

**INTEGRATED SAFEGUARDS DATA SHEET
APPRAISAL STAGE**

Report No.: ISDSA2999

Date ISDS Prepared/Updated: 04-Apr-2013

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I. BASIC INFORMATION

1. Basic Project Data

Country:	Bangladesh	Project ID:	P128276
Project Name:	Coastal Embankment Improvement Project - Phase 1(CEIP-1) (P128276)		
Task Team Leader:	Maria Sarraf		
Estimated Appraisal Date:	08-Apr-2013	Estimated Board Date:	19-Jun-2013
Managing Unit:	SASDC	Lending Instrument:	Specific Investment Loan
Sector(s):	General water, sanitation and flood protection sector (60%), General agriculture, fishing and forestry sector (30%), Other social services (10%)		
Theme(s):	Natural disaster management (50%), Climate change (30%), Water resource management (20%)		
Is this project processed under OP 8.50 (Emergency Recovery) or OP 8.00 (Rapid Response to Crises and Emergencies)?			No
Financing (In USD Million)			
Total Project Cost:	400.00	Total Bank Financing:	375.00
Total Cofinancing:		Financing Gap:	0.00
Financing Source			Amount
BORROWER/RECIPIENT			0.00
International Development Association (IDA)			375.00
Climate Investment Funds			25.00
Total			400.00
Environmental Category:	A - Full Assessment		
Is this a Repeater project?	No		

2. Project Objectives

The project development objectives are to (a) increase the area protected, in selected polder, from tidal flooding and frequent storm surges, which are expected to worsen due to climate change; (b)

improve agricultural production by reducing saline water intrusion; and (c) improve the Government of Bangladesh’s capacity to respond promptly and effectively to an eligible crisis or emergency. These objectives will be achieved by strengthening and upgrading embankments as part of an integrated approach to improve the polder system in the coastal area.

3. Project Description

The Project has five components: four components are related to polder improvement and a fifth component (with a provisional zero amount) has been included to allow for rapid reallocation of loan proceeds during an emergency, under streamlined procurement and disbursement procedures:

- A. Rehabilitation and Improvement of Polders;
- B. Implementation of Social Action and Environment Management Plans;
- C. Construction Supervision, Monitoring & Evaluation of Project Impact, Supervision of Social and Environment Plans, and Coastal Zone Monitoring;
- D. Project Management, Technical Assistance, Training and Strategic Studies; and Contingent Emergency Response.

Component A – Rehabilitation and Improvement of Polders (\$291 million).

Component A1: Rehabilitation and Improvement of Polder (\$286 million). (\$266 million from IDA Credit; 20 million Grant from Climate Investment Fund- Pilot Program for Climate Resilience “PPCR”). This component will finance activities that aim to increase community resilience to tidal flooding and storm surges. Investments include: (i) rehabilitation of critical portions of polder embankments including slope protection work, (ii) increasing embankment height in some stretches to improve resilience, (iii) repairing and upgrading drainage and flushing systems within polders, and (v) improving operations and maintenance (O&M). The upgrading and rehabilitation works will be designed with improved standards so that protection is for both tidal flooding and frequent storm surges. It is expected that about 17 polders will be rehabilitated under this component. Polders have been selected based on technical, environmental, social, economic and geographic criteria. A list of the polders considered for rehabilitation is presented in the table below .

Improving the embankment system will provide stronger protection to people living inside polders from storm surges; hence reducing the recovery time after a natural disaster such as a cyclone. Improving the internal drainage system will enhance agriculture production, which is the primary source of livelihood for coastal population. Protecting assets and enhancing agricultural production will bring in much needed economic growth to the coastal population.

