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IDA/R2019-0030/3

February 26, 2019

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FROM: Vice President and Corporate Secretary

## **Bangladesh - Emergency Multi-Sector Rohingya Crisis Response Project**

### **Postponement and Rescheduling**

In order to balance the Board business, the proposed IDA grant to Bangladesh for the Emergency Multi-Sector Rohingya Crisis Response Project (IDA/R2019-0030) that was scheduled for discussion on March 5, 2019, is being postponed to **Thursday, March 7, 2019**.

#### Distribution:

Executive Directors and Alternates  
President  
Bank Group Senior Management  
Vice Presidents, Bank, IFC and MIGA  
Directors and Department Heads, Bank, IFC, and MIGA



February 25, 2019

**For meeting of  
Board: Tuesday, March 5, 2019**

FROM: Vice President and Corporate Secretary

**Bangladesh - Emergency Multi-Sector Rohingya Crisis Response Project**

**Corrigendum**

*(This cover replaces the version distributed on February 21, 2019  
that deletes paragraph 3)*

1. Attached is the President's Memorandum and Recommendation on a proposed IDA grant, which includes funding from the IDA18 Refugee Sub-Window for Refugees and Host Communities and the Bangladesh's core IDA allocation, to Bangladesh for an Emergency Multi-Sector Rohingya Crisis Response Project. This grant is being processed under Paragraph 12, Project in Situations of Urgent Need of Assistance or Capacity Constraints, of the World Bank Investment Project Financing (IPF) Policy. This operation is being proposed by Management for discussion at a meeting of the Executive Directors due to risk.
2. As explained in the MOP, there are ongoing INT investigations in the relevant sector and country. The region is prepared to provide a technical briefing, if so requested by Executive Directors.
3. The Executive Directors last discussed the joint IDA/IFC/MIGA Country Partnership Framework for Bangladesh on April 5, 2016 (IDA/R2016-0041 [IFC/R2016-0065; MIGA/R2016-0013]). The Chair Summary was distributed as (IDA/SU2016-0005 [IFC/SU2016-0005; MIGA/SU2016-0005]).
4. A detailed report entitled "Project Appraisal Document: Bangladesh - Emergency Multi-Sector Rohingya Crisis Response Project" is being distributed separately (IDA/R2019-0030/1).
5. Draft Legal Agreements for projects are available on request from the Corporate Secretariat's Board Resource Center by sending an email to [BRC@worldbank.org](mailto:BRC@worldbank.org).
6. Questions on these documents should be referred to Ms. Sreen Juma (ext. 31259).

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IDA/R2019-0030/1

February 21, 2019

**For meeting of  
Board: Tuesday, March 5, 2019**

FROM: Acting Vice President and Corporate Secretary

**Bangladesh - Emergency Multi-Sector Rohingya Crisis Response Project**

**Project Appraisal Document**

Attached is the Project Appraisal Document regarding a proposed IDA grant, which includes funding from the IDA18 Refugee Sub-Window for Refugees and Host Communities and Bangladesh's core IDA allocation, to Bangladesh for an Emergency Multi-Sector Rohingya Crisis Response Project (IDA/R2019-0030), which will be discussed at a meeting of the Executive Directors.

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Report No: PAD2954

INTERNATIONAL DEVELOPMENT ASSOCIATION

PROJECT APPRAISAL DOCUMENT

ON A

PROPOSED GRANT

IN THE AMOUNT OF SDR 119.4 MILLION (US\$165 MILLION EQUIVALENT)

OF WHICH

SDR 99.5 MILLION (US\$137.5 MILLION EQUIVALENT)

IS FROM THE IDA 18 REGIONAL SUB-WINDOW FOR REFUGEES AND HOST COMMUNITIES

TO THE

PEOPLE'S REPUBLIC OF BANGLADESH

FOR THE

EMERGENCY MULTI-SECTOR ROHINGYA CRISIS RESPONSE PROJECT

February 14, 2019

Social, Urban, Rural and Resilience Global Practice  
Social Protection and Jobs Global Practice  
South Asia Region

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**The World Bank**

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## CURRENCY EQUIVALENTS

(Exchange Rate Effective October 31, 2018)

Currency Unit =	Bangladesh Taka (BDT)
BDT 83.84 =	US\$1
US\$1.38 =	SDR 1

FISCAL YEAR  
July 1 - June 30

## ABBREVIATIONS AND ACRONYMS

ADC	Additional Deputy Commissioner	ISCG	Inter Sector Coordination Group
ACF	Action Against Hunger ( <i>French</i> )	IUFR	Interim Unaudited Financial Report
BBS	Bangladesh Bureau of Statistics	LGD	Local Government Division
BCC	Behavior Change Communication	LGED	Local Government Engineering Department
BP	Bank Policy	LIPW	Labor Intensive Public Workfare
C&AG	Comptroller and Auditor General	M&E	Monitoring and Evaluation
CERC	Contingent Emergency Response Component	MDSP	Multipurpose Disaster Shelter Project
CESIA	Cumulative Environmental and Social Impacts Assessment	MEB	Minimum Expenditure Basket
CiC	Camp in Charge	MIS	Management Information System
CPF	Country Partnership Framework	MoFA	Ministry of Foreign Affairs
CSO	Civil Society Organization	MoP	Ministry of Planning
DA	Designated Account	MoPME	Ministry of Primary and Mass Education
D&S	Design and Supervision	MoU	Memorandum of Understanding
DLI	Disbursement-linked Indicators	NCB	National Competitive Bidding
DPD	Deputy Project Director	NFI	Non-Food Item
DPHE	Department of Public Health Engineering	NGO	Non-Governmental Organization
DRC	Danish Refugee Council	NPV	Net Present Value
DRM	Disaster Risk Management	NTF	National Task Force
DRP	Displaced Rohingya Population	OP	Operational Policy
ECHO	European Civil Protection and Humanitarian Aid Operations	O&M	Operations and Maintenance
E&S	Environmental and Social	PAD	Project Appraisal Document
ESMF	Environmental and Social Management Framework	PD	Project Director

ERD	Economic Relations Division	PDO	Project Development Objective
EWARS	Early Warning Alert and Response System	PIC	Project Implementation Committee
FAO	Food and Agriculture Organization	PIU	Project Implementation Unit
FAPAD	Foreign Aided Project Audit Directorate	PPSD	Project Procurement Strategy for Development
FSCD	Fire Service and Civil Defence	PSC	Project Steering Committee
FSM	Fecal Sludge Management	ROSC	Reaching Out of School Children
GBV	Gender–Based Violence	RRRC	Refugee Relief and Repatriation Commissioner
GDP	Gross Domestic Product	SCD	Systematic Country Diagnostic
GoB	Government of Bangladesh	SEG	Strategic Executive Group
GRM	Grievance Redress Mechanism	SWM	Solid Waste Management
GRS	Grievance Redress Service	ToR	Terms of Reference
HEC	Human Elephant Conflict	UN	United Nations
HIES	Household Income and Expenditure Survey	UNDP	United Nations Development Programme
HSSP	Health Sector Support Project	UNFPA	United Nations Population Fund
HWC	Human Wildlife Conflict	UNICEF	United Nations Children's Fund
ICT	Information and Communications Technology	UNHCR	United Nations High Commissioner for Refugees
IDA	International Development Association	WASH	Water, Sanitation and Hygiene
IEC	Information, Education and Communication	WB	World Bank
IOM	International Organization for Migration	WBG	World Bank Group
IPF	Investment Project Financing	WHO	World Health Organization
IRR	Internal Rate of Return	WFP	World Food Programme



Regional Vice President: Hartwig Schafer

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Practice Manager: Christoph Pusch, Stefano Paternostro

Task Team Leader(s): Swarna Kazi, Suleiman Namara



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DATASHEET

**BASIC INFORMATION**

Country(ies)	Project Name		
Bangladesh	Emergency Multi-Sector Rohingya Crisis Response Project		
Project ID	Financing Instrument	Environmental Assessment Category	Process
P167762	Investment Project Financing	A-Full Assessment	Urgent Need or Capacity Constraints (FCC)

**Financing & Implementation Modalities**

<input type="checkbox"/> Multiphase Programmatic Approach (MPA)	<input checked="" type="checkbox"/> Contingent Emergency Response Component (CERC)
<input type="checkbox"/> Series of Projects (SOP)	<input type="checkbox"/> Fragile State(s)
<input type="checkbox"/> Disbursement-linked Indicators (DLIs)	<input type="checkbox"/> Small State(s)
<input type="checkbox"/> Financial Intermediaries (FI)	<input type="checkbox"/> Fragile within a non-fragile Country
<input type="checkbox"/> Project-Based Guarantee	<input type="checkbox"/> Conflict
<input type="checkbox"/> Deferred Drawdown	<input checked="" type="checkbox"/> Responding to Natural or Man-made Disaster
<input type="checkbox"/> Alternate Procurement Arrangements (APA)	

Expected Approval Date	Expected Closing Date
05-Mar-2019	05-Mar-2022

Bank/IFC Collaboration

No

**Proposed Development Objective(s)**

To strengthen the Government of Bangladesh systems to improve access to basic services and build disaster and social resilience of the displaced Rohingya population.

**Components**

Component Name	Cost (US\$, millions)
Component 1: Strengthening Delivery of Basic Services, Resilient Infrastructure, Emergency Response, and Gender-Based Violence Prevention	120.00
Component 2: Strengthening Community Resilience	35.00
Component 3: Strengthening Institutional Systems to Enhance Service Provision to the Displaced Rohingya Population	10.00
Component 4: Contingent Emergency Response Component (CERC)	0.00

**Organizations**

Borrower:	People's Republic of Bangladesh
Implementing Agency:	Local Government Engineering Department Ministry of Disaster Management and Relief Department of Public Health Engineering

**PROJECT FINANCING DATA (US\$, Millions)****SUMMARY**

<b>Total Project Cost</b>	165.00
<b>Total Financing</b>	165.00
<b>of which IBRD/IDA</b>	165.00
<b>Financing Gap</b>	0.00

**DETAILS****World Bank Group Financing**

International Development Association (IDA)	165.00
IDA Grant	165.00

**IDA Resources (in US\$, Millions)**

	Credit Amount	Grant Amount	Guarantee Amount	Total Amount
National PBA	0.00	27.50	0.00	27.50



Refugee	0.00	137.50	0.00	137.50
<b>Total</b>	<b>0.00</b>	<b>165.00</b>	<b>0.00</b>	<b>165.00</b>

**Expected Disbursements (in US\$, Millions)**

WB Fiscal Year	2019	2020	2021	2022
Annual	12.38	32.32	73.05	47.25
Cumulative	12.38	44.70	117.75	165.00

**INSTITUTIONAL DATA**

**Practice Area (Lead)**

Social, Urban, Rural and Resilience Global Practice

**Contributing Practice Areas**

Social Protection & Labor, Transport, Water

**Climate Change and Disaster Screening**

This operation has been screened for short and long-term climate change and disaster risks

**Gender Tag**

**Does the project plan to undertake any of the following?**

a. Analysis to identify Project-relevant gaps between males and females, especially in light of country gaps identified through SCD and CPF	Yes
b. Specific action(s) to address the gender gaps identified in (a) and/or to improve women or men's empowerment	Yes
c. Include Indicators in results framework to monitor outcomes from actions identified in (b)	Yes

**SYSTEMATIC OPERATIONS RISK-RATING TOOL (SORT)**

Risk Category	Rating
1. Political and Governance	● Substantial
2. Macroeconomic	● Moderate
3. Sector Strategies and Policies	● High



4. Technical Design of Project or Program	● Substantial
5. Institutional Capacity for Implementation and Sustainability	● Substantial
6. Fiduciary	● High
7. Environment and Social	● High
8. Stakeholders	● High
9. Other	● High
10. Overall	● High

**COMPLIANCE**

**Policy**

Does the project depart from the CPF in content or in other significant respects?

Yes  No

Does the project require any waivers of Bank policies?

Yes  No

Safeguard Policies Triggered by the Project	Yes	No
Environmental Assessment OP/BP 4.01	✓	
Performance Standards for Private Sector Activities OP/BP 4.03		✓
Natural Habitats OP/BP 4.04	✓	
Forests OP/BP 4.36	✓	
Pest Management OP 4.09		✓
Physical Cultural Resources OP/BP 4.11	✓	
Indigenous Peoples OP/BP 4.10		✓
Involuntary Resettlement OP/BP 4.12	✓	
Safety of Dams OP/BP 4.37		✓
Projects on International Waterways OP/BP 7.50	✓	
Projects in Disputed Areas OP/BP 7.60		✓



## Legal Covenants

### Sections and Description

Institutional Arrangements (FA Section I.A and I.B of Schedule 2). By no later than one (1) month after the Effective Date, the Recipient shall establish and maintain throughout the implementation period of the Project (a) two (2) Project steering committees; (b) through the implementing agencies, such number of Project Implementation Committees within each of these implementing agencies; and (c) through the implementing agencies, such number of Project Implementation Units within each of these implementing agencies, each with a mandate, composition and resources satisfactory to the Association.

For purposes of implementing Part 2 of the Project, the Recipient through MoDMR shall maintain, throughout the period of implementation of the Project, the Refugee Relief and Repatriation Commissioner’s office and the camps in charge (CiCs), with functions and resources satisfactory to the Association.

Project Operations Manual (FA Section I.B of Schedule 2.) The Recipient for implementing Part 2 of the Project shall carry out the Project in accordance with the Project Operations Manual in a manner satisfactory to the Association.

Sub-projects (FA Section I.B of Schedule 2) . The Recipient through MoDMR shall ensure that only those Community Services Subprojects and Community Workfare Subprojects selected, prepared and implemented in accordance with the requirements set out in the Project Operational Manual, ESMF, shall be financed out of the proceeds of the Financing, including those related to the selection of the displaced Rohingya population and the associated provision of Stipends or Wages, as applicable, for carrying out said subprojects.

Agreements with UN Agencies/NGOs (FA Section I.E of Schedule 2). The Recipient shall enter into appropriate standard form of agreement(s) between the Recipient and the UN Agency(ies) and/or NGOs approved by the Association when entering into a contract with any UN Agency or NGO .

Safeguards (FA Section I.C of Schedule 2). The Recipient shall ensure and cause each of the Implementing Agencies to ensure that the Project is carried out in accordance with the provisions of the ESMF, the RPF and all Safeguard Assessments and Plans and the requirements of the Grievance Redress Mechanism. To this end, the Recipient shall ensure that the appropriate review, clearance and public disclosure of all Safeguard Assessments and Plans as required by the ESMF and the RPF.

## Conditions

### Type

Effectiveness

### Description

The Additional Condition of Effectiveness consist of the following: (a) the Association is satisfied that the Recipient has an adequate refugee protection framework; and (b) The Recipient has: (i) prepared and disclosed the Environmental and Social Management Framework and Resettlement Policy Framework; (ii) carried out adequate public consultation on such frameworks as per the framework documents; (iii) submitted such frameworks to the Association for its review and approval; and (iv) adopted and publicly disclosed such



	frameworks as approved by the Association, all in the form and substance satisfactory to the Association.
Type Disbursement	Description No withdrawal shall be made: (a) for Eligible Expenditures under Category (2), unless and until the Recipient has submitted the Project Operational Manual in a manner satisfactory to the Association; and (b) for Emergency Expenditures under Category (3), unless and until the Association is satisfied, and has notified the Recipient of its satisfaction, that the necessary conditions have been met in respect of the said expenditures

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## I. STRATEGIC CONTEXT

### A. Country Context

1. Bangladesh is one of the world's most populous country with an estimated 165 million people in a geographical area of about 144,415 sq.km and per capita income of US\$1,670 (WB Atlas method) in 2018, well above the lower middle-income country category threshold which it crossed in FY14. During recent years, economic conditions improved in the country. However, headline inflation increased to 5.8 percent in FY18, from 5.4 percent in FY17, reflecting increases in food prices due to supply shocks. Fiscal deficit was contained at around 4.5 percent of Gross Domestic Product (GDP) in FY18. The FY18 budget targets 5 percent deficit with 26.2 percent growth in expenditures. The current account deficit increased to 3.5 percent of GDP in FY18. The GDP grew well above the average for developing countries in recent years, averaging 6.5 percent since 2010, with an officially estimated growth of 7.86 percent in FY18, driven by manufacturing and construction. Progress on reducing extreme poverty and boosting shared prosperity through human development and employment generation has continued with the poverty incidence based on the international \$1.90 per capita per day poverty line (measured on the basis of the Purchasing Power Parity exchange rate) declining from 44.2 percent in 1991 to a 14.8 percent in 2016 (latest available poverty data. In the World Bank's Human Capital Index 2018, Bangladesh performed better than the South Asian average as well as the Lower Middle-Income average in all criteria except for Stunting. Bangladesh's performance on the Millennium Development Goals (MDG) was impressive against the South Asia Region average for most of the indicators. The country has witnessed a profound social transformation with an influx of girls into the education system and women into the labor force. The Government of Bangladesh has also emphasized on 'accelerating growth' and 'empowering citizens' through more job creation, inequality reduction, access to education and employment, transportation and power sector improvement, social protection coverage and building resilience against natural disasters.

2. Bangladesh's physical and cultural characteristics and the livelihoods of the people are defined by the Ganges-Brahmaputra-Meghna delta—the world's largest, most densely populated delta, and one of the richest in aquatic resources. The societal vulnerability to extreme weather events is clearly illustrated in the case of Bangladesh, considered one of the most disaster-prone and climate vulnerable countries in the world. Bangladesh faces considerable development challenges posed by its low and flat topography and vulnerability to floods, torrential rains, erosion, storms and tidal surges due to severe cyclones and landslides. Its vulnerability is exacerbated by climate change induced increase in frequency and intensity of extreme weather events, sea level rise and uncertainty. Bangladesh is ranked the 6th most climate vulnerable country among 181 countries. Damages and losses associated with a single extreme event impose substantial costs on the national economy and repeated exposure to hydro-meteorological hazards such as cyclones and floods often pushes the poor, particularly rural poor, into chronic poverty.

