCs will record the details of the complaints and their resolution in a register, including intake details, resolution process and the closing procedures. The IAs/PIUs will maintain the following three Grievance Registers:

- **Intake Register:** (1) Case number, (2) Date of receipt, (3) Name of complainant, (4) Gender, (5) Father or husband, (6) Complete address, (7) Main objection (loss of land/property or entitlements), (8) Complainants' story and expectation with evidence, and (8) Previous records of similar grievances.
- **Resolution Register:** (1) Serial no., (2) Case no., (3) Name of complainant, (4) Complainant's story and expectation, (5) Date of hearing, (6) Date of field investigation (if any), (7) Results of hearing and field investigation, (8) Decision of GRC, (9) Progress (pending, solved), and (10) Agreements or commitments.
- **Closing Register:** (1) Serial no., (2) Case no., (3) Name of complainant, (4) Decisions and response to complainants, (5) Mode and medium of communication, (6) Date of closing, (7) Confirmation of complainants' satisfaction, and (8) Management actions to avoid recurrence.

To resolve the grievances arises from the PAPs, the implementing agencies (BWDB/BIWTA/IDRA) would adopt the following procedures:

The GRC at the Field level (FGRC) will establish a simple computerized system to record the complaints; information on the complainants and perpetrators with names of the enterprises they are employed in; acceptance/rejection of the complaints by FGRC and the reasons thereof. If the decision made at this level is not acceptable to the aggrieved person, FGRC will refer to the Project Level GRC (PGRC). PGRC will review the

case and send its decision within four weeks from the receipt of the complaint or earlier. However, if an aggrieved person is dissatisfied with the GRM, he/she may lodge complaint following the law of the land. An example of a grievance registration form for JRSMP project is given at Annex B. The grievance resolution process is presented in **Figure 7-2**.

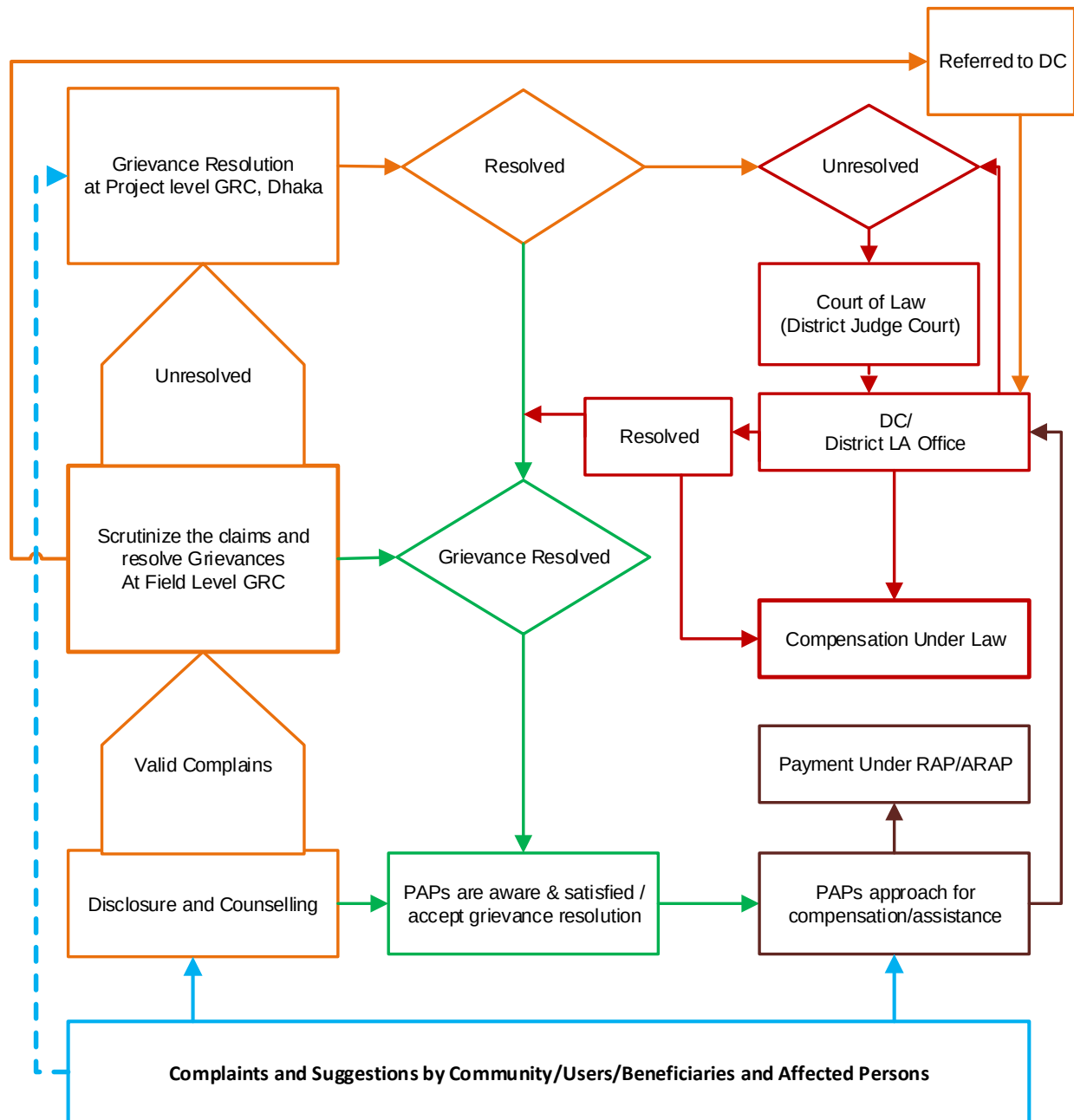


Figure 7-2: Grievance Resolution Process

7.4 SEA/SH Responsive GRM

The field and project level GRM will be equipped to handle SEA-SH related complaints. Cases will be handled in a survivor-centric manner in line with the World Bank guidelines provided in the WB good practice note on

gender-based violence.²² SEA-SH-related complaints will be dealt with strict confidentiality, based on the wishes of the victim/survivor. Any SEA-SH survivor will be referred to an NGO assigned for the project by the IA to manage and respond to SEA-SH cases. The NGO will support SEA-SH cases in accessing service providers and guiding them through options of lodging a complaint. The following mechanism would be followed for SEA/SB related matters.