Component A2: Afforestation (\$5 million). Afforestation is important to the security of embankments and the lives and livelihoods of communities by providing green belts of protection from tidal flooding and storm surge. Pilot planting of selected mangrove and other salt tolerant species are planned on BWDB owned land to demonstrate the critical role of a protective belt on the tidal inundation zone on the riverside of the embankment. Planting of a range of commercial wood, fruit and other shallow rooting social forestry tree species in phase with livelihoods needs of landless, marginalized and poor villagers are proposed on the foreshore lower slopes of embankments. Plantings would commence after resolving land ownership and competing land-use (fish and shrimp ponds, rice paddies, livestock grazing, settlement, etc.) issues and the completion of earthworks to restore embankments. The afforestation component will engage community participation in pro-poor approaches to encourage ownership and benefit sharing in an attempt to achieve social, environmental and economic sustainability. The component will finance effort to increase

community awareness of the protective and productive functions of planting trees and build capacity of local government institutions, Water Management Organizations (WMOs), Non-Governmental Organization (NGOs), community organizations and beneficiaries in secondary maintenance schemes for improved O&M, foreshore and embankment afforestation, social forestry and protection of embankment toe against erosion. Key lessons from past embankment afforestation has been taken into account in participatory planning, selection of afforestation types and species, selection of participants and beneficiaries, post-planting O&M, plantation protection, harvesting of wood and non-wood forest products and benefit sharing.

Component B—Implementation of Social Action and Environment Management Plans (US\$56 million).

Component B1: Implementation of Social Action Plan (US\$3 million). This component will support consultation with and strengthening of polder stakeholders and beneficiaries. Polder Committees will be strengthen or established in all Polders to determine the competing needs and uses for water resources, and to decide on the operation of hydraulic infrastructure. Intensive social mobilization will be piloted in 4-6 polders to establish participatory WMOs that will be responsible for the operation and minor maintenance works of the polders. The establishment of WMOs will follow an eight step process, as identified in the Guidelines for Integrated Planning for Sustainable Water Resources Management, published by BWDB in 2008. Social mobilization is expected to last around two years, during which time the WMOs will be established and trained in participatory planning, as well as in operation and minor maintenance activities. Small works, including minor periodic maintenance and operation of minor hydraulic infrastructure would be undertaken by the WMOs under a memorandum of understanding with BWDB. Should the participatory approach prove to be successful, it would be scaled up under the next phase of investments. It is envisaged that this component, along with the social afforestation (Component A2) and the implementation of the RAP (Component B2) will be implemented through a well-established NGO.

Component B2: Implementation of Resettlement Action Plans (US\$49 million). Polder scheme rehabilitation is a complex project that involves a variety of issues ranging from land acquisition, physical and economic displacement of people and other unanticipated impacts. Generally there are informal settlers on the embankments as they are safe structures. A Social Management and Resettlement Policy Framework (SMRPF) has been prepared and will be disclosed in accordance with Bank guidelines. A draft Resettlement Action Plan (RAP) for the first package of investment has been prepared and disclosed in the info shop on February 15, 2013. This component will finance the implementation of the RAP and public consultation plans. The component will finance the resettlement and rehabilitation of persons adversely affected by the project. It will also support the development of a system to computerize land acquisition and resettlement data with Global Position System (GPS) reference and independent institute to undertake surveys and verify field data in order to guard against improper targeting of beneficiaries and/or false delivery of benefits in case of SAP/ RAP.

Component B3. Implementation of Environment Management Plan (US\$4 million). An overall environmental assessment of the polder system; a draft Environmental Management Framework (EMF) for the project; and Environment Impact Assessment (EIA) for polders targeted under the first package of investment have already been prepared and disclosed in the infoshop on February 15, 2013. This component will finance: (i) the preparation of EIAs for all remaining polders; (ii) the implementation of the Environment Management Plan (EMP) and environmental mitigation and enhancement measures; and (iii) the establishment of an environmental monitoring system in BWDB

to enable it to track continuous improvement in environmental performance of the polder system.

Component C- Construction Supervision, Monitoring & Evaluation of Project Impact, Supervision of Social and Environment Plans, and Coastal Zone Monitoring (US\$32 million)

Component C1: Detailed Design and Construction Supervision (US\$16 million). This component will cover consulting services for (i) surveys, designs of remaining polders to be included in the project (other than the 5 for which detailed designs have already been completed), and (ii) construction supervision of rehabilitation and improvement of coastal embankments. This will include facilitating consultations with local communities in identifying needs and suitable design of the embankment as well as with other stakeholders such as local government, upazilla and union level governments. The component will finance surveys required prior to construction work.

Component C2: Monitoring and Evaluation, Third Party Monitoring of Project implementation, RAP and EMP (US\$4 million). This component will cover consulting services for continuously monitoring project activities and providing feedback to the government and the implementing agency on the project's performance. This includes supervising the implementation of the EMP, SAP and RAP. This will be provided through third party assessment and monitoring of key aspects of project implementation.