#### **Situation in Urgent need of assistance**

3. Since August 25, 2017, extreme violence in Rakhine State, Myanmar, has driven an estimated 730,000<sup>1</sup> people from the Rohingya community across the border into the Cox's Bazar district of Bangladesh. This exodus brings the total number of Displaced Rohingya Population (DRP) in the district to about 923,033<sup>2</sup> in what is one of

<sup>1</sup> ISCG: Situation Report Rohingya Refugee Crisis, (September 27, 2018)

<sup>2</sup> IOM Needs and Population Monitoring round 12 as of October 10, 2018



the fastest developing forced displacement crises in the world. 85% of the DRP are living in collective sites, 13% in collective sites with host communities, and 2% in dispersed sites in host communities. In Ukhia and Teknaf, the two upazilas where most of the DRP have settled, they outnumber the host community by over a factor of three.

4. Almost all the DRP are hosted in some of the world’s most congested areas, including in the Kutupalong “mega-camp”, which has fast become the largest displaced population camp in the world. The DRP account for about one-third of the total population in Cox’s Bazaar, a district that was already facing severe development challenges. They are sheltered in makeshift shelters and extremely congested settlements, in areas that have minimal access to basic infrastructure and services and are prone to natural disasters, especially cyclones and floods. Setting up of camps has led to rapid deforestation, further increasing vulnerability of the DRP to disasters and monsoon rains. Relocation of households most at-risk from landslides and flooding is underway, but there is insufficient suitable land available to accommodate even the highest-risk category.

5. The influx is straining existing infrastructure and degrading an already resource-constrained social service delivery system and the environment in Cox’s Bazar district. Stress on existing water points has increased over 20-fold with the new influx, rendering many of them dysfunctional while disposal and treatment of fecal sludge have become a challenge. Over 70 percent of water stored in households is contaminated<sup>3</sup>, and there have been outbreaks of diseases like diphtheria, measles, and diarrhea. The influx has increased strain on referral and inpatient services provided by the district hospital and the two upazila Health Complexes.

6. The situation of displaced women and girls, who account for 52 percent<sup>4</sup> of the DRP in Bangladesh, is particularly difficult. Women among the DRP had been subjected to gender-based violence (GBV) even before they fled to Bangladesh and remain at risk in the camps, including of trafficking. Psychological distress is highly prevalent, as girls and boys have witnessed violence in Myanmar, including seeing family members killed and their homes burnt down. There is a relatively large share of female-headed households, who would be particularly vulnerable to social exclusion.

## **B. Sectoral and Institutional Context**

7. While progress has been made in delivering essential services, there remain significant gaps and unmet needs in various sectors. In Cox’s Bazar, many of these sectors lagged the national average even before the crisis and the drastic DRP influx has further exacerbated the situation. As such, Government agencies and resources are overstretched under crisis response efforts and thus most services are now provided by the humanitarian sector.

8. Health: Ministry of Health and Family Welfare (MOHFW) and partners (bilateral, UN agencies and NGOs) have scaled up health, nutrition and immunization services for the DRP. However, challenges persist. Prior to entering Bangladesh, the DRP had poor access to health and nutrition services. Immunization coverage was around 10 percent with high rates of child malnutrition. Overcrowding in the camps places women at risk for additional forms of GBV, such as trafficking. A high prevalence of sexually transmitted diseases including HIV/AIDS has been found in the DRP in addition to respiratory infections and malaria that pose serious risks. There is a need to improve primary and outpatient health services, maternal and infant mortalities, and nutrition services through

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<sup>3</sup> Bangladesh Humanitarian Situation Report No.32 (Rohingya Influx) UNICEF, May 19, 2018.

<sup>4</sup> Population Factsheet, UNHCR, Bangladesh, Cox’s Bazar - as of 31 August 2018



additional health and nutrition centers<sup>5</sup>, referral (secondary) facilities<sup>6</sup> and scale up behavior change communication (BCC) and counseling.

9. **WASH:** Access to improved water quality and quantity is a priority. However, thousands of poorly positioned and low-quality water installations that were constructed during the initial phase of the influx present a major health risk. Of 5,731 existing tube-wells, some 21% are estimated to need immediate rehabilitation or replacement<sup>7</sup>. Salinity is a further risk to water quality; as are the threats of water-borne diseases which are exacerbated by poor personal hygiene and low awareness of good WASH practices. Fecal sludge management in the DRP camps is insufficient, and latrines with shallow pits are located close to water points, so water from shallow tube-wells are easily contaminated<sup>8</sup>. There is a need to move away from the current temporary water and sanitation facilities to improved WASH services, with stronger focus on service delivery and behavior change communication.

10. **Environment:** The settlement of DRP in Cox's Bazar's South Forest Division, including the Teknaf and Ukhiya Ranges, the Teknaf Wildlife Sanctuary, and other Reserved Forest areas has added unprecedented pressure on the area's natural resources: 730 tons of trees per day are being cut for fuel<sup>9</sup>. The financial loss from tree destruction is about US\$55 million. The loss from ecosystem services, biodiversity and environmental degradation is much higher and has not yet been measured.

11. **Education:** Through the efforts of the Inter Sector Coordination Group (ISCG) and the GoB, 110,042 primary and 24,645 pre-primary school-aged children, mostly DRP, have been enrolled in learning centers in the affected area. However, around 625,000<sup>10</sup> DRP still need education-centric responses. Around 55 percent<sup>11</sup> (370,000) of the DRP are under 18 years. The existing learning centers in the makeshift settlements are unable to cope with increased numbers and there are no educational facilities in the spontaneous settlements. Additionally, many households within the camps are headed by orphaned children.

12. **Social Protection:** At least 80 percent of the DRP are dependent on life-saving external assistance. The remaining 20 percent only partially meet their needs through coping strategies, which will quickly deteriorate as coping capacities such as savings are exhausted. The high influx of DRP has placed formidable pressures on an already inadequately resourced social service delivery system. There are also concerns about recruitment of DRP into armed groups, threatening stability both in Bangladesh and over the border into Myanmar.

13. **Disaster Risk Management:** Bangladesh is one of the most vulnerable countries in the world to natural calamities like cyclones and floods – 60 percent of the worldwide deaths caused by cyclones in the last 20 years occurred in Bangladesh<sup>12</sup>. Climate change may increase the frequency, peak intensity of cyclones and precipitation rates. Also, cyclone-induced storm surges are likely to be exacerbated by a potential rise in sea level. Bangladesh

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<sup>5</sup> around 1 per 20,000 population.

<sup>6</sup> around 1 per 200,000 population.

<sup>7</sup> WASH Sector 2018 Strategy

<sup>8</sup> Ibid.

<sup>9</sup> IOM & FAO (2017). Assessment of Fuel Wood Supply and Demand in Displacement Settings and Surrounding Areas in Cox's Bazaar District, Dhaka, Bangladesh.

<sup>10</sup> Joint Response Plan for Rohingya Humanitarian Crisis, March - December 2018

<sup>11</sup> NPM Round 7.

<sup>12</sup> World Bank Climate Change Knowledge Portal (<http://sdwebx.worldbank.org/climateportal/>)



sits on the floodplains of several major rivers which drain from the mountainous regions of the Himalayas, making seasonal flooding another hazard often coinciding with the cyclone season. Floods and riverbank erosion affect some one million people annually. Once every three to five years, up to two-thirds of Bangladesh is inundated by floods. In the Kutupalong/Balukhali extensions sites, a high percentage of the land is unsuitable for human settlement as risks of flooding and landslides are high and are further aggravated by the congestion and extensive terracing of the hills. The population density is 8m<sup>2</sup> per person, compared to the accepted international standard of 45m<sup>2</sup>. In March 2018, over 500 additional acres of land were allocated by the GoB and are being prepared for relocation of people at risk. As of September 23, 2018, about 43,000 at-risk people had been relocated to safer sites. Along with shelter improvements, other mitigation works such as dredging, improvement of roads and bridges, and culvert construction, as well as training of Cyclone Preparedness Program volunteers are ongoing. Despite these efforts, the effects of a cyclone could be devastating given the amount of people, difficult access, and insufficient places for safe shelter.

14. **Gender:** DRP women face high levels of discrimination within their community, and most women stay in their shelters due to social norms that limit their roles in the public sphere as well as to avoid sexual assault and trafficking that is occurring in the camps. This restricted mobility is particularly challenging for women-headed households who compose 16 percent of DRP households. The extent of Gender-Based Violence (GBV) faced by DRP women is difficult to quantify, but UN agencies and local NGOs report high levels. Approximately 85 percent of sites within Bangladeshi communities hosting DRP have no services for survivors of violence<sup>13</sup>. Immediate health services for survivors of violence, and outreach, peer counseling, and behavior change training will have an impact on GBV prevention. While women unquestionably should be prioritized in a gendered approach given their lower socio-economic status and education levels in the Rohingya community, higher risk of violence and trafficking, etc., a number of men are suffering from trauma, which can play out in anti-social behavior, including intimate partner violence. The tendency for engaging in anti-social behavior for adolescent boys is also high among the DRP.

15. **Local Governance:** The DRP are currently located in 16 Unions of Ukhia and Teknaf Upazilas in the Cox’s Bazar district. Union Parishads (UPs) are the lowest tier in the local government system in rural areas. UPs are critical in provisioning of services under their jurisdiction, identifying and meeting rapidly evolving needs, and strengthening the social contract between host communities and the DRP. They are also critical in ensuring local ownership of recovery and resilience building processes for communities and institutions at all levels. Significant challenges however impede the core functions of host UPs and their upazilas as frontline agents of the crisis. Most of their land and services have been taken up to accommodate the camps and the crisis has weakened their human, financial, and institutional capacities to carry out their core functions.

**Table 1: Sectoral Impact Highlights**

Sector	Impact Highlights
<b>Health</b>	<ul style="list-style-type: none"> <li data-bbox="397 1587 954 1650">• Health and nutrition indicators in Cox’s Bazar lag national averages.</li> <li data-bbox="397 1654 954 1717">• From Nov 2017 - August 2018<sup>14</sup>, among DRP, there were 8,031 cases of diphtheria with 44</li> <li data-bbox="982 1587 1539 1743">• The MOHFW service delivery system in Cox’s Bazar is inadequate for the influx, composed of 1 district Hospital, 7 upazila Health Complexes, 53 Union-level facilities, and 174 Community Clinics<sup>16</sup>.</li> </ul>

<sup>13</sup> ISCG Situation report: Rohingya Refugee Crisis Cox’s Bazar | May 24, 2018.

<sup>14</sup> UNICEF Situation Report, August 2018

<sup>16</sup> Health Bulletin 2016, Cox’s Bazar Civil Surgeon Office, MOHFW; District Health Information System 2 (DHIS2), MOHFW



Sector	Impact Highlights	
	<p>deaths. In host communities, there were 71 cases, with no deaths.</p> <ul style="list-style-type: none"> <li>In case of flooding, the number of people suffering from acute watery diarrhea is likely to increase. UNICEF and partners are readying to support an estimated 10,000 people, more than half of which (55 percent) are children, with treatment for Acute Watery Diarrhea from May to July 2018<sup>15</sup>.</li> </ul>	
<b>WASH</b>	<ul style="list-style-type: none"> <li>Prior to the influx, 76 percent<sup>17</sup> of Rohingya population had no access to safe water.</li> </ul>	<ul style="list-style-type: none"> <li>Access to water from tube-wells went down from 1:5 households prior to the crisis to 1:100<sup>18</sup>.</li> </ul>
<b>Environment</b>	<ul style="list-style-type: none"> <li>The population of Cox's Bazaar is 2.29 million (2011 census), growing at 2.55 percent annually<sup>19</sup>. The influx of about 1.0 million DRP has added unprecedented pressure on the area's natural resources.</li> </ul>	<ul style="list-style-type: none"> <li>The crisis has led to slope instability, exposure to flooding, high temperature due to lack of vegetation cover, indoor air pollution, increase surface water pollution, ecosystem destruction and other environmental impacts.</li> </ul>
<b>Education</b>	<ul style="list-style-type: none"> <li>625,000 DRP will need education-centric response<sup>20</sup>.</li> <li>Rakhine state has the lowest enrollment rates (early: 5.4 percent, primary: 71-76 percent, secondary: 31-32 percent) in Myanmar.</li> </ul>	<ul style="list-style-type: none"> <li>73 percent of children and youth aged between 3 and 24 years in Cox's Bazar, from both of DRP and host have no literacy skills<sup>21</sup>.</li> <li>Cox's Bazar's primary enrolment rate is the lowest in the country (72.6 percent boys, 69.1 percent girls) compared to national average 98 percent<sup>22</sup>.</li> </ul>
<b>Social Protection</b>	<ul style="list-style-type: none"> <li>At least 80 percent of the overall displaced Rohingya population is highly or entirely dependent on life-saving external assistance.</li> </ul>	<ul style="list-style-type: none"> <li>The remaining 20 percent can only partially meet their needs through coping strategies including savings, sale of jewelry and purchase of food on credit.</li> </ul>
<b>Disaster Risk Management</b>	<ul style="list-style-type: none"> <li>Around 246,000<sup>23</sup> DRP were vulnerable to landslides and floods given their location, hazard profile of the area, congestion, and severe environmental degradation before the starting of relocation activity.</li> </ul>	<ul style="list-style-type: none"> <li>Around 24,401 DRP have relocated and around 24,040 have been prioritized to shift from the high landslide risk areas as of August 12, 2018<sup>24</sup>.</li> </ul>
<b>Gender</b>	<ul style="list-style-type: none"> <li>52 percent<sup>25</sup> of the DRP are women. Over 70 percent of DRP women have been subjected to</li> </ul>	<ul style="list-style-type: none"> <li>77 percent of women and girls residing in the settlement sites hosting DRP across Cox's Bazar district reported feeling unsafe.</li> </ul>

<sup>15</sup> UNICEF, July 2018

<sup>17</sup> Humanitarian Response Plan, October 2017

<sup>18</sup> ACAPS Thematic Report. Rohingya Crisis. Host communities review, January 2018

<sup>19</sup> Bangladesh Bureau of Statistics, Population and Housing Census 2011

<sup>20</sup> Joint Response Plan for Rohingya Humanitarian Crisis, March - December 2018

<sup>21</sup> On March 1st, 2018, UNICEF shared a Global Partnership for Education Funding Proposal (Leaving No One Behind: Education for girls and boys of Rohingya displaced Rohingya populations and host communities in Cox's Bazar) with the World Bank.

<sup>22</sup> Ministry of Primary and Mass Education (MoPME), Annual Primary School Census 2017

<sup>23</sup> Monsoon Emergency Response Update, ISCG, Rohingya Refugee Crisis, Cox's Bazar, Bangladesh (8-14 August 2018)

<sup>24</sup> Ibid

<sup>25</sup> Population Factsheet, UNHCR, Bangladesh, Cox's Bazar - as of 31 August 2018



Sector	Impact Highlights
	gender-based violence (GBV) even before they fled to Bangladesh.

**Institutional Context**

**Government Response**

16. The GoB has demonstrated its generosity by maintaining an open border policy for the DRP. In spite of its own development challenges, and in the aftermath of devastating floods, the GoB has maintained a commendable stance to let the DRP find safety in the country. To date, the GoB has supported basic humanitarian assistance for the DRP, including provision of land for shelters, building access roads, immunization campaigns and other health services, water points and sanitation facilities. Although the overarching goal of the GoB is to facilitate safe, voluntary and dignified return of the DRP, which has been agreed on in a bilateral discussion with the Government of Myanmar, the GoB has expressed its commitment to continue delivering services for the DRP hosted in Bangladesh.

17. The GoB has responded rapidly and effectively to the unfolding crisis and continues to deliver much needed basic assistance. The Ministry of Disaster Management and Relief (MoDMR), represented by the Refugee Relief and Repatriation Commissioner (RRRC) at the local level, is charged with operational coordination of the response. The Deputy Commissioner’s Office and his entire team were key initial responders as well. Two thousand acres of forestry land were quickly allocated to shelter the DRP. The Military was engaged in September 2017 and continue to provide on the ground support to the construction of roads and WASH facilities and distribution of substantial relief items received from civil society and the private sector through the district authorities. At the strategic level, the Ministry of Foreign Affairs and the National Task Force (NTF), which involves 29 Ministries and agencies and is chaired by the Foreign Secretary, leads the overall strategy and policy coordination.

18. The GoB has demonstrated its leadership by coordinating with various humanitarian agencies. Such efforts yielded multi-sectoral needs assessment and strategic planning, leading to the development of a Joint Response Plan (JRP) covering March to December 2018. The JRP identifies key needs to be urgently addressed to mitigate any further shocks. Current humanitarian efforts fall short of the total financing needs highlighted in the JRP. There is a broad consensus, however, that a focus on the short-term immediate response is insufficient and that the emphasis on strengthening the GoB’s service delivery capacity on the ground is crucial. The GoB is concerned that its limited resources are not adequate to bear the full responsibility of the crisis response effort. It has called on its partners, including development institutions such as the World Bank Group, for help. The GoB is keen on ensuring such assistance can be sustained for as long as may be necessary.

