Social Development Foundation (SDF)

Bangladesh Sustainable Recovery, Emergency Preparedness and Response Project (B-STRONG)

Project Code: P508058

Small Ethnic Community Planning Framework (SECPF)

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1. Introduction

The Government of Bangladesh is implementing the project entitled Bangladesh Sustainable Recovery, Emergency Preparedness and Response Project (B-STRONG) with financing from the World Bank. This Small Ethnic Community Planning Framework (SECPF) is prepared for the component 2 and SDF part of component 5 for SDF project intervention areas. The Project is being implemented by the following organization:

I. Social Development Foundation (SDF)

SDF will focus on restoring and enhancing livelihoods of the flood affected population through services that support economic opportunities for affected households through community driven development. The fundamental purpose for the RPF is to establish guidelines, principles and procedures to ensure recognition of the Indigenous People (IP) and Ethnic minority (EM) groups and avoid any adverse impact on them. In addition, it is also essential to address any impacts with mitigation measures in an immediate manner.

Objectives of the SECPF are as follows:

- Determine the presence of ethnic communities (meeting the criteria of ESS7) in all project interventions and ensure that they are directly involved in the selection, design, and implementation of the project's activities, being culturally cognizant of the differences.
- Ensure any adverse effects will be screened out or modified or adequately mitigated.
- In addition to strategies for impact mitigation, taking additional steps to promote and reinforce any possible socioeconomic opportunities for ethnic communities located in the area.
- Selection of a facility site will be avoided if it falls under traditional ownership of ethnic communities, even if not legally recognized.

2. Project Description

The project development objectives are to (a) rehabilitate and enhance the resilience of critical public infrastructure and (b) support flood-affected households to strengthen livelihoods.

2.1 Project Components

There are five components in this project and this SECPF is only applicable for the SDF -component 2 and SDF part of the component 5 only. detail of these components are depicted below.

Components	
Component 2 Livelihoods Recovery and Enhancement Support	Subcomponent 2.1: Community Empowerment and Institutional Strengthening mobilization efforts at the community level to form community institutions, including Cluster Community Societies (CCS) and Regional Community Societies (RCS);

(Implemented by SDF)	• provision of sub-grants to the Village Development Fund (VDF) and the CCS and RCS to implement community plans, institutional development activities, and activities to improve climate-resilient livelihood facilities; • awareness-raising activities related to hygiene, nutrition, and disaster preparedness. Subcomponent 2.2: Enhancing Sustainable Livelihoods • provision of one-time cash transfers, sub-loans (financed from the VDF), and stipends; • skills development training on market-driven needs and financial literacy; • provision of sub-grants for the Productive Investment Fund to producer alliances to support business development, market linkages, and product promotion.
Component 5: Project Administration, Management, Coordination, Monitoring and Evaluation	Subcomponent 5.1: Project Management, Coordination, Monitoring and Evaluation of LGED, BWDB, and DAE Subcomponent 5.2: Project Management, Monitoring and Evaluation of SDF Subcomponent 5.3: Project Management, Monitoring and Evaluation of DDM

2.2 Project Implementation Area

The project will be implemented in the following districts:

B-STRONG Project Locations

Bangladesh

Bay of Bengal

Legend
- Sundarbans
- B-STRONG Project Areas
- Bangladesh Administrative Boundary

0 20 40   80   120   160
Kilometers

Noakhali, Sylhet, Moulvibazar, Habiganj, Brahmanbaria, Cumilla, Feni, Lakshmipur, Chattogram, and Cox's Bazar. The Project will work in the Sylhet Division and Chattogram Division. Preliminary consultation with locals including the tribal communities demonstrate inclusiveness in the project areas including establishment and strengthening of community institutions and livelihood opportunities. The Project would significantly improve livelihoods recovery and enhancement support. However, no adverse impacts on tribal communities, their lands, properties or businesses, or any land acquisition is permissible under the Project.

There may be need for temporary land use for project activities by the existing rural roads. The extent of such impact will be definitively known upon the confirmation of specific location of subproject and screening of sites and will be managed as per application rules and regulations. In case of considerable adverse impacts, alternative options will also be considered.

3. Laws, Rules, Regulations, Acts, Policies

There are a number of laws, rules, acts, and policies applicable to the project in context of implementing in IP community areas.

3.1 Government Laws and Rules

There are a number of laws, rules, and acts related to the Sylhet and Chattogram Division of Bangladesh. Relevant ones are described below:

i) Small Ethnic Groups Cultural Institutes Act, 2010

Establishes cultural institutes and recognizes state support for the cultures/languages of small ethnic groups; useful context for education, cultural programming, and visibility measures.

Link: https://sdf.org.bd/storage/project-reports/sevcdf20-20relip20final202620jan202021.pdf

ii) National Education Policy, 2010

Policy commits to mother-tongue-based education for small ethnic groups. NCTB has printed early-grade textbooks in five languages (Chakma, Marma, Tripura, Garo, Sadri).