Component C3: Long Term Monitoring, Research and Analysis of Bangladesh Coastal Zone (US\$12 million). (\$7 million from IDA credit; \$5 million Grant from PPCR).

The coastal zone is a crucial region for Bangladesh, and it is subject to a multitude of complex natural phenomena that are currently not fully understood. The region is experiencing fast paced changes due to changes in river morphology, fluvial processes, human intervention, and climate change. To tackle this knowledge gap and enhance people's understanding of this complex environment, the project will support a comprehensive monitoring and morphological assessment of the Bangladesh Delta. A program to extend the current monitoring systems in Coastal Bangladesh is also essential to generate data, information, and new knowledge for assessments of effects of multiple drivers on the environment of coastal zone and guide future design, rehabilitation and improvement requirements. The monitoring will cover sediment rates and composition; erosion rates; sea level rise; subsidence rates; tidal dynamics changes; river cross section changes and meander migration; shoreline changes; and any relevant geomorphological attributes.

This work will be carried out by key institutions in Bangladesh, such as IWM, CEGIS, Dhaka University, BUET, and BWDB, in cooperation and twinning arrangements with international institutions and experts in the topic of estuarine and coastal morphology and geomorphology. This twinning arrangement is needed to build in-house capacity and guide local institutions and experts to improve their understanding of the physical processes of such a complex delta system. The project will support the installation and operation of needed equipment and systems on the ground, technical expertise, provision of advanced technology and equipment, high resolution specialized remote sensing images, and the capability to analyze these images. The project will support procurement of goods, services, and incremental operation costs in carrying out this research and analysis, and the development of databases and information systems that will be made available widely both within and outside of Bangladesh.

Component D – Project Management, Technical Assistance, Training and Strategic Studies (US\$21 million).

This component will support BWDB in implementing the project through the establishment of a fully functioning Project Management Unit (PMU). It will provide resources for needed strategic studies (including the continuous updating of the strategic polder assessment as well as all necessary preparatory studies for following phases of the CEIP), institutional capacity building, technical assistance and training.

Component E – Contingent Emergency Response Component (\$0 million)

In case of a major natural disaster, the Government may request the Bank to re-allocate project funds to this component (which presently carries a zero allocation) to support response and reconstruction . This component would allow the Government to request the Bank to cancel project funds from Immediate Response Mechanism (IRM) portfolio projects and designate them as IRM funds to be engaged to partially cover emergency response and recovery costs. This component could also be used to channel additional funds should they become available as a result of the emergency.

Disbursements under an Contingent Emergency Response Component (CERC) will be contingent upon the fulfillment of the following conditions: (i) the Government of Bangladesh has determined that an eligible crisis or emergency has occurred and the Bank has agreed and notified the Government; (ii) the Ministry of Finance has prepared and adopted the Contingent Emergency Response (CER) Implementation Plan that is agreed with the Bank; (iii) Bangladesh Water Development Board has prepared, adopted, and disclosed safeguards instruments required as per Bank guidelines for all activities from the CER Implementation Plan for eligible financing under the CERC.

Disbursements would be made either against a positive list of critical goods and/or against the procurement of works, and consultant services required to support the immediate response and recovery needs of the GoB. All expenditures under this component, should it be triggered, will be in accordance with BP/OP 8.0 and will be appraised, reviewed and found to be acceptable to the Bank before any disbursement is made.

4. Project location and salient physical characteristics relevant to the safeguard analysis (if known)

The study area is the coastal region of Bangladesh. The coastal region borders the Bay of Bengal with 710 km coastal line and has three distinct geographic sections, the Sundarban mangrove forest in the southwest, the very active delta in the central south, and the narrow coastal strip along the Chittagong and Chittagong Hill Tracts area on the east. The coastal region of Bangladesh has 139 polders, which were constructed in late sixties to protect the land from saline water intrusion and to increase crop production.

Of the 139 polders, 17 polders are proposed to be considered under this project using technical criteria and environmental consideration. The selection of polders has been undertaken in consultation with various level of stakeholders and development partners. The proposed 17 polders belong to 6 coastal districts such as Khulna, Satkhira, Bagerhat, Pirojpur, Barguna and Patukhali.