19. In May 2018, the GoB shared a preliminary plan outlining a series of actions to respond to the crisis. Building on the 2014 strategy<sup>26</sup> on addressing the issue of Myanmar Refugees and Undocumented Myanmar

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<sup>26</sup> In 2014, the Government of Bangladesh developed the “Government Strategy Paper addressing the issue of Myanmar Refugees and Undocumented Myanmar Nationals in Bangladesh”, which focuses on: (i) listing of undocumented Myanmar Nationals in Bangladesh; (ii) meeting the basic needs of the individuals; (iii) strengthening Bangladesh-Myanmar border management; (iv) sustaining diplomatic relations with the Government of Myanmar at bilateral and multilateral levels; and (v) ensuring national level coordination.



Nationals, the GoB proposed a plan to respond to the current crisis and to further support the DRP by providing basic services including: health, nutrition and population services, WASH, social protection, environment management, improved access roads, disaster risk management, and support for learning centers and life skills. The GoB is willing to adapt its action plan, as and when required, to respond to the situation as it evolves. The Bank has been engaged in a strategic policy dialogue with the authorities to address medium-term socioeconomic dimensions of the crisis.

20. The GoB's overall framework for the protection of refugees is adequate based on practices consistent with international refugee protection standards. Bangladesh's ratification of a number of human right instruments, as well as its 2014 strategy covering humanitarian and repatriation issues, and the recent Memorandum of Understanding (MoU) with UNHCR (United Nations High Commissioner for Refugees) on voluntary repatriation, have provided the basis for the GoB's treatment of DRP since the start of the current crisis. The MoU includes commitments to ensure and document the DRP free and informed choice to return, to preserve family unity, to take adequate measures for individuals with specific needs, and to register and document the birth of DRP children. The commitment also includes safety and security of the DRP.

21. As a result of strong government leadership and the Bank's early engagement, the GoB has achieved important policy progress in the early phase of the crisis. First, the GoB is using its country systems, staff and resources to support DRPs and host communities in key sectors such as health, education, water and sanitation, disaster risk management, social protection, among others. Second, the GoB plans to engage DRPs in community works and community services and provide them with wages and stipends through an e-voucher scheme. Third, in education, the GoB is preparing a learning competency framework for the DRP children similar to that used for host community children. Fourth, the GoB will construct climate resilient multi-purpose disaster shelters inside and outside the camps. Lastly, the GoB will continue to focus on the development of the Cox's Bazar area to tackle the long-term impact of the DRPs. The WBG will continue to engage in dialogue with the new government in Bangladesh to support the medium-term dimensions of the DRP situation and to tailor future support accordingly.

22. UNHCR's assessment of the Bangladesh refugee framework points out to a set of protection-related concerns. These include overcrowding of the hosting area, lack of legal refugee status, lack of access to formal education and income generation activities, sexual- and gender-based violence, and voluntariness of return. Also, the GoB plans to relocate 100,000 DRP from their current settlement in Cox's Bazar district to the island of Bhashan Char. UN agencies and observers have expressed concerns and asked the GoB to ensure that three criteria key to maintaining an adequate protection framework are met: (i) any relocation is done on a voluntary basis; (ii) DRP on the island are allowed to move back and forth to the island (including to engage in livelihood activities); and (iii) planned relocation sites offer basic living conditions. The GoB's plan for the island includes construction of embankments against tidal surges, housing, multi-purpose shelters, community centers, and other facilities. As the situation evolves, the Bank will continue to rely on UNHCR's assessment on the adequacy of the protection framework

23. The GoB plans to divide the DRP camps into administrative zones with proposals to establish 25-30 temporary administrative units within each zone. This would require a concerted effort to hire and train staff in these units to manage and govern zones within camps. Hiring from within the DRP community would limit language barriers and ensure needs are better communicated to local authorities. Efforts to build capacity and collaboration between host and DRP communities will be critical to ensure smooth governance, limit conflict and build trust. Of immediate concern is the need to support mechanisms that enable DRP to voice their needs and to



monitor responses to those needs by local governments and camp administrative offices. These mechanisms should include channels for grievance redress and conflict resolution, as well as channels for addressing perceptions of inequitable access to support and services during the recovery process.

**Humanitarian Response**

24. In response to the crisis, international humanitarian agencies are providing almost all services and basic needs, with a focus on addressing the urgent needs of the DRP community. Prior to August 25, 2017, a number of agencies were present to provide support for both registered refugees (under UNHCR leadership) and other DRP (under International Office of Migration – IOM leadership). With the crisis, humanitarian efforts have been rapidly scaled up, with a strong engagement by UN agencies (WFP, WHO, UNICEF, UNFPA, IOM), humanitarian financiers (e.g., ECHO), key bilateral, and international and local NGOs. However, the magnitude of the crisis is such that these efforts remain insufficient. The overall effort is coordinated under ISCG, which is chaired by a Senior Humanitarian Coordinator. Meanwhile, a number of ad hoc individual initiatives undertaken by international and local charities are further complicating coordination efforts. For the humanitarian agencies, strategic guidance and national level government engagement is provided by the Strategic Executive Group (SEG) in Dhaka, which is co-chaired by the UN Resident Coordinator, IOM, and UNHCR.

25. The ISCG ensures comprehensive response, and is comprised of Sector Coordinators from ten active sectors of response activities taking place in Cox’s Bazar: Health (Civil Surgeon/WHO); Shelter/NFI (RRRC/IOM/Caritas); Site Management (RRRC/IOM/DRC); WASH (DPHE/ACF/UNICEF); Education (ADC Education/UNICEF/SCI); Nutrition (Civil Surgeon/UNICEF); Food Security (DC Food Controller/RRRC, WFP/Mukti); Protection (RRRC/UNHCR and gender-based violence sub-sector by MoWCA/UNFPA); Child Protection sub-sector (MoWCA/UNICEF); Logistics (RRRC/WFP); and Emergency Telecommunications (WFP). A summary of existing priorities and key humanitarian agencies involved is provided in Table 2.

**Table 2: Summary of Existing Priorities and Key Humanitarian Agencies**

Needs areas	UN agencies involved*	Priorities
<b>Food Security</b>	FAO, IOM, UNDP, WFP	<ul style="list-style-type: none"> <li>Continue life-saving, life-sustaining blanket food distribution</li> <li>Emergency distribution of fortified biscuits and ready to eat meals</li> <li>Support the economic resilience of the most affected host communities</li> <li>Promote opportunities for resilience and empowerment in camps</li> </ul>
<b>Nutrition</b>	WFP, UNICEF, UNHCR	<ul style="list-style-type: none"> <li>Treatment for Severe and Moderate Acute Malnutrition</li> <li>Strengthen malnutrition prevention interventions through infant and Young Child Feeding (IYCF) interventions</li> </ul>
<b>Health</b>	UNICEF, IOM, UNHCR, UNFPA	<ul style="list-style-type: none"> <li>Strengthening routine immunization</li> <li>improving early detection, surveillance, investigation and response to epidemic prone diseases</li> <li>Consolidating preventive and curative services</li> <li>Ensuring access of all women in need to reproductive health care</li> <li>Mainstreaming mental health services</li> </ul>
<b>Shelter and Non-Food Items</b>	IOM, UNHCR	<ul style="list-style-type: none"> <li>Providing shelter materials, tools and technical assistance</li> <li>Distributing alternative cooking stoves</li> <li>Emergency preparedness: pre-positioning of shelter materials etc.</li> </ul>
<b>Education</b>	UNICEF, UNHCR	<ul style="list-style-type: none"> <li>Children and youth enrolled in learning opportunities in camps</li> </ul>



Needs areas	UN agencies involved*	Priorities
		<ul style="list-style-type: none"> <li>• Safe, protective and equipped classrooms</li> <li>• Learners and facilitators provided with standardized education materials</li> <li>• Learning instructors from DRP and host communities trained</li> </ul>
<b>Site Management</b>	IOM, UNDP, UNHCR, WFP	<ul style="list-style-type: none"> <li>• Site planning and development works for access and disaster risk mitigation</li> <li>• Site Management Support to Camp in Charge (CiC) in camps</li> <li>• Quick Impact Projects in host communities</li> </ul>
<b>WASH</b>	UNICEF, UNHCR, IOM	<ul style="list-style-type: none"> <li>• Sufficient quantity and quality of safe water</li> <li>• Access to safe &amp; acceptable sanitation</li> <li>• Ensure basic hygiene practices</li> </ul>
<b>Protection (Including Child Protection, Gender-Based Violence)</b>	IOM, UNICEF, UNDP, UNHCR, UNFPA, UN-Women, UN-HABITAT	<ul style="list-style-type: none"> <li>• Engagement of communities in the response</li> <li>• Case management and psychosocial care</li> <li>• Social cohesion activities</li> <li>• Orientation to police and military on protection, gender, gender-based violence etc.</li> </ul>
<b>Communication</b>	IOM, UNICEF	<ul style="list-style-type: none"> <li>• Language support</li> <li>• Humanitarian information and communication servicing</li> <li>• Systematic consolidation of community feedback</li> </ul>

\*In addition to INGOs, national NGOs and others.

Source: Joint Response Plan (March to December 2018)

**World Bank Response**

26. Building on humanitarian assistance, the World Bank adjusted ongoing operations to respond to prioritized medium-term needs of DRP. Two operations were expanded with additional financing to cover the DRP: US\$50 million in additional financing to the ongoing US\$500 million Health Sector Support Project (HSSP), approved by the World Bank Board on June 28, 2018; and US\$25 million in additional financing to the US\$130 million Reaching Out of School Children (ROSC) approved by the Board on September 19, 2018.

27. In parallel, the World Bank is supporting host communities in the Cox’s Bazar district through existing IDA (International Development Association) operations in the Bangladesh country program. Support to the host communities through World Bank IDA investments are as follows; US\$375 million Multi-Purpose Disaster Shelter Project (MDSP) is supporting disaster preparedness, US\$410 million Municipal Governance and Services Project (MGSP) is improving municipal governance and basic urban services in participating Urban Local Bodies (ULBs), US\$300 million Local Governance Support Project (LGSP) is institutionalizing the Union Parishad (UP) fiscal transfer system and introducing a fiscal transfer system for Pourashavas on a pilot basis, US\$745 million Safety Net Systems for the Poorest Project (SNSP) is supporting the improvement of the equity, efficiency and transparency of safety nets to benefit the poorest, and US\$175 million Sustainable Forests and Livelihood Project (SUFAL) is supporting host communities to improve collaborative forest management and increase benefits for forest-dependent communities in targeted sites. Through these interventions, approximately US\$200 million will be supporting Cox’s Bazar district and the host communities. The proposed stand-alone Emergency Multi-Sector Rohingya Crisis Response Project will complement the above projects and will target DRP.



28. In line with the JRP, the Bank's assessment has identified a number of key needs to be addressed in the medium term (3 years). They include: access to drinking water and adequate sanitation; access to health and nutrition services and response to potential disease outbreaks; response to weather-related hazards; access to fuel and mitigation of associated environmental degradation; and inclusion in productive activities to yield basic services and to address needs and vulnerability of women and children as well as respond to psychosocial issues. Most of these challenges are inter-related, and the strain on resources, gaps in service delivery, and the exposure to shocks directly influence the relationship between host communities and the DRP.

29. The overall Bank response focuses on seven priority areas, identified during consultations with affected communities, DRP and local and central government and various needs assessments by development partners. These areas are: (i) health and nutrition; (ii) water, sanitation and hygiene; (iii) social protection; (iv) disaster risk management; (v) environment; (vi) gender; and (vii) education. The proposed program aims to support the GoB in addressing these priority areas of intervention through a combination of restructuring/additional financing of existing projects in Health, Nutrition and Population Services and Education, as well as this multi-sector project addressing needs in the rest of the priority areas.

30. To address both the immediate and medium-term impacts and needs generated by this situation the Bank is taking a phased approach starting with two additional financing projects in Health and Education and this multi-sector project including: (i) a surge of high-impact, early recovery interventions in the period of stabilization for rebuilding lives and economic resilience, and addressing social vulnerabilities, while humanitarian operations continue in tandem; and (ii) a gradual transition toward medium-term recovery and resilience building through investments in basic service delivery improvement, productive capital, environmental services, and social infrastructure and strengthening government systems and coordination.

31. The proposed engagement will be accompanied by an ongoing dialogue with the Government on the management of the Rohingya situation, as well as poverty and vulnerability analytical work. Dialogue is expected to evolve over time to reflect changing circumstances and to be closely coordinated with other stakeholders, including UNHCR. The policy dialogue will focus on monitoring the maintenance of an adequate protection framework, in close cooperation with specialized agencies; supporting the Government in further enhancing the protection framework and developing its action plan to manage the crisis; helping the authorities in their efforts to strengthen coordination on the ground; and encouraging the Government to adopt measures that allow for poverty reduction among the Rohingya without undermining Bangladesh's position on eventual repatriation (e.g., learning for children and youth, rebuilding of social capital).

### **C. Relevance to Higher Level Objectives**

32. The proposed interventions will contribute to the objectives of the IDA 18 Sub-Window for Refugees and Host Communities. The Sub-Window's purpose is to help refugee-hosting countries to: (i) mitigate the shocks caused by an influx of refugees, and create social and economic development opportunities for refugees and host communities; (ii) facilitate sustainable solutions to protracted refugee situations, including through the socioeconomic inclusion of refugees in the host country and/or their return to their country of origin; and (iii) strengthen preparedness for increased or potential new refugee flows. The proposed interventions will complement humanitarian efforts on the ground and support the GoB to address short and medium-term dimensions of the crisis. The proposed financing will also support the GoB to strengthen its capacity to respond



to the crisis. In line with the overall purpose outlined above, the sub-window would support projects that include priority initiatives such as helping ensure access and quality of services and basic infrastructure to the DRP.

33. The proposed engagement aims to contribute to the GoB's preliminary action plan to provide basic services and to strengthen its capacity to respond to the DRP crisis. The GoB has outlined a series of actions to scale up the delivery of basic services for the DRP and the management of the crisis. The engagement will also build on the GoB's commitment to further develop its strategic plan as the situation evolves.

34. The proposed interventions are aligned with the WBG's (World Bank Group) strategic directions to remove impediments to faster growth, job creation and accelerate poverty reduction; supporting WBG's twin goals of ending poverty and promoting shared prosperity. The World Bank Group's Country Partnership Framework (CPF) for Bangladesh for 2016-2020, dated April 5, 2016 identifies three focus areas: (i) Growth and Competitiveness; (ii) Social Inclusion; and (iii) Climate and Environment Management. The Project will support the last two focus areas by improving access to basic services, improving social protection coverage for the poor, and increasing resilience to natural disasters, all of which are objectives identified in the CPF. Additionally, Bangladesh's Seventh Five Year Plan emphasizes continued investments in poverty reduction, inclusiveness, and a sustainable development pathway that is resilient to disaster and climate change; all of which are aligned with the proposed interventions. To that end, the interventions undertaken under the Project will consider the vulnerability to climate change and disaster risks for their design and implementation.

## II. PROJECT DESCRIPTION

### A. Project Development Objective

35. The Project development objective (PDO) is to strengthen the Government of Bangladesh systems to improve access to basic services and build disaster and social resilience of the displaced Rohingya population.

- "Basic services" is defined as water, sanitation, roads, street lighting, and lightning protection systems.
- "Disaster Resilience" is defined as increased access to climate resilient multipurpose disaster shelters, resilient roads and evacuation routes resulting in reduced climate vulnerability, multi-hazard risks as well as enhanced accessibility and adaptability.
- "Social resilience" is defined as increased access and participation in gender sensitive community services, workfare activities that mitigate the risk of engagement in negative coping behavior, community services, and gender-based violence prevention and response.
- "Government Systems" is defined as the framework of resources, skills and coordination capacity needed to respond to the crisis in the present and long run.

### PDO Level Indicators

- Number of people with access to improved public infrastructure as a result of the project (disaggregated by gender).
- Number of people with access to climate resilient multi-purpose disaster shelters as a result of the project (disaggregated by gender).
- Households participating in community workfare and services (disaggregated by gender).
- Development of a DRP Camp Management System.



## B. Project Components

36. The project will have the following components and sub-components:

**Component 1: Strengthening Delivery of Basic Services, Resilient Infrastructure, Emergency Response and Gender-Based Violence (GBV) Prevention (US\$120 million)**

Subcomponent 1.A: Resilient Water, Sanitation, and Hygiene (US\$30 million)

Subcomponent 1.B: Basic Services, Resilient Infrastructure, Emergency Response and GBV Prevention (US\$90 million)

**Component 2: Strengthening Community Resilience (US\$35 million)**

Subcomponent 2.A: Community Services (US\$21 million)

Subcomponent 2.B: Community Workfare (US\$14 million)

**Component 3: Strengthening Institutional Systems to Enhance Service Provision to the Displaced Rohingya Population (US\$10 million)**

Subcomponent 3.A: Strengthening MoDMR, NTF, RRRC, CiC, and Line Ministry Systems (US\$5 million)

Subcomponent 3.B: Strengthening LGED, DPHE, and GBV Services (US\$5 million)

**Component 4: Contingent Emergency Response Component (CERC) (US\$0 million)**

37. To achieve better results, the project will have the following areas of emphasis:

38. **Strategic communication** to improve: (i) availability of information on existing services for both host communities and DRP; (ii) social cohesion between host communities and DRP; (iii) transparency and accountability for and among all stakeholders and measures to submit grievances and receive feedback from DRP on service delivery and gender-based violence.