Link:https://filechittagong.portal.gov.bd/files/www.lakshmipur.gov.bd/files/f97d6b95_2046_11e7_8f57_286ed488c766/National%20Education%20Policy-English%20corrected%20_2_.pdf

iii) Social Forestry Rules, 2004

Governs Reserved/Protected Forests, transit of forest produce; Social Forestry provides benefit-sharing arrangements and community participation options that projects can use for IP/EM engagement

Link:https://bforest.gov.bd/sites/default/files/files/bforest.portal.gov.bd/page/0c05d1d9_54b2_4b0c_91d3_b1008b50c591/Social%20Forestry%20Rules%202004.pdf

iv) Protected Area Management Rules, 2017 and Wildlife (Conservation and Security) Act, 2012

Create co-management structures and regulate activities in Protected Areas—important anywhere projects sit near national parks/sanctuaries (e.g., Lawachara NP in Moulvibazar).

Link: https://faolex.fao.org/docs/pdf/bgd165019.pdf

3.2 World Bank Policy

ESS-7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities is triggered for the project as project implementation area includes Chattogram, Cox's Bazar, Moulvibazar and Sylhet districts where IP community resides. The standard requires that the development process fully respects the dignity, human rights, economies, and cultures of indigenous peoples and also that the project activities do not threaten ethnic minorities' cultural identities and well-being. The Bank financed project activities will ensure, through site specific assessments that it (a) avoids potentially adverse effects on the ethnic communities; or (b) when avoidance is not feasible, minimize, mitigate, or compensate for such effects. Bank-financed projects are also designed to ensure that the indigenous peoples receive social and economic benefits that are culturally appropriate and gender and inter-generationally inclusive.

List of ESF: https://thedocs.worldbank.org/en/doc/837721522762050108-0290022018/original/ESFFramework.pdf

4. Indigenous and Small Ethic Communities of Project Area

Table 4.1: Tribal, Indigenous, and Ethnic communities in Chattogram Division

Name	Description	Language	Religion
Rakhain	A small coastal ethnic group residing in parts of Chattogram city, coastal upazilas, and Cox's Bazar. Known for traditional weaving, boat-making, and dry fish processing.	Rakhain language	Buddhism
Tripura	Present in scattered pockets in rural Chattogram and adjacent plains; traditionally engaged in agriculture and handicrafts.	Kokborok language	Hinduism, Christianity
Chakma (migrants)	Some Chakma families migrated from the Hill Tracts to urban/peri-urban Chattogram; retain cultural practices.	Chakma language	Buddhism
Marma (migrants)	Smaller number of Marma households outside the hill tracts, often in service or trade.	Marma language	Buddhism, Animism
Bawm & Other Kuki-Chin groups	Small numbers of Bawm, Mro, and other related groups present in rural fringes bordering CHT.	Various Kuki-Chin dialects	Christianity, Buddhism
Bengali-speaking Muslim minorities of Arakan origin	Communities with heritage ties to Arakan (Myanmar), engaged in fishing and trade.	Chattogram local dialect, some Rakhain influence	Islam

Table 4.2: Tribal, Indigenous, and Ethnic Communities in Sylhet Division

Name	Description	Language	Religion
Khasi	Indigenous community living mainly in forested areas of Moulvibazar and Sylhet (e.g., Khasi punjis), known for betel leaf cultivation.	Khasi language (Mon-Khmer family)	Christianity, Animism
Manipuri (Meitei & Bishnupriya)	Distinct cultural community concentrated in Sylhet city and Moulvibazar; known for weaving, dance, and music.	Meitei (Manipuri) and Bishnupriya dialects	Hinduism, Vaishnavism
Tripura	Indigenous group living in parts of Habiganj and Moulvibazar; primarily engaged in agriculture.	Kokborok language	Hinduism, Christianity
Tea garden worker communities	Descendants of laborers brought during the colonial period from different parts of India (Oraon, Munda, Santal, etc.); many speak Sadri and maintain distinct customs.	Sadri, Kurukh, Santali, and Bengali	Hinduism, Christianity, Animism
Garo (migrants)	Small number of Garo families in parts of Sylhet, often in church-based networks.	Garo language (Achik)	Christianity

Many of the tribal communities are dependent on agriculture, farming, hunting. Only a small proportion is engaged in salaried jobs and businesses. As such, often average income is less and poverty rates is higher than national average for these communities are.

5. Planning Framework

To avoid or minimize adverse impacts on the Tribal People (TP), Indigenous People (IP), Small Ethnic Community (SEC), and, also to ensure culturally appropriate benefits, the PIU will apply the following basic principles in selection, design and implementation of the subprojects:

- Ensure that affected TP, IP, SECs and their organizations are involved in the project development process including identification and selection of beneficiaries, being cognizant of cultural differences.
- Carefully screen the sub-projects, together with TP, IP, SECs, for a preliminary understanding of the nature and magnitude of potential adverse impacts and explore alternatives to avoid or minimize them. Any resettlement of such community should be avoided at all costs.
- Where alternatives are infeasible and adverse impacts are unavoidable, immediately assess the key impact issues, together with the affected community and others knowledgeable of tribal culture and concerns.
- Undertake the necessary tasks to identify the impact details and the most appropriate mitigation measures, through intensive consultations with the affected tribal/indigenous organizations, civil society organization like NGOs and CBOs, professionals, and the like.
- Avoid subproject/activity where the tribal communities remain unconvinced to offer broad support for the project.