5. Environmental and Social Safeguards Specialists

Chaohua Zhang (SASDS)

Shakil Ahmed Ferdausi (SASDI)

Nadia Sharmin (SASDC)

6. Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/ BP 4.01	Yes	<p>An overall environmental assessment of the polder system and Environmental Management Framework (EMF) for the project are already under preparation.</p> <p>A provisional zero amount component (Component E) has been included in the project which will allow for rapid reallocation of loan proceeds during an emergency. The EMF will incorporate the guideline for dealing with emergency operation.</p> <p>The project will conduct polder specific Environmental Impact Assessment and Environmental Management Plan.</p>
Natural Habitats OP/BP 4.04	Yes	<p>The coastal zone of Bangladesh falls in ten different bio-ecological zones namely the Ganges flood plain and major rivers, coastal marine water, Meghna flood plain, Sundarbans, Chakaria Sundarbans, coastal plains, offshore islands and Meghna estuarine flood plain. There may be localized impact on the natural habitats especially on the fish spawning site and protected areas, during the implementation of the civil works. The impact will be determined during the selection process of the polders</p>
Forests OP/BP 4.36	Yes	<p>Sundarbans the largest Mangrove forest of South Asia is in close proximity of the 6 districts of 17 polders. Rehabilitation and reconstruction of polders may have indirect impact on the water flow quantity and pattern within the channels of Sundarbans. The technical studies will consider the flow changes criteria due to the reconstruction and rehabilitation of the polders.</p>
Pest Management OP 4.09	No	
Physical Cultural Resources OP/ BP 4.11	Yes	
Indigenous Peoples OP/BP 4.10	No	
Involuntary Resettlement OP/BP 4.12	Yes	<p>Project works will require land acquisition and population displacement for improvement of existing embankments, construction of retired embankments, construction of new water management structures, and construction of bank</p>

		protection works. BWDB has therefore prepared the SMRPF for CEIP-I. It includes issues related to Involuntary Resettlement, Indigenous Peoples and social inclusion as well as gender. Among other issues, the SMRPF includes (a) a legal framework outlining the principles and guidelines which will be used to acquire lands and mitigate the adverse impacts, including those on indigenous peoples; (b) facility for screening of social safeguard issues related to involuntary resettlement and indigenous peoples; (c) mitigation principles, guidelines, and a policy matrix in terms of different impact categories; (d) a grievance redress procedure for the project affected persons; (e) stakeholder consultation framework; and (f) arrangement for monitoring progress in the implementation of impact mitigation plans. The SMRPF will provide the basis to prepare Resettlement Action Plans and IPPs for annual civil work programs under CEIP-I.
Safety of Dams OP/BP 4.37	No	
Projects on International Waterways OP/BP 7.50	Yes	The project is unlikely to have any adverse impact. During preparation the EA will evaluate any potential impact due to project activities.
Projects in Disputed Areas OP/BP 7.60	No	

II. Key Safeguard Policy Issues and Their Management

A. Summary of Key Safeguard Issues

1. Describe any safeguard issues and impacts associated with the Restructured project.

Identify and describe any potential large scale, significant and/or irreversible impacts:

Overall the project bears significant positive environmental aspects. It will increase the resilience of vulnerable communities living in natural disaster prone coastal areas and it will develop the capacity of BWDB in environmental management. The project's physical intervention is expected to reduce loss of crops and assets by withstanding storm surges, taking into account the impact of climate change, and to decrease salinity intrusion which, in turn, will increase agricultural production in the long run. Component A of the project (about 75% of total funding) will involve embankment upgrading and rehabilitation with extensive earth work. Component B will support the implementation of the Environmental Management Plan (EMP) and the establishment of an environmental monitoring system in BWDB to enable it to track improvement in environmental performance of the polder system during implementation and after project completion. Component C2 will support an independent supervision (possibly through third party monitoring) of the EMP implementation.