39. **Strong gender and social inclusion focus.** The project has mainstreamed gender but also added a specific gender intervention focusing on GBV. Water and sanitation facilities will target women, children and disabled individuals (including behavioral change communication activities) and the street lights will contribute to the safety of these disadvantaged DRP. Shelters will be designed in a gender friendly manner including accessibility by disabled persons. Under Component 2, community services are specifically designed to target women, adolescent girls, disabled persons, and other disadvantaged groups. The focus will be on using a network of community volunteers to reach women and other vulnerable groups and encourage them to participate in sessions about preventing anti-social behaviors. Participation incentives in form of stipends will be paid for those households that participate in these sessions. Component 3 includes analytical work to determine the overall needs and gaps for GBV services to inform planning and design of future interventions by the Bank and other partners.

40. **Strong coordination agenda.** Coordination of the many actors providing services in the camps is key for implementation success of Bank interventions. Successful coordination is one that is GoB led but also brings together all the major actors, particularly at the Cox's Bazar level. Strengthening the camp management structures by building the capacities of the CiCs linked to the network of community volunteer will be the foundation of implementation coordination. This will be supported by a strengthened (more staff, technology, tools and equipment, information exchange, grievance redress system) office of the RRRC and the district level local government administration. Coordination at the RRRC level will also involve a strong partnership with ISCG. RRRC will then link up with NTF and MoDMR and the Project steering Committees at both LGED and MoDMR.



## Detailed Project Description

### **Component 1: Strengthening Delivery of Basic Services, Resilient Infrastructure, Emergency Response, and Gender-Based Violence Prevention (US\$120 million)**

#### *Subcomponent 1.A: Resilient Water, Sanitation and Hygiene (US\$30 million)*

41. The objective of this subcomponent is to support improved access to safe water and sanitation (with climate resilient features to reduce the risk to climate vulnerability and disasters) as well as hygiene promotion in a gender and socially inclusive manner.

42. This subcomponent will establish improved water supply service with a combination of community standpoints, rainwater harvesting, and piped water supply systems. The water supply scheme will comprise of: (i) resilient mini piped water supply schemes (including rehabilitation of existing tube wells connected with solar powered photovoltaic (PV) pumping systems with elevated platforms above flood level); (ii) resilient tube wells (rehabilitation of existing tube wells with elevated platform above flood level); (iii) mobile water treatment plants in selected Upazilas; and (iv) water resource mapping and water quality monitoring including water resource availability considering climate vulnerability and extreme weather conditions;. These interventions are expected to improve the quality, resilience, and sustainability of water services, as well as help, reduce water losses for DRP.

43. This subcomponent will also aim to improve access to resilient and eco-friendly sustainable sanitation. It will finance safe and acceptable sanitation services focusing on the entire sanitation service chain i.e. containment, collection, transport, treatment and safe disposal of fecal matter through: (i) construction of climate resilient improved individual and chamber community latrines (including measures for gender segregation; bath and cloth washing facilities, with water source, septic tanks and solar lighting system) with resilient superstructure and raised platform (above flood level) to enhance resilience against heavy rainfall and flooding; (ii) construction of biogas plants to capture and combust methane for energy in the camps with flood protective measures; (iii) construction of integrated waste and fecal sludge management systems, co-composting plants and waste collection facility with solar energy system, resilient superstructure, and raised platform (above flood level); and (iv) a feasibility study on waste management options in selected Upazilas and their surrounding areas (v) hygiene promotion, awareness program on sanitation, Fecal Sludge Management (FSM), and safe water use, training on Operation and Maintenance (O&M) of the WASH interventions including climate vulnerability and disaster risks. Community mobilization will be critical for behavioral change as well as the O&M of the facilities. These interventions will contribute to improve sanitary and hygiene conditions in the camps, soil, and water contamination due to untreated fecal discharge to the environment, and to produce agricultural fertilizer and a clean renewable energy source for community use.

#### *Subcomponent 1.B: Basic Services, Resilient Infrastructure, Emergency Response, and Gender-Based Violence Prevention (US\$90 million)*

44. The objective of this subcomponent is to support improved access to basic services, climate resilient infrastructure, emergency response services, in a gender and socially inclusive manner, and support a scale up of



the gender-based violence prevention program. The disaster risk profile of the area will be incorporated in the design and execution of the activities to ensure increased sustainability and resilience.

45. This subcomponent will finance: (i) construction of all-weather resilient access and evacuation roads as well as internal roads to increase readiness and resilience to natural hazard events, including associated storm-water drainage network and slope protective works to reduce the risk of landslides; (ii) construction of climate resilient culverts and bridges (aligned with the storm water drainage network) to drain the increased surface runoff from extreme precipitation and flooding; (iii) repair, rehabilitation and construction of rural markets for DRP incorporating resilient and environmentally friendly features including elevated platform above flood level; (iv) installation of solar powered street lights in DRP camps to improve energy efficiency, help increase safety, in particular of woman and children; (v) walkways; and (vi) installation of lightning protection systems in DRP camp areas to decrease vulnerability to lightning strikes resulting from extreme hydro-metrological events. Sealing the surface of roads, storm-water drainage network, culverts and bridges, slope protective works will help prevent washouts while maintain critical access for logistics and resources to the Camps, overall enhance the resilience of road infrastructure. These activities will also benefit to reduce soil erosion and surface water contamination and improve hygiene condition.

46. This subcomponent will also finance construction of climate resilient multi-purpose disaster shelters/primary schools and climate resilient multi-purpose disaster shelters/community service centers including rainwater harvesting, solar powered lights and climate proofing connecting roads (above flood level) to provide a haven from cyclones, storm surges, and strong winds.

47. This subcomponent will support improved emergency response services to better prepare for catastrophic events including climatic hazards through: (i) contingency planning for evacuation and emergency preparedness; and (ii) strengthening community based early-warning systems for hydrometeorological hazards; (iii) improved search & rescue operations including equipment and training of the first responders, Fire Service and Civil Defence (FSCD) in the onset of extreme hydrometeorological events and geophysical hazards.

48. This subcomponent will also finance the establishment and operation of gender-friendly spaces incorporating some resilient features including elevated platforms (above the flood level) which would be linked to the Gender-Based Violence (GBV) referral pathway and be a safe space for women and adolescent girls. This will represent a scale-up of GBV prevention and treatment services to be delivered through the women and children centers, door to door services, and interactive workshops on general and specific topics, assessments to determine barriers including extreme hydrometeorological events as well as geo-physical hazard to access services in the camps and ways to address them, and the development of a GBV referral pathway that will link with the ongoing Bank-financed Health Services Project in support of the DRP and existing referral pathways being implemented by other development agencies and the development and implementation of a GBV prevention program for adolescent boys.

49. To ensure that the benefits of the project reach everyone in an inclusive manner, a concerted effort will be made to: (i) design services in a gender-informed manner and reach women and girls through appropriate targeting approaches; (ii) the promotion of child-friendly and disability friendly approaches to service delivery; (iii) mobilize local communities to ensure the participation and inclusion of the most vulnerable groups through the use of the organizations and volunteers described below under component 2; (iv) formation of water and



sanitation committees for O&M, and (v) adoption of resilient and climate-friendly features to free from female dependent labors such as collection of firewood for household fuels.

## **Component 2: Strengthening Community Resilience (US\$35 million)**

50. This component will address economic and social resilience of the vulnerable through their engagement in community services and workfare schemes. Under this component, DRP households will participate in subprojects and activities intended to enhance community services for the vulnerable (woman, children, disabled and elderly); strengthen their engagement mechanisms (through mobilization, outreach and GRM activities); contribute to climate and environment risk mitigation; improve camp living conditions through cleaner environments, and prevent anti-social behavior.

51. Beneficiaries will be selected from among the DRP community to participate in activities and subprojects on a demand basis. Inclusive community services will prioritize subprojects that fill service gaps for vulnerable groups, while the community workfare schemes will be identified by camp authorities based on prevailing needs. Adequate training will be provided to the participating DRP community members on their respective compliance measures – participation in awareness raising/community mobilization sessions or in workfare schemes - and participation will be monitored. Stipends for their participation will provided through a secure, transparent and accessible mechanism that will enable households to purchase food and non-food items in a safe and dignified environment.

### *Subcomponent 2.A: Community Services (US\$21 million)*

52. The objective of this subcomponent is to connect and engage women, children, elderly and persons with disabilities in community services catered to the vulnerable population. These community engagement activities will be carried out through a network of Rohingya volunteers and will cover about 60,000 beneficiary households. It will finance: (i) stipends for participants; (ii) supporting materials, and (iii) management activities (which includes planning, selection of beneficiaries, supervision of participation and delivery of stipends).

53. The subcomponent will support provision of and participation in awareness generation activities covering issues including: climate and disaster risk resilience or mitigation; community-based early warning systems of cyclones, flood and other natural disasters; adoption of clean energy for cooking which will serve to reduce deforestation for firewood collection; nutrition; prevention of child abuse, child marriage, GBV, sexual harassment, and trafficking of women and children; illegal drug trade. Other activities will include provision of child care and elderly support services; community group facilitation to strengthen social networks; grievance management volunteer groups, and other communication and outreach activities. These activities will be held in small groups in locations identified to be best suited to their delivery and convenient for participants to attend. Payments to participating households will be made through the e-voucher scheme supported by the WFP. Implementation will be supported by a UN agency and or a Civil Society Organization (CSO) and details of sessions, logistics and monitoring will be described in the Project Operations Manual.

### *Subcomponent 2.B: Community Workfare (US\$14 million)*



54. This subcomponent aims at reducing the likelihood of at-risk-youths' participation in anti-social behavior by engaging them in workfare on basic infrastructure maintenance that would help to reduce climate vulnerability and disaster risks as well as camp cleaning and maintenance activities. Engaging the working-age youth can also contribute towards improved mental and emotional wellbeing through their participation in labor-intensive activities that also serve to enhance camp livability. This subcomponent will finance: (i) wages for beneficiaries in exchange for their work in rehabilitating or maintaining the environment where they live or camp assets; (ii) capital inputs for the subprojects, and (iii) supervision of participation and delivery of wages. The wage rate will be set at the prevailing official minimum wage for the DRP and as determined by district authorities and the ISCG. Each beneficiary household representative will work for a maximum of 120 person-days for a period of three years. Simple community workfare, which is unskilled labor intensive by nature includes (minor) slope protective works, storm water drainage network as well as bag gardening/vegetation for soil retention and tree plantation. These interventions will reduce the vulnerability to landslides and soil erosion, provide vegetation cover in the camp sites and carbon sinks, as well as drain the increased surface run-off from excessive rainfall inside the DRP camp area. The use of labor-intensive technologies in the construction and maintenance of these infrastructure also contributes to reduced greenhouse gas emissions in otherwise machine-dominated construction/maintenance.

55. The number of beneficiaries in each camp will be selected according to its relative population. Approximately 40,000 households with able-bodied adults (aged 18 to 29) willing to accept the prevailing wage rate will self-select to work. If the number of eligible people willing to participate exceeds the opportunities available, a first-come first-serve approach will be used to select the beneficiaries. A waiting list will be kept for participant turnover. Each household will be allowed to register up to two eligible adults as alternate participants to ensure that on occasions where the primary household representative is not available, the alternate could work in his/her stead to guarantee continuous participation and payment in the works activities.

56. Community subprojects will be identified by the CiCs in conjunction with the UN agency/CSO that will support implementation. The RRRC will approve subprojects to be implemented subject to meeting the criteria that a minimum of 80 percent of the combined subprojects' expenditure in the camps will be paid as wages using e-vouchers to the participating poor households. Eligible subprojects selected from camps will be validated with communities to ensure that the needs and interests of beneficiary communities are served. As a precondition for eligibility, camps will be required to put in place and record arrangements for asset management, which in turn will generate further work opportunities for households. CSOs will be engaged to provide quality assurance of the assets. Payments to participating households will be made through the e-voucher scheme supported by the WFP. Details of the menu of subprojects and eligibility criteria will be detailed in the Project Operational Manual.

### **Component 3: Strengthening Institutional Systems to Enhance Service Provision to the Displaced Rohingya Population (US\$10 million)**

57. The objective of this component is to strengthen the GoB's capacity to plan and coordinate DRP response (including disaster response) and manage and coordinate project implementation. This includes surge capacity increase through equipment, systems, and staffing to address the needs of the DRP including risks to climate vulnerability and disasters.

#### *Subcomponent 3.A: Strengthening MoDMR, NTF, RRRC, CiC, and Line Ministry Systems (US\$5 million)*



58. MoDMR has historically played an important role in similar influx management in Bangladesh. MoDMR's Refugee Cell leads the coordination of refugee-related initiatives and has direct oversight of the Refugee Relief and Repatriation Commissioner (RRRC at the district level which is represented by the CiCs at the camp level). According to GoB's Allocation of Business (revision Dec. 2014)<sup>27</sup>, MoDMR is mandated to coordinate all activities related to emergency response management besides disaster management. However, to fulfill this central coordinating role in the current influx crisis, MoDMR's capacity needs to be increased through strengthened institutional and administrative systems at the national, district and camp level.

59. National: At the national level, this subcomponent aims to enhance the capacity of MoDMR and the NTF to plan, coordinate and respond to the needs of the DRP including after extreme hydromet events that affect particularly those in the Cox's Bazar area through: (i) policy dialogue on emergency management, response and coordination support for the DRP;<sup>28</sup> (ii) exchange and knowledge sharing with other countries with similar experiences on best practices for refugee management and response; (iii) development of crises information management systems as well as benefit transfer mechanism for the DRP; and (vi) central level communication and reporting mechanism.

60. RRRC: To strengthen this unit's capacity to coordinate, have oversight and report on field activities in Cox's Bazar (during/after disasters as well) including: (i) technical advice to improve planning and management of multi-agency activities in the camps; (ii) information systems, equipment and training to manage the reporting mechanism, benefit transfer oversight and registry for DRP; (iii) logistics and technical support for improved coordination; and (iv) consultant remuneration for coordinator at the RRRC.

61. Camp-level: To strengthen CiCs' governance and DRP engagement capacity (including emergency response to disasters) as well as fostering community participation through the enhancement of the Rohingya volunteer network. This activity will finance: (i) two staff at the CiC level (one for GRM and one volunteer network supervisor); (ii) training and technical assistance on grievance management, community engagement and gender mainstreaming;

62. DRP Engagement Structure (Volunteer Network). Presently, the CiC personnel mobilize DRP through a volunteer network comprised of Rohingya community leaders (known as Majhi). This project will support the enhancement of the volunteer network to serve as the Government's main DRP engagement structure which will serve as the last mile delivery tool through which LGED, DPHE, and MoDMR will streamline outreach, behavior change communication (through Training of Trainers- ToT strategies) as well as the grievance redress mechanism. The volunteers will be chosen in a transparent, inclusive and representative manner giving due consideration to women and other vulnerable groups in this process. The DRP engagement structure will not only provide social resilience activities to the population, particularly women (supported through subcomponent 2.A inclusive community service), but it will allow for the contextualization of the messaging and awareness-raising activities to the culture and language of the DRP. For this purpose, this subcomponent will finance the service of a specialized agency (SCO) to set-up and facilitate the functioning of the DRP engagement system. The SCO will hire experienced staff to be placed at the CiC office for the recording of grievances and providing feedback to the community. The agency will also facilitate, supervise and monitor the DRP engagement mechanism, which

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<sup>27</sup> Cabinet Division, Bangladesh.

<sup>28</sup> The Inter-Ministry Meeting on Execution, Monitoring and Coordination of Humanitarian Assistance activities for Forcibly Displaced Myanmar Nationals (headed by MoDMR) and the National Task Force (led by MoFA).



includes: (i) selection and training of volunteers; (ii) monitoring and reporting activities; (iii) periodic CiC-volunteer meetings; and (iv) distribution of Information, Education and Communication (IEC) materials.

*Subcomponent 3.B: Strengthening LGED, DPHE, and GBV Services (US\$5 million)*

63. This subcomponent will strengthen the capacity of government agencies to provide essential services to the DRP and respond effectively to potential emergencies and extreme hydro-meteorological events particularly in the Cox's Bazar area. The subcomponent will encourage harmonization or transfer of systems and capacities between UN, other specialized agencies and the GoB, in the provisioning of basic services, infrastructure improvement, and emergency response services for the DRP and will also focus on the gradual transition of service delivery from humanitarian to country systems.

64. DPHE is the lead agency responsible for drinking water supply and sanitation in the country apart from the jurisdiction of Water and Sewerage Authority (WASA) of Dhaka, Chittagong, and Khulna. Access to improved and climate resilient water supply and sanitation facilities by the DRP is expected to contribute to poverty reduction and gender equality among the DRP by addressing burdens especially borne by women and girls.

65. This subcomponent will enhance the institutional capacity of DPHE to provide services to the DRP through: (i) technical training of DPHE staff; (ii) strengthening the technical capacity of DPHE to improve the camp sanitation, fecal sludge management, and safe water use; (iii) training of frontline public health workers; (iv) training on community WASH management.

66. LGED is the lead agency to develop rural and urban infrastructure as well as small scale-water resources. In addition, they construct primary schools and have been the implementing agency for all Bank-financed multi-purpose disaster shelters. They are also responsible for roads, bridges, culverts as well as emergency construction, repair, and maintenance after a disaster. This subcomponent will enhance the capacity of LGED's staff working in and around the DRP camps through: (i) technical training of LGED staff; (ii) strengthening the technical capacity of LGED to develop risk-informed maintenance guidelines for the roads and associated drainage network in and around the DRP camps; (iii) develop a training and capacity building program for LGED to evaluate additional resilience-enhancing measures and to prepare guideline to consider resilience in design of road works on geohazards (earthquake and landslides) risks in and around the DRP camps; and (iv) technical assistance to support new site plans for service delivery to DRP and identify needed infrastructure (internal roads, solar street lights, lightning protection systems, drainage, markets). Considering the climate vulnerability and disaster risks of the DRP, this subcomponent will also provide capacity building sessions on (i) hazard, vulnerability and risk; and (ii), emergency crisis response during disasters in the DRP camps.