Guidelines for carrying out assessments are as follows:

- The ethnic and demographic characteristics of the affected population;
- The prevailing intuitions such as family, religion, language and education and other variables including socio-cultural traditions;
- Inclusion of the local traditional leadership (as Headman, Karbari), gender and inter-generational issues, civil society and NGOs in their implementation plan;
- Identification of vulnerable, destitute, extreme poor people/household(s);
- The views and impacts on the prevailing institutions; both formal and informal;
- Adequate and appropriate consultation and communication, their participation and approval of their implementation of project inputs and mitigation plan.

6. Social Impact Assessment

In compliance with the project financing policy of the World Banks ESS-7 it will be required that borrowers evaluate potential social standards and impacts on the ethnic communities during the project preparation, and that they adopt and implement appropriate measures to mitigate these issues, which are specified in ESS7 on existing ethnic communities within the project area. ESS7 is relevant to the B-STRONG, and the provisions included in this SECPF are in accordance with ESS7. As such, borrowers implementing projects in areas habituated by tribal, ethnic minority community must carry out Social Screening, considering the ESS-7 requirements. Meaningful and effective Consultation must be ensured. IF required, further detailed Social Impact Assessment will need to be carried out. Fundamental procedure for such assessment will be as follows:

- ✓ Establish baseline information regarding demography, social, cultural, political characteristics of the potentially affected indigenous people, small ethnic community including lands and territories that are owned and/or utilized along with natural resources that they are dependent on.
- ✓ Analyze the scope of work and implementation area of the project on the baseline condition of the affected communities to identify potential impacts.
- ✓ Carry out meaningful consultations in a gender sensitive and culturally appropriate manner with the affected communities, considering any language barrier. Disclose relevant information of the project and impacts to obtain information on their views, observations, concerns, queries.
- ✓ Adjust the project activities to avoid impacts or adopt to adequate mitigation measures to minimize the impacts or compensate for the adverse effects.
- ✓ Carry out periodic consultations and disclose updated information, as necessary.

Different indigenous/small ethnic community may have different cultural characteristics, all of which will need to be addressed.

7. Consultation and Disclosure

To ensure broad community support through consultations with the ethnic communities, the project will:

- Ensure widespread participation of SEC with adequate gender and generational representation; customary/traditional SEC organizations; community elders/leaders; civil society organizations like NGOs and CBOs; and groups knowledgeable of SEC development issues and concerns.
- Disclose all relevant information about the nature of the development activities, including that on potential adverse impacts, organize and conduct these consultations in manners to ensure full coverage of the SECs and free expression of their views and preferences.
- Document and share with the Bank the details of all community consultation meetings, with SEC perceptions of the proposed activities and the associated impacts, especially the adverse

ones; any inputs/feedbacks offered by SECs; and the minutes stating the conditions, if any, that have been agreed during the consultations, which may have provided the basis for their broad base community.

In addition to the local communities, regional and national level organizations regarding Tribal, Indigenous, Ethnic communities may also need to be consulted.

The SECPF must be publicly disclosed after approval.

8. Grievance Redress Mechanism

Grievance Redress Mechanism (GRM) must be established in a way that it is accessible by the IP, SEC people. The Project Implementation Unit (PIU) may include specific Grievance Redress Committee (GRC) for the IP, SEC. The GRC shall include representations from IP, SEC including female member(s).

The PIU shall take necessary steps like awareness campaigns, signboards to inform the people about the GRM.

9. Implementation, Monitoring, and Budget

Implementation of the SECPF will be responsibility of the PIU. Field level activities will be undertaken by the field level officials, and consultations. Day to day activities will be implemented by relevant personnel of the design and supervision consultants.

Table 9.1: Indicative Cost Estimate of SECPF

Serial No.	Activities	Unit	Unit Cost (Tk.)	Quantity	Total Cost (Tk.)	Remarks
1	Consultation workshop	Event	50000.00	2	100000.00	At Regional office
2	Public Dissemination meeting	Event	20000.00	22	440000.00	To be held at Upazila level
3	Awareness Campaigns	Event	-	-	-	Information share during Gram Samity/ Parishad Meeting
4	Monitoring of Gram Samity (GS) activates	Nos.	-	-	-	During different Committees formation and meeting minutes of GS

The implementation will be monitored by PIU office in Dhaka. The PIU Social Specialist will be responsible for monitoring the overall SECPF implementation and GRM. Relevant monitoring data shall be included in periodic reports.

10. Conclusion

SECPF is a very important instruments to ensure smooth project implementation in regions with IP, SEC communities. It is imperative to adhere to the guidelines and respectful to the sensitivity to avoid any social issues, friction that may affect the implementation and success of the project.

The World Bank and the Implementing Agencies are committed to comply with the laws, rules, regulations related to IP, SEC communities and will carry out necessary activities, as required.