Environmental impacts will be triggered from the following activities: upgrading embankments

(height increased and base widening), limited realignment, embankment slope and river bank protection work by concrete block and vegetation, disposal of drainage substrate obtained from drainage channels re-excavation and construction/repair and operation of hydraulic structures. These activities are expected to affect agricultural land, fish habitat, flora and fauna, physical and cultural structure and livelihood of the people. Considering the sensitivity, extent and duration of the impact, CEIP-I is a Category 'A' project according to the Bank's safeguard classification. Table 1 shows a summary of the environmental impacts obtained from the EIA for the four polders out of the 17 polders that will be targeted under this project.

The coastal polders provide social protection to the communities in the region from flooding, tidal inundations and salinity intrusion. The polder embankments also provide emergency shelter to victims of riverbank erosion and flood inundations. As the embankments are safe structures and serve also as roads, the slopes are often used by the poor and landless peoples and sometimes socially influential persons for residential, commercial and community purposes without any functional restrictions. Bank investment for improvement of these polders will involve acquisition of land to accommodate improved design and displacement of people, largely the informal embankment settlers. The World Bank policy on involuntary resettlement (OP/BP 4.12) has therefore been triggered for this project. As none of the residents or likely affected persons within the polders selected by CEIP Phase I is from the tribal communities (indigenous peoples), OP/BP 4.10 on Indigenous Peoples has not been triggered for CEIP-I.

Adverse social impacts of the polders to be part of the first group (i.e., the rehabilitation of 17 polders is expected to take place in four packages) for rehabilitation are related to land acquisition and population displacement due to embankment upgrading and improvement of water control structures. According to the social impact assessment as of February 2013 following the detailed engineering design, a total of 259 ha of land have been proposed for acquisition affecting about 1,864 titled households in their land, structure, trees and fish culture areas. In addition, the project is likely to cause the displacement of housing and livelihood resources affecting 4,339 non-titled households largely on existing embankments and to affect 184 common resource structures within the new right of way of the five polders.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:

Preliminary analysis of the location and proposed design specification (including assessment of the impacts of climate change) of 17 polders covered in this project shows that most of the polders will not have significant impact on storm surge level and cumulative impact on other polders, as they are located either on the bank of big river and sea or far from the coast on the northern side of the Sundarbans. If realignment is necessary towards Sundarbans, sufficient set back has to be provided to avoid erosion or any adverse impact on on the Sundarbans side. Only a few polders (39/2C, 41/1, 43/2C, 47/2) might face slight impact of increasing storm surge level and cumulative impact on other surrounding polders.

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

Several alternatives were considered during the design phase of the Project. These included 'no-project' alternative and technical alternatives. The present situation of the polder is extremely vulnerable to cyclones, storm surges, wave action, and climate change effects, and the polder scheme is not in a state to provide required services particularly protection against tidal inundation, efficient drainage, and minimizing the impact of cyclonic surges. It has been found the project will bring reduction of drainage congestion, reduction of tidal flood/storm surge,

increasing flood free land type, increasing cropping intensity, increase of cropped area and crop production, increase of fish pond and production and increasing employment opportunity.

Since CEIP-I is a rehabilitation project, no site alternatives were available to be considered. However a comprehensive multi-criteria analysis was carried out to prioritize the polder rehabilitation under CEIP-I. Once the problems being faced by the polder scheme and its inhabitants had been identified, several technical alternatives were considered to address these issues. These alternatives pertained to strengthening the polder embankment, protection of river banks, protection of embankment slope, improving the sluices and their performance, and reducing drainage congestion and water logging.

Necessary efforts have been made to minimize environmental and social impacts including land acquisition and disruption of livelihoods. Land acquisition and displacement of people will take places in cases of re-sectioning, retirement and construction of new embankments. The planned key efforts to minimize impacts of the project interventions in the first year contract comprise of the following:

- Closing of open sections of embankments has been designed to use the original alignment with provisions of bank protection.
- Slope protection will be provided for existing sections vulnerable to immediate erosion avoiding retirement and acquisition of additional land.
- Embankment sections through villages, markets and lands of higher elevation have been designed severally to avoid displacement.
- Extensive consultations have been conducted with the affected communities and people living along the embankment alignments to consider their views and incorporate them in the polder design, as far as possible.
- In sections with some constraints of construction of embankment in full section, retaining wall will be constructed to avoid displacement of households and shops.
- The crest level by sections and polders will be decided through technical analysis of recurring events of floods and cyclonic storms.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.

The project will be implemented by the Bangladesh Water Development Board (BWDB) under the Ministry of Water Resources (MoWR). The MoWR is the apex body of the government responsible for development and management of the whole water resources of the country. BWDB is the implementing arm of the MoWR in the executions of flood, drainage and irrigation plans and development projects. The National Water Policy (1999), the Coastal Zone Policy (2005), and the National Water Management Plan (2004) are major instruments guiding BWDB in its operation. The MoWR will shoulder the responsibility on behalf of the Government of Bangladesh for overall project management and coordination. For the day to day management of the project, BWDB will rely on a Project Management Unit (PMU) at the headquarter and Field Offices at the local level. The PMU will address the safeguard compliance issues through its Social Environment and Communication Unit (SECU).

BWDB has developed an Environmental Management Framework (EMF) for the Project. The EMF provides the guidelines to comply with national legislation and World Bank safeguards policies, and defines all environmental requirements and management plans needed for the reconstruction/rehabilitation of all polders as well as for the afforestation program. In addition, BWDB has also conducted polder specific Environmental Impact Assessment (EIA) for polder

numbers 32, 33, 35/1 and 35/3 (polder selected for rehabilitation in the first batch for rehabilitation) and recommended polder specific EMP. An Independent Consultant with international experience reviewed the 4 EIAs. Polder specific consultations with community and stakeholders were carried out during the EMF and EIA. The views of the community have already been incorporated in the EMP and project design.

Considering the substantial and possibly long term impacts of the project, the PMU will be staffed with a Senior Environment Specialist in the Dhaka office and one or more environment specialists at the field office. At least one environment specialist is expected to be on board by project effectiveness. The contractor will ensure proper environmental management during project implementation, the environment specialist of project supervision consultant will supervise the implementation of EMP during project period. The participatory water management organizations (WMO) will be trained to ensure environmental management during project operation. The SECU Unit of BWDB will oversee the environmental management during project implementation and operation.

The Senior Environmental Specialist will oversee the proper implementation of EMP and other environmental management responsibilities. S/he will maintain liaison with WB safeguards team, regulatory agencies, and other stakeholders during the project implementation. S/he has to be on Board as soon the PMU is set up. S/He will be responsible for ensuring the adequacy of environmental component in the Bidding Document (BOQ) and ensure the quality of Environmental Action Plan (EAP) submitted by the contractor. The field level environmental specialist should be on board before commencement of the field work.

Civil works under CEIP-I have been packaged into 4 packages; each including works in 4 or 5 polders. Social impacts will be identified when specific investments are designed for each package. BWDB has developed a Social Management and Resettlement Policy Framework (SMRPF) for the CEIP-I and a Resettlement Action Plan (RAP) for the first package of CEIP-I in compliance with the World Bank policy on Involuntary Resettlements and the national law on land acquisition. The SMRPF will guide the preparation of social management plans (SMP) for future investments and the RAP aims to mitigate adverse social impacts of the first package of CEIP-I. The SMRPF includes a resettlement policy framework and a social inclusion/gender framework. Social screening and social impact assessment will be carried out for future investments in line with the SMRPF and SMPs like social action plans and RAPs will be prepared. The PMU will have a Senior Social Specialist at its headquarters and Social Specialists in the field offices to ensure application of the SMRPF for social safeguard compliance of the project interventions. An independent monitor will be recruited to monitor the implementation of the RAPs and the SMRPF.

The construction contractors will have dedicated properly qualified and experienced, site-based Environment Supervisors (ESs) at each construction site. The ESs will be responsible to implement various aspects of the EMP particularly the mitigation measures to ensure that the environmental impacts of the construction works remain within acceptable limits. The Construction Supervision Consultants will have dedicated, properly qualified and experienced site-based Environment and Social Monitor (ESM) at each construction site. The ESMs will monitor and supervise implementation of EMP and SMP at the field level.

BWDB core unit has posts of 4 Assistant Chief and 2 Deputy Chief to oversee the overall environmental compliance of BWDB implemented projects. Under CEIP-I, the SECU unit will provide training to the BWDB people responsible for monitoring of environmental compliance.

Thus smooth transition to BWDB will happen to ensure environmental compliance during the O&M after the project completion.

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

The population in the 6 coastal districts (Bagerhat, Khulna, Satkhira, Barguna, Patuakhali and Pirojpur) in the exposed coast of Bangladesh is the prime beneficiary of the project. At least 8% of this population is compounded within the polder embankments selected for improvement. The local residents including peoples representatives, village leaders, farmers, traders, fishers, boat operators and wage laborers have expressed their interest to the project. The primary stakeholders of the project include the local farmers, business community and the affected persons, women groups, among others. Secondary stakeholders include the community groups, fishermen, boatmen and elected local government representatives. The other stakeholders include the businessmen groups like contractors, sub-contractors and suppliers during the construction period.

The local potential affected persons along with local community leaders and other stakeholders were consulted through group meetings and personal contact. During the preparation of the RAP, PAPs and their communities have been informed, closely consulted, and encouraged to participate in the meeting. The opinion of the different levels stakeholders regarding the project was sought and considered in preparation of RAP and EMP. A total of 19 formal stakeholders meetings were held with different communities along the right of way of which 3 meetings in polder 32, 5 meetings in polder 33, 4 meetings in polder 35/1, and 3 meetings in polder 35/3. Different types of stakeholders i.e. concerned UP Chairman/member, Teacher, Imam, Local Community Leader, Political Leader, farmer, shop keepers and other affected people attended the sessions. One national level workshop was held on February 28, 2013 on 4 EIAs, EMP, EMF, SMRPF and RAP.

Consultation with the stakeholders will be continued during implementation of the project. During the implementation phase, the Polder Committees and Water Management Organizations (WMOs) will be sought to provide cooperation from various stakeholders in the decision-making and implementation of RAPs and EMPs. Through public consultations, the PAPs will be informed that they have a right to grievance redress from the BWDB. The areas for participation of the primary stakeholders include: (i) identify alternatives to avoid or minimize resettlement; (ii) assist in inventory and assessment of losses; (iii) assist developing alternative options for relocation and income restoration; (iv) provide inputs for entitlement provisions; and (v) identify likely conflict areas with resettlers.

B. Disclosure Requirements

Environmental Assessment/Audit/Management Plan/Other	
Date of receipt by the Bank	14-Feb-2013
Date of submission to InfoShop	15-Feb-2013
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	05-Apr-2013
"In country" Disclosure	
Bangladesh	18-Feb-2013
<i>Comments:</i>	
Resettlement Action Plan/Framework/Policy Process	
Date of receipt by the Bank	10-Feb-2013

Date of submission to InfoShop	15-Feb-2013
"In country" Disclosure	
Bangladesh	18-Feb-2013
<i>Comments:</i>	
If the project triggers the Pest Management and/or Physical Cultural Resources policies, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.	
If in-country disclosure of any of the above documents is not expected, please explain why:	

C. Compliance Monitoring Indicators at the Corporate Level

OP/BP/GP 4.01 - Environment Assessment	
Are the cost and the accountabilities for the EMP incorporated in the credit/loan?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
OP/BP 4.04 - Natural Habitats	
If the project would result in significant conversion or degradation of other (non-critical) natural habitats, does the project include mitigation measures acceptable to the Bank?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
OP/BP 4.11 - Physical Cultural Resources	
Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
OP/BP 4.12 - Involuntary Resettlement	
If yes, then did the Regional unit responsible for safeguards or Sector Manager review the plan?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
OP/BP 4.36 - Forests	
Does the project finance commercial harvesting, and if so, does it include provisions for certification system?	Yes [<input type="checkbox"/>] No [<input checked="" type="checkbox"/>] NA [<input type="checkbox"/>]
OP 7.50 - Projects on International Waterways	
Has the RVP approved such an exception?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
The World Bank Policy on Disclosure of Information	
Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
All Safeguard Policies	
Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Have costs related to safeguard policy measures been included in the project cost?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?	Yes [<input type="checkbox"/>] No [<input type="checkbox"/>] NA [<input checked="" type="checkbox"/>]

III. APPROVALS

Task Team Leader:	Maria Sarraf	
<i>Approved By</i>		
Regional Safeguards Coordinator:	Name: Zia Al Jalaly (RSA)	Date: 15-Apr-2013
Sector Manager:	Name: Bernice K. Van Bronkhorst (SM)	Date: 15-Apr-2013