67. Strengthening services for prevention of GBV. Under this subcomponent, LGED will engage a specialized agency to carry out a GBV needs assessment to determine the current needs, coverage, and quality, and gap assessment for GBV services, and address gender-based barriers resulting from climate and disaster risks. This assessment will inform Project activities as well as serve as a basis to design a more comprehensive GBV prevention and treatment approach in Cox's Bazar including among others, local labor participation strategies, and labor recruitment/management strategies which would need to be included in civil contracts. This activity is directly linked with Component 1.B intervention, scale-up of the GBV prevention and treatment services program.

**Component 4: Contingent Emergency Response Component (CERC) (US\$0 million)**



68. The objective of this subcomponent is to cater to unforeseen emergency needs. 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 for the benefit of the DRP. Disbursements under 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) LGED, DPHE and MoDMR have 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; and (iv) the expenditures under the component will be to benefit the DRP.

### **C. Project Beneficiaries**

69. Project beneficiaries are the approximately 900,000 Rohingya people settled in informal camps that are adjacent to previously existing Registered Camps (RCs). Approximately 720,000 are settled around the Kutupalong RC in Ukha, approximately 130,000 around the Nayapara RC in Teknaf, and approximately 50,000 in three smaller camps in Teknaf.

70. For Components 1 and 2, in the selection of specific investments, due consideration will be given to ensure that the investments are: (i) necessary for the project to achieve its objectives; (ii) directly benefiting DRP communities; (iii) creating greater development outcomes within the period of the project; and (iv) feasibility of the investments considering existing institutional systems. The selected investments will be screened based on environmental and social screening procedures to be defined in the Environmental and Social Management Framework (ESMF) to plan and mitigate the investment specific potential environment and social risks and impacts.

### **D. Theory of Change**

71. Access to basic infrastructure and services will be achieved by supporting the GoB's capacity to improve access to water and sanitation services, climate resilient infrastructure, as well as emergency response and urban services particularly within the camps. The capacity to provide socio-economic resilience will be attained through supporting the Government's participation in creating workfare opportunities that target at-risk youth and the most vulnerable population. Finally, the capacity to address the short, medium and long-term dimensions of the crisis will be achieved by strengthening the Ministries' capacity to implement the project as well as to plan and coordinate DRP response at the field, ministry and national levels.



		Outputs	Intermediate outcomes	PDO Outcomes	PDO
Component 1	Resilient Water, Sanitation & Hygiene	Community latrines & household toilets	Safe water access points	Strengthen the provision of water and sanitation services	<p>Increase the number of people with access to basic services, resilient infrastructure, enhance disaster preparedness &amp; GBV prevention services</p> <p>To strengthen the Government of Bangladesh systems to improve access to basic services and build disaster and social resilience of the displaced Rohingya population</p>
	Basic Services, Resilient Infrastructure, Emergency Response & Gender Based Violence (GBV) Prevention	Basic service infrastructure (roads, street lights, etc.)	Multi-purpose disaster shelters	Enhanced disaster resilient infrastructure & preparedness	
		Emergency search & rescue equipment	GBV Prevention services & referral pathways	Strengthen provision of basic services	
		Woman friendly spaces		Strengthen prevention of GBV services to the DRP	
Component 2	Strengthening Community Resilience	Community services for woman and vulnerable groups	Community workfare for at-risk youth	Strengthen availability of community services & workfare	Increase the number of people participating in community services and workfare activities
				Strengthen activities that mitigate the risk of engagement in anti-social behavior	
Component 3	Strengthening Institutional Systems to Enhance Service Provision to the DRP	Consultancy services & technical support	Training & knowledge exchange	Strengthen MoDMR, RRR, CIC's Capacity to manage DRP	Increase Government capacity to manage refugee influx & basic service delivery
		Equipment & Systems	Grievance redress mechanism	Strengthen LGED, DPHE & FSCD capacity for basic service delivery	



## **E. Rationale for Bank Involvement and Role of Partners**

72. The Bank's engagement during the early phase of the displacement crisis is critical to mitigate medium-term impacts of the crisis. While there are considerable risks in engaging in an emergency and evolving policy environment, the risk of inaction is even higher. The country is in the early stage of a large forced displacement crisis that could become protracted. The WBG's engagement can help mitigate some of the risks facing both the forcibly displaced and their host communities and help implement a development response which complements humanitarian activities on the ground. It also provides an opportunity to engage in an ongoing dialogue with the Bangladesh authorities to help manage the situation in an effective manner until the situation in Myanmar becomes suitable for voluntary, safe and dignified return for the DRP.

73. The Bank's interventions to strengthen the government capacity will contribute to meeting both immediate and medium-term needs for the DRP and to further support the GoB to manage the crisis. The Bank is committed to working in partnership with development and humanitarian actors. The program will be well aligned with the JRP proposed by UN agencies and NGOs. The financial support under IDA 18 sub window only addresses a part of significant medium terms needs arising out of the crisis. The proposed program is selective and focused on activities that are supportive of government priorities and can realistically be carried out in the current environment. The program is indicative and may be adjusted in consultation with the government and key partners as the situation evolves. Interventions aim to provide sustainable benefits dignity to the DRP.

74. The project aims to facilitate sustainable solutions to the protracted crisis and the growing tensions with the host community. It will do so through moving towards increased self-reliance to reduce dependency on humanitarian aid and assistance, as this lack of independence only increases the vulnerability of the DRP to exploitation in the informal sector. The project also aims to alleviate the risks caused by idleness, lack of opportunities, and lack of communication between groups. There lies the opportunity to use DRP labor to realize project interventions (especially those of environmental degradation in camp sites). In such ways the Bank's involvement in middle-term, multi-sectoral development aims to progressively reduce the dependency on humanitarian aid.

75. The Bank program will be based on an integrated and phased approach to balance the needs for both immediate response and medium-term impact. The program will build on existing operations including Additional Financing for the Health Sector Support Project (P167672), which will extend health services to the DRP. Additional financing for the Reaching Out of School Children Project (P167870) will provide education and skills learning support to the DRP. This new multi-sectoral project will coordinate with both projects to yield synergies and minimize duplication of Bank resources on the ground.

## **F. Lessons Learned and Reflected in the Project Design**

76. As per a recent Bank assessment on the displaced Rohingya crisis it is estimated that the highest proportions of needs have emerged in service delivery, followed by infrastructure rehabilitation and capacity enhancement. These needs are in line with the disproportionate impact and strain the crisis has had on basic service delivery, especially health, water and disaster shelter as well as opportunities for engaging in productive activities for socio-economic resilience. The assessment went on to propose sector specific recovery strategies that have informed the design of this project. These recovery strategies often require close collaboration with the



local government agencies in implementation, and therefore the Bank’s assessment also includes scenario analysis to inform the government’s adaptation measures to hydro meteorological hazards, which are linked to climate change. These recommendations form the basis from which the Project was designed.

77. Lessons from Bank best-practice operations in other countries both within the region and globally have been considered. As sentiments of distrust and tension between the host population and the DRP are building up in the region and rising concerns of potential radicalization, the project integrates measures to avoid aggravating conflict as a consequence of the project interventions, while also addressing the drivers of conflict through community consultation and participation which have proven to help support social cohesion and foster inclusion of marginalized groups, including women, DRP and minority clans. The Project thereby will employ consultative approaches for determining beneficiaries, and in implementing other aspects of the project in collaboration with local stakeholders, district-level authorities and civil society organizations.

78. Bank experience in responding to disasters has established the sustainability of multi-sectoral disaster recovery, combined with a comprehensive spatial approach. Single-sector focused responses have not been proven effective to deliver lasting results. The systematic planning of multi-sectoral recovery interventions enables coordination among the different actors involved, defines clear roles and responsibilities, and allows for establishing a comprehensive monitoring mechanism for recovery. Complementarity of sectors like disaster risk management, transport, social protection, water, health, etc. provide holistic disaster recovery, and has therefore motivated this project design. Combined with this, geographical coordination and alignment of actors, and associated needs, through a coordinated approach will ensure that the program supports activities in locations where the needs are greatest.

79. Lessons from forced displacement crises in other countries point to the importance of developing a broader strategic response. A number of countries in the past few years experienced a large and rapid inflow of displaced populations and borne a substantial shock in domestic markets. Many countries had to cope with immediate shocks to provide emergency relief without a medium- and long-term strategy. Such strategy will require a degree of clarity on the full scope of the crisis and the prospects of finding a rapid diplomatic solution. It also requires time to review international experience and build consensus among key stakeholders. The Bank’s engagement on an integrated and phased approach is built on the experience to manage the emergency phase and to formulate a strategic plan as there is more clarity on the scope.

### **III. IMPLEMENTATION ARRANGEMENTS**

#### **A. Institutional and Implementation Arrangements**

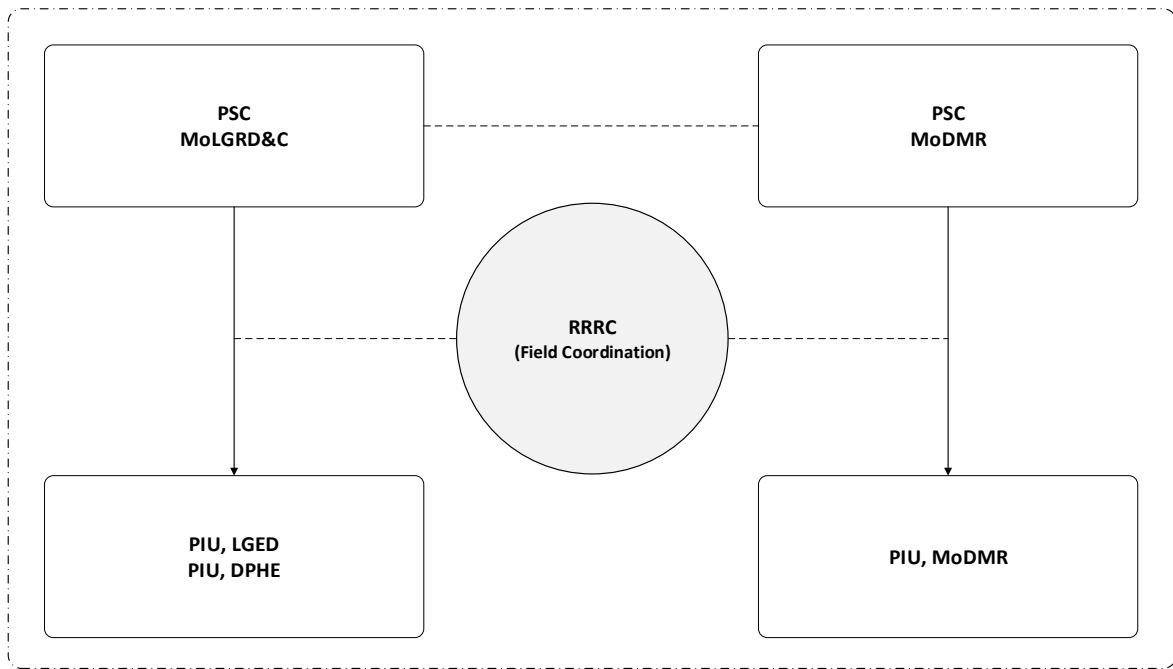
80. The Government will have overall responsibility for project implementation and management through its Ministry of Local Government, Rural Development, and Cooperatives (MoLGRD&C) and Ministry of Disaster Management and Relief (MoDMR).

81. The project will be implemented by LGED, DPHE, and MoDMR through three Project Implementation Units (PIUs). LGED and DPHE are implementing agencies within the MoLGRD&C. All activities will be coordinated by the Refugee, Relief and Repatriation Commissioner (RRRC) at the field level.



82. The rationale for adopting the proposed implementation structure is to be in accordance with the mandate of government agencies, in-line with the rules of business for DRP assistance and coordination, and to enable most efficient decision making, taking into account internal government fiduciary clearance procedures.

83. Following the GoB’s Rules of Business, Project Directors of the PIUs will be responsible via head of agency for reporting to their respective Ministerial Project Steering Committee (PSC). There will be a PSC chaired by the Sr. Secretary/Secretary, Local Government Division (LGD), MoLGRD&C and a PSC chaired by Sr. Secretary/Secretary MoDMR, representatives of each PIU will be present at both PSC meetings.



84. DPHE will be the implementing agency of Component 1. A and a part of Component 3.B. DPHE PIU will have a dedicated Project Director and two DPDs.

85. LGED will be the implementing agency of Component 1.B and a part of Component 3.B. Currently, as LGED is already implementing the IDA financed US\$375 million Multi-Purpose Disaster Shelter Project (MDSP), with an existing Project Director, PIU and interventions in the Cox’s Bazar district, it was agreed the existing MDSP PD will be the PD of the proposed project’s LGED related component and the existing MDSP PIU and MDSP Procurement Panel would provide necessary support to the project. This setup is not expected to have any implications for the continued successful implementation of MDSP. This existing MDSP PIU would be strengthened to implement additional activities proposed under the proposed Project. MDSP and this proposed Project would maintain separate Deputy Project Directors (DPDs).

86. MoDMR will be the implementing agency for Component 2 and Component 3.A. A dedicated PD, not below the rank of Joint Secretary, and two DPDs will be appointed to ensure smooth project implementation and supervision. A PIU will be set up within the Refugee Cell to assist the PD in project management.



87. The Refugee Cell and its field level team represented by Camp-in-Charges/Refugee, Relief and Repatriation Commissioner (RRRC) will also be supported by qualified service provider(s), including specialized agencies, to coordinate and administer day-to-day activities under this component.

### **Coordination**

88. The Project will use existing arrangements of the GoB with all implementation coordinated through the existing government mechanism. The existing Development Partner/Multi-Lateral/Bi-Lateral/UN Agencies coordination mechanism in the field will be through the Inter Sector Coordination Group (ISCG) and coordinated in Dhaka by the Strategic Executive Group (SEG). There will be inter-agency field level coordination on project activities with the RRRC, the ISCG, and the implementing agencies.

89. Overall policy coordination at the national level will be by the National Task Force (NTF), which is an Cabinet approved inter-ministerial body with secretarial services provided by the Ministry of Foreign Affairs. National level coordination will be through MoDMR and field level coordination through the RRRC. This is in-line with the overall coordination and communication arrangements in the country regarding the Rohingya influx. Furthermore, the activities for all the investments will be complementing that of the GoB, Asian Development Bank, and other Agency interventions, to avoid any duplication or overlap.

### **B. Results Monitoring and Evaluation Arrangements**

90. Monitoring and Evaluation (M&E) Firm will provide support in monitoring and evaluating project activities and safeguards compliance requirements of Component 1. The specialized agency implementing Component 2 activities will be mainly in charge of monitoring for MoDMR, supported by an individual specialist within the PIU. The Monitoring and Evaluation (M&E) consultants would report to the respective Project Directors of LGED, DPHE and Refugee Cell, MoDMR.

91. M&E reports will be submitted quarterly to the Bank no later than 30 days after the end of each quarter by the PDs. LGED Project Director will submit a consolidated report for LGED and DPHE. MoDMR PD will submit a separate quarterly progress report. The M&E report will cover but is not limited to: (a) progress towards achieving the results framework; (b) progress and expected completion dates for works, goods and services contracts; (c) progress on implementation of safeguards compliance requirements; and (d) progress in institutional strengthening, capacity building, training and studies.

92. A Management Information System (MIS) will be established to capture and report implementation progress and quality for infrastructures and services financed under the Project. For Component 1 LGED and DPHE, MIS will be based on the existing system used by LGED which uses phone applications for data collection and a georeferenced web-based dashboard for visualization. In addition to reporting progress, the MIS is used to provide an additional layer of quality monitoring using photos, and a system to follow up on progress or quality issues raised by the supervision consultant and/or LGED and DPHE. To strengthen overall governance and coordination systems for MoDMR, an MIS system will be developed for Component 2.



93. Implementation data will also feed into existing reporting, e.g. carried out by the RRRC, ISCG which will include a comprehensive mapping of infrastructure and services provided to DRP in the camps. This will facilitate coordination and avoid overlap.

### **C. Sustainability**

94. The Project's sustainability rests on its ability to adequately link activities targeting DRP and host communities to broader sector strategies; in other words, to deliberately and consistently, albeit gradually, include DRP and host communities in public service delivery. Questions of sustainability have been addressed separately in the Project design for each of key areas of intervention.

95. Activities under Component 1, were designed in collaboration with line ministries to ensure that the Project abides by sector standards including facility plans, construction standards, training of staff, and salary payments. Designs will incorporate resilient measures given the terrain and will aim at minimizing O&M costs. However, it is unlikely services will continue after the project without further external support or funds allocated by the GoB.

96. Component 2 will support poor and vulnerable families through community works and services, which will likely be strengthened and scaled up overtime in order to increase the economic resilience of both DRP and the host communities. Community participation approaches that will have a strong emphasis on behavior change and mitigate the risks of anti-social behavior are expected to outlast the project and enable DRP households to cope with some of the stressful situations and improve social cohesion.

97. Implementation of the project is envisaged to be undertaken in collaboration with the UN agencies and other programs financed by development partners and NGOs. Component 3 will strengthen capacity within the government systems in close collaboration with UN agencies – some of which have been providing support to refugees for several years. The project will work closely with NTF and UNHCR to ensure that capacity development for the government agencies and supports the refugee protection framework and the Government's ability to respond to refugee situations more efficiently, with clear guidelines in place and transparent processes.

98. Additional support to governmental entities will be provided under the project in the form of training for operations and maintenance, disaster risk management activities, social protection and development workfare, information management etc. will also strengthen the capacity of these groups to improve and ensure sustainability of workfare and management of similar disasters. It is also envisaged that in time, the role and responsibilities of the Government will increase, and their activities will complement those of the project. Ultimately the resources of the project will be transferred to the Local Government and it is hoped in time that the activities of the Project are scaled back as they are adopted by the recognized Government actors.

## **IV. PROJECT APPRAISAL SUMMARY**

### **A. Technical Analysis**

99. The project's design is based on successful approaches and methodologies as well as on lessons learned by past and ongoing projects on forced displacement, conflict prevention, local Government involvement,



community participation, and in a FCV operating environment. Therefore, the design is simple and flexible, and focuses on core activities that can show results and can be scaled up.

100. Basic service infrastructure under Component 1 will use pre-existing standard designs and standards based on the extensive experience of the implementing agencies. LGED is implementing large scale projects of similar nature in the area, and DPHE's core competence is on building piped water schemes. For fecal sludge the Bank's team and DPHE will test new technologies based on international experience in similar contexts taking into account existing constraints such as extremely scarce land, hilly terrain, monsoon season with heavy rains, and limited capacity and resources for O&M.

101. According to the ISCG, the Minimum Expenditure Basket (MEB) for a DRP household is BDT 7,290 (US\$87) per month. Basic community workfare, on a short-term basis, would help yield wages for beneficiaries to improve their socioeconomic resilience and smooth out any consumption gaps in complement to the current in-kind support that each household receives to meet the MEB, without resorting to negative coping mechanisms. Improved economic resilience is also likely to help households become more capable of addressing subsistence needs ahead of and following a natural disaster especially since they live in precarious conditions in a country that is highly susceptible to climate change. Approximately 40,000 households will benefit from participation in the short-term community workfare while the broader community will benefit from the resulting facilities.

## **B. Economic Analysis**

102. Overall, the proposed project is expected to have a positive impact. The interventions aiming to improve WASH are expected to reduce the likelihood of waterborne diseases such as diarrhea, with potential positive consequences on nutrition and health. The WASH components are expected to reach approximately 215,000 people. A cost-benefit analysis for this component suggest an internal rate of return (IRR) of 16% with a net present value (NPV) of US\$14 million over a 15-year period. Enhanced connectivity through road and bridge construction is expected to improve service delivery and access to services and markets, as well as reduce upward pressure on local prices. Investments on emergency disaster shelters are expected to save lives during severe weather events and will have indirect positive benefits due to their use as schools and community centers during non-cyclone seasons. A cost-benefit analysis for the construction of 23 new multi-purpose disaster shelters/primary schools and 30 multi-purpose disaster shelters/community service centers under conservative assumptions produces an IRR of 14 percent and NPV of US\$9 million.

103. The economic analysis also considers the shadow cost of carbon emissions as a part of the cost-benefit analysis across three scenarios – a baseline measure without considering costs of carbon emission, an upper bound (high cost) scenario that considers a cost of US\$80/tCO<sub>2e</sub> and last, a lower bound (low cost) scenario considering a cost of US\$40/tCO<sub>2e</sub> over the 15-year project cycle. We find that even in the high cost scenario (US\$80/tCO<sub>2e</sub>), each of the two components remain viable throughout the duration, thereby suggesting that there is a strong economic case for the project despite the increase in emissions.



**Effects of varied shadow carbon externalities on cost-effectiveness**

Shelters/community centers		NPV	IRR
Shadow carbon price	Baseline	\$9,011,536	14%
	Upper bound (\$80/tCO2e)	\$3,419,099	4%
	Lower bound (\$40/tCO2e)	\$6,215,317	8%
WASH		NPV	IRR
Shadow carbon price	Baseline	\$14,031,468	16%
	Upper bound (\$80/tCO2e)	\$2,860,559	2%
	Lower bound (\$40/tCO2e)	\$8,446,013	8%
Combined (Shelters + WASH)		NPV	IRR
Shadow carbon price	Baseline	\$23,043,004	16%
	Upper bound (\$80/tCO2e)	\$6,279,658	3%
	Lower bound (\$40/tCO2e)	\$14,661,331	8%

104. The community workfare and inclusive community services activities will directly impact beneficiary households by providing a source of income which will cover between 12 and 18 percent of Minimum Expenditure Basket (MEB) from ISCG. Estimates suggest that the cash transfers would reduce the poverty rate (using the MEB) for the DRP population in about 10 percentage points (20%).

105. The interventions are also expected to be inclusive in terms of benefiting vulnerable groups. The WASH investments are highly relevant for young children who are more prone to disease. Improvements in WASH will also benefit women who are more likely to spend time and effort in collecting water and experience safety risks associated with poor access to water and sanitation. In addition, the community workfare and inclusive community services will prioritize youth and women. The incentives to adopt clean cooking technologies are also expected to benefit disproportionately women and children, who are more likely to be exposed to the hazards from traditional cooking methods and collecting firewood.

106. Finally, even though the proposed interventions are mostly focused on the DRP population, there may be positive indirect impacts on the host community as well. The improvements in connectivity associated with the construction of roads and bridges may facilitate the distribution and storage of products and help reduce upward pressure on prices of goods. This will likely benefit both hosts and DRP as they often use the same markets. Moreover, the community workfare and inclusive community services will allow DRP to participate in income generating activities which may help reduce the pressure on labor markets and market daily wages, also benefiting the host community which has seen a reduction in daily wages of about 24 percent since the onset of the crisis.

**C. Fiduciary**

**(i) Financial Management**



107. The overall financial management risk is “High”. Para 12 of Bank Policy, Investment Project Financing (IPF), dated November 10, 2017, Projects in Situations of Urgent Need of Assistance or Capacity Constraints is applicable to the proposed project on the ground of urgent need of assistance because of a natural or man-made disaster or conflict. The project design is complex in terms of multisector involvement, identification of beneficiaries, modality of intervention, financial reporting risks for unreconciled balances with UN agencies and involvement of multiple agencies. In addition to UN agencies, there may be specialized NGOs as implementation partners and expenditure reporting arrangements would be included in their respective contracts.

108. As per the institutional arrangements for this proposed project, the fiduciary responsibility for fund flow, accounting, financial reporting and audit of project implementation would be with three agencies, LGED, DPHE, and MoDMR. Each of the agencies has adequate experience in implementing World Bank funded projects.

109. Each PIU will appoint experienced medium-level Financial Management Consultants (FMCs), with qualifications acceptable to the Bank, to lead and coordinate the FM activities under the project. The consultants will support the project in strengthening budgeting practices, internal controls, fund reconciliations, and other relevant financial functions. The process of hiring the consultants should begin before signing the financing agreement so that he/she can be onboard as soon as the project is declared effective. The ToR of the FMCs will be sent to the Bank for review and concurrence before starting the selection process.

110. There will be three separate designated accounts (DAs) with variable ceiling with LGED, DPHE and MoDMR. Disbursements would initially be made on an advance and replenishment method, based on regular statements of expenditure (SOEs). The Bank will disburse funds directly to UN agencies in the cases where they are service providers, based on issuance of UN commitment. Monthly reconciliation on utilization of UN payment against expected deliverables will be undertaken and intensified during the two quarters of closing the project to mitigate against challenges in refund of any unspent balance. The Project will send yearly cash flow projections within June 30 of each year and this projection will be updated on quarterly basis. Separate set of accounts/budget heads using the Budget and Accounting Classification System (BACS) would be maintained in the integrated budgeting and accounting system (iBAS++) for each financing to ensure charging of expenses related under the appropriate financing. All implementing agencies will prepare a separate Interim Unaudited Financial Report (IUFR) from iBAS++, in the format agreed with the Bank, on a quarterly basis and submit to the World Bank for its review and clearance within 45 days from the end of each quarter. The project Annual Financial Statements for the three implementing entities will be submitted to the Comptroller and Auditor General’s Office (C&AG) of Bangladesh within three months of the end of each fiscal year. Taxes are estimated to be less than 15% of total IDA financing.

111. Considering the high-risk nature of the project especially at the individual level of the DRP, the project will seek to leverage on the special biometric identification system of the Department of Immigration and Passports and the WFP Food Card System were possible to ascertain the authenticity of direct Rohingya beneficiaries were applicable. Depending on the level of ICT infrastructure in the selected or targeted areas, the actual design of the payment system may leverage on emerging cutting-edge technology to make cash-based transfers faster, cheaper and more secure. In case of transferring fund to beneficiaries specially for communities, the WFP established SCOPE platform, on which the e-voucher program is built, will be used, and would not involve transfer of cash. The platform maintains digital and biometrically secured records of all transactions.



112. The Foreign Aided Project Audit Directorate (FAPAD) of the C&AG of Bangladesh shall carry out the annual financial statement audit of the project. Audited project financial statements will be submitted to the Bank within six months from the close of each fiscal year until the close of the grant and credit. Additionally, a risk based internal audit by an independent audit firm will be performed each year over the project term. There are no outstanding audit reports of the implementing agencies.

**(ii) Procurement**

113. All implementing agencies (DPHE, LGED, and MoDMR) will carry out procurement for their parts of the Project. Most procurement will be conducted by the headquarter based PIUs of the agencies. Some small value procurement will be conducted by Cox's Bazar Executive Engineer office of LGED and DPHE. Total procurement expenditure of the Project is about US\$140 million. This will mainly involve procurement of goods, works, non-consulting services, and consultancy services to provide basic services in a congested area with challenging terrain which is vulnerable to cyclones, floods, and landslides. Community participation in procurement would provide much needed engagement of the idle youth while also ensuring awareness creation in the services being provided. Infrastructure design, procurement and construction under the Project may not be amenable to typical procedures. Information, Education and Communication (IEC) will be critical for service delivery and would be procured to ensure flexibility in design, testing and dissemination of appropriate, relevant and timely messaging. All goods, works, non-consulting services and consulting services under the project shall be procured in accordance with the requirements set forth or referred to in the World Bank's Procurement Regulations for Borrowers under Investment Project Financing, dated July 1, 2016 (Revised November 2017) (Procurement Regulations). Further, paragraph 12 of section III of the Investment Project Financing policy of the World Bank has been triggered which allows the use of streamlined procedures to address the evolving emergency and urgent needs of the DRP. Retroactive financing would be provided for eligible payments under contracts implemented by LGED and DPHE, and MoDMR, with the retroactive financing start date being 12 months before the expected date of signing. For the purposes of retroactive financing, the cut-off date is determined with respect to payment and not incurrence of expenditures. Such contracts will be eligible for Bank's financing if the procurement procedures, including advertising, shall be found to have been consistent with Sections I, II and III of the Procurement Regulations.

114. Procurement risk of the project has been assessed as "High" mainly due to number of agencies involved, multiple number of procurement packages, capacity constraint of the implementing agencies for contract management, capacity constraint at the MoDMR to perform procurement activities, delay in procurement process etc. Some of the key risk mitigation measures that will be put in place are: (i) engaging relevant UN agencies as suppliers and service providers including technical assistance in the delivery and supervision of part of the interventions; (ii) recruiting local procurement consultants by the implementing agencies to conduct/support procurement activities under the project; (iii) using the national electronic government procurement (e-GP) system for procurement of goods and services following national competitive procurement methods; (iv) training relevant project officials on procurement, contract management, and fiduciary due-diligence considering applicable Bank's regulations and procedures; (v) forming, in concurrence with the Bank, the bid/proposal evaluation committees (BEC/PEC) for the project's procurement activities; (vi) using Systematic Tracking of Exchanges in Procurement (STEP) system of the Bank to manage and monitor procurement activities against agreed time-line; (vii) engaging supervision consultants by LGED to supervise implementation of civil works; and (viii) preparing a Project Procurement Strategy for Development (PPSD) by the Implementing Agencies, in agreement with the Bank, taking into account the nature of the procurement activity, capacity of the procuring



organization, prevailing market conditions, activity level risks etc. The PPSD document will spell out the detailed procurement arrangements (e.g., procurement packaging strategy, method, bid evaluation methodology of the major packages, timeline for the procurement activities, contracting arrangement etc.) for the Project including the detailed risk mitigation measures. Due to the situation of urgent need and capacity constraint the World Bank will assist the implementing agencies to prepare a simplified PPSD along with the procurement plan to be completed during project implementation.

115. UN Agencies would be directly selected where they have a comparative advantage and possess adequate capacity on the ground to rapidly deliver the required services. Due to the emergency nature and multiplicity of solutions required for the infrastructure workfare, including the risks of natural disaster, a UN Agency with proven expertise in engineering, procurement and contract management may be well-placed to implement the workfare activities including mobilization of workers i.e. DRP as well as the implementation and supervision of the workfare with flexibility and value-for-money. Existing World Bank instruments will be used to engage relevant UN agencies as suppliers and service providers including technical assistance in the delivery of the interventions. Agreement with any UN Agency will be subject to prior review by the Bank.

116. As paragraph 12 of the Bank Policy on IPF (projects in situation of urgent need of assistance or capacity constraints) is applicable for the project, in such cases, the Mandatory Direct Payment Pilot (imitative introduced by the Bank in November 2017) would apply where payments relating to international open or limited and direct selection contracts should be made only through Direct Payment or Special Commitment disbursement methods, these contracts will be included in the procurement plan.

117. In accordance with paragraph 5.3 of the World Bank Procurement Regulations, when approaching the national market, as agreed in the Procurement Plan, the country's own procurement procedures may be used. These procurement procedures shall be consistent with the Bank's Core Procurement Principles and ensure that the Bank's Anti-Corruption Guidelines and Sanctions Framework and contractual remedies set out in its Legal Agreement apply. When the Borrower uses its own national open competitive procurement arrangements as set forth in the Public Procurement Act 2006 and the Public Procurement Rules 2008, such arrangements shall be subject to paragraph 5.4 of the Procurement Regulations and the following conditions: (i) lottery in award of contracts shall not be allowed, (ii) bidders' qualification[s]/experience requirement[s] shall be mandatory, (iii) bids shall not be rejected based on percentage above or below the estimated cost, (iv) Model Bidding Documents agreed with the Bank shall be used for all national open competitive procurement, and (v) the eligibility of bidders shall be as defined under Section III of the World Bank Procurement Regulations for IPF Borrowers - accordingly, no bidder or potential bidder shall be declared ineligible for contracts financed by the Bank for reasons other than those provided in Section III of the Procurement Regulations.

118. When the Borrower uses other national procurement arrangements (other than national open competitive procurement such as limited/restricted competitive bidding, request for quotations), such arrangements shall be consistent with the above requirements.

#### **D. Safeguards**

##### **(i) Environmental (including Safeguards)**



119. The Project will include construction, reconstruction and rehabilitation of internal roads, access roads, culverts, bridges, disaster shelters, community markets, individual and community WASH, FSM and introduction of alternative cooking fuels to reduce dependence on fuelwoods for cooking and loss of forests which will not only reduce the vulnerability of the DRP to natural disasters and fire hazards, but also provide basic facilities and help improve the degraded environment. The proposed project areas are highly sensitive because registered camps are in the degraded forests including the Teknaf Wildlife Sanctuary and other Reserved Forests. Given the current context and sheer volume of people, notwithstanding the small-scale nature of the project intervention, the project is classified as Category A considering potential significant environmental and social risks and residual impacts associated with the project areas such as disturbance of the forest lands, Human Elephant Conflict/Human Wildlife Conflict (HEC/HWC), GBV, voluntary shifting/land donation and relationship between DRP and host communities and introducing small scale infrastructural development in the historically reserved forest area. There are also high natural disaster related risks such as land slide, flooding, soil erosion, water and soil contamination etc. The project will trigger Environmental Assessment (OP/BP 4.01), Natural Habitat (OP/BP 4.04), Forest (OP/BP 4.36) and Physical Cultural Resources (OP /BP 4.11).

120. Water supply and sanitation activities under Component 1 of the Project will imply the use of groundwater from aquifers [potentially linked to the Naf River] that are international waterways as defined in paragraph 1 of the Policy. The Project will rehabilitate deep tubewells and mini-piped water supply systems for 214,250 beneficiaries in the targeted camps. The rehabilitation will not lead to any increase in groundwater use, and thus would also have no impact on the flows in the Naf River beyond that may be already taking place. For surface water, the Project will support the carrying out of water resource surveys. It will not undertake detailed designs and/or engineering activities for projects that may involve use or pollution of water in international waterways. The Naf River rises in Myanmar and flows into the Bay of Bengal, the lower part of the river marks the border between Bangladesh and Myanmar. There are no treaties/agreements between Bangladesh and Myanmar relating to the Naf River, and no formal bilateral arrangement requiring riparian notification. Considering the above, it is concluded that these activities meet the elements for an exception to riparian notification under the paragraph 7 (a) and (b) of the Policy. Therefore, OP7.50 is triggered and the approval for exception to riparian notification was obtained from Regional Vice President of the Bank on September 6, 2018.

121. The Project is processed as per the emergency procedures defined by IPF Policy paragraph 12 and the preparation of the safeguard instruments are deferred to the project implementation. Therefore, a Safeguard Action Plan (SAP) has been developed (Annex 2) which provides a detailed timetable with sequential steps for preparing the relevant safeguards instruments. Since exact location and design of each investment is unknown, to ensure the proper management of potential environmental and social impacts from the Project activities, an Environmental and Social Management Framework (ESMF) has been prepared, consulted with DRP, host communities, relevant stakeholders, and will be disclosed in country and on the World Bank's external website before the project effectiveness. The ESMF will recommend specific mitigation measures for potential environmental and social impacts from Project activities, based on the result of environmental and social screening against each activity. In addition, environmental and social assessment instruments will be prepared and implemented, if required, before the commencement of any physical activities. Screening procedures to be included in ESMF will ensure to exclude the project activities in the remaining forest areas and elephant migration routes, and when necessary, additional measures to avoid Human Elephant Conflict and to protect the forests will be proposed as the site-specific measures as the result of the screening.



122. The proposed project will also create the positive environmental impacts through implementation of a series of activities. The construction of latrines, fecal management systems and composting and biogas plants under subcomponent 1.A will contribute to improve inadequate sanitary and hygiene conditions in the camps and soil and water contamination due to untreated fecal discharge to the environment, and to produce agricultural fertilizer and a clean renewable energy source for community use. The subcomponent 1.B will benefit to reduce soil erosion and surface water contamination and improve hygiene condition in the camp through provision of basic infrastructure such as sealing the surface of roads, storm water drainage network, slope protective works. Options for alternative fuel through e-voucher scheme under Component 2.A will contribute to reduced firewood collection from remaining trees within camp site as well as the forest surrounding the camp sites. Tree planting conducted under Component 2.B will partially serve to restore degraded forest cover areas with shaded trees and hedges and to reduce vulnerability to landslides and soil erosion in the camp sites.

123. Cumulative impacts. Since the influx of DRP into Cox's Bazar district in August 2017, a wide range of activities to support DRP have been scaled up by the different organizations such as UN agencies, development partners, national and international NGOs, other donors or GoB. Given this, the cumulative environmental and social impact is becoming a growing concern in the DRP camps and surrounding areas. In this project, a Cumulative Environmental and Social Impacts Assessment (CESIA) will be conducted during project implementation, and the ToR for the assessment will be included in the ESMF.

124. Climate Change Consideration: The Project would uniquely enhance both climate mitigation and adaptation co-benefits through adoption of not only resilient design features but also climate-friendly technologies and services. The project's overall exposure to extreme precipitation and flooding, storm surge, as well as geophysical hazard such as landslide is considered high and could be worsen due to climate change. Hence, it is critical for the Project to ensure that beneficiaries in the DRP areas are well prepared for and protected from adverse impacts by climate change such as outbreaks of waterborne diseases, safe water supplies, structural damage on public infrastructure as well as evacuation shelters. With non-structural risk mitigation measures and capacity building, the Project considers a wide variety of resilient design features in each Component, which include, but not the least, resilient-proofed individual latrines as well as chamber community latrines against flooding, connecting roads (above flood levels), multipurpose disaster shelters/primary schools/community service centers, and storm water drainage network and slope stabilization works inside the camp areas.

125. Greenhouse Gas (GHG) Accounting: Project is likely to reduce Greenhouse Gas (GHG) emissions through adoption of climate-friendly technologies and services as described above. This will be provided by, for example, context specific water supply systems, improved access to sanitation, solar street lighting, effective fecal sludge management system with bio-gas plants, improved solid waste collection and management within/outside camps as well as energy efficient community services such as the use of improved cooking stove. At least around 48-52 thousand tons of CO<sub>2</sub> equivalent of avoided GHG emission can be derived from introducing better integrated fecal sludge and solid waste management with biogas plants, co-composting plants and proper waste collection and segregation. The intervention also foresees reduction of local pollution within the camps by better sanitary, fecal sludge, and solid waste management system in place.

## **(ii) Social Safeguards**

126. Some of the proposed infrastructure will be developed within the camps sites. While the main registered camp at Kutupalong is entirely on public land (various entities including Department of Forest), some of the



unregistered camps in Teknaf are on private lands (needs further assessments to ascertain the amount of private land, specific ownership types, number of DRP in the different camps). DRP are in some cases paying nominal rent for staying on these lands. Since acquisition cannot be an option for the project (given the emergency nature of the intervention, and necessity to manage the relationship between host and DRP), voluntary arrangements such as MoUs and/or renting/leasing (where appropriate, because the interventions may not all be discrete, but take the form of network laying, water supply pipes, etc.) will be considered. No land acquisition will be permitted in the camp areas, some temporary livelihood impacts may occur due to civil works, in the event of which mitigation measures as per OP 4.12 may be required.

127. In all the camps, it may be necessary to shift or re-align some structures (expected to be few in terms of scale, involving quick rebuilding in nearby spaces within the camps) to make way for the infrastructure and service provision envisioned by the project. All such activities will be done on a purely voluntary basis, and after the shifting and rebuilding activities are completed (the tents and bamboo structures with plastic sheeting for roofs are makeshift in nature and can be quickly rebuilt) by the responsible agencies. UN agencies are being considered for implementation of some activities under GoB issued contracts. They will adhere to all WB safeguards policies and safeguards documents. OP 4.12 will be triggered as a precaution, and especially for the private lands in case it is necessary to compensate local owners (for crop-losses, or losses accruing from dumping/moving construction materials etc.). The government may not allow cash compensation for DRP for any impacts incurred, hence all adverse, involuntary resettlement related impacts on DRP have to be avoided. There are indigenous people present in Cox's Bazar district but not in the project areas. Therefore, OP 4.10 will not be triggered. Some access roads and multi-purpose disaster shelters may be built outside the camps to improve accessibility and make provisions for shelter during emergency/disaster situations. The routes/sites for these are not determined; a Resettlement Policy Framework (RPF) has been prepared to mitigate for impacts on land, squatters, livelihood related impacts should they occur. The activities are expected to take place on government-owned lands and along existing alignments. The ESMF prepared under OP4.01 includes RPF and assesses the social and cultural norms of the DRP and propose culturally appropriate approaches and mitigation measures.

128. Given the sensitivities in the camps areas (social, cultural, religious, gender, disabilities, orphaned and vulnerable children, relationship with host community), a vulnerability assessment covering the latter mentioned topics (and any other identified issues) will be undertaken. It may be mentioned that gender and gender-based violence issues (rape, trafficking, physical and mental violence, etc.) are being addressed through mainstreaming activities as well as concrete deliverables through the project. Also, there are similar assessments being carried out under the two other Bank funded projects aimed at the DRP; these will be referenced and/or used where required. Addressing social inclusion, gender issues and preventing gender-based violence is being handled through a consultancy package (TORs have been developed) which will cover gender mainstreaming, and the design and implementation of all other inclusion and gender actions. The consultancy will build referral systems for GBV cases as and when required, but since the DRP are not subject to national laws, the project will rely on local systems and community-based approaches (as are being used by other UN agencies) to mitigate the issues.

129. A project specific GRM will be established as a part of Component 3 on the basis of the existing governing mechanisms in the camps as much as possible. The GRM will be implemented under the following operating principles: i) all cases received should be recorded; ii) resolutions must be communicated to the complainant; and iii) all cases will be monitored through its completion or countermeasure implementation. The Rohingya volunteer network will serve as the field-level interface for the DRP to file grievances both in-writing and verbally. A software application and a hotline will also be established to allow grievances to be channeled through electronic means.



The CiC office will periodically consolidate and register the grievance cases. A Camp-level Grievance Redress Committee (CL-GRC) will be set-up in each camp and will be responsible for reviewing each case and providing a resolution.<sup>29</sup> In accordance to the resolution, the grievance cases will be referred to the service provider or relevant agency for the implementation of corrective measures. Conversely, if the cases exceed the competence of the camp-level, these will be remitted to the RRRRC Grievance Redress Committee (RRRC-GRC), which will be set up at the district level, for its respective review and resolution.<sup>30</sup> A system will be developed to register and follow-up grievance cases. Parallely, a manual system will also be deployed to assure functionality in the initial stages of the project, as well as to serve as a fallback system in case of contingencies. As a part of the GRM design, a set of grievance categories will be produced to prioritize cases as well as facilitate their redressal.<sup>31</sup> The GRM will also be designed to collect and respond to environmental and social safeguard related grievances.

130. Labor and labor influx issues, including the prevention of any child labor via contractors will be addressed through the ESMF and review of contractors obligations under the procurement packages, which will also include OHS considerations and non-compliance remedies. The workfare program will be fully cognizant that no hazardous work is delegated to any children between 14 -18 and that their education is in no way harmed. No children under 14 will participate in the workfare program or any other type of labor.

131. Management of Project Specific Safeguard Aspects: LGED has an extensive experience in managing safeguard issues through implementation/assistance of the Bank funded projects which are similar type of activities at various extent in different locations of Bangladesh such as Multi-Purpose Disaster Shelter Project, Local Government Support Project, Municipal Governance and Services Project, etc. To ensure the proper management of safeguards aspects under the Project, LGED, DPHE, and MoDMR each will deploy fulltime environmental and social specialists. For on-site environmental and social safeguard compliance of the extensive infrastructural development, LGED will deploy two field level officers, one for environment and one for social. The officers will be responsible for liaising with the UN agencies and other entities which may be sub-contracted and ensuring that the Bank's policies are adhered to similar arrangements will have to be established at every layer of contracting). A firm with all requisite specialists and experts, will be deployed to ensure screening, assessments and the preparation of all relevant safeguards documentation, monitoring and progress reporting for the LGED Component and DPHE Component and MoDMR will hire a UN Specialized Agency with the requisite expertise. ToRs for the firm have been prepared. Each agency will also hire gender experts to ensure gender mainstreaming across all project activities. It may be mentioned that a standalone Gender, Inclusion and GBV prevention package has also been prepared under the package and will be delivered in coordination with the Bank funded Health project (Additional Financing) working with the DRP. One forestry specialist/NGO/UN organization will be employed by MoDMR who will ensure only endemic species are introduced and organic fertilizer is applied as part of the tree plantation. LGED (in partnership with DPHE) and MODMR will prepare monitoring reports and will share with the World Bank quarterly.

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<sup>29</sup> The Camp Level Grievance Redress Committee will be comprised of CiC (chair), the UN agency involved with protection for each camp, relevant NGO's as well as representatives of DRP volunteers.

<sup>30</sup> The RRRRC Grievance Redress Committee will be integrated by the RRRRC representative (Chair), representative of the Deputy Commissioner, representatives from UNHCR, IOM, WFP, UNICEFF and UNWOMAN.

<sup>31</sup> This will include several categories related to project grievances, GVB related grievances, safeguards related cases, etc.



## **Beneficiary Engagement<sup>32</sup>**

132. The project has a robust approach on engaging beneficiaries which is supported by strategic communication and outreach. The project is cognizant of the need to ensure that all approaches are inclusive. It will also ensure that all approaches and supported infrastructure schemes contribute to building cohesion between hosting and DRP communities and do not contribute to further escalating the conflict (mainly around the use of scarce resources locally). Approaches and tools under different components will draw on two main BE channels:

- Grievance Redress Mechanism supported by grievance management volunteer groups at the camp level (CL-GRC) and district level (RRC-GRC);
- Mobilization and self-organization of communities (Participatory Camp Management Committees) with representation of different camp community groups. The Committee will be instrumental in conducting consultations with the camp community on various issues related to the implementation, O&M of the infrastructure improvements, receiving camp residents feedback on the improvements, and (where necessary) liaising with the host/neighboring communities. Community based early-warning systems will also rely on the Committee. Camp residents' feedback will be periodically collected (using a simple group Score Card approach or similar) and analyzed and appropriate measures will be taken to close the feedback loop. The project also includes an indicator on beneficiary engagement: Level of camp residents satisfaction with the improved infrastructure and services (at least 70%).

## **Other Safeguards**

### **Grievance Redress Mechanisms**

133. In order to set up, monitor and streamline the Project's GRM, subcomponent 3.A will finance: (i) protocol design; (ii) setting-up the manual system (manual forms and registers, training and outreach); (iii) develop GRM management capacity; (iv) digital system development (software, computers, printers, telephones, mobile application, internet and electricity); (v) operation space (desks and chairs); and (vi) grievance hotline (service contract).

134. Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit [www.inspectionpanel.org](http://www.inspectionpanel.org).

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<sup>32</sup> As project is more likely to engage beneficiaries, this terminology has been used instead of Citizen Engagement in line with the corporate indicators.



## **E. Gender and Social Inclusion**

135. The gender and social inclusion dimensions of the crisis are multifaceted, evolving, and particularly challenging. Around 52<sup>33</sup> percent of the DRP are female, 51 percent of the total are under the age of 15, there are large numbers of orphans and female/children headed households in the camps. In addition, significant numbers still carry the scars of severe psychosocial trauma and serious injuries. Therefore, addressing gender and gender-based violence issues, as well as ensuring inclusion of women, children, youth, elderly and those who are differently abled, as recipients of project benefits in an equitable manner is important to reach satisfactory project outcomes.

136. Gender: The project will ensure gender mainstreaming across all the proposed activities (identify gaps, present analyses, incorporate measurable indicators against specific actions for gender outcomes). All proposed infrastructure, facilities and services (latrines and WASH facilities, roads, shelters, etc.) will be designed, implemented and delivered in a gender inclusive manner; with the cognizance that in the absence of this there is a risk that the proposed activities may have negative gender impacts. Emphasis will be put on women's safety and privacy.

137. The contractor's obligations under each procurement package will be reviewed for incorporation of mitigation measures against labor influx issues, with particular attention to gender, as it may be expected that workers from outside the DRP will be employed during construction works. Age verification will also be conducted to avoid the risk of child labor. In addition, the workfare program will provide an avenue for employing women; requisite training will have to be provided to instill skills for this purpose. Obligations of the contractor will also include environmental and social obligations (such as OHS) and the contracts will include non-compliance remedies.

138. Child protection is rapidly emerging as an urgent area of need. Women and child friendly spaces are being operated in the camps, but the numbers are not nearly enough to provide coverage, not in terms of numbers nor issues. The project will construct at least 16 such spaces and provide resources to make them fully operational. Awareness raising, campaigning, including door-to-door volunteerism will be utilized to build community cohesion and resilience to face the threats of trafficking, kidnapping and abuse that women and children are facing. A localized system of grievance redress and referral (building on existing ones that women have grown to trust) will be established with the help of women's lawyer's associations, DRP representatives and leaders, and volunteers from the NGO community as well to implement a system that can mete out some punitive action against harmful acts.

139. The wider social inclusion agenda will focus on the inclusion of youth, elderly and those with disabilities in suitable work generated through project activities – workfare where appropriate, group formation and special programs where necessary (stipends, safety nets). In the workfare program, as well as special messaging and campaigning will be done to divert DRP from potential anti-social activities (trafficking in persons, drugs; radicalization etc.). The project may hire an NGO (perhaps through a UN partner) which will receive a comprehensive TOR (prepared) encompassing the above-mentioned activities. The NGO will also be responsible for coordinating and bridging the gender and inclusion activities across this project and the Bank financed Health and Education additional financing projects, which will work with the same population and project sites.

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<sup>33</sup> Population Factsheet, UNHCR, Bangladesh, Cox's Bazar - as of 31 August 2018



## F. Strategic Communications

140. A robust and well-sequenced communication strategy will be crucial for better sequencing of the interventions, larger stakeholder support and smoother implementation. This will help mitigate potential resistance and misunderstanding between the DRP and the host community. The strategy will help the stakeholders better understand and adopt the project interventions as well as create support for those at all levels. A Communications Needs Assessment will be undertaken first for designing an effective strategy. The assessment will identify all stakeholders and allow a better understanding of the socio-political context, information gaps, attitudes, aspirations, real and perceived concerns and fears as well as barriers to change.

141. The communication activities will support the strengthening of a beneficiary communication and a feedback loop which consists of a DRP volunteer network at the camp level that will serve as a vehicle for all project beneficiary engagement activities. Communication activities will be implemented by a firm that will be contracted by MoDMR under subcomponent 3.A.

142. The strategy will have two-prong objectives: i) behavioral change communication and information sharing to ensure the affected communities are aware of and can benefit from the project interventions; and ii) to build consensus of proposed interventions at the local and national level. As the communication will be aimed at multiple stakeholders including different ministries at central and local level, development partners, policy makers, media, and DRP and host community; it will be important to ensure consistent messaging aimed at managing and mitigating any evolving risks, including domestic violence and trafficking. The project will deploy multiple communication channels to reach different stakeholder groups. To help build public understanding and support for the project and create an enabling environment for the projects implementation.

## V. KEY RISKS

143. The overall risk for the project is High.

144. **Political and governance (Substantial).** Political and governance risks are rated as substantial due to the possibility of events with potential adverse consequences relating to the DRP, government's policy formulation approach towards a sensitive program and possible protracted situation in repatriation arrangements.

145. **Technical Design of the Project (Substantial).** The technical design of the project is rated as substantial, considering that the interventions, not technically complex, will be implemented in an extremely fragile context.

146. Sustainability of Interventions under the Project: There is a risk emanating from the lack of clarity on how sustainable and development-focused the interventions under the Project should be, given the Government's preference to facilitate quick repatriation of DRP and avoid encouraging the prolonged stay of DRP in camps. However, there is also a growing realization among various quarters that the DRP will likely need to be hosted over a 2-3 year period at least, which will also strain infrastructure and services for host populations. Hence the Project has adopted a middle-ground approach that provides a mix of rapid-implementing interventions to serve



the immediate needs of the DRP, as well as schemes that are relatively more sustainable, resilient and development-oriented.

147. **Institutional Capacity (Substantial).** There is risk in implementation considering the institutional capacity of the implementing agencies. However, one of the key components of this project is strengthening institutional systems, it is expected that the risk of institutional capacity of the implementing agencies in relation to the complex implementation arrangements will be addressed as part of the of the project's overall objective, through the efforts in increased coordination and systems strengthening.

148. **Stakeholders risk (High).** Coordination with Humanitarian and Developmental Projects and Actors: There is also a risk of inadequate coordination within and across recovery and development-focused interventions and the likely continuation of humanitarian activities over a 1-2 year time horizon. Hence the Project proposes to support the coordination functions of the RRRC and the project implementing agencies to act as oversight and coordination agents across both recovery operations funded by various development partners as well as humanitarian actors. This will help inculcate an integrated approach for infrastructure development and service provision within and across multiple sectors, which also provides strategic and operational coordination across recovery and humanitarian interventions. Such coordination shall also be encouraged at individual sector levels to improve coordination of programs within sectors. The Project team has also worked closely with the Asian Development Bank to ensure a coordinated approach between the Bank and Asian Development Bank (ADB) projects to support the Rohingya response, that builds complementarities and avoids gaps and overlaps in infrastructure development and service provision, with the LEGD acting as a coordinating body across the respective projects.

149. **Fiduciary risk (High).** Fiduciary risk is high mainly driven by the number of agencies involved, beneficiary selection, and the interventions modality. The basis for Financial Management and Procurement risks are described in the respective sections. Mitigation measures include the use of direct payments when possible, reliance on digital and biometrically secured records already in use for transfers to DRP, use of e-GP and STEP, hiring of additional capacity, training, and close monitoring.

150. **Environment and Social (High).** The Environment and Social risk is rated high as the beneficiary population have experienced traumatic violence, with very limited access to basic services and livelihood opportunities. The area where they have settled is at risk of floods, landslides, high winds, and cyclones, and is in what was a forest prior to the August 2017 influx. It is also adjacent to protected forests and elephant migration routes. Poverty among host communities in this area is high and the intense pressure on common resources due to the influx of Rohingya is leading to social tensions. There is also a risk of radicalization and violence, as well as conflict with the host community.

151. Project activities in themselves constitute mitigation measures to some of the identified risks such as radicalization, disaster risk, environmental degradation, and conflict with host communities. Strong coordination mechanisms, consultations, and participatory approaches will also contribute to mitigate these risks. Residual risk will be managed through proactive and continuous supervision and close dialogue with the Government.

152. **Sector Policies and Strategies (High).** Under the IDA 18 Sub-Window eligibility process, the Bank in consultation with UNHCR has determined Bangladesh's adequacy to its protection framework based on practices with international refugee standards. However, there remain a set of protection-related risks such as



overcrowding of the hosting area, lack of legal refugee status, registration and documentation process, specific vulnerabilities (disabilities, needs for psychosocial support), access to services and livelihoods, secondary movement, sexual- and gender-based violence, and voluntariness of return, as important protection challenges. In addition, the GoB is planning to relocate 100,000 DRP to the island of Bhashan Char. UN agencies and other observers have raised the issue of voluntariness, adequacy of living conditions, and unrestricted movement from the island. The Bank will closely monitor the situation in consultation with UNHCR and other relevant agencies to ensure the protection framework remains adequate through project implementation.

153. **Other Risk: Gender Based Violence risk (High).** Construction activities are associated with risks of labor influx, giving rise to already worsening situation of gender discrimination, Sexual Exploitation and Abuse (SEA) and GBV. This risk would be mitigated through the implementation of the risk assessments carried out as outlined in the ESMF, as well as the dedicated GBV needs assessment as part of Component 3 and a number of GBV targeted activities being undertaken in Component 1.



**VI. RESULTS FRAMEWORK AND MONITORING**

**Results Framework**

**COUNTRY: Bangladesh**

**Emergency Multi-Sector Rohingya Crisis Response Project**

**Project Development Objectives(s)**

To strengthen the Government of Bangladesh systems to improve access to basic services and build disaster and social resilience of the displaced Rohingya population.

**Project Development Objective Indicators**

<b>Indicator Name</b>	<b>DLI</b>	<b>Baseline</b>	<b>End Target</b>
<b>Improved access to basic services</b>			
Number of people with access to improved public infrastructure as a result of the project (Number)		0.00	532,000.00
Of which 52% are women (Number)		0.00	276,640.00
<b>Improved disaster resilience</b>			
Number of people with access to climate resilient multi-purpose disaster shelters as a result of the project (Number)		0.00	55,500.00
Of which 52% are women (Number)		0.00	28,860.00
<b>Improved social resilience</b>			
Households participating in community workfare and services (Number)		0.00	100,000.00
Households supported through the participation of DRP women in community workfare and services (Number)		0.00	58,000.00



Indicator Name	DLI	Baseline	End Target
<b>Strengthened Government systems</b>			
Development of the DRP Camp Management System (Yes/No)		No	Yes

**Intermediate Results Indicators by Components**

Indicator Name	DLI	Baseline	End Target
<b>Strengthening Delivery of Basic Services, Resilient Infrastructure, Emergency Response, and GVB</b>			
Number of people with access to improved water sources as a result of the project (Number)		0.00	170,000.00
Of which 52% are women (Number)		0.00	88,400.00
Number of people with access to improved sanitation provided as a result of the project (Number)		0.00	56,700.00
Of which 52% are women (Number)		0.00	29,484.00
Climate resilient multi-purpose disaster shelters/primary schools constructed (Number)		0.00	23.00
Climate resilient multi-pupose disaster shelters/community service centers constructed (Number)		0.00	30.00
Climate resilient access and evacuation roads improved as a result of the project (Kilometers)		0.00	205.00
Roads and footpaths in camps improved as a result of the project (Kilometers)		0.00	25.00
Climate resilient access and evacuation bridges constructed as a result of the project (Number)		0.00	10.00
Lightning protection systems installed (Number)		0.00	375.00



Indicator Name	DLI	Baseline	End Target
Local markets improved (Number)		0.00	6.00
Solar street lights installed as a result of the project (Number)		0.00	1,500.00
Warehouses for firefighting and search & rescue equipment constructed (Number)		0.00	9.00
Firefighting and search & rescue equipment provided to FSCD (Yes/No)		No	Yes
Women and girls using GBV services as a result of the project (Number)		0.00	24,000.00
<b>Strengthening Community Resilience</b>			
Workdays generated through community services (person-days) (Number)		0.00	6,000,000.00
Workdays generated through community services (person days) to women (Number)		0.00	5,800,000.00
Workdays generated through community workfare (person-days) (Number)		0.00	3,600,000.00
<b>Strengthening Institutional Systems to Enhance Service Provision to the DRP</b>			
Beneficiaries satisfied with service delivery (Percentage)		0.00	70.00
DRP directly reached by communication activities as a result of the project (Number)		0.00	400,000.00
Women DRP directly reached by communication activities as a result of the project (Number)		0.00	208,000.00



**Monitoring & Evaluation Plan: PDO Indicators**

Indicator Name	Definition/Description	Frequency	Datasource	Methodology for Data Collection	Responsibility for Data Collection
Number of people with access to improved public infrastructure as a result of the project	Number of people with access to at least one basic service as a result of this project: street lights, lightning protection, connectivity, water and sanitation, or local markets.	Biannual	LGED and DPHE Administrative Reports	Report review and site visits	LGED and DPHE
Of which 52% are women	Number of women with access to at least one basic service as a result of this project: street lights, lightning protection, connectivity, water and sanitation, or local markets.	Biannual	LGED and DPHE Administrative Reports	Report review and site visit	LGED and DPHE
Number of people with access to climate resilient multi-purpose disaster shelters as a result of the project	Number of people with access to climate resilient multipurpose disaster shelters/primary schools or climate resilient multipurpose disaster shelters/community service centers, as measured by the design capacity.	Biannual	LGED Administrative Reports	Report review and site visits	LGED
Of which 52% are women	Number of women with access to climate resilient multipurpose disaster shelters/primary schools or climate resilient	Biannual	LGED Administrative Reports	Report review and site visits	LGED



	multipurpose disaster shelters/community service centers, as measured by the design capacity.				
Households participating in community workfare and services	Number of eligible households participating in workfare and services activities	Biannual	WFP SCOPE Platform	Minimum participation of 30 days of work per household will be counted	MoDMR
Households supported through the participation of DRP women in community workfare and services	Number of households supported through the participation of DRP women in community workfare and services	Biannual	WFP Scope Platform	Minimum participation of 30 days of work per household will be counted	MoDMR
Development of the DRP Camp Management System	Documentation and presentation of the camp governance improvement strategy which entails the strengthening of the camp level capacity and tools, as well as enhancing the DRP volunteer network as the main service interface (for GRM, behavior changing communication and outreach) with the Rohingya population.	Once, at completion	MoDMR reports	Report review and site visits	MoDMR (RRRC)



**Monitoring & Evaluation Plan: Intermediate Results Indicators**

Indicator Name	Definition/Description	Frequency	Datasource	Methodology for Data Collection	Responsibility for Data Collection
Number of people with access to improved water sources as a result of the project	Number of people with access to one of the following: mini piped water schemes, deep tube well, or mobile water treatment plant. Liters/person/day: In post-emergency refugee situations, the minimum allocation of water is 20 liters per person per day. This standard covers domestic and individual needs only. Coverage means dwellings no further than 200m from water points up to the maximum design standard (no more than 100 people per water point).	Biannual	DPHE Administrative Reports	Report review and site visits	DPHE
Of which 52% are women	Number of women with access to one of the following: mini piped water schemes, deep tube well, or mobile water treatment plant. Liters/person/day: In post-emergency refugee situations, the minimum allocation of water is 20 liters per person per day.	Biannual	DPHE Administrative Reports	Report review and site visits	DPHE



	This standard covers domestic and individual needs only. Coverage means dwellings no further than 200m from water points up to the maximum design standard (no more than 100 people per water point).				
Number of people with access to improved sanitation provided as a result of the project	Number of people with access to an improved sanitation solution provided by the project: community latrine or household toilet. Communal latrines compliant with UNHCR standards which require latrines to have cleanable slabs & superstructures, provide privacy, and allow use at any time by all users.	Biannual	DPHE Administrative Report	Report review and site visits	DPHE
Of which 52% are women	Number of women with access to an improved sanitation solution provided by the project: community latrine or household toilet. Communal latrines compliant with UNHCR standards which require latrines to have cleanable slabs & superstructures, provide privacy, and allow use at any time by all users.	Biannual	DPHE Administrative Reports	Report review and site visits	DPHE



Climate resilient multi-purpose disaster shelters/primary schools constructed	Number of climate resilient multi-purpose disaster shelters/primary schools constructed (cumulative). Average design capacity per shelter is 1,500 people.	Biannual	LGED Administrative Reports	Report review and site visits	LGED
Climate resilient multi-pupose disaster shelters/community service centers constructed	Number of climate resilient multi-purpose disaster shelters/community service centers improved. A service center is an existing space in the camp providing a public service in the camp, inter alia: relief administration and distribution, childcare, informal education, woman friendly spaces, and information sessions. Each center serves approximately 700 people.	Biannual	LGED Administrative Reports	Report review and site visits	LGED
Climate resilient access and evacuation roads improved as a result of the project	Kilometers of improved all-weather climate resilient sealed access and evacuation roads providing access to the camps or the ability to evacuate to a shelter or a medical center.	Biannual	LGED Administrative Reports	Report reviews and site visits	LGED
Roads and footpaths in camps improved as a result of the project	Kilometers of improved roads and footpaths within the camps.	Biannual	LGED Administrative Reports	Report review and site visits	LGED



Climate resilient access and evacuation bridges constructed as a result of the project	Number of climate resilient bridges providing access to the camps or the ability to evacuate to a shelter or a medical center constructed under the Project. The total length of the bridges under the project is estimated at 345 m.	Biannual	LGED Administrative Reports	Reports review and site visits.	LGED
Lightning protection systems installed	Number of early Steamer Emission Lightning Protection Systems installed in and around the camps to reduce the risk of lightning strikes resulting from extreme hydro-meteorological events. Coverage is estimated as 532,000 people: 0.03 square km (coverage radius 97m); Population density inside the camp: 48,000/ square kilometer	Biannual	LGED Administrative Reports	Report review and site visits	LGED
Local markets improved	Number of local markets (hat bazars) in and around camps improved including footpaths, lights, water and drainage, and other improvements. The markets are estimated to serve 193,000 people based on 50% of the total population	Biannual	LGED Administrative Report	Report review and site visits	LGED



	of 11 camps considering that DRP will use existing makeshift markets alongside the roads.				
Solar street lights installed as a result of the project	Number of solar street lights installed to help increase safety and improve energy efficiency. Total 1500 street lights	Biannual	LGED Administrative Reports	Report review and site visits	LGED
Warehouses for firefighting and search & rescue equipment constructed	Number of warehouses constructed in strategic locations for storage and efficient deployment of firefighting and search & rescue equipment	Biannual	LGED Administrative Reports	Report review and site visits	LGED
Firefighting and search & rescue equipment provided to FSCD	The following equipment procured and delivered to the FSCD: 6 fire and rescue vehicles, 15 portable firefighting pumps, 4 fire services command vehicles, 5 ambulances, 6 rescue boats, and 1 firefighting turn table	Biannual	LGED Administrative Reports	Report review and site visits	LGED
Women and girls using GBV services as a result of the project	Using services refers to women and girls who use GBV services including inter alia the following: use psychosocial support activities/sessions (individual, group), participate in GBV	Biannual	LGED Administrative Reports	Specialized agency reporting	LGD (LGED)



	information sharing sessions and trainings as part of a service provision activity (including door-to-door), and/or are referred to services (i.e. health). Average coverage per center is estimated at 1,500 women and girls.				
Workdays generated through community services (person-days)	Summation of the number of person days generated through community services for all participating beneficiaries	Biannual	WFP SCOPE Platform	Each working day will comprise 5 hours	MoDMR
Workdays generated through community services (person days) to women	Summation of the number of person days generated through community services for all women participating beneficiaries	Biannual	WFP Scope Platform	Each working day will comprise 5 hours	MoDMR
Workdays generated through community workfare (person-days)	Summation of the number of person days generated through community workfare for all participating beneficiaries	Biannual	WFP SCOPE Platform	Each working day will comprise 7 hours	MoDMR
Beneficiaries satisfied with service delivery	Share of people satisfied with service delivery, out of a sample of people (not cumulative, measured within a fiscal year).	Annual	Spot Checks	This survey will be applied to the same community to assess the improvement of service delivery over time. Specific questions to be determined (instrument will be	MoDMR



				consistent)	
DRP directly reached by communication activities as a result of the project	Number of DRP that are reached by service activities funded by the project. The service activities include the dissemination of face to face messages designed through the project including: points of access for services, gender based violence prevention, hygiene practices, and others.	Biannual	Administrative Reports	Administrative data	MoDMR
Women DRP directly reached by communication activities as a result of the project	Number of women DRP that are reached by service activities which include the dissemination of face-to-face messages, designed through the project including point of access to services, gender based violence prevention, hygiene practices and others	Biannual	Administrative Reports	Administrative Data	MoDMR



**The World Bank**

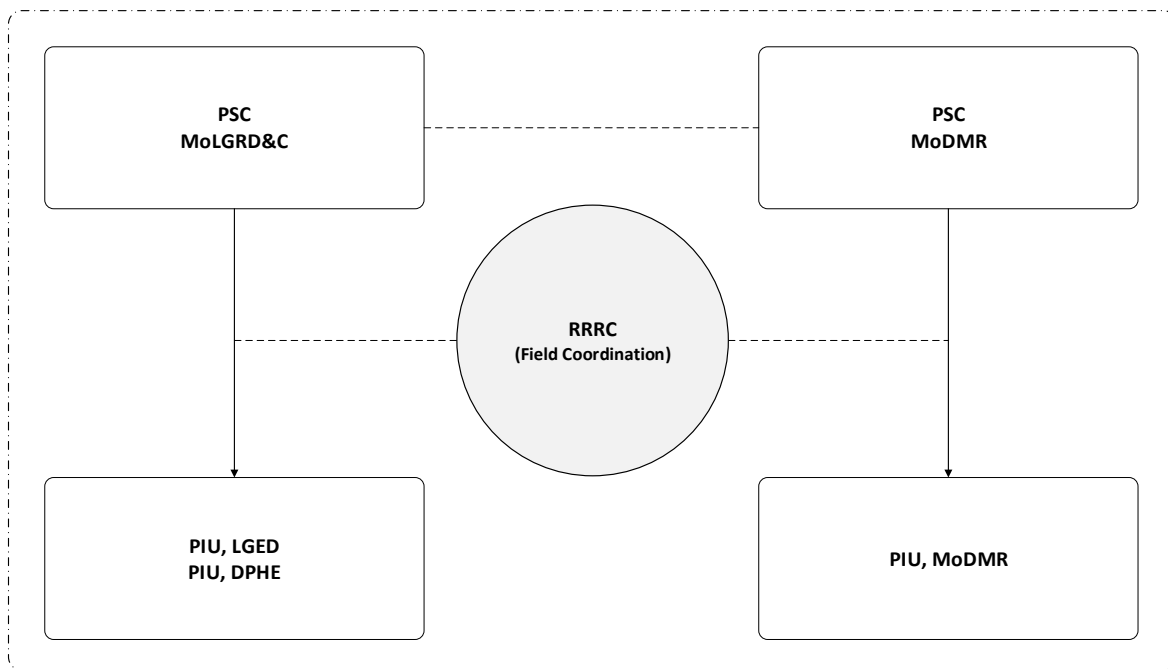
Emergency Multi-Sector Rohingya Crisis Response Project (P167762)

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**ANNEX 1: Implementation Arrangements and Support Plan**

1. The Government will have overall responsibility for project implementation and management through its Ministry of Local Government, Cooperatