



Government of the People's Republic of Bangladesh

**BBIN REGIONAL TRANSPORT AND
TRADE FACILITATION PROGRAM – BANGLADESH PHASE 1**

- **Bangladesh Land Port Authority (BLPA)**
- **National Board of Revenue (NBR),**
- **Ministry of Commerce (MoC), and**
- **Road and Highway Department (RHD)**

**Stakeholder Engagement Plan
(SEP)**

March 2022

Abbreviations and Acronyms

BBIN	Bangladesh, Bhutan, India, and Nepal
BLPA	Bangladesh Land Port Authority
DoE	Department of Environment
ECA	Environment Conservation Act
ECR	Environment Conservation Rules
EIA	Environmental Impact Assessment
EMF	Environmental Management Framework
EMP	Environmental Management Plan
ESIA	Environmental and Social Impact Assessment
ESA	Environmental and Social Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environment and Social Standards
FGD	Focus Group Discussion
GBV	Gender Based Violence
GDP	Gross Domestic Products
GoB	Government of Bangladesh
Gol	Government of India
GRID	Green, Resilient, and Inclusive Development
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
JV	Joint Venture
MPA	Multiphase Programmatic Approach
MoC	Ministry of Commerce
NBR	National Board of Revenue
NTFC	National Trade Facilitation Committee
O&M	Operation and Maintenance
OHS	Occupational Health Safety
PCC	Project Coordination Committee
PWD	People With Disabilities
RAP	Resettlement Action Plan
RHD	Roads and Highway Department
SASEC	South Asia Sub-Regional Economic Cooperation
SEC	Small Ethnic Communities
SEF	Stakeholder Engagement Framework
SEP	Stakeholder Engagement Plan
SHE	Safety, Health and Environmental
SIA	Social Impact Assessment
WB	The World Bank

Executive Summary

The proposed BBIN Regional Transport and Trade Facilitation Program will seek to address the main drivers of the high cost of trade and transport in the sub-region, namely low levels of technology adoption in trade facilitation, inadequate transport and logistics infrastructure, and regulatory procedural impediments to the cross-border movement of freight. Bangladesh Land Port Authority (BLPA), National Board of Revenue (NBR), Ministry of Commerce (MoC) and Roads and Highway Department (RHD) will be implementing the project to augment trade-enabling infrastructure, technology, and processes to improve the conditions for regional transport and trade in Bangladesh

The Program Development Objective is to develop efficient and resilient regional trade and transport in the BBIN countries. The program is anchored around the following three pillars that will be common across all projects in all countries – Bangladesh, Bhutan, India and Nepal (BBIN) - under the Program.

- i. Adoption and implementation of digital and automated systems to facilitate trade;
- ii. Upgrading of regional transport infrastructure, last mile and hinterland connectivity, and modernization of priority trade gateways (land ports and customs houses); and
- iii. Technical assistance and capacity building to enable reforms required for the adoption of contemporary trade facilitation environment in the sub-region.

The COVID-19 pandemic has highlighted the need of modernizing trade facilitation. The unprecedented crisis led to uncoordinated border closures, and restrictions on freight transport operations in BBIN countries. Supply chains were disrupted, and demand weakened, resulting in large contractions in trade. Intensifying these structural changes in BBIN countries can be the basis of robust, resilient, and sustainable economic recovery. Trade in the sub-region is paper-heavy and often requires physical submission of paper documents within and outside the regulatory requirements. This runs counter to the need to reduce face-to-face interactions which has become imperative in the context of the COVID-19 pandemic. It also adds complexity, delays border clearance, provides rent-seeking opportunities, and acts as a costly impediment to the private sector.

This Stakeholder Engagement Plan (SEP) is prepared and will be followed throughout the project life cycle. The SEP identifies the “project affected parties”, “other interested parties” and the “vulnerable and disadvantaged groups” specific to all 4 IAs (BLPA, NBR, MOC and RHD) of the project and includes the relevant provisions to engage all the stakeholders from the inception to the project to all through the project cycle, till completion and post-construction/operational phase. This SEP aims to identify the potential stakeholders, detail how stakeholders will be engaged throughout the course of the project, and methods that will be used as part of the process. In addition, the SEP will detail how the views and concerns of the stakeholders are reflected in the project design and implementation approach. Timely and two-way information sharing, and communication will be resorted to for mobilization and maintaining stakeholders’ support for the project and advance the overall project goals. The SEP has been prepared to comply with the World Bank Environmental and Social Framework (ESF) requirements on Stakeholder Engagement and Information Disclosure (ESS-10), which applies to this project and cross-cutting to all ten standards the ESF.

The SEP will be considered as living document and will be revised as necessary if the changing project context requires so with clearance from the Bank. Finally, the SEP elaborates a project-specific GRM for all the 4 IAs. Both in person and virtual consultations were carried out to develop this SEP, the latter considering the ongoing COVID-19 situation in Bangladesh.

All four implementing agencies (IAs); NBR, MoC, RHD, and BLPA have existing GRMs, which will be adapted to redress the project-specific grievances that may rise in the project cycle. The GRM will be 2 tiers; site level, and

PIU level with a Grievance Redress Committee (GRC) at each level. Members of the GRCs will include women and PAPs. Training will be provided to the staffs who will work on managing the grievances.

The two-tier GRM will be sensitized to receive SEA/SH related complaints. Any SEA/SH related complaints will be handled following a survivor-centric approach with confidentiality in line with the World Bank guidelines provided in the WB good practice note on gender-based violence. The IA, PIU and contractor are not equipped to handle complaints or provide relevant services to survivors. The Gender Expert placed at the IA's PIU and nominated SEA/SH focal point will assess the case and will refer any person to relevant service providers, including health facilities, law enforcement's gender unit or others, as relevant using the information on available services.

Information on the GRM will be widely disseminated among the PAPs and wider stakeholders including at site levels. The GRM will be accessible to all and all grievances will be resolved within a settled time period not exceeding 14 days. All proceedings of grievance resolution will be duly recorded and reported to the stakeholders and the Bank by each IA.

All E&S related documents and information of the program and sub-projects will be disclosed in English and the local languages by the implementing agencies on their website and hard copies will be made available at project office throughout the project life cycle.

The mechanism of information disclosure dissemination will be simple and be accessible to all. Two of the important means that have been followed until now include briefing material and organization of community consultation sessions. The briefing material (all to be prepared in local language i.e., *Bangla*) can be in the form of (a) brochures (including project information, details of entitlements including compensation and assistance to be given to the PAPs; grievance mechanism) that can be kept in the offices of local government (union parishad office) and project office; (b) posters to be displayed at prominent locations and (c) leaflets that can be distributed in the project areas. Consultation meetings should also be organized at regular intervals by the project to acquaint the communities, target group beneficiaries and affected persons of the following:

- Timeline and progress of the program and sub-project by components;
- Information on beneficiary participation;
- Information of involuntary displacement, compensation and entitlements;
- Sub-project E&S risks and impacts

Information disclosure procedures are mandated to provide citizen-centric information and all documentation necessary for addressing any queries. Disclosure of information will enhance governance and accountability specifically with respect to strengthening of monitoring indicators to help the World Bank monitor compliance with the agreements and assess impact on outcomes.

Table of Contents

1	INTRODUCTION.....	1
2	LEGISLATIVE AND POLICY REQUIREMENTS	5
3	STAKEHOLDER ENGAGEMENT AT PROJECT PREPARATION STAGE	8
4	STAKEHOLDER IDENTIFICATION AND ANALYSIS	10
	☐	
	☐	
	☐	
	DISADVANTAGED AND THE VULNERABLE PEOPLE	12
5	GRIEVANCE REDRESS MECHANISM (GRM)	21
6	RESOURCES AND RESPONSIBILITIES	26
7	MONITORING AND EVALUATION.....	28
	Annex A: Stakeholder Consultation and Information Disclosure Methods.....	29
	Annex B: Sample GRM Form.....	33
	Annex C: Summary of Consultation Meetings and FGDs.....	34

1 INTRODUCTION

The Government of the People's Republic of Bangladesh has sought finance from the International Development Association (IDA) of the World Bank Group (WBG) for the BBIN Regional Transport and Trade Facilitation Program - Phase 1. An IDA finance is expected through an Investment Project Financing (IPF). Bangladesh Land Port Authority (BLPA), National Board of Revenue (NBR), Ministry of Commerce (MoC) and Roads and Highway Department (RHD) will be implementing the project to augment trade-enabling infrastructure, technology, and processes to improve the conditions for regional transport and trade in Bangladesh. Design and implementation of the Project activities, therefore, trigger national legal framework and the World Bank Environmental and Social Framework (ESF) and the Environmental and Social Standards (ESSs).

The purpose of this SEP is to identify the potential stakeholders, detail how stakeholders will be engaged throughout the course of the project and methods that will be used as part of the process. In addition, the SEP will detail how the views and concerns of the stakeholders are reflected in the project design and implementation approach. Timely and two-way information sharing, and communication will be resorted to for mobilization and maintaining stakeholders' support for the project and advance the overall project goals. The SEP has been prepared to comply with the requirements of the World Bank Environmental and Social Framework (ESF) on Stakeholder Engagement and Information Disclosure (ESS-10), which applies to this project and cross-cutting to all ten standards of the ESF.

BACKGROUND AND PROJECT CONTEXT

Regional trade in South Asia continues to lag. The deepening of the relationship between Bangladesh, Bhutan, India, and Nepal (BBIN countries) as reflected by an increasing number of sub-regional and bilateral connectivity agreements¹, suggests there is momentum to advance the regional transport and trade facilitation agenda. The unexploited trade potential of the countries in the region is estimated at 93 percent for Bangladesh, 50 percent for India and 76 percent for Nepal.² Trade numbers reflect high costs of connectivity. Many countries in the region trade on better terms with distant economies than with their neighbors. Several factors account for the high cost of trade and transport. They include inadequate transport and trade infrastructure, cumbersome regulations and manual processes, protective tariffs and nontariff barriers, and a trust deficit throughout the region.

The program will seek to address the main drivers of high trade and transport costs. It will support the transformation of the cross-border clearance ecosystem through the provision of (1) digital systems for trade, (2) green and resilient transport and trade infrastructure, and (3) Institutional and policy strengthening for transport and trade. The MPA Program Development Objective (PrDO) is to develop efficient and resilient trade and transport along selected regional corridors in the BBIN countries. The Program will generate positive economic and/or social externalities: The MPA is expected to generate significant benefits that spill over country boundaries. Modernization of border posts, automation and digitization of trade processes, and last mile connectivity to trade gateways will reduce the cost of doing business for traders in the region; and strengthening weak links in the regional road network will generate network effects that will enhance the integration of the landlocked or semi-isolated status of Nepal, Bhutan and the Northeastern Region of India with the rest of the sub-region. Results indicators for regional spillover effects will be measured through increased freight throughput at priority border points and travel times on regional road corridors.

¹ Such as BBIN Motor Vehicles Agreement (MVA), BD-IN Protocol on Inland Water Transit and Trade, BD-IN coastal shipping agreement, amended NP-IN Treaty of Transit, etc.

² United Nations. 2016. Unlocking the Potential of Regional Economic Cooperation and Integration in South Asia, United National Economic and Social Commission for Asia and the Pacific (UNESCAP). New Delhi.

The Government of Bangladesh (GoB) has participated in BBIN Regional Transport and Trade Facilitation Program – Bangladesh Phase 1 to augment trade-enabling infrastructure, technology, and processes to improve the conditions for regional transport and trade in Bangladesh. The overarching vision of the project is to support GoB in establishing a functional and empowered institutional structure, capable of formulating and implementing the envisioned long-term program to facilitate trade and related outcomes in the country. The project will be implemented by the Bangladesh Land Port Authority (BLPA), Bangladesh Ministry of Commerce - WTO cell, Bangladesh National Board of Revenue (NBR), and Roads and Highways Department (RHD). The Bangladesh Public Works Department (PWD) will be the implementing agency for the customs infrastructure under the second component of the project. An MOU between NBR and PWD would govern the activities to be carried out by each agency for the infrastructure component. The GoB would establish (within three months of effectiveness) and maintain a Project Steering Committee (PSC). The PSC will be chaired by the Secretary, Ministry of Commerce, and will include the heads of agencies from BLPA, NBR, and RHD and meet at least every six months for the purposes of; (i) providing strategic and policy direction on all project activities, (ii) reviewing progress in project implementation, and (iii) facilitating the coordination of project activities and addressing obstacles during project implementation. The PSC may be established a sub-group under the National Trade Facilitation Committee (NTFC). In Bangladesh, the Phase 1 of the Program (Project) will have 4 components with the following implementing agencies -

COMPONENT 1: DIGITAL SYSTEMS FOR FACILITATING TRADE

- Subcomponent 1a: Automated border management system (ABMS) (US\$15 million, BLPA).
- Subcomponent 1b: Bangladesh Trade Portal enhancement (US\$2 million, MOC-WTO cell).