Sl.	Stages	Responsible
1	Complaint Reporting	Kin/ Community/ Project Staff
2	Complaint Sorting and Processing	Communication and GRM Expert
3	Support Service to the Survivor	SEA/SB: Committee/ Service Providers
4	Complaint Investigation, Action and Monitoring	PIU

The project and field level GRC will be sensitized on SEA/SB handling procedures. The proposed GRM will be strengthened to make it responsive to GBV/SEA/SB. PIU will set up the GRM based on local resources and mechanism on GBV response and WB guiding model 1. Under this model, SEA/SB allegations can be reported, just like any other project-related grievance, using a regular project-level GM channel (Figure: xx). In doing so, training of the responsible officials in the PIU will be provided on how to receive and handle SEA/SB including GBV complaints. The Communication and GRM specialist, supervision consultants, contractors and PIU staffs will also be included in these trainings which will allow them to determine follow up modalities. To make the GRM more responsive to SEA/SB and GBV issues, an information sharing protocol with GBV service providers will be developed so that survivor related information is carefully managed, and confidentiality is maintained. In addition, awareness campaign and development of IEC materials on GRM will be done for the communities and stakeholders using easily accessible methods. A response protocol, reporting of allegation procedures and response framework of the GRM is attached (Annex XX). The communication materials will be disseminated among the communities and stakeholders through appropriate channels and media including IAs website.

²² The World Bank (2018): Good Practice Note Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works.
<https://documents1.worldbank.org/curated/en/399881538336159607/Environment-and-Social-Framework-ESF-Good-Practice-Note-on-Gender-based-Violence-English.pdf>

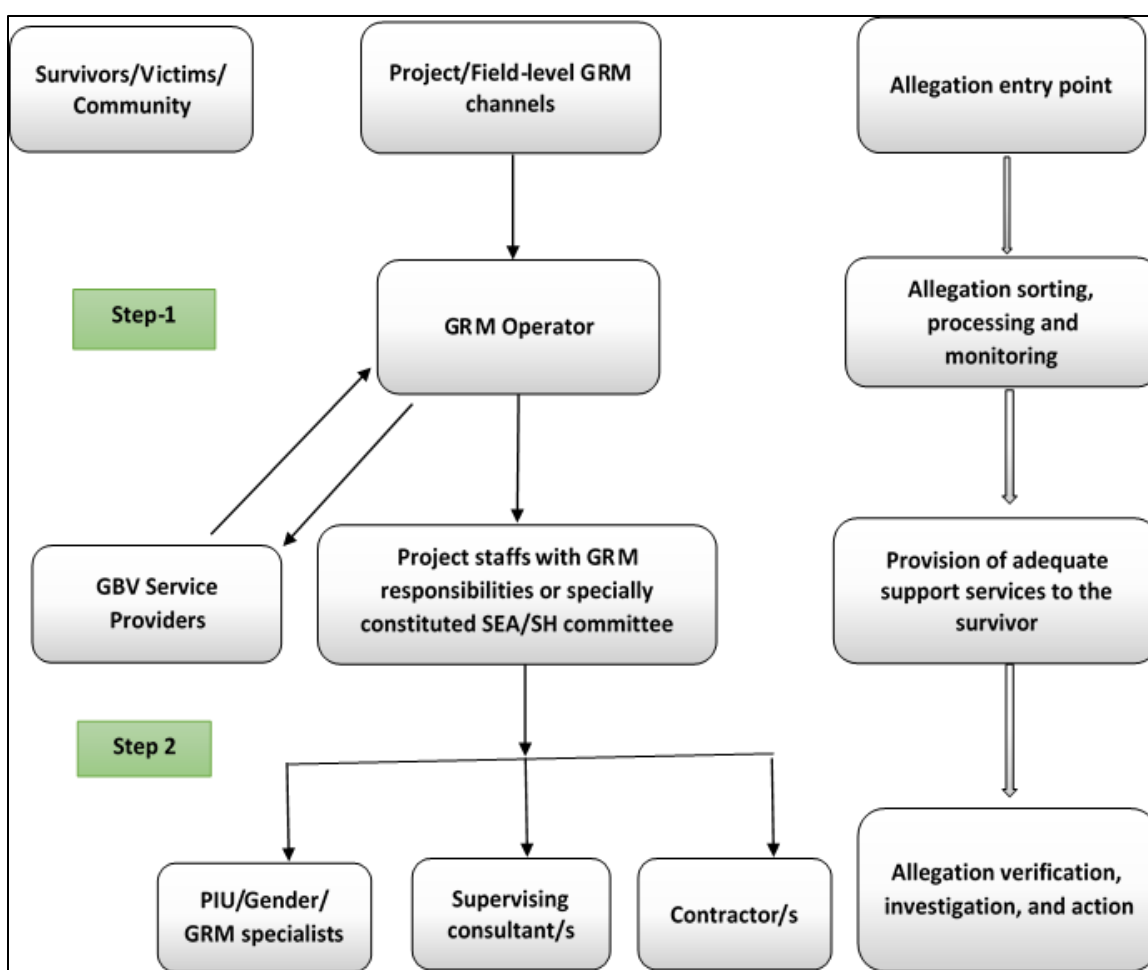


Figure 7-3: Mechanism to address SEA/SH Allegations

7.5 GRM Monitoring and Reporting

The GRM will be instituted and placed within BWDB/BIWTA/IDRA with qualified personnel trained in handling such complaints. Day-to-day implementation of the GRM and reporting to the World Bank will be the responsibility of the Project Directors. To ensure management oversight of grievance handling, the internal team will be responsible for monitoring the overall process, including verification that agreed resolutions are actually implemented.

7.6 GRM contact information

Information on the project and future stakeholder engagement programs will be available on the project's website and will be posted on information boards in the project office, villages, Union Parishad office, Upazila Office crossed by the line. Information can also be obtained from BWDB/BIWTA/IDRA offices in Dhaka and respective district offices. A sample for the point of contact regarding the stakeholder engagement program at BWDB/BIWTA/IDRA is in Table 7.4.

Table 7.4 Sample of point of contact

Description	Contact details
Company	
To	

Address	
Email	
Website	
Telephone	

8 Monitoring and Reporting

8.1 Involvement of stakeholders in monitoring activities

The Monitoring and reporting will include involving Project Affected Parties, internal and external stakeholders, interested group and the disadvantaged and vulnerable groups in monitoring, mitigation measures that will be agreed on the ESCP to satisfy stakeholder concerns; thus, promoting transparency. The Environmental and Social Commitment Plan (ESCP) will further outline, based on close consultations with all stakeholders, how affected parties and interested or beneficiary parties will be involved in the monitoring and evaluation and assess whether or not capacity building and training programs will be required to enable affected parties and local council staff participate in monitoring. The Project will establish a monitoring system that is participatory, which will utilize indicators that are sensible to concerned stakeholders. Furthermore, the project will involve affected parties by gathering their observations to triangulate scientific findings and involve them in participatory discussions of external and monitoring and evaluation missions. Monitoring and evaluation will be adjusted accordingly based on the COVID-19 situation in future.

8.2 Reporting back to stakeholder groups

The PIUs will prepare monthly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the senior management of the project(s). The monthly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner.

Further, PIUs will ensure that on receipt of any grievance, necessary timeframe would be strictly followed to communicate solution reached/if referred to hierarchy/is in the Court of Law awaiting final decision to the local community and the interested groups verbally/through meetings/interactions/local elected leadership/local administration etc. in order to close the feedback loop. NGOs operating in the locality could also be used to communicate the message. The project website would be regularly updated covering all aspects of the project including progress, outcome of various meetings, and the Grievance related issues. Close and intense monitoring by PD with the assistance of Social Development Officer (field), and PIU in the project area would also work as an effective means of disseminating related information to the PAPs.

The PIUs will conduct local workshops annually to share activities of the project and summarize progress, particularly related to social, resettlement, and SEA-SH issues. A comprehensive report will be prepared following the annual workshops to record the outcomes and comments by stakeholders. If necessary, implementation strategies and modalities will be modified to enhance performances. The annual workshop report will be shared with the Bank and other stakeholders.

Table 8.1: Monitoring of activities and Reporting to Stakeholders

Key Elements of reporting	Monitoring Indicators	Time frame	Methods to be used	Responsibilities
Public grievances enquiries and related incidents	Raised grievances	Daily	Providing Reports, Meeting with of the complaint	PIU, Communication and GRM Specialist
Status of implementation of agreed resolution and verification of resolved grievances	Agreed resolutions, resolved grievances	Monthly	Face to face meeting with the aggrieved person, field observation	Communication and GRM Specialist

Key Elements of reporting	Monitoring Indicators	Time frame	Methods to be used	Responsibilities
Compensation and Resettlement issues	Compensation received or not	Monthly	Consultation with the land and structure owners, squatters, other affected people, and relevant authority	PIU, Communication and GRM Specialist
Livelihood Condition and Employment Status	Occupational change In employment Household income and expenditure	Half yearly	Household survey and FGD	PIU, Communication and GRM Specialist
Gender SEA-SH	Implementation of SEA-SH action plan	Monthly	Both quantitative and qualitative assessment	CSC, PIU
Community Health, Safety and Security	Rates of COVID-19 and other communicable disease Project related safety and security incidents, Number of grievances or claims of Project related impacts on the community.	In various frequencies	Inspection and interview of labor, project personnel and community members followed by a checklist	CSC, PIU
Activities of the project and summarize progress of the project		Yearly	Workshop, Dissemination of report prepared based on the outcomes of the workshop and comments by stakeholders	BWDB/BIWTA/IDRA, PIU

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Annex A: Details of Consultation Meetings

Table 1: Summary of the Consultation Meetings Conducted at Different Locations through the Study Area

Place	Date	Participants			Type of Consultation	Issue discussed	Key points raised
		Total	Male	Female			
Consultation conducted in June 2021.							
Chikajani Union Parishad, Dewanganj, Jamalpur	21 June 2021	30	21	9	Public Consultation Meeting (PCM)	• Project objectives and scope of work • Briefing on the project and potential environment and social impacts • Project activities under different components • Mitigation measures and grievance redress mechanism • Stakeholder engagement process and World bank policies on disclosure • Land ownership pattern and land tenure • Land acquisition and compensation process • Future plan of action • Stakeholders’ opinion about the project	• The union and the whole Upazila is under threat of erosion • Already two wards (ward 1&2) of Chikajani Union are wiped out into the river and 60% of ward three is gone into the river • There is no flood protection embankment in this union. Therefore, every year the Chikajani and adjacent area remain inundated for 20-25 days • Need immediate action to protect river erosion from Erendabari to Deoanganj • Bank protection needed through piling from river bed • Embankment is must to protect the flood • The river is silted up and require dredging • Whether the char people and displaced people receive compensation for their land during project implementation • People shows their positive attitude about the project • Both women and men enjoy land ownership in the project but there were issues of discrimination • Women faces SEA-SH risk, in most cases problems were resolved locally. • Women’s opinion is hardly considered in important and critical issues like land, agriculture and livestock. Women can participate in decision-making

Place	Date	Participants			Type of Consultation	Issue discussed	Key points raised
		Total	Male	Female			
							process which is considered as less important. Women are gradually developing themselves in terms of empowerment, education, employment, and participation
Char Halka Haowaibari, Chukaibari Union, Dewanganj, Jamalpur.	21 June 2021	16	16	0	FGD with Char people	- Project objectives and scope of work - Stakeholders' opinion about the project - Project activities under different components - Stakeholder engagement process and World bank policies on disclosure	- Sustainability and stabilization of char - Need regular basis dredging of the river and char protection work to stabilize the char - People are mainly agricultural farmer - Once a land goes into the river, it declared as khash by govt. In that case what will be the process of compensation? - Any type of land purchasing is off
Kholabari, Chikajani Union, Dewanganj, Jamalpur.	22 June 2021	22	22	0	FGD with Fishing groups	Same as above	- Due to the siltation of river the availability of big fish has decreased - Fishermen could not catch fish due to the govt. monitoring and regulations - This group of people are changing their occupation and involved themselves in daily wage - Due to river erosion became landless and living into others land as a tenant
Kholabari, Chikajani Union, Dewanganj, Jamalpur.	22 June 2021	18	18	0	FGD with Agricultural group	Same as above	- A farmer became landless due to river erosion - Vulnerable groups became more vulnerable and marginalized - People are sought to protect the river erosion to save their life - Maintenance dredging is mandatory to protect the river erosion - People are willing to provide land for any kind of bank protection activity
2 No. Kholabari, Chikajani Union, Dewanganj, Jamalpur.	22 June 2021	14	14	0	FGD with Displaced People	Same as above	- All the displaced people become marginalized and living on others land as a tenant - Land owners become landless and farmer turned into wage laborer - Showed positive attitude to the project

Place	Date	Participants			Type of Consultation	Issue discussed	Key points raised
		Total	Male	Female			
							• Want Bank protection work and embankment • If any land reclaimed from the project, give priority the displaced people to distribute • Built resettlement site for the displaced people
Gobindashi union Parishad, Gobindashi, Bhuapur, Tangail.	23 June 2021	27	24	3	Public Consultation Meeting (PCM)	• Project objectives and scope of work • Briefing on the project and potential environment and social impacts • Project activities under different components • Mitigation measures and grievance redress mechanism • Stakeholder engagement process and World bank policies on disclosure • Land ownership pattern and land tenure • Land acquisition and compensation process • Future plan of action • Stakeholders' opinion about the project	• The chars of under the union is under threat of erosion • Four Unions i.e. Gobindashi, Nikrail, Gabchara & Arjuna of Bhuapur Upazila are vulnerable to river erosion • Already two wards of Gobindashi Union are wiped out into the river • Prepare resettlement site for the displaced people living in the embankment • Compensation for land acquisition should be ensured • appropriate and regular river training work are needed to protect bank erosion • The river is silted up and require dredging • People shows their positive attitude about the project
Patitapara, Nikrail Union, Bhuapur, Tangail	23 June 2021	19	19	0	FGD with Agricultural Group	• Project objectives and scope of work • Stakeholders' opinion about the project • Project activities under different components • Stakeholder engagement process and World bank policies on disclosure	• River erosion accelerated after the construction of Banggabandhu bridge • Most of the farmers become landless and turned into wage laborer • appropriate and regular river training work are needed to protect bank erosion • People shows their positive attitude about the project • When new char accredited, the land owners take position of the land according to their previous documents but they cannot buy or sell any land. Because any kind of buying and selling is off from the govt.

Place	Date	Participants			Type of Consultation	Issue discussed	Key points raised
		Total	Male	Female			
Dovaya, Nikrail Union, Bhuapur, Tangail	23 June 2021	21	21	0	FGD with Displaced People	Same as above	- All the displaced people become marginalized and living on others land as a tenant - Some are migrating to another Upazila and districts which is less vulnerable to river erosion and have work opportunity - Land owners become landless and farmer turned into wage laborer - Showed positive attitude to the project - Want Bank protection work and embankment - If any land reclaimed from the project, give priority the displaced people to distribute - Built resettlement site for the displaced people
Gandhail Union Parishad, Kazipur, Sirajganj	24 June 2021	31	26	5	Public Consultation Meeting (PCM)	- Project objectives and scope of work - Briefing on the project and potential environment and social impacts - Project activities under different components - Mitigation measures and grievance redress mechanism - Stakeholder engagement process and World bank policies on disclosure - Future plan of action - Stakeholders' opinion about the project - SEASH risk, gender issues	- The chars of under the union is under threat of erosion, - Prepare resettlement site for the displaced people living in the embankment - Compensation for land acquisition should be ensured - appropriate and regular river training work are needed to protect bank erosion - The river is silted up and require dredging - People shows their positive attitude about the project - both women and men enjoy land ownership in the project but there were issues of discrimination - Women faces SEASH risk, in most cases problems were resolved locally. - women's opinion is hardly considered in important and critical issues like land, agriculture and livestock. Women can participate in decision-making

Place	Date	Participants			Type of Consultation	Issue discussed	Key points raised
		Total	Male	Female			
							process which is considered as less important. Women are gradually developing themselves in terms of empowerment, education, employment, and participation
Purbo khuksia, Gandhail Union, Kazipur, Sirajganj.	24 June 2021	17	17	0	FGD with Agricultural Group	Same as above	- A farmer became landless due to river erosion - Vulnerable groups became more vulnerable and marginalized - People are sought to protect the river erosion to save their life and livelihood - Maintenance dredging is mandatory to protect the river erosion - People are willing to provide land for any kind of bank protection activity
Shingrabari, Kazipur Union, Kazipur, Sirajganj	24 June 2021	13	13	0	FGD with Fisherman Group	Same as above	- Availability of fish has decreased - Need alternative livelihood - Need livelihood assistance during river dredging
Baropakhia, Shonaton Union, Shajadpur, Sirajganj	25 June 2021	19	19	0	FGD with Char People	Same as above	- Sustainability and stabilization of char - Need regular basis dredging of the river and char protection work to stabilize the char - People are mainly agricultural farmer - Once a land goes into the river, it declared as <i>khush</i> by govt. In that case what will be the process of compensation? - Any types of land transaction is nearly non-existent due to erosion
Consultation meetings conducted in September and November 2021							
Pingna, Sharishabari, Jamalpur	14 Sept. 2021	8	8	0	Group discussion with community people	- Project objectives and scope of work - Stakeholders' opinion about the project - Project activities under different components	- Flood proofing is highly required for protecting assets - Erosion needs to be prevented - Flood and erosion-affected rural people are mainly hard to reach; therefore, the benefits of the project must ensure the benefits for these poor people.

Place	Date	Participants			Type of Consultation	Issue discussed	Key points raised
		Total	Male	Female			
						Stakeholder engagement process and World bank policies on disclosure	Proper compensation is required without administrative complicity.
Krishnapur, Bhuapur, Tangail	13 Sept. 2021	12	12	0	Group discussion with community people	- Project objectives and scope of work - Stakeholders' opinion about the project - Project activities under different components - Stakeholder engagement process and World bank policies on disclosure	- Flood proofing is highly required for protecting assets - Erosion needs to be prevented - Rural employment is highly needed. - Aligning the river into a proper channel to avoid erosion - Proper compensation is required without administrative complicity.
Pachthakur, Kazipur, Sirajganj	14 Sept. 2021	10	10	0	Group discussion with community people	- Project objectives and scope of work - Stakeholders' opinion about the project - Project activities under different components - Stakeholder engagement process and World bank policies on disclosure	- Effective and immediate measures are required against riverbank erosion - Flood proofing is also highly demanding - Engagement of local people in the project activities is a must
Katadara, Fulchhari	15 Sept. 2021	11	0		Group discussion with community people	- Project objectives and scope of work - Stakeholders' opinion about the project - Project activities under different components - Stakeholder engagement process and World bank policies on disclosure	- Effective and immediate measures are required against riverbank erosion - Flood proofing is also highly demanding - Engagement of local people in the project activities is a must
Gohalabari Union Parishad, Kalihati, Tangail	1 Novemb er 2021	6	6	0	Meeting with Local Govt. Body	- Project objectives and scope of work - Project activities under different components - Mitigation measures and grievance redress mechanism - Stakeholder engagement process and World bank policies on disclosure - Land acquisition and compensation process	- Take immediate action to protect river erosion and save community people; - Proper compensation to affected persons; - Engage the local Govt. bodies in to the project work so that they can monitoring the quality of work; and - Rehabilitate the project affected peoples through <i>Asroyon</i>/resettlement; and

Place	Date	Participants			Type of Consultation	Issue discussed	Key points raised
		Total	Male	Female			
						• Future plan of action • Stakeholders' opinion about the project	• Enable early warning system for river erosion
Char Mouli Bazar, Kakua Union, Tangail Sadar Chukaibari Union,	3 November 2021	12	12	0	Group discussion with Agricultural group	• Project objectives and scope of work • Stakeholders' opinion about the project • Project activities under different components • Stakeholder engagement process and World bank policies on disclosure	• Protection of homesteads and agricultural land from erosion • Ensure alternative livelihood for the displaced people due to river erosion • Provide compensation for land at market price • River training work should be maintaining regularly • Provide proper compensation for loss of land, crops and tress • Rehabilitate the PAPs by project if any
Alipur, Gohalabari Union Parishad, Kalihati, Tangail	2 November 2021	24	24	0	Group discussion with Local elite with community people	• Same as above	• Take immediate action to protect river erosion and save community people; • Working opportunity in the project • If any land reclaimed from the project, give priority the displaced people to distribute; • Prepare resettlement/<i>Asroyon</i> site for the vulnerable people and • Training for income and small business • Create job opportunity for the unemployed group
Alipur Moddhopara, Gohalabari Union Parishad, Kalihati, Tangail	2 November 2021	9	9	0	Group discussion with community people	• Same as above	• Protection of homesteads and agricultural land from erosion • Provide compensation for land at market price • Provide proper compensation for loss of land, crops and tress • Rehabilitate the PAPs by project if any • Working opportunity in project
Consultation meeting at Kaoakola Site							

Place	Date	Participants			Type of Consultation	Issue discussed	Key points raised
		Total	Male	Female			
Barni Char, Shirajganj	20 January 2022	7	5	2	Group discussion with community people	- Project objectives and scope of work - Stakeholders' opinion about the project - Project activities under different components - Stakeholder engagement process and World bank policies on disclosure	- Develop physical infrastructure in the char for better livelihood and communication - If any land acquired by the project, people should be compensated properly
Boroitola Ghat, Kaoakola Char, Sirajganj	19 January 2022	10	10	0	Group discussion with community people	- Project objectives and scope of work - Stakeholders' opinion about the project - Project activities under different components - Stakeholder engagement process and World bank policies on disclosure	- Take initiative to protect the Boroitola Ghat from erosion - If the adjacent khal is re-excavated then people will be benefited by going a long distance through boat, as there is no road network in the char - In that case, Guide wall need to be constructed at both side of the canal either the canal will be silted up again and erosion could take place - Working opportunity in the project - Provide proper compensation for loss of land
Mechrapara, Kazir hat, Shirajganj	19 January 2022	17	15	2	Group discussion with community people	- Project objectives and scope of work - Stakeholders' opinion about the project - Project activities under different components - Stakeholder engagement process and World bank policies on disclosure	- If the proposed khal is re-excavated the erosion will take place again in the char - The communication system should be developed without re-excavating the canal - Develop physical infrastructures i.e. road, health center etc. for better life of the char people. - Working opportunity in the project - Provide proper compensation for loss of land
Consultation meeting at Uria Union, Fulchori, Gaibandha							
Sadek Khaner Bazar (Kabilpur), 9 No. Ward, Uria Union, Fulchori	25 July 2022	8	8	0	Group discussion with community people	- Project objectives and scope of work - Project activities under different components	The Sadek Khan Bazar is situated on the opposite side of the project location. Only on the east side of Uria Union especially Ward 5 has extreme river erosion. If the project is

Place	Date	Participants			Type of Consultation	Issue discussed	Key points raised
		Total	Male	Female			
						• Mitigation measures and grievance redress mechanism • Stakeholder engagement process and World bank policies on disclosure • Land acquisition and compensation process • Future plan of action • Stakeholders' opinion about the project	implemented the people of the area will be highly benefited. People's life and resource will be saved from erosion. • On the other hand, Ratonpur could be vulnerable to river erosion as it is located at the opposite downstream of the project site. In that case, protection work also may be needed for Ratonpur. • If the project is implemented people of Kabilpur and aAtunpur will be benefited as they can easily perform their daily activities like transporting their produced crops and goods, attending school by students, and other activities. • If they can easily carry their good to the Bazar, they will get comparatively more price than the present time. • They will be able to get health services facilities from the Union and Upazila health complex. Especially the pregnant women will be able to get their health services when needed • The agricultural land of Kabilpur and Ratonpur will be saved from erosion and they will be able to manage most of their needs by their own production.
Ratonpur, 5 No. Ward, Uria Union, Fulchori	25 July 2022	7	2	5	Informal Group Discussion	• Project objectives and scope of work • Project activities under different components • Mitigation measures and grievance redress mechanism • Stakeholder engagement process and World bank policies on disclosure • Land acquisition and compensation process • Future plan of action	• If the protection work took place at Uria, Ratonpur could be vulnerable to river erosion as it is located at the opposite downstream of the project site. • In that case, protection work also should be taken to protect the Ratonpur Char from erosion • If the project is implemented people of will be benefited as they can easily transport their produced crops and goods.

Place	Date	Participants			Type of Consultation	Issue discussed	Key points raised
		Total	Male	Female			
						Stakeholders' opinion about the project	If they can easily carry their good to the Bazar, they will get comparatively more price than the present time.
Uria Union Parishad, Fulchori, Gaibandha	26 July 2022	36	28	8	Formal Consultation meeting	- Project objectives and scope of work - Project activities under different components - Mitigation measures and grievance redress mechanism - Stakeholder engagement process and World bank policies on disclosure - Land acquisition and compensation process - Future plan of action - Stakeholders' opinion about the project	- On an average about 70-80% people of Uria Union is farmer and dependent on agriculture. - The east side of Uria Union especially Ward 5 is highly vulnerable to extreme river erosion. - All the displaced people become marginalized and live on other's land as a tenant - Land owners become landless and farmers turned into a wage laborer - Some people migrated to other places especially Dhaka as a Rickshaw puller, and Garments workers for their livelihood. - Want Bank protection work and embankment for flooding - If the project is implemented the people of the area will be highly benefited. People's life and resource will be saved from erosion. - The land price will be increased if the project implemented - Out migration due to the river erosion will be stopped. - Agricultural production will also be increased - Provide compensation for land at market price if any land is acquired - Provide proper compensation for loss of land, crops and tress - Working opportunity for the local people in project - both women and men enjoy land ownership in the project but there were issues of discrimination - Women faces SEASH risk, in most cases problems were resolved locally.

Place	Date	Participants			Type of Consultation	Issue discussed	Key points raised
		Total	Male	Female			
							• Women can participate in decision-making process which is considered as less important. • Women are gradually developing themselves in terms of empowerment, education, employment, and participation
Dhaka, BWDB auditorium	17 April 2023	70			National level	• Project objectives and scope • E&S impacts and proper mitigation measures • River erosion victims • Dredging, river training activities and induced impacts on the local populations • Impacts on bio-diversity and requirement for assessment on critical species, ecological zones and social components • Stakeholder engagement	• On the design, further evaluation of the proposed TPG groynes • Carry-out in-depth assessment on E&S risks, propose relevant mitigation measures including on rural livelihood and bio-diversity. • Continuous and effective engagement with the stakeholders and listening to their concerns • Thorough study on ecological zones and char lands and rural livelihood • The E&S management should use more digital technology and land acquisition should be smooth, in particular, on identifying the land owners and payment of compensation. • Engage and consult particularly, the local communities, affected persons and hear their concerns • Given the dynamic characteristics of the Jamuna, the E&S risks management need to be flexible including the overall project management.

Table 2: Details of the Public Consultation Meeting Conducted at Khudra Katenga, Kawakhola

In Katanga Primary School, Kawakhola Char, Sirajganj, formal public consultation meeting was held on 21 January 2022, and totally 60 participants were attend the meeting and among them 20 were female and 40 were male.

Sl no	Potential CDD Activity proposed by Feasibility Team	Findings from the Consultation	Opinion of the local people on E&S Impacts and Risks
1	River bank Protection near Boroitola Ghat (1.5~2km in total)	The bank protection by geobag dumping without constructing any permanent structure might not require acquisition/reacquisition of land. Such improved traditional approach of bank erosion is now a day very common in Bangladesh and is treated as a temporary solution. In case of geobag dumping, there is a high opportunity for community labor. Since the extent of the work is very limited, it would not make any significant workload on current ESIA preparation, if the CDD component is covered by an ESMF. In our opinion, this can qualify as a CDD without impacting the ESIA preparation significantly but we are not sure whether BWDB can implement this under LCS.	The E&S risk associated with bank protection by geobag might be moderate to low. The earlier studies on Environmental Impacts of Geobag use in erosion protection work did not report any significant environmental risk. The need of land acquisition/compensation is unclear to us. However, C1 consultant team explained that the geobag will be placed on the river bank slope and underwater which will not require any acquisition.
2	River bank protection at vulnerable locations of the canal flowing along the North-eastern and eastern part of the Union (e.g., at Bonnir Char)	If the work is completed using geobag placement, considering the extent of work this should not impact the ESIA preparation extensively.	Similar to the Sl. no 1 activity, the E&S risk associated with this activity might be moderate to low.
3	Re-excavation of a canal to improve navigability between Boroitola boat point to Khudro Katanga	While proposing this as an option, the participants came into an agreement that this can only be implemented if the bank protection component is included. The community raised the following concerns: • Agreed that this might benefit the community by saving their transportation time and cost. • But, canal re-excavation might require land acquisition/compensation. And similarly, land acquisition would be needed to dispose the dredged/excavated materials • If the banks of the re-excavated canal are not protected, it would increase erosion risk significantly. • The community is willing to give their land for any civil works but they expect adequate compensation	In our opinion, this proposed activity is associated with high or substantial E&S risk and should be decided on the basis of hydro-dynamic modeling. Therefore, it may not comply with the CDD work criteria²³. It can be included as an additional activity of C1 and in that case further E&S survey, RAP, stakeholder consultation etc. are needed to revise the current ESIA. Any land take at char areas and Kawakhola needs to take into account proper compensation to the PAPs.

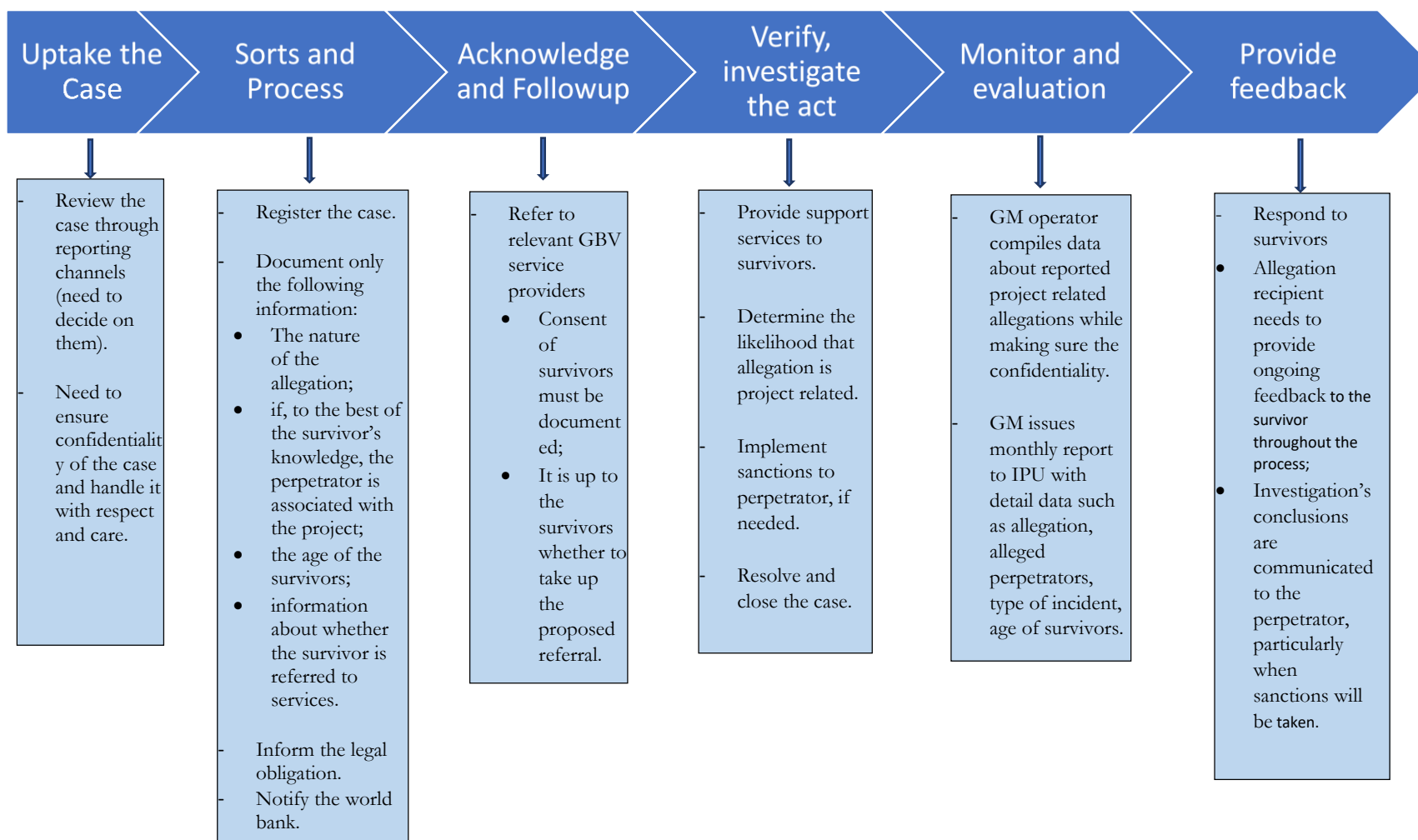
²³ Low to moderate risks work only for CDD.

Sl no	Potential CDD Activity proposed by Feasibility Team	Findings from the Consultation	Opinion of the local people on E&S Impacts and Risks
4	Construction of new rural roads to improve connectivity and resilience	Participants were expressing their demand that communication is extremely poor in the area. Therefore, it is very much important to have proper infrastructure for their lives and livelihood in chars. Currently, the union has only one road which is 1~2 km long and connect only a small part of the community with a growth center. Traditionally, these chars have very poor road connectivity because government does not have any development work in most of these char areas. Therefore, rural development and roads connectivity are always high priority for them. However, rural development and rural road connectivity are not mandated activity of BWDB. LGED is the mandated agency for this.	Such activity involves land acquisition and substantial environmental and social risk.
5	Construction of embankment cum road along the canal from Boroitola to Khudro Katanga	Community agreed that this activity would benefit them a lot by improving their flood resilience, road connectivity. However, they warned the following: • While constructing embankment, sufficient drainage should be provided • Embankment should not prevent the monsoon flood, because their agriculture and livelihood highly depend on monsoon flood. According to them, flood deposits fertile sediments (alluvium) on their agricultural land which is an essential element for their agriculture. • Construction of embankment would require land acquisition	In our opinion, this activity is associated with substantial E&S risk and would impact significantly the current ESIA preparation.
6	Construction of a flood shelter/raised platform in the village	Highly beneficial and support the concept of flood proofing strategy for char livelihood. Community can identify such area and make available the needed lands for such development with proper compensation. Besides the implementing agency can find government land for such development as well.	The E&S risk associated with such activities is generally moderate to low. But source of earth/sand for construction is an issue. Any private land take will require necessary compensation to the PAPs.
7	Raising of growth center, schools, and other community area for improving flood resilience	Highly beneficial and support the concept of flood proofing strategy for char livelihood. But BWDB might not be the mandated agency for such development work.	The E&S risk associated with such activities is generally moderate to low.

Annex B: Sample Grievance Form

Grievance Form: Jamuna River Economic Corridor Project			
Grievance reference number (to be completed by Project):			
Contact details (maybe submitted anonymously)	Name (s):		
	Address:		
	Telephone:		
	Email:		
How would you prefer to be contacted (check one)	By mail/post: ☐	By phone: ☐	By email ☐
Preferred language	☐ Bangla	☐ English	
Provide details of your grievance. Please describe the problem, who happened to, when and where it happened, how many times, etc. Describe in as much detail as possible.			
What is your suggested resolution for the grievance, if you have one? Is there something you would like BWDB/BIWTA/IDRA or another party/person to do to solve the problem?			
How have you submitted this form to the project?	Website ☐	Email ☐	By hand ☐
	In-person ☐	By telephone ☐	Other (specify) ☐
Who filled out this form (If not the person named above)?		Name and contact details:	
Signature			
Name of BWDB/BIWTA/IDRA official assigned responsibility			
Resolved or referred to GRC1?	☐ Resolved	☐ Referred	If referred, date:
Resolved referred to GRC2?	☐ Resolved	☐ Referred	If referred, date:
Completion			
Final resolution (briefly describe)			
	Short description	Accepted? (Y/N)	Acknowledgment signature
1st proposed solution			
2nd proposed solution			
3rd proposed solution			

Annex C: Operating Procedures and Response Protocol for SEA/SH Allegations



Annex D: Photographs of Consultation Meetings

Consultation conducted in June 2021.



Photo: Stakeholder Consultation in Chikajani union, Jamalpur



Photo: FGD in Chukaibari Char, Chikajani union, Jamalpur



Photo: FGD in Kholabari, Chikajani union, Jamalpur



Photo: FGD in 2 no. Kholabari, Chikajani union, Jamalpur



Photo: Stakeholder Consultation in Gobindashi, Tangail



Photo: FGD in Patitapara, Nikrail union, Tangail



Photo: FGD in Dhovaiya, Nikrail union, Tangail



Photo: Stakeholder Consultation in Gandail union, Sirajganj



Photo: FGD in Purba Khukshia, Gandail union, Sirajganj



Photo: FGD in Shingrabari, Gandail union, Sirajganj

Consultation meetings conducted in September and November 2021



Photo: Meeting at Gohalibari Union Chairman, Kalihati, Tangail



Photo: Group discussion with Community people at Alipur, Gohalibari Union



Photo: Group discussion with Community people at Pingna, Sharishabari



Photo: Group Discussion with Local people at Char Mouli, Kakua Union.



Photo: Consultation with in local people Alipur, Tangail



Photo: Consultation with in local people Moddho Alipur, Tangail



Photo: Consultation with community people Katadara, Fulchhari



Photo: Consultation with community people Pachthakuri, Kazipur

Consultation meetings conducted in July 2022 at Fulchori, Gaibandha



Consultation Meeting at Uria Union Parishad, Fulchori, Gaibandha



Consultation with Uria Union Parishad Chairman and Members



Consultation with Community people at Ratonpur and Kabilpur

National Consultation Workshop on 17th April 2023.