COMPONENT 2: GREEN AND RESILIENT REGIONAL TRADE AND TRANSPORT INFRASTRUCTURE

- Subcomponent 2a: Resilient land port infrastructure (US\$250 million, BLPA).
- Subcomponent 2b: Green customs infrastructure (US\$170 million, NBR).
- Subcomponent 2c: Regional connectivity infrastructure (US\$261 million, RHD).

COMPONENT 3: INSTITUTIONAL AND POLICY STRENGTHENING FOR TRANSPORT AND TRADE

- Subcomponent 3a: Implementation of Trade Facilitation Agreement (MOC-WTO cell).
- Subcomponent 3b: Automated Policy Support Unit for trade policy analysis, statistics, and negotiations (MOC-WTO cell).
- Subcomponent 3c: Formulation and implementation of a National Tariff Policy (MOC-WTO cell).
- Subcomponent 3d: Training programs on trade facilitation for women traders and entrepreneurs (MOC-WTO cell).
- Subcomponent 3e: Technical assistance for customs modernization (NBR).
- Subcomponent 3f: Technical assistance to foster contemporary border management (BLPA).
- Subcomponent 3g: Technical assistance for enhanced regional transport connectivity (RHD).

COMPONENT 4: CONTINGENCY EMERGENCY RESPONSE

SUMMARY OF POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

It is important to identify the potential risks related with project location, design, construction, and operation phases of the project on the physical, biological and socioeconomic domains. An impact is defined as any change to an existing condition of the environment. Identification of potential impacts is based on data analyses and stakeholder discussions. Environmental and social impacts can be broadly classified as those taking place during pre-construction, construction and operational phases of the project. Activities

involved affecting environmental components at different phases of the project implementation as well as potential environmental impacts are discussed in the following sections which may be relevant in the subprojects (BLPA, NBR, RHD & MoC).

The following are the likely **Environmental Risks and Impacts** of the project:

- Land filling/cutting along the Highway (for RHD) would create dust and noise pollution;
- Road construction would entail soil, water, light, dust and noise pollution for a prolonged period;
- Filling of Road side Borrow-pit and pond may cause to lose the habitat of some aquatic lives and some flora and fauna could be endangered;
- Burning of Bitumen and Tar during road construction will emit large quantity of Carbon di Oxide and cause air pollution. Laborers working in the project and local communities, including elderly people, pregnant women and children may suffer from respiratory tract infections or asthma;
- There would be environmental pollution due to usage of fossil fuel and lubricant and their unsafe disposal by the construction-related equipment and vehicles; during operation phase increased traffic would play along these roads increasing additional carbon emission;
- Tree cutting along roads will remove green canopy and adversely affect the environment at least during the project implementation stage. However, planting trees by the roads, including on barren road slopes and shoulders, will regenerate green canopy and positively affect the environment;
- Water in the ponds and in other natural water reservoirs along the road may be polluted and there would be a large quantity of water needed for construction and dust suppression;
- Labor and Construction workers will also generate solid waste that would also endanger the surrounding environment;
- Solid and liquid waste management at the Growth Centers/ rural market areas would have positive effect on the environment and could reduce water-borne diseases in the area.

The following are the likely **Social Risks and Impacts** of the project:

- Land acquisition of public and private land, including farmland/waterbodies/orchards etc. near the work-site for widening the Highway, dumping stores, developing construction yard, workers shed, bridge and alternative crossing sites and approach roads;
- Resettlement as short/long term effect of homesteads/business entities, shops etc. near the construction site could lead to uprooting locals and shifting of certain homestead/businesses roofed with CI sheet, timber etc. to other places and destruction of RCC made homestead, businesses being immovable;
- The squatters occupying public land/Khas land along the Highway and who have built temporary accommodation and businesses for living and livelihood could also be adversely affected;
- Adverse impact may occur owing to destruction of temporary and semi-permanent business structure for the improvement of the Highway;
- Vehicular traffic movement in the project area will be restricted during construction phase and there would be additional traffic during operation phase owing to widening of the roads. This could increase traffic accident manifold;

- In the process petty business and linked employments along the Highway will be affected. However, they could shift to surrounding areas through the help of their association/local administration/local elected leadership support and the support rendered by the project;
- Access through the under-construction road may impede safe movement of the elderly people, persons with disabilities, pregnant women and minor children through the specific lane adjacent to the project site;
- Influx of migrant workers at the works sites may put extra pressure on the local market and civic facilities. This may raise the price of daily necessities in the area adversely affecting the local population;
- Presence of migrant workers either at the Labor Camps/rented households may also increase the likelihood of SEA/SH and rise in STD in the area;
- Adverse effects on the crop harvested, fisheries farms and felling of fruit bearing trees/trees with timber value in proximity of the Highway;
- The contractors or their representatives may employ child labors at a lower wage to reduce construction cost and increase profiteering;
- Widening of the Highway would force some land owners to move their homestead away from the Highway to new locations, thus causing permanent loss of fertile land.
- Increase in mobility in project footprint areas may increase risks of the spread of Covid-19

OBJECTIVES OF THE STAKEHOLDER ENGAGEMENT PLAN

The World Bank's Environmental and Social Framework (ESF) underscores the importance of open and transparent engagement between the borrower and project stakeholders as an important pillar of good practice. Effective stakeholder engagement through a robust consultation and disclosure mechanism promotes environmental and social sustainability of the project, enhances its acceptance and makes important contributions to design and aids in smooth implementation of the project. Stakeholder engagement is an inclusive process and is carried out throughout the life cycle of the project. ESS10 refers to Stakeholder Engagement and Information disclosure requirements of the ESF. The following are the objectives of ESS10:

- Establishment of a systematic approach to stakeholder engagement that will enable borrowers to identify and form constructive relationships with the relevant stakeholders, including Project Affected People (PAP).
- To assess the level of interest and support stakeholders have for the project and ensure that through this mechanism, the views of the stakeholders are incorporated into the project design.
- Encourage and facilitate methods of effective, meaningful consultation and engagement with PAPs throughout the project cycle on issues that could potentially have an impact on them
- Ensure that project information related to environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.

ESS10 promotes meaningful consultation and communication with all stakeholders, and the process of stakeholder engagement involves the design and implementation of a Stakeholder Engagement Plan (SEP). The SEP covers the following aspects: (i) Stakeholder identification and analysis; (ii) planning how stakeholder engagement will take place;(iii) disclosure of information;(iii) consultation with

stakeholders;(iv) consultation with stakeholders; (v) addressing and responding to grievances;(vi) reporting to stakeholders. The coordination and monitoring mechanisms in the SEP will be overseen by the respective IAs NBR, BLPA, RHD and Ministry of Commerce (MoC) and their field/site level project management setup, as relevant.

2 LEGISLATIVE AND POLICY REQUIREMENTS

NATIONAL LEGAL PROVISIONS AND CITIZEN ENGAGEMENT

Bangladesh has relevant laws on right to information, information disclosure, transparency, and citizen participation in development decisions. The Constitution of the People's Republic of Bangladesh guarantees freedom of thought and conscience, and freedom of expression and speech, subject to any reasonable restrictions imposed by law. The Right to Information Act 2009 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. Citizen participation in development decisions is recognized and obliged under the laws on local governments including the zila parishads (2000), upazila parishads (1998, amended 2009), union parishads (2009), paurashavas (2009), city corporations (2009) and hill district councils (1989).

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. The Government of Bangladesh (GoB) 2014 Secretariat Instructions (chapter 8 instructions 262(1) and (2)) mandate provisions for receiving opinions from citizens and to redress grievances in a transparent and neutral manner. The Cabinet Division's Coordination and Reform Unit issued a revised version of the 2015 guidelines on the GoB's grievance redress system in 2018, which provides instructions on a range of issues, such as classification and monitoring of grievances and the responsibilities of various ministries including the Cabinet Division.

Key legislative instruments governing citizen rights to information, freedom of expression and speech, citizen participation in development decisions and policy formulation inclusive of gender and social vulnerability are as follows:

- The Constitution of Bangladesh
- The Right to Information Act 2009
- The Zila Parishad Act 2000
- Local Government (Upazila Parishad) Act 1998
- Local Government (Union Parishad) Act 2009
- Local Government (Paurashava) Act 2009
- The Local Government (City Corporation) Act, 2009
- Hill District Council Acts 1989
- The Five-Year Plans (Bangladesh)
- Bangladesh Secretariat Instructions 2014
- Grievance Redress System Guidelines, 2015

Key National, Social, Legal Provisions and Citizen Engagement

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

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.

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;

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.

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.

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.

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.

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 Act³ 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.

MAIN GAPS BETWEEN GOVERNMENT REGULATIONS AND WORLD BANK ESS

WB ESF Standard	Gaps
ESS2: Labour and Working Conditions	(i) The Labour Act does not specifically require that development projects be assessed and reviewed in terms of labour and working conditions including OHS requirements before approval. (ii) The Labour Act does not require development projects to prepare the Labour Management Plans/Procedure or OHS Plan, which the project has prepared to avoid labor related risks. (iii) The Labor Act allows children above the age of 14 to work. However, according to World Bank Regulations and ESS, no children below the age of 18 can work.
ESS4: Community Health and Safety	(i) Covered under ESIA but the systems do not provide clear requirements for the development project and implementation. Health issues are within the purview of the government, but it is currently not involved in project preparation and oversight. (ii) Laws concerning SEA/SH and Human trafficking are in place but lack in implementation. This will be mitigated through the activities set out under the ESCP, including the SEA/SH Action Plan prepared under the project.
ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement -	GoB law does not recognize squatters and non-title holders under ARIPA 2017. RFP and RAP has been prepared under the project which will compensate title-holders and non-title-holders alike.

WORLD BANK REQUIREMENTS

The World Bank’s Environmental and Social Framework (ESF) came into effect on October 1, 2018. The ESF

³ The Bangladesh Labour Law, 2006; Act No. XLII OF 2006 [11 October, 2006]

includes Environmental and Social Standard 10 (ESS10) on “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 the ESF and 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 ESS 10 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.
- ❖ Borrower agencies (in this case, BLPA, NBR, RHD and MoC) 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.
- ❖ Borrower will engage in meaningful consultations with all stakeholders. Borrower 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.
- ❖ Borrower will develop SEP proportionate to the nature and scale of the project and its potential risks and impacts. Stakeholders would be identified, and the SEP would be disclosed for public review and comment as early as possible, before the project is placed for the World Bank appraisal.
- ❖ ESS10 also requires the development and implementation of a grievance redress mechanism that allows project-affected parties and others to raise concerns and provide feedback related to the environmental and social performance of the project and to have those concerns addressed in a timely manner.

3 STAKEHOLDER ENGAGEMENT AT PROJECT PREPARATION STAGE

THE CONSULTATION PROCESS

The preparation of the SEP started during the inception stage of the project preparation and involved extensive consultations with a broad range of stakeholders. The feedback from these consultations shaped

the overall approaches, including the details of the project design, methods and process of engagement with the stakeholders of this SEP. A well array of stakeholders were invited during the consultations, and they were particularly asked to talk about the challenges they face while seeking services from the IAs. Beside preparing a detail minutes, a comprehensive draft were shared with the committee to ensure proper reflection of the consultations' outputs to the project design. Continued consultations along with the other relevant engagement methods and tools will be utilized all through the project duration and feedback of the stakeholders will be incorporated in the project's implementation strategy. The key feedback from the consultations are provided in Annex C. Please see the following table for the list of consultations meetings:

Table 1: List of Consultation Meeting

Date	Name of the IA	Meeting & Place	Participants (Male)	Participants (Female)	Total
10 December 2021	BLPA	FGD at Burimari Land Port with local community (Zero Point) (males only)	13	-	13
11 December 2021	BLPA	FGD at Conference Hall, Burimari Land Port with Importers and C&F Agents	10	-	10
11 December 2021	BLPA	FGD at Tatipara, Burimari Land Port with Community Elite Persons	10	-	10
11 December 2021	BLPA	FGD at Burimari Bazar with Truck Labor Association	07	-	07
11 December 2021	BLPA	FGD at Burimari Land Port with local community (Zero Point) (females only)	-	13	13
13 December 2021	BLPA	Consultation Meeting with stakeholders at Burimari Land Port	39	01	40
24 January 2022	BLPA	Tower mor, Purbo para Jam-E Masque, Bhomra, Sadar, Satkhira	08	-	08
24 January 2022	BLPA	Labor Association Office, Bhomra	09	-	09
25 January 2022	BLPA	Jahangir Market, Bhomra Bazar, Sadar, Satkhira	09	-	09
26 January 2022	BLPA	Golam Eazuddin's house, Majherpara, Lakshmidari, North side of Bhomra zero point, Sadar, Satkhira	-	08	08
27 January 2022	BLPA	Majherpara, Lakshmidari, North side of Bhomra zero point, Sadar, Satkhira	10	-	10
06 February 2022	BLPA	Near terminal gate no. 9, Benapole Land port, Boro Anchra, Benapole, Sharsha, Jessore	-	21	21
06 February 2022	BLPA	Gatipara, Benapole, Sharsha, Jessore	22	-	22
07 February 2022	BLPA	Terminal Para, gate 9, Benapole, Sharsha, Jessore	07	-	07
09 February 2022	BLPA	Benapole Labor Union Office	10	-	10
8 December 2021	MoC	Online (Zoom); Consultations with the officials of MoC	4	1	5
9 December, 2021	NBR	Online (Zoom); Consultations with the participants from IAs (focal person), government officials based in Dhaka Headquarters of relevant departments.	24	04	28

Date	Name of the IA	Meeting & Place	Participants (Male)	Participants (Female)	Total
20 December, 2021	NBR	Conference Room, Custom House, Chattogram; Local level consultation with the participants of district level government officials of NBR, representatives of C&F Association, and representatives of Chattogram Women Chamber and Commerce.	18	04	22
29 April 2019	RHD	Public Consultation Meeting, Jhalopara Government Primary School	250	250	500
May 2021	RHD	Interview of GoB Official- Deputy Conservator, Sylhet	-	-	-
May 2021	RHD	Interview of GoB Official- Director, DOE	-	-	-
24 April 2019	RHD	FGD- Transport Workers- Golapganj, Sylhet	15	-	15
28 April 2019	RHD	FGD- Small/ Medium-level Businessperson- Phulbari, Golapganj, Sylhet	8	4	12
30 April 2019	RHD	FGD- Local people- Sylhet City Corporation	6	6	12
30 April 2019	RHD	FGD- Local people- Biyanibazar, Sylhet	6	6	12
1 May 2019	RHD	FGD- Small/ Medium-level Businessperson	10	7	17
4 May 2019	RHD	FGD- Businessperson and Transport Workers- Biyanibazar, Sylhet	10	3	13
5 May 2019	RHD	Community Consultation- PAPs and community people- Biyanibazar, Sylhet	10	4	14

LESSONS FROM THE CONSULTATION PROCESS

All the IAs are aware of the ESF requirements outlined in its 10 Environmental and Social Standards (ESSs). RHD has its Social and Environmental Circle (SEC) with designated staff and project related resources to deal with environmental and social risks and impacts associated with any road projects. The designated consultants of BLPA, RHD and NBR visited the project site and conducted stakeholder consultations and FGDs. As detailed in Annex C, a few key concerns the stakeholders have is regarding compensation, livelihood restoration, infrastructural design, disturbances during construction, labor issues and pollution arising from project activities. The IAs put due attention to the deliberations of the wider stakeholders and felt the need for continuous consultations with them in the project life cycle at the implementation stage to keep them informed and ensure meaningful and effective engagement. The IAs also find ways to identify various stakeholders, ways to engage with them and close the feedback loop along with ways of reporting back to the stakeholders are discussed in this SEP. Additional measures will be taken to identify and include all stakeholders in the consultation process.

4 STAKEHOLDER IDENTIFICATION AND ANALYSIS

STAKEHOLDERS ANALYSIS

The World Bank Environmental and Social Framework 2018 defines “stakeholder” as individuals or groups who: (a) are affected or likely to be affected by the Project (project-affected parties); and (b) may have an interest in the Project (other interested parties). Stakeholder identification for the BBIN Phase 1 was initiated

during the Environment and Social Impact Assessment (ESIA) processes initiated by the BLPA and RHD. The stakeholder mapping workshop was undertaken to:

- Confirm the stakeholders and groups who were identified in initial scoping exercises and further revise and update the stakeholder list with input from key stakeholders;
- Analyze the level of impact the Project have on each stakeholder group, their level of interest, influence and importance, to identify the level of engagement required for each group; and
- Identify engagement strategy with each stakeholder group and assign responsibility to team members.

Mapping project stakeholders marks the first step in preparing the Stakeholder Engagement Plan (SEP), given its contribution to developing the Project's approach to consultation and communication. Doing so entails identifying relevant Project stakeholders or groups of stakeholders, their key characteristics, specific needs or demands, preferred means of communication and appropriate level of engagement needed for each. In order to ensure effective and tailored engagement, stakeholders of this proposed project have been classified into three overlapping categories:

Affected peoples refer to individuals, groups, local communities and other stakeholders that are directly or indirectly affected by the Project, with particular focus being accorded to those directly and/or adversely affected. It also refers to those who are more susceptible to changes associated with project activities, and thus need to be closely engaged in identifying impacts and their signification, as well as in decision-making on mitigation and management measures;

Interested parties predominantly refer to those who are not directly affected by project activities, but are interested owing to its proximity, as in broader local communities where beneficiaries are located, or by virtue of their role in project preparation and implementation.

Disadvantaged and vulnerable groups, although somewhat covered under the first category, they experience unique limitations and barriers to participating in consultation process and being minimally represented in stakeholder engagement. By extension, they are disproportionately impacted or further disadvantaged due to their vulnerable status, notably women, elderly, children, female-headed households, person with disabilities (PWD), ethnic and religious minority's communities etc. Given particular engagement efforts required to enable their equitable representation in consultation and decision-making process for the project, this additional category seeks to explore their constraints, means of receiving information and any additional assistance required.

Affected Parties

Affected Parties include individuals, groups, and communities directly affected by project interventions or who may be subject to direct impacts from the Project. 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;
- Traders/business owners, especially women, who are involved in cross country trading;
- Training participants, particularly women, in the training program (MOC);

- Public who uses land port and custom house facilities;
- Neighboring communities to the project sites;
- Individuals exposed to Covid-19 as a result of the project or while using project facilities or services;
- Transport owners' and workers' associations;
- Educational establishments, healthcare facilities, and other common property users (mosques, graveyards, etc.) along the Sylhet – Sheola highway sections including staff and students;
- Highway users, road users in Sylhet districts and the city commuters in Dhaka;
- Construction workers and laborers.

Other Interested Parties

This includes stakeholders who are not directly affected but otherwise have an interest and/or can exercise influence in the outcome of the project. This includes the following:

- Civil Society Organizations (CSOs) including media (on/offline);
- Trade unions;
- Chambers of Commerce;
- Businesses and Trading houses;
- Clearing and forwarding agents;
- National and International NGOs;
- Transporters and transport unions;
- Traditional national and local media;
- Local government institutions (LGIs) including the city/municipal corporations, etc.;
- Government officials at the sites/local level;
- Border Guard Bangladesh;
- Border/ Immigration Police and any other law enforcement agency related to border security.

Disadvantaged and the Vulnerable People

It is particularly important to understand that project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups or communities who often do not have the voice to express their concerns or understand the impacts of a project or otherwise, may not be able to access the project benefits equally due to their vulnerable social, economic, occupational or cultural conditions. It is important to ensure that awareness raising of and engagement with disadvantaged or vulnerable individuals or groups be adapted to take into account the needs of such community/groups or individuals, their concerns and cultural sensitivities, and to ensure a full understanding of project activities and benefits. Within the Project, the vulnerable or disadvantaged communities/groups may include are, although not limited to the following:

- Women and poor street vendors who may face dislocations due to land acquisition or civil construction;
- Person with disabilities (PWD) who depend for livelihood on access the current infrastructure of the IAs;
- Poorest households whose livelihood are likely to be disrupted due to civil works or land acquisition;
- Women and female-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;

- Potential victim of human trafficking especially women and children;
- Women and children who may be at the risk of SEA/SH from labor influx and human trafficking due to project interventions.

ENGAGING WITH DISADVANTAGED AND VULNERABLE GROUPS

It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups or communities who often do not have a voice to express their concerns or understand the impacts of a project and to ensure that awareness raising and stakeholder engagement with disadvantaged or vulnerable individuals or groups be adapted to take into account the needs of such community/groups or individuals, their concerns and cultural sensitivities, and to ensure a full understanding of project activities and benefits. Vulnerable groups consist of people who may not be able to access Project information and articulate their concerns and priorities about potential Project impacts owing to certain barriers that disadvantage them. The barriers could be socio-political, for example in Bangladesh, and especially rural patriarchal societies, women are expected to not speak out in public. Other factors could be related to poverty, socio-economic conditions or physical conditions as people influenced by these factors are not expected to or do not feel that they can have a ‘voice’ in public.

A number of measures will be used to remove obstacles to participation for vulnerable groups:

- Focus groups for women, led by a female facilitator, to introduce the Project and discuss any issues and concerns that the women may have regarding the Project development while assuring privacy and anonymity.
- Individual household visits to as many households in ‘deep poverty’, single female headed households, people with disability, the elderly who have mobility issues, and households of minority religious groups in the Directly and Indirectly Affected Population as possible at each Project milestone to ensure they are provided with the Project information and have opportunities to raise their questions and concerns freely without intimidation, discomfort or ridicule.
- While reaching out to different groups particularly vulnerable groups such as women, elderly and disabled, the Project team will make sure time and location of consultation are appropriate to their needs.
- Throughout implementation, the IA will continue to identify representatives of these groups locally and at the district level to facilitate two-way communication on the Project development.
- During the construction phase and operation, in coordination with BLPA and other government agencies, an NGO will carry out an awareness raising campaign for human trafficking at all three land ports.

Engagement with all identified stakeholders may incentivize their maximum contributions to successful implementation of the project by drawing on their existing expertise, experience and networks. It also facilitates community and institutional endorsement of project activities. A general list of stakeholder groups identified and one of vulnerable or disadvantaged stakeholders are each tabulated below:

Table 2: Description of Project-Specific Stakeholder Groups and relevance of engagement

Stakeholder Groups	Details	Specific interest and needs of stakeholders
Affected Parties	* People and households who will lose their land, assets and properties and become displaced as a result of land acquisition; specifically, RHD component will have this particular category of stakeholders.	* Direct recipient of the financing provided to the Government of the People’s Republic of Bangladesh * The needs of vulnerable populations must be prioritized in project activities especially female

	<ul style="list-style-type: none"> * Informal occupants who will be displaced and face loss of livelihoods as a result of involuntary resettlement or other interventions of the project; for instance, squatters, people living in the land port or custom house areas and earning a living, etc. * Businesses, traders, small shop owners who face disruptions in their income and livelihood from project interventions or land acquisition * Women traders/business owners, and women who are involved in cross country trading. * Training participants, particularly women, in the training (MOC) * Public who uses land port and custom hose facilities, including the government officials. * Neighboring communities to the project sites, who are likely to get affected by the tertiary impact of the construction process. * COVID-19 affected people as a result of the project or using project facilities or services 	<p>traders, female-headed households, elderly, ethnic minorities and the disabled</p> <ul style="list-style-type: none"> * Participate in the design of the project to ensure beneficiary needs are being met by project activities including beneficiary engagement and selection * For inputs in project design, baseline analysis and future predictions, experience sharing from similar projects * Be well informed of the social and environmental risks arising from the project and relevant mitigation measures * Be well informed of the safety measures including OHS, community health and safety and safety from Covid-19 * Be well informed of the land acquisition process and subsequent compensation entitlement and process including resettlement and livelihood benefits * Be aware of the risks of SEA/SH from labor influx as well as human trafficking risks from project interventions; be well informed of the GRM process
Other Interested parties	<ul style="list-style-type: none"> * Civil Society Organizations (CSOs) including media (on/offline) * Trade unions * Chambers of Commerce * Businesses and Trading houses * Clearing and forwarding agents * National and International NGOs * Transporters and transport unions * Traditional national and local media * Local government institutions (LGIs) including the city/municipal corporations, etc. * Government officials at the sites/local level * Border Guard Bangladesh * Border/ Immigration Police and any other law enforcement agency related to border security 	<ul style="list-style-type: none"> * If support is needed from partner organizations for successful implementation of project activities including SEA/SH issues * GRM and awareness raising program. * Awareness raising for SEA/SH human trafficking * COVID-19 related support * The project implementing agencies and other potential partner organizations may communicate with print and electronic media for promotional and greater dissemination purposes.

<p>Disadvantaged and vulnerable people</p>	<ul style="list-style-type: none"> * The vulnerable communities including females, minorities, migrants and the disabled whose livelihoods would be disrupted due to land acquisition and project activities * 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 * Potential victim of human trafficking especially women and children * Women and children who may be at the risk of SEA/SH from labor influx and human trafficking due to project interventions 	<ul style="list-style-type: none"> * Participate in the design of the project to ensure beneficiary needs are being met by project activities including beneficiary engagement and selection * For inputs in project design, baseline analysis and future predictions, these groups can share their experience from similar projects * Women and poor street vendors may face dislocations due to land acquisition or civil construction are more vulnerable than others and may require specific attention including compensation and other livelihood-related support. * Person with disabilities (PWD) who depend for livelihood on access the current infrastructure of the IAs would require special attention to reinstate their livelihood incase of relocation due to land acquisition * Poorest households' livelihoods are likely to be disrupted due to civil works or land acquisition and will require additional support to re-establish their livelihood. * Women and female-headed households who face displacement from land acquisition are more vulnerable * Many of these groups would require the project to provide employment opportunities and skills training to reinstate their livelihoods which may be disrupted due to land acquisition and project activities
---	---	--

STAKEHOLDER ENGAGEMENT PROGRAM

The objective of the Stakeholder Engagement Program is to engage stakeholders throughout the entire project life cycle to ensure transparency, information disclosure, beneficiary satisfaction by establishing a mechanism by which people can raise concerns, provide feedback, or make complaints about the project and any activities related to the project. The involvement of the local population is essential to the success of the project(s) in order to ensure smooth collaboration between project staff and local communities and to minimize and mitigate environmental and social risks related to the proposed project activities. Various methods such as in-person consultations, focus group discussions, period reports and project websites will be used to engage with stakeholders (see Annex A).

INSTITUTIONAL RESPONSIBILITY OF STAKEHOLDER ENGAGEMENT

The PIUs will coordinate and support the IAs (BLPA, NBR, MoC and RHD) and will lead the implementation and updating of the SEP as the implementation progresses. The PIUs will identify the stakeholders of their respective component activities and will assist in communication. Social, environmental and genders experts with the PIU consultants will provide technical support in the process of engagement with their stakeholders. PIU specific stakeholder engagement program (SE Program) will be developed following the guidelines in this SEP and implemented throughout the identification, design, procurement, and implementation of the activities. The activities under the respective PIUs for implementation of the project and the stakeholders who have been identified will be updated at the implementation level as the SEP will be considered as a living document.

Objectives of each activity, implementation approach, environmental and social impacts and their management, and areas of stakeholders' engagement will be shared with the stakeholders to facilitate obtaining their feedback through consultation and other relevant engagement process. The topics of

discussion and frequency and timing of relevant consultation events, notification procedures, and method of consultation will be defined in the PIU specific SE Program. The PIUs will identify the relevant stakeholders including their contact details (telephone, e-mail address, street/location address and contact person). These contact details will be included in the PIU specific SE Program.

ADVANCE PUBLIC NOTIFICATION

Advance public notification of an upcoming consultation meeting will be given, and it will be available via publicly accessible locations and channels. Selected participants for formal public meetings or consultation workshops will be notified individually formally through e-mail and phone notifications and sharing invitation letters to the address of the selected participant stakeholders. The primary means of notification for formal and informal meetings may include mass media and the dissemination of posters/ advertisements in public places. The project keeps proof of the notification (i. e. a copy of the newspaper announcement, and/or email correspondence) for the accountability and reporting purposes. Existing notice boards in the communities may be particularly useful for distributing the announcements, such as boards adjacent to the widely visited public premises like local government office (ward counselors office, city corporation/Paurashava/union parishad offices), highway side and local markets, bus stops and terminals, and offices of the local NGOs and road safety organizations, transport owners and workers association offices and any other public places.

The notification should contain date, time and venue, consultation agenda, objectives of consultation, and commitment of potential review and consideration of stakeholders' feedback in project design and the environmental and social planning documents.

DOCUMENTING CONSULTATIONS

Consultation proceedings in any format will be recorded for transparency, accuracy of capturing public comments and feeding the information obtained from the consultation process into project design and implementation approach. The consultation proceedings will be recorded in the following three ways, including:

- Taking written minutes of the meeting by a specially assigned person;
- Audio recording of the discussions with prior information to the participants (if virtual); and
- Photographing.

Photographs of notable scenes during consultation will be captured at reasonable interval but not distracting or disturbing the audience excessively. Where feasible, the video recording may also be undertaken. Combination of these methods assures that the course of the meeting is fully documented and that there are no significant gaps in the records which may result in some of the important comments received from the stakeholder audience being overlooked.

MECHANISMS FOR STAKEHOLDER ENGAGEMENT

This sub-section details all possible measures deployed to consult each of the stakeholder groups, from surveys, polls and questionnaires to public workshops, provide them relevant information and opportunities to voice their views on matter of important. The table below presents topics of engagement, methods used, targeted stakeholders for each of the activities, among others. Please note that the sessions and items for consultation will be bundled to the extent possible in order to maximize the cost effectiveness and efficiency of the engagement process.

Table 3: Stakeholder Consultations and Corresponding Engagement Mechanisms

Target stakeholders	Topic(s) of engagement	Method(s) used	Responsibilities
Preparatory			
<p>People potentially affected by land acquisition, if any</p> <p>People residing in project area</p> <p>Project side residential and business squatters</p> <p>Vulnerable households who are likely to lose their land and livelihood due to land acquisition.</p> <p>Women</p> <p>Local government</p> <p>Media</p> <p>Construction workers</p> <p>Local businessmen</p> <p>Others</p>	<p>All the ES documents will be disclosed</p> <p>Land acquisition process, if required, and resettlement process</p> <p>Project risks and impacts and mitigation measures</p> <p>Project scope and rationale including timeline</p> <p>Grievance mechanism process</p> <p>Future consultation</p>	<p>Public meetings, separate FGD for women and vulnerable</p> <p>Face-to-face meetings</p> <p>Disclosure of written information: brochures, posters, flyers, website</p> <p>Information boards or desks in local language</p> <p>Grievance procedures through consultation, information brochures</p> <p>The following modes to be adopted specifically for the vulnerable groups:</p> <p>Robust engagement with local community-based organizations.</p> <p>The project would arrange separate consultation sessions for women to discuss any gender or SEA/SH concerns. Manageable and gendered FGD to be arranged so that women can speak freely.</p> <p>The project must have adequate means to reach the disabled ones in the community. If need be, teams must visit the disabled ones in their habitat</p> <p>Resources allocation towards local administration representatives and councilors.</p> <p>Engagement of local NGO's who work with vulnerable people at the community level to help disseminate information and organize consultations. Use of radio, mobile phones and other forms of communication to engage stakeholders.</p> <p>Notice board for employment recruitment and student admission.</p>	<p>PIU/E&S consultants</p>
Implementation Phase			
<p>Project Affected People</p> <p>People potentially affected by land acquisition (if any)</p> <p>People residing in project area</p> <p>Vulnerable households</p> <p>Contractors</p> <p>Local Government</p> <p>Local NGOs</p> <p>Government office</p>	<p>Grievance redress mechanism (GRM) and awareness raising process to close the feedback loop.</p> <p>Health and safety impacts (RAP, community H&S, community concerns)</p> <p>Employment opportunities</p> <p>Project status</p> <p>Project risks and impacts</p>	<p>Public meetings, open houses, trainings/workshops</p> <p>Separate meetings as needed for women and vulnerable</p> <p>Individual outreach to PAPs as needed</p> <p>Disclosure of written information: brochures, posters, flyers, website</p> <p>Information boards in local offices/education institutions</p> <p>Notice board(s) at construction sites</p> <p>Grievance redress mechanism (GRM)</p> <p>Awareness Raising Campaign on Human Trafficking</p> <p>The following modes to be adopted specifically for the</p>	<p>PIU/E&S consultants</p> <p>Contractor</p> <p>NGO</p> <p>External Monitor</p>

<p>Local Press</p> <p>Local businessmen</p> <p>Construction workers</p> <p>Others</p> <p>Law enforcement agencies, i.e., Border guard Bangladesh, Border Police, etc.</p>		<p>vulnerable groups:</p> <p>Robust engagement with local community-based organizations.</p> <p>The project would arrange separate consultation sessions for different target groups</p> <p>Resources allocation towards local administration representatives and councilors.</p> <p>Engagement of local CBO's who work with vulnerable people at the community level to help disseminate information and organize consultations</p>	
--	--	--	--

MECHANISMS FOR INFORMATION DISCLOSURE

The SEP and other relevant documents will remain in the public domain for the entire project life cycle, and will be updated on a regular basis as the project progresses through its various phases, in order to ensure timely identification of and engagement with any new stakeholders and interested parties to tracking of changes to characteristics and subsequent methods of engagement, if required. To that extent, the latter would also be revised periodically to maintain their effectiveness and relevance to project performance and external circumstances. Based on this, the table in Annex A highlights information that would be disclosed, stage of the project lifecycle when they are each publicized and generic timeline, specific stakeholder to whom they may hold particular relevant, their means of disclosure to various stakeholder groups, entities responsible for the output and targeted percentage of reach of said product.

Distribution of the disclosure materials will also be done by making them available at venues and locations frequented by the community and places to which public have unhindered access, given COVID-19 restrictions. Free printed copies of the ES documents in Bangla and English will be made accessible for the general public at the following locations, if situation permits:

- PIU
- District Administration offices
- Project offices at Local and Regional
- 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

Stakeholder consultation and information disclosure method is at **Annex A**

COVID-19 CONSIDERATION FOR STAKEHOLDER ENGAGEMENT

A precautionary approach will be taken to the consultation process to prevent infection and/or contagion, given the highly infectious nature of COVID-19. The following are some considerations for selecting channels of communication, in light of the current COVID-19 situation:

- Avoid public gatherings (taking into account national restrictions or advisories), including public hearings, workshops and community meetings as much as feasible;
- If smaller meetings are permitted/advised, conduct consultations in small-group sessions, such as focus group meetings, observing COVID-19 protocols such as wearing masks, sanitizing and maintaining social distance. If not permitted or advised, make all reasonable efforts to conduct meetings through online channels;

- Diversify means of communication and rely more on social media and online channels. Where possible and appropriate, create dedicated online platforms and chat groups appropriate for the purpose, based on the type and category of stakeholders;
- Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders do not have access to online channels or do not use them frequently. Traditional channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions;
- Where direct engagement with project affected people or beneficiaries is necessary, identify channels for direct communication with each affected household via a context specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators;
- Each of the proposed channels of engagement should clearly specify how feedback and suggestions can be provided by stakeholders.
- Identify trusted local civil society, ethnic organizations, community organizations and similar actors who can act as intermediaries for information dissemination and stakeholder engagement; engage with them on an ongoing basis. Prepare different communication packages and use different engagement platforms for different stakeholders, based on the stakeholder identification above. The communication packages can take different forms for different mediums, such as basic timeline, visuals, charts and cartoons for newspapers, websites and social media; dialogue and skits in plain language for radio and television; and more detailed information for civil society and media. These should be available in different local languages. Information disseminated should also include where people can go to get more information, ask questions and provide feedback.

GENDER AND SEA/SH CONSIDERATIONS AND STAKEHOLDER ENGAGEMENT

An assessment of SEA/SH risks using the Bank’s SEA/SH risk assessment tool for projects with major civil works suggests a Substantial” SEA/SH rating for the BLPA, and RHD subproject components. This is because although the project sites are in peri-urban areas, and most of the unskilled and semi-skilled labor are expected to be recruited from the neighboring areas, the proximity of construction activities to communities and educational institutions as well as substantial involuntary settlement may bring changes to power dynamics and can drive the risk up. The project sites by NBR are in Chattogram, the second largest city in Bangladesh. MOC doe not have any civil works. Overall, no labor influx is thus anticipated under the NBR and MoC component.

However, the construction works of the proposed land ports will inevitably lead to greater mobility of people, which could contribute to raising several social problems. These are greater exposure to communicable and sexually transmitted diseases, including HIV/AIDS, due to an influx of outsiders, such as traders, businesspersons, skilled and unskilled migrant laborers, and transport workers, all of which may also potentially lead to social tensions among the local communities. Human and sex trafficking targeting girls and women is common in South Asia, and immigration points at the land ports could potentially serve as conduits for cross-border trafficking. Furthermore, the infrastructure upgradation of ports will be premised on digitalization, contact-free and paper-free processing, as well as automated border management. With digitized infrastructure, automated border management and increased flow of traffic, there is an increased risk of human trafficking through the land ports and borders.

This project design includes support to institutional capacity building of the IAs on SEA/SH risk management, raising awareness on SEA/SH among the beneficiary communities, stakeholders and IAs and, by setting up GRM responsive to SEA/SH complaints. Finally, skills development activities and cross border trade facilitation have been proposed as part of the project and to build skills and employability of women. Delineation of such gender action will embed SEA/SH prevention and response activities. Additionally, the

SEA/SH action plan will also incorporate mitigation measures to manage risks related to trainings. may target women with the aim to building their skills for employability and empower them against potential abuse and harassment.

A Gender and SEA/SH Action Plan is prepared for the project that details the relevant mitigation measures both preventive and curative on SEA/SH risks, STDs and human trafficking concerns, and as well as includes specific actions to promote gender and women empowerment. An SEA/SH responsive GRM will be set up at the site and project level that will handle SEA/SH cases through a survivor-centric approach.

The following are some considerations for selecting channels of communication and topics that must cover during the consultations, in light of the above-described conditions:

- Engage with local NGOs that work on gender and labor issues
- If possible, involve female unskilled migrant laborers
- Involve local entrepreneurs, who are involved with SMEs
- Engage local civil society organizations
- Maintain a quota for women participants in the stakeholder consultation meetings
- Raise awareness among the communities on STDs, SEA/SH and the project GRM
- Enforce a Code of Conduct for all the workers including the security personnel
- Carry out awareness raising campaigns on anti-human trafficking in the land ports, during the construction phase and operation of the project, with the support a qualified NGO.

COMMUNICATIONS AND AWARENESS RAISING CAMPAIGN

Extensive consultations have already taken place with transport and trade stakeholder and local communities, civil society organizations and relevant government departments during different stages of project preparation and the development of the SEP; these consultations will continue during project implementation to close the feedback loop. The project plans to conduct satisfaction surveys to track beneficiary satisfaction of project investments, with specific attention to frequent users (such as transporters, passengers, and traders), local users (e.g., slow moving vehicles in the case of the Sylhet-Sutarkandi Road) from neighboring communities and especially those taking part in the training programs under the project.

All implementing agencies will develop a two tier – site and PIU level - GRM system in their respective SEP. The GRMs follow the principle of accessibility for potential users and accountability of the contractors and implementing agencies. As such, all information related to the GRM process will be available on bulletin boards at the project site and office. Besides physical complaints registration, the Central GRC at PIU will also establish a dedicated phone number, SMS reception number (toll free), social media i.e., Facebook, web page option and an email to receive complaints/grievances which will be routed to the specific PIU level desk for their course of action. These channels will also be open to receive feedback from the stakeholders to close the feedback loop. Also, social media and other related communications channels will be used to raise awareness about the GRM and the process of lodging complaints.

The Project's results framework includes specific Community Engagement (CE) related indicators to measure the satisfaction of the beneficiaries/users and as well as share of grievances received that are processed within the stipulated service standards.

Consultations with the key stakeholders will be carried out throughout the project life cycle. These will include consultations and liaison with communities and other stakeholders during the project implementation and also extensive consultations with the local people as well as institutional stakeholders during the ESA studies. The framework for the future consultations is presented in the following table:

Table 4: Future Consultation Framework

Description	Objective/Purpose	Responsibility	Timing	Frequency
Consultations with communities and other stakeholders during ESA study	Sharing ESIA ToR	PIUs and ESA team	During scoping stage of ESA	Consultation Meeting at all Districts and Urban areas
	Dissemination of information on program and its key impacts and proposed mitigation measures; soliciting views, comments, concerns, and recommendations of stakeholders	PIUs and ESA team	During ESA study (once draft analysis is available for discussion and feedback) before submission to DoE for clearance	Consultation Meeting at all Districts and Urban areas; National Stakeholders Consultation.
Consultations with communities and other stakeholders during project implementation	Information dissemination; public relation; confidence building; awareness about risks and impacts; minimizing conflicts and frictions.	PIUs; Contractors; PMC	During Project Implementation	Project Specific Location of interventions and impacted areas.
Consultations with communities during project operation	Liaison with communities and program beneficiaries	IAs	Post Project Period	As and when necessary

5 Grievance Redress Mechanism (GRM)

The fundamental objective of GRM will be to resolve any project related grievances locally in consultation with the aggrieved party to facilitate smooth implementation of the social and environmental action plans. Another important objective is to make the development process participatory at the local level and to establish accountability to the affected people.

The GRM will be consistent with the requirements of the World Bank policies to ensure mitigation of community concerns, risk management, and maximization of environmental and social benefits. The overall objective of the GRM is therefore to provide a robust system of procedures and processes that provides for transparent and rapid resolution of concerns and complaints identified at the local level. The GRM will be accessible to diverse members of the community, including women, senior citizens and other vulnerable groups. Culturally-appropriate communication mechanisms will be used at all project sites both to spread awareness regarding the GRM process as well as complaints management. Where project intervention areas cover beneficiaries from the small ethnic communities, project GRM will integrate traditional grievance

management system available with the small ethnic communities and the Grievance Redress Committee (GRC) will include a representative from these communities.

In any working environment, both employers and employees need to be fully conversant with all aspects of disciplinary processes, the grievance handling procedures and the legal requirements and rights involved. In implementing an effective dispute management system consideration must be given to the disputes resulting from the following:

1. Disciplinary action
2. Individual grievances
3. Collective grievances and negotiation of collective grievances
4. Sexual exploitation and workplace sexual harassment

COUNTRY SYSTEM – CENTRALIZED GRS

Each of these Government organizations has their own system of communication with their respective beneficiaries and stakeholders and addressing their complaints on their services or relevant issues following the Bangladesh Secretariat Instructions 2014 (chapter 8 instructions 262(1) and (2)). These instructions mandate provisions for receiving opinions from citizens and to redress grievances in a transparent and unbiased manner. To ensure good governance and citizen friendly public services, the Cabinet Division has issued the Grievance Redress System Guidelines 2015 (GRS Guideline 2015) with instructions for all government office to operate GRS protocols at national, divisional, district, upazila and union level.

In 2014, the Cabinet Division launched the [Grievance Redress System](#) (GRS), an online and centralized system that includes line ministries, government departments and subordinate departments/agencies. The central GRS is intended to address --

- i) public grievances about service provision that is under the purview of government, semi-government or autonomous organizations, and
- ii) staff complaints that can be submitted by the officials of government/semi-government/autonomous organizations regarding their access to services or rights as employees.

Citizens can also use the GRS to provide suggestions for simplification of services, law and regulation reforms or share other ideas. However, complaints related to religious matters, right to information, departmental cases against government officials or employees, or issues pending in any court are beyond the scope of the GRS.

PROJECT GRIEVANCE REDRESS MECHANISM

All four implementing agencies (IAs); NBR, MoC, RHD and BLPA have existing GRMs, which will be further adapted for redressal of the project-specific grievances that may potentially rise in the project cycle. The GRM will be 2 tiers; site level, and PIU level with a Grievance Redress Committee (GRC) at each level. Members of the GRCs will include women and PAPs. Training will be provided to the staffs who will work on managing the grievances.

The GRMs will follow the principle of accessibility for potential users and accountability of the contractors and implementing agencies. As such, all information related to the GRM process will be available on bulletin boards at the project site and office. Brochures with related information 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, etc.

The IA's and their respective PIU's will continue to report on grievance cases in monthly reports, as well as annual reports, which are shared with stakeholders and the public to close the feedback loop.

The Project's results framework includes specific CE related indicators to measure the satisfaction of the beneficiaries/users and as well as share of grievances received that are processed within the stipulated service standards. Information about the GRM will also be posted online on the respective IA's website (MOC: <https://mincom.gov.bd/>; RHD: <https://rhd.portal.gov.bd/>; BLPA: <http://www.bsbk.gov.bd/>; NBR: <https://nbr.gov.bd/>).

GRM FOR DEALING SEA/SH RELATED ISSUES

The GRM will be tailored to receive SEA/SH related grievances which will be handled following a survivor-centric approach. All such grievances will ensure strict confidentiality in line with the World Bank guidelines provided in the WB good practice note on gender-based violence. The IA/PIU will nominate a focal point to receive and deal with SEA/SH related grievances, assisted by the Gender/SEA-SH Expert in the PIU. Grievances related to SEA/SH will be reported by the PIU and the nature of the complaint will be recorded along with the other relevant information of the complainant such as: age of the victims, nature of the case incidence, relation to the project, etc. PIU will assist the victim with necessary support, including psycho-social counseling, medical treatment, legal remedies as necessary, for which it will assess the case and may also refer to relevant service providers, including qualified NGOs, health facilities, law enforcement agencies or others pertinent government agencies using the information on available services. A Detail Gender Action Plan (GAP) and SEA/SH Plan is prepared for this project and will be disclosed prior to the project's effectiveness. This is included in the ESCP.

GRM FOR DEALING WITH LABOR ISSUES

The two-tier GRM will be sensitized to receive labor related complaints so that any potential dissatisfaction, concerns, or notice can be raised by anyone employed by the contractor. This may include issues related to wages, occupational health and safety, community cohesion and labor relations and SEA/SH. The contractor will run the labor GRM under the supervision and technical guidance of the PIUs. The contractor will coordinate with Gender/SEA-SH Expert for SEA/SH complaints as they require sensitive handling and referral to services. Detailed information on the labor GRM are provided in the project's Labor Management Procedures (LMPs).

PROJECT GRIEVANCE REDRESS COMMITTEE

This project will have four PIUs, given four different implementing agencies (IAs), and every PIU level GRM shall have the following Grievance Redress Committee (GRC) members: -

- Project Director (Convener)
- Local Officer, ideally from the project site office of the IAs - (NBR, BLPA, RHD and MOC)
- An Elected Member of the Union Parishad or Upazila Parishad or City Corporation (Project Level Only)
- A Female Member of the Union or Upazila Parishad or City Corporation (Project Level Only)
- A Representative of the PAPs in the subproject
- An Area Representative of an NGO working in the area on Social Development /Gender/SEA-SH and labour issues
- Social/ Resettlement Specialist (Member Secretary)
- A representative of Indigenous People (if any in the project area)

The project level GRC shall resolve or reach a decision in fifteen (15) days from the date the complaint is received. The GRC members can consult the local level GRC and visit the field for clarification, where

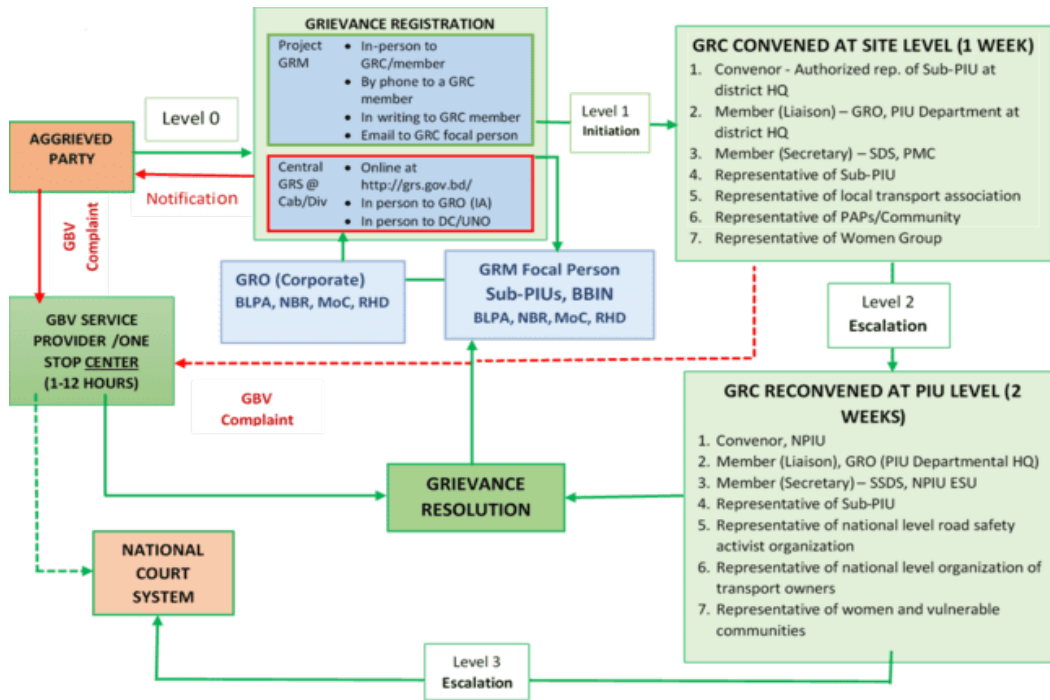
required. The chairperson of the GRC shall communicate the committee's decision to the aggrieved persons in writing and maintain a record of all decisions related to each case.

GRM IMPLEMENTATION ARRANGEMENTS AND GRIEVANCE REDRESS PROCEDURES

The overall process for the GRM will include six steps as described below. This GRM process structure is the combined output of all the IAs.

- **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 and submissions related to SEA/SH will be delegated to a mapped service provider.
- **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 resolve the complaints following the Figure 7.1. 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. 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. Typical grievance resolution process is shown on Figure 4.
- **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. On a monthly basis, the Planning Department will report to the Executive Chairman on grievances resolved since the previous report and on grievances that remain unresolved, with an explanation as to steps to be taken to resolve grievances that have not been resolved within 30 days.

Figure 1: Grievance Resolution Process



Project will devise protocols of security (both physical and psychological) for aggrieved persons and members on the GRM institutions to participate without fear of intimidation or retaliation. Focal persons and members in institutions under project GRM will be safeguarded from any external sock in the process of hearing, investigation and decision making. The mechanism will ensure respect for the dignity and self-esteem of complainants and an empathetic relationship towards them. The mechanism will also be equitable for all to access information, advice, and expertise in the 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. RHD 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. Anonymous complaints will be registered as anonymous in column (3) and information in columns (4), (5) and (6) will be subject to agreement by the complainant.

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. For resolution of anonymous complaints, column (3) will be marked anonymous.

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. For resolution of anonymous complaints, column (3) will be marked anonymous. Complainants’ satisfaction on the resolution will be confirmed through written acceptance or verbal consent before three witnesses

documented by the GRC member secretary. Complaints once resolved, will be notified to the Central GRS portal and to the complainant.

Grievance resolution will be a continuous process in subproject level activities and implementation of those. The PIUs will keep records of all resolved and unresolved complaints and grievances (one file for each case record) and make them available for review as and when asked for by Bank and any other interested persons/entities. The PIUs will also prepare periodic reports on the grievance resolution process and publish these on the official websites of the respective PIU departments. The form at **Annex B** may be used for lodgment of complaints and grievances.

6 RESOURCES AND RESPONSIBILITIES

MANAGEMENT FUNCTIONS AND RESPONSIBILITIES

The BLPA, NBR, MOC-WTO cell, and RHD will each establish and maintain separate Project Implementation Units (PIUs) which will be (1) headed by a full-time Project director, without any additional duties or responsibilities; (2) staffed with fulltime technical experts and specialists in areas such as procurement, financial management, environmental, health and social aspects, and monitoring and evaluation; and (3) responsible for the day-to-day implementation of their respective parts of the project, including preparing financial and Project reports, and annual work plans and budgets. Each PIU will appoint a procurement specialist, an environmental specialist, and a social development or stakeholder engagement specialist within three months of effectiveness.

The PIUs are responsible for the implementation of activities listed. The implementation of SEP, coordination and administration will be the Communication Specialist's responsibility in coordination with the Senior Social Development Specialist. The PIU will receive monthly reporting which will reflect on the performance of stakeholder engagement activities, alongside monthly stocktaking of Grievance Redress and Feedback, and Accidents and Incidents Reports. These materials are compiled into the bi-yearly Progress Report mandated by the Environmental and Social Commitment Plan (ESCP). The World Bank Task Team for the Project provides oversight on these and may request any of the monthly reports as needed. The PIU's responsibility will include the following major activities:

- Organize regular meetings with stakeholders
- Organize awareness and information sharing campaigns
- Update the SEP half yearly and report to WB
- Quarterly reporting on GRM to the WB
- Respond to stakeholder feedback
- Keep WB posted on all matters relating to stakeholder engagement
- Develop, implement and monitor all stakeholder engagement strategies/plans for the Project
- Administer and coordinate the grievance redress mechanism
- Interact with related and complementary support activities that require *ad hoc* or intensive stakeholder engagement
- Proactively identify stakeholders, project risks and opportunities and inform Implementing Agency's senior management to ensure that the necessary planning can be done to either mitigate risk or exploit opportunities.

HUMAN RESOURCES AND BUDGET

A tentative budget for implementing the Stakeholder Engagement Plan throughout the entire program management cycle is provided below, to be finalized post effectiveness. This will be annually reviewed by the PIU, and adjusted as needed.

Table 5: Tentative Annual Budget to Implement Stakeholder Engagement

Serial no	Stakeholder engagement activities	Budget				Quantity	Unit Cost (USD)	Total Cost (USD)
		BLPA	NBR	MoC	RHD			
1.	Staff/ Consultant Salaries							Paid from Project Consulting Service Budget
2.	Training on Stakeholder Engagement and GRC issues	9,000	9,000	9,000	9,000	12 times	3000	36,000
3.	Information Desk officer (will be nominated from /PIU existing staff)							Paid from Project Consulting Service Budget
4.	Stakeholder/Community/ Sensitization meeting	6000	6000	3000	6000	TBD		21000
5.	Meeting with Govt Officials	6000	6000	6000	6000	12 meetings/year	2,000	24000
6.	Meeting with PIU etc.	6000	6000	6000	6000	12 meetings/year	2,000	24000
7.	Surveys for report preparation	2000	2000	2000	2000	4/year	2,000	8000
8.	Beneficiary Satisfaction Survey	2000	2000	2000	2000	4/year	2000	8000
9.	Travel Expenses	3000	3000	3000	3000		3,000/yr	12000
10.	Communication Materials	1000	1000	1000	1000		1000/yr	4000
11.	GRM Guidebook/ Manual	2000	2000	2000	2000		2,000	8000
12.	Suggestions Box	2000	2000	2000	2000	400	20	8,000
13.	GRM/GRC expenses	15,00,000	50,000	0	TBD			15,50,000
14.	GRM MIS Database	5000	5000	5000	5000		5,000	16000
15.	Honorarium for committees	7000	7000	7000	7000		7,000	28000
16.	Contingency (10%)							
Total (Rounded)								17,47,000

**** Some of the figures in the budget are tentative. This will be finalized later**

7 MONITORING AND EVALUATION

MONITORING AND EVALUATION

The SEP will be periodically revised and updated by the Social Specialists of the respective IAs as necessary in the course of project planning and implementation in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP. As such, there would also be opportunities to include any newly identified stakeholder group who might have been overlooked during the initial SEP preparation.

Regular monitoring of project progress is built into the design, in the form of appropriate indicators, targets, information systems, and review mechanisms. The Project's Citizen's Engagement indicator will measure the share of grievances received that are processed within the stipulated service standards. Project progress will be assessed using monitoring data, and course corrections will be made as necessary. PIU officials will undertake regular supervision visits to project sites for supervision and monitoring, at least quarterly. Innovative actions under the project would include their own impact evaluation. The designated officer (preferably the Social and Environmental Consultant) will be responsible for the monitoring and reporting of this SEP. S/he will prepare periodic monitoring report as required (monthly, quarterly, six-monthly, annual, etc.) by the PIU. In case consolidated report on E&S management is prepared, s/he will ensure that specific sections/chapters on the SEP implementation are entered in such reports.

Monitoring and reporting will involve Project Affected Parties, internal and external stakeholders, interested groups and the vulnerable in monitoring mitigation measures that will be agreed in the ESCP to satisfy stakeholder concerns, thus, promoting transparency. The Project will establish a monitoring system that is participatory including relevant stakeholders (e.g. PAPs), which will utilize indicators that are sensible to concerned stakeholders. Furthermore, the project will involve affected parties by gathering their observations to triangulate findings and involve them in participatory discussions of external and monitoring and evaluation missions. The monitoring report will include clear and specific indicators as regards to the engagement with stakeholders and also the project's grievance redress mechanism. The Social Consultant will work on a reporting matrix in this regard.

Table 6: Monitoring, Evaluation and Reporting of Stakeholder Engagement Processes

Key Elements	Timeframe	Methods	Responsibilities	Monitoring Indicators
Stakeholders' access to project information, consultations, public information and dissemination materials	Constant (during project preparation and maintained throughout project implementation)	Interviews, observations, survey, attendance registers	PIU/IAs	Number of Interviews and surveys held, number of beneficiary and stakeholder organization covered
Project beneficiaries' awareness of project activities, their entitlements and responsibilities	Constant (during project preparation and maintained throughout project implementation)	Interviews, observations, post-session questionnaires, pre-session checklist	PIU/IAs	Number of survey and beneficiary covered. Sample beneficiary tested for awareness

Acceptability and appropriateness of consultation and engagement approaches	Constant (during project preparation and maintained throughout project implementation)	Interviews, observations, survey, score cards, spot checks, process evaluations	PIU/IAs	Number of concerns raised by beneficiaries, comparison between expected and actual beneficiary engaged
Community facilitators' engagement with target beneficiaries	Constant (during project preparation and maintained throughout project implementation)	Interviews, observations, survey, score cards, spot checks, process evaluations	PIU/IAs	Number of engagement and number of beneficiaries covered
Public awareness of GRM channels and their reliability	Constant (during project preparation and maintained throughout project implementation)	Interviews, observations, post-session questionnaires, pre-session checklist, Bulletin boards	PIU/IAs	Random sampling public response of awareness
Acceptability and appropriateness of GRM mechanisms	Constant (during project preparation and maintained throughout project implementation)	Interviews, observations, survey, score cards, spot checks, process evaluations	PIU/IAs	Number of complaints received and average days to solve the same
Reporting, processing and resolution of grievances	Periodic (maintained throughout project implementation)	Monthly reports, Review of case reports, interviews, survey, score cards, spot checks, process evaluations	PIU/IAs	Number of complaints received and average days to solve the same

REPORTING BACK TO STAKEHOLDERS

The PIU will ensure regular/periodic reporting back and information sharing with the PAPs and as well as other stakeholder groups to close the feedback loop. This reporting back measures should always be done through face-to-face meetings, or if not possible, virtually, given COVID-19 requirements. Other pertinent media, such as website, social media, press briefing, may also be used. 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 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. As all four implementing agencies would be following the same SEP, an annual comprehensive and integrated report on consultations and GRM will be published and shared among all stakeholders.

The Project will arrange necessary training associated with the implementation of this SEP that will be provided to the staff and as well as to the senior management. Specialized training will also be provided to the staff appointed to deal with community stakeholder grievances as per the Grievance Procedure. Information on public engagement activities undertaken by the Project may be conveyed to the stakeholders in two possible ways:

- Publication of a standalone annual report on project's interaction with the stakeholders.
- A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis, and may be posted on the project page for each IA, including the following parameters:

- *Number of public hearings, consultation meetings and other public discussions/forums conducted within a reporting period (e.g., monthly, quarterly, or annually);*
- *Frequency of public engagement activities;*
- *Geographical coverage of public engagement activities – number of locations and settlements covered by the consultation process;*
- *Number of public grievances received within a reporting period (e.g., monthly, quarterly, or annually) and number of those resolved within the prescribed timeline;*
- *Type of public grievances received;*
- *Number of press materials published/broadcasted in the local, regional, and national media;*

The outcomes/feedback from these ‘reporting back’ measures will be compiled and shared/disclosed with the stakeholders’ and general public through the use of proper media, such as Implementing Agency website, social media accounts, communication materials, etc.

Annex A: Stakeholder Consultation and Information Disclosure Methods

Project Phase	Information to be Disclosed	Mechanism Used (Tentative)	Schedule and Location	Target Stakeholders (Tentative)	Responsibilities for Disclosure
PREPARATION (i.e., prior to project effectiveness)	Project Information Document	Project/IAs website, and physical informational products	Following approval of the document	All project stakeholders and interested parties, with particular emphasis on eligible project beneficiaries	BLPA/NBR/RHD/MoC
	Environmental and Social Commitment Plan	Project/IAs website, and physical informational products	Following approval of the document	PIU & all project stakeholders and interested parties, with particular emphasis on eligible project beneficiaries	BLPA/NBR/RHD/MoC
	Stakeholder Engagement Plan	Project/IAs website, and physical informational products and in-person consultations as needed	Following approval of first draft and every time thereafter accompanying a revision	All project stakeholders and interested parties for initial session only, with emphasis only on implementing entities and project beneficiaries thereafter	BLPA/NBR/RHD/MoC
	Environmental and Social Management Framework	Project/IAs website, and physical informational products and in-person consultations as needed	Following approval of first draft	Partner Organizations and other industry partners contributing to project activities	BLPA/NBR/RHD/MoC
	Terms of Reference for Environmental and Social Specialist, and other recruited staff positions	Project website, job search portals and appropriate physical news outlets	Following approval of the document	Eligible candidates, Partner Organizations and other industry partners contributing to project activities	BLPA/NBR/RHD/MoC
	Labor Management Procedures	Project/IAs website, and physical informational products and in-person consultations as needed	Following approval of first draft, with online publication only taking place after final approval	Partner Organizations, industry partners, master craftsmen and direct project beneficiaries	BLPA/NBR/RHD/MoC
	Occupational Health and Safety Measures				
	Emergency Action Plan				
	Sexual Exploitation and Abuse/ Sexual Harassment Prevention and Response Plan				
	Grievance Redress and Feedback Mechanism	Project/IAs website, and physical informational products and in-person consultations as needed	Following approval of first draft, with online publication only taking place after final approval	Partner Organizations, industry partners, master craftsmen and project beneficiaries	BLPA/NBR/RHD/MoC

IMPLEMENTATION	Project Appraisal Document	Project/IAs website, and physical informational products and in-person consultations as needed	Following World Bank Board approval of the Project	All project stakeholders and interested parties, with particular emphasis on eligible project beneficiaries and Partner Organizations serving them	BLPA/NBR/RHD/MoC
	Annual Work Plan	Project/IAs website, and physical informational products and in-person consultations as needed	Following approval of the document	Partner Organizations, industry partners and master craftsmen	BLPA/NBR/RHD/MoC
	Project Procurement Plan				
	Bidding Documents for Procurement	Project/IAs website and appropriate physical news outlets	Following approval of the document	Eligible candidates and firms, Partner Organizations and other industry partners contributing to project activities	BLPA/NBR/RHD/MoC
	Environmental and Social Standards Training and Corresponding Module	Project/IAs website, and physical informational products and in-person consultations as needed	Published following completion of training sessions	Partner Organizations, industry partners, master craftsmen and project beneficiaries	BLPA/NBR/RHD/MoC
	Implementation Arrangements in Response to Covid-19 Training and Corresponding Module	Project website, and in-person training sessions for each of the target stakeholder groups	Published following completion of training sessions	Partner Organizations, master craftsmen and project beneficiaries	BLPA/NBR/RHD/MoC
	Labor Management, Occupational Health and Safety Training and Corresponding Module, including Code of Conduct				
	Sexual Exploitation and Abuse/Sexual Harassment Training and Corresponding Module, including Code of Conduct				
	Emergency Response and Preparedness Training and Corresponding Module				
	Stakeholder Mapping and Engagement Training and Corresponding Module				

	Grievance Redress and Feedback Mechanism Training and Corresponding Module				
	Environmental and Social Management Plans for Sub-Projects	Project/IAs website, and physical informational products and in-person/virtual consultations as needed	Following approval of first draft	Partner Organizations and other industry partners contributing to project activities	BLPA/NBR/RHD/MoC
	Informational Products on Case Management System and Eligibility Criteria	Project/IAs website, and physical informational products and in-person/virtual consultations as needed	Following approval of the document	All project stakeholders and interested parties, with particular emphasis on eligible project beneficiaries and Partner Organizations serving them	BLPA/NBR/RHD/MoC
	Informational Products on Life Skills, Apprenticeship and Self-Employment Curriculum				
	Employer and Skills development trainer's selection	Project/IAs website, dissemination in other online and print media, public launching sessions and, for targeted stakeholders,	Following approval of final draft	All project stakeholders and interested parties, with particular emphasis on Partner Organizations, industry partners, lending institutions, master craftsmen, potential employers and other service providers contributing to project activities	BLPA/NBR/RHD/MoC and if contracted skills development firm(s)
	Midterm & Impact Evaluation	Project website, public information sessions, as needed, and focus group discussions	Following approval of the document	World Bank	BLPA/NBR/RHD/MoC and Research Firms
	Incidents and Accidents Report	Project/IAs website, and physical informational products and in-person consultations as needed	Following resolution of issues presented, or otherwise as needed	World Bank	BLPA/NBR/RHD/MoC
	Grievance Redress and Feedback Reports and/or Resolution				
	Monthly Report from PIU/IAs and if contracted firms	Physical informational products and in-person consultations as needed	Following approval of the document	World Bank	BLPA/NBR/RHD/MoC
	Bi-Yearly and Annual Project Reports (Includes Mid-Term Review and External Audits)	Project/IAs website, and physical informational products and in-person consultations as needed	Following approval of the document	World Bank	BLPA/NBR/RHD/MoC

	Additional Spot Checks				BLPA/NBR/RHD/MoC
CLOSURE	Sustainability Plan and Exit Strategy	Project/IAs website, public information sessions and, for targeted stakeholders, focus group discussions	Following approval of first draft, with online publication only taking place after final approval	All project stakeholders and interested parties, with particular emphasis on eligible project beneficiaries and Partner Organizations serving them	BLPA/NBR/RHD/MoC
	Impact Evaluation	Project/IAs website, and physical informational products and in-person consultations as needed	Following approval of the document	Project stakeholders	BLPA/NBR/RHD/MoC
	Final Audit	Project/IAs website, and physical informational products and in-person consultations as needed	Following approval of the document	World Bank & other Stakeholders	LGCRRP -RSCs/PIU

Annex B: Sample GRM Form

Grievance Form: Bangladesh Road Safety Program			
Grievance reference number (to be completed by Project):			
Contact details (Can be submitted anonymously)	Name (s):		
	Address:		
	Telephone:		
	Email:		
How would you prefer to be contacted (check one)	By mail/post: <input type="checkbox"/>	By phone: <input type="checkbox"/>	By email <input type="checkbox"/>
Preferred language	<input type="checkbox"/> Bangla	<input type="checkbox"/> English	
Provide details of your grievance. Please describe the problem, who it 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 IA (RHD, BRTA, DGHS, BP) or another party/person to do to solve the problem?			
How have you submitted this form to the project?	Website <input type="checkbox"/>	Email <input type="checkbox"/>	By hand <input type="checkbox"/>
	In person <input type="checkbox"/>	By telephone <input type="checkbox"/>	Other (specify) <input type="checkbox"/>
Who filled out this form (If not the person named above)?	Name and contact details:		
Signature			
Name of IA's official assigned responsibility			
Resolved or referred to GRC1?	<input type="checkbox"/> Resolved	<input type="checkbox"/> Referred	If referred, date:
Resolved referred to GRC2?	<input type="checkbox"/> Resolved	<input type="checkbox"/> Referred	If referred, date:
Completion			
Final resolution (briefly describe)			
	Short description	Accepted? (Y/N)	Acknowledgement signature
1 st proposed solution			
2 nd proposed solution			
3 rd proposed solution			

Annex C: Summary of Consultation Meetings and FGDs

SUMMARY OF ISSUES SURFACED IN THE CONSULTATION PROCESS

During preparation of ESMF and other documents, BLPA, NBR, MoC and RHD has conducted several stakeholder consultation meetings. A summary of consultation outcomes and disclosure workshop is given below Table 2, 3, 4 and 5. Please see the details of the participants and photos of the stakeholder consultation in Annex C.

Table 2: Summary of Stakeholder Consultation Outcomes (NBR)

Issues	Discussion
Environmental Risks and Management	<p>Due to the nature and size of the project, the participants were more interested to discuss on the infrastructural design and environmental aspects of the project. Following are some key environmental factors that were identified and asked to take into consideration during implementation of the project:</p> <ul style="list-style-type: none"> • Air and Noise pollution would be one of the vital issues, particularly during the period when the existing building would be demolished to build new ones. There should be a proper plan in place to minimize air and noise pollution during the implementation period. • Custom House, Chattogram discard huge amount of paper every day. They usually store those papers in a warehouse and then sell those off later. During the site visit, the World Bank team observed a huge amount of waste paper stored in the corners of the balconies those are waiting to get disposed in the proper way. However, a paper recycling center or/and waste treatment plant can be considered to build so that they can dispose them immediately to maintain a clean working environment. • Sound pollution management system in the new buildings; this needs to take into consideration by installing sound proof windows and other ventilation systems. • The Custom House, Chattogram has a decent number of trees inside their compound. During the implementation of the project, need to minimize the number of trees to be cut down. • Custom House, Chattogram chemical laboratory is one of the crucial laboratories in the country, where 90% of the chemicals are tested that are imported in Bangladesh. The lab is severely understaffed (it has only 4 people and among them 3 are assistants) and the lab technically operates only in two rooms. The ESMF should propose a “Hazardous Material Management Plan” before implementation of the project. The HCMP should clearly mention probations on how to transfer the chemicals from one place to another. • Water logging during the rainy season: Custom Excise and VAT Training Academy goes under water during the rainy season. This temporary yet hazardous problem makes lives miserable for the people who live and work in that area. • Custom Excise and VAT Training Academy (CEVTA) produces significant amount of waste every day and the representative of the CEVTA suggested a waste treatment plant in their compound to keep the environment clean and safe on a regular basis. • Drainage system: Proper drainage system is important to keep the area clean and safe for all. While designing and panning for this system, need to consider sustainability issues, like capacity and proper management in mind. • Rooftop Management: Green rooftop management can be considered to increase the aesthetic aspect of the building. Also, plantation, proper sitting area for small meetings, well managed open area for different activities can be considered within the design which can potentially benefit everyone.
Social Risks and Management	<ul style="list-style-type: none"> • Sometimes there are accidents and even fatalities during construction. Proper measures have to be taken to avoid these kinds of incidents.

	<ul style="list-style-type: none"> • Temporary resettlement of the NBR employees/workers living in the compound of both sites; proper compensation and related issues has to be considered with utmost care. There are no squatters/informal occupants at both sites. • People visiting Custom House, Chattogram mostly have their lunch in the compound in an existing canteen. During the reconstruction of the compound, the canteen will not be there and that may create some inconveniences for the people visiting Custom House. An alternative of this system needs to be considered during the implementation. • Mosquitoes and pesticides control measures; mostly forgotten but one of the crucial issues since serious health issues like dengue, chikungunya, etc. are associated with this. • Traffic congestion: During the construction period, the amount of usable land will be reduced, hence creating traffic congestion inside the compound. An alternative plan needs to put in place to minimize the congestion.
<p>Infrastructural Design Related Feedback for Custom House, Chattogram</p>	<p>Everyday around 2000 people come visit Custom House, Chittagong and the number of incoming people will go up in next decades, given the growth trajectory of Bangladesh. Hence, the design of the building has to be foresightful and it is important that the building is designed in a way that would be sustainable with green engineering design, remain relevant to time, and most importantly, can accommodate any changes in demand of time.</p> <ul style="list-style-type: none"> • The new buildings need to be built in a way that they have enough probation to use daylight during the day time as a source of light. Enough open space and green building need to take into consideration to minimize the use of Air Conditioner. • The buildings need to have wide stair case to manage fire hazard; and the lift and stair can't be side by side. • The building must have an emergency exit and the staircase of the exit has to be wide enough to accommodate enough people at a time during fire or any other disaster. • The building must have a separate prayer room and washroom for ladies. Also, a separate rest room for child care or can be used as a rest room. • The building must have two to three seminar halls of different capacity and an auditorium. Also, the present stakeholders suggested considering a gym/yoga center, a library and dining halls as of needs. • The building must have three to four lifts and each lift should have a capacity to lift 20 people or more. • Proper parking space is of high importance and it has to be properly managed to accommodate all incoming vehicles. • The compound must have proper toilet facilities outside for the visitors.
<p>Planning and Operational Management</p>	<ul style="list-style-type: none"> • During the project implementation, there will be temporary arrangement for many issues, like resettlements, labor sheds, server reinstallation, and many more. It needs to make sure that the temporary operational issues are smooth and not interrupting the daily activities of Custom House, Chattogram. • Custom House, Chattogram server installation is supremely important; sincere attention is needed here. • The existing Custom House building will not be broken initially; the rest of the complex will be rebuilt first and then the official activities will be moved to those new buildings temporarily. • There is a grave, that has to be preserved. • NBR needs to apply to the forest department for clearance for cutting down the trees of the compound.

Suggestions (Not related to E&S)	<ul style="list-style-type: none"> Alternative connecting road from Bangladesh to Agartala: People living in Agartala need 36 hours to reach Kolkata, whereas they can reach to the nearest Bangladesh districts within 3-4 hours. There is a huge untapped trade potential for both counties in that area. An alternative smooth road connectivity can ease the process and can facilitate trading in that area. Custom House and port connectivity: To mitigate traffic congestion, an underpass connecting the Custom House and Port would be helpful.
----------------------------------	---

Following table summarizes the consultation notes of the BLPA component:

Table 3: Summary of Stakeholder Consultation Meeting (BLPA)

SI	Key Issues Raised	Participant/S Type	Response
1	Brief on the project	AD, Burimari Land Port	The AD of Burimari Land Port welcomed and thanked all the participants for their presence in the public consultation meeting. Then he gave a brief on the project.
		Environmental and Social consultants	The consultants discussed to the participants what environmental and social standards will be maintained throughout the project like, preparing separate documents on Environmental and Social Management Framework (ESMF), Environmental and Social Impact Assessment (ESIA), Stakeholder Engagement Plan (SEP), Labor Management Procedure (LMP), Resettlement Policy Framework (RPF), Resettlement Action Plan (RAP), Sexual Exploitation & Abuse and Sexual Harassment (SEA/SH), Gender Action Plan (GAP), Environmental and Social Commitment Plan (ESCP)
		Company Commander, Border Guard Bangladesh (BGB)	The BGB company commander then said that his organization would try to provide all possible assistance in implementing the project.
2	How the price is determined in case of land acquisition?	AD, Burimari Land Port	Social consultants firstly said that, for the development or expansion of the existing land port, according to the World Bank's Environmental and Social Framework (ESF) the project Implementing Agency's primary target is to avoid any kind of private property/ land acquisition. If it is not avoidable then the project will go following the Resettlement Policy Framework and Resettlement Action Plan for land acquisition where policy from both the Government of Bangladesh and The World Bank will be followed. It was also discussed that, to determine the price of land or any kind of loss (e.g., structures, crops, tress, business etc.) there will be Property Valuation/Market Survey.
		President, C&F Agents Union	He said that, if possible, there would be about 25 acres of vacant land on the east side of the present port. That space can be acquired and used for project work.
3	If someone runs a floating business on other's land or Government-owned land (Khas) and if that business is affected, how will that person be paid compensation?	In-Charge, Immigration Police, Burimari land port	Answering the question raised by the Immigration Police consultants discussed in the meeting that any business, whether small, medium or large, permanent or temporary, would be compensated if affected by the project. The participant also wanted to know, if land acquisition takes place, compensation will be determined for the lands on the front side of the road and that are away from the main road. Consultants informed that by evaluating the market survey and government rate land price, all affected person/s should get a fair price for their land parcel.
4	If land acquisition takes place what will the community living	From representatives that are living in	Consultants assured them again that if land acquisition is unavoidable, then the project will follow the RAP and accordingly affected persons will be compensated and provided support for their resettlement.

Sl	Key Issues Raised	Participant/S Type	Response
	very close to the land port do	the proposed land area adjacent to the existing land port (near zero point)	
5	Education system and children's security	Head Teacher of primary school, and Community representatives	<p>Stone is the most important of the various products imported through this land port. The stone crushing business around this port area is currently making a huge contribution to the economy of Burimari. But due to the business of stone crushing, stone powder, etc., the environment has become much polluted in the area around 5/8 km near Burimari port. All the citizens living here are moving in a dusty and sandy environment. As a result, people are suffering from shortness of breath, asthma, cold and cough. The headmistress drew the attention of the authorities to keep in mind reducing the environmental pollution by expanding and modernizing the port area. The participants agreed with what she said and they suggested Participants suggested that a particular area with boundary be set up in an uninhabited area for the stone related businesses and that the companies regularly set up sprinklers on their behalf and abide by those rules.</p> <p>Nearly one third of the participant said that the education system in this area is poor. In addition, it is plagued with various problems due to which number of school dropout is also high.</p> <p>More than 15 primary school is located in this area contrarily only 1 high school and 1 college which is 6 kilometers away from this area.</p> <p>The Head Teacher again said, 'A country is bigger than the individual'. Therefore, in the interest of development of the country, we have to take any kind of action positively. But the project will be implemented by giving priority to the 6 basic needs of the people - that is what they hope. Burimari is not as green as before. All the trees in the area are now covered in dust. If the Ministry of Environment initiates a tree planting program here, it is very good for the area.</p> <p>Excessive load-shedding has resulted in students not being able to study properly.</p>
6	Labor related issues	Head Teacher of the local primary school	<p>All workers who come to the area to work on the project must ensure that they are provided with the Covid-19 vaccine.</p> <p>The use of gloves, helmets, boots, etc. should be ensured to avoid the risk of accidents and safety of those who will work as laborers.</p>
		President, Landport labor union	About 3000 workers are involved in various activities of the port. They do not have restrooms, toilets, overnight accommodation etc. in the port area.
		President, C&F Agents Union	There is no accommodation for the drivers of freight vehicles arriving in the port area. Most of the incoming drivers spend the night in freight cars or trucks. Which is very risky for them to do their job properly. So, accommodation needs to be arranged for them.
7	Communication facilities	All Participants	<p>Getting students to school is challenging as they have to sit in traffic jams for a long time almost every day.</p> <p>In addition, Heavy mud in rainy days and extensive dust in normal times creates a tremendous suffering to the school-college going children.</p> <p>Furthermore, road accident happens very often there, driving of over loaded tracks in less width road is responsible for accidents. Accidents often happen because of narrow roads, broken roads. In addition, dust, severe traffic congestion has made communication in this area difficult.</p> <p>Communication will be much easier if a bypass road can be made from Burimari Land port zero point aligning with the rail way line. Undoubtedly it will be a tremendous support for local residence.</p>
		President, C&F Agents Union	The highway that started from Burimari Zero Point area and passed through Burimari Bazar towards Patgram is quite narrow considering

Sl	Key Issues Raised	Participant/S Type	Response
			the number of vehicles currently plying in the area. This road needs to be at least 6 lanes. This will almost completely alleviate the severe traffic congestion in the area.
		Company Commander, Border Guard Bangladesh (BGB)	He said if the port is developed, the country will develop. First, the allocation of BGB's security needs to be expanded. The existing highways need to be widened. A separate walkway has to be built for people to walk. In this project, all the infrastructural development has to be done considering Burimari port, but infrastructural development has to be done keeping in view the common man.
8	Health system of this area	All Participants	Nearly all the participants said that the health system of this area is terrible. Community clinic, upazila health complex, even in Sadar hospital don't have sufficient medical facility, and nowadays they don't even expect to get adequate service. Consequently, critical patients are taken to rangpur medical where they get proper treatment. At least 70 people in this area have died of silicosis due to excessive air pollution, and 100 more people are still infected. A large number of residences of this area suffer from Asthma, silicosis, shortness of breath and other critical diseases due to open stone crushing miles.
9	Environmental awareness of stone crushing company	All Participants	Majority of the participants blame 'Stone traders' for environmental pollution as crushing rocks in the open air, the dust of the rock spreads in the air and pollutes the air. After being washed by rain water, this dust goes into rivers or reservoirs and causes water pollution. As there is a possibility of air pollution by the project, the authority should take necessary steps to reduce the environmental pollution. Wastes of this project should be kept or managed away from localities. If the stone crushing traders' water regularly, the dust will be reduced in this area. Regular monitoring by law enforcement agencies will reduce such irregularities.
		President, C&F Agents Union	At present, the volume of Burimari land port-centric business has increased many times over. The area of Burimari land port is presently approximately 11 acres. Even if the size of the port is increased 10 times more than it is now, it will not be enough to run port-based businesses. Neither the traders nor the appropriate authorities are responsible for reducing the environmental pollution by the stone business. The stone workers are risking their lives to earn a living. The stone business is one of the major contributors to the region's economy. According to the government policy, all the stone crushing businesses are supposed to operate within 3 km of the port area, but at present the stone business establishments are spread over an area of about 8 km. Therefore, administrative monitoring is very important for sustaining the business and keeping the environment safe.
10	Development of Land Port Immigration related issues and other facilities	In-Charge, Immigration Police, Burimari land port	The current situation of rest, toilets, food intake for our immigrant passengers is very inadequate compared to other countries in the international arena. Since they have to face immigration first by crossing the border from a neighboring country, their first impression of our country will be positive once immigration meets international standards. So, we want a tidy, tidy, clean immigration.
11	What should be kept in mind for this project?	All Participants	There are no residence facilities for drivers and staff from India or other countries, and even there are no toilet or bathing facilities. These issues must be kept in mind planning this project. A mosque should be built within port boundary so that workers can pray in time properly. To reduce road accident a foot over bridge needs to be installed in the land port area. The labors are often victims of accidents. Contrarily, there is no insurance facilities for them. There should be an insurance facility so that they can get support from.

Following table summarizes the consultation notes of the BLPA component:

Table 4: Summary of Consultations (RHD)

sl	Issues	Summary views/recommendations
	Proof of title ownership of land	In many cases, owners of affected plot are afraid of facing cumbersome process of proving ownership title to claim compensation when their ownership has not yet legally transferred to their own name. They should be given enough time (say, minimum 6 months from the date of receipt of acquisition notice), so that they are able to legally transfer ownership and can arrange rehabilitation for themselves within that period.
2.	Immediate special assistance for the vulnerably poor owners/occupants of affected structures/ shop owners	The vulnerable PDPs should immediately be given some special financial assistance as a grant so that they can overcome the initial problems of displacement. Poor household dependent on shops significantly affected by the project should get special financial and institutional assistance to restore their income and livelihood status. The amount of cash grant for vulnerable poor should be higher enabling them to arrange rental house or shops on other places.
3.	Employees of business enterprises	Like those of the business owners, the employees should also be given some financial assistance to withstand the loss of their employment/income opportunities between the period of eviction/displacement of their employers from present place of business and restarting at new place.
4.	Adequate and timely payment of compensation and resettlement benefit	A good number of affected people losing land, shops and residences in certain locations will be facing severe hardship. Most of them are unlikely to be able to buy new land for their resettlement and commercial purposes. They expect adequate and timely payment of compensation and resettlement benefit so that they can buy new land elsewhere. Any delay in paying the compensation and resettlement benefits will put them at a risk of missing the chance of rehabilitation. Many participants also argued for disbursement of compensation by any trustworthy NGOs to avoid involvement of any broker/local leaders of political parties and not even the Land Acquisition Office (LAO).
5.	Non-availability of commercial spaces for business within adjacent areas	In most of the commercial areas, suitable alternative spaces are not available. Even if any space is available, cost thereof would be too high to manage by most of the small business owners/operators. Consequence would be quitting business. The government should take note of the circumstances and arrange proper rehabilitation of the affected people.
6.	Provision of project sponsored resettlement and commercial plots for squatters	The Project will displace a good number of shops and residences on land which is not of their own. They would not get compensation for land; although some displacement benefits, they might be receiving. For them it would be very difficult to find a similar place to resettle.
7.	Gender compliant policy	The married female co-sharers of parental land properties living away from the area should be identified to ensure payment of compensation and resettlement benefit for their share in the lost property.

8.	Support for compensation award collection	The poor people losing land may not be able to organize necessary papers and documents to establish ownership and claim compensation to the LA office. The cost of compensation collection may also be high. It is suggested that requiring body may pay the additional grant over and above the due cash compensation under law (CCL) following notice under section 7 ARIPA 2017; so that they don't have to wait for their resettlement benefit until CCL is paid. There should be some institutional and financial support for clearing/updating ownership of the poor and vulnerable groups likely to lose land.
9.	Physical relocation of the displaced HH	DPs have raised the physical relocation options during consultation meetings; (i) self-managed resettlement with some assistance from the project; (ii) host/nearby area benefits and (iii) livelihood restoration support during post-relocation period.
	Use of unused RHD land for relocation of shops	The likely affected community along the road believes that in some areas there is sufficient land remaining vacant for decades. Those lands could be given them lease for relocation of displaced shops.

Following table summarizes the consultation notes of the BLPA component:

Table 5: Summary of Consultations (MOC)

SI	Issues/Topics	Discussions
1.	General	The meeting started with an introduction session; the MoC officials had an elaborate discussion with the project structure and implementation process. The ES consultants introduced themselves and proposed a tentative plan on how they will proceed with preparing the ES documents. They also proposed a timeline of ES documents submission.
2.	Environmental issues	E-waste management would be one of the most challenging concerns given the remarkable progress in digitalizing the public and private sectors. E-waste is one of the fastest-growing waste streams globally, and Bangladesh is no exception. Need proper policy and regulations, and proper focus on implementing those policies.
3.	Social issues	Capacity building trainings on trade facilitation should include people from all social groups, particularly women and people from underprivileged communities. Proper use of GRM given the share of the MoC component is one crucial issue. All stakeholders need to be aware of the GRM process and proper use of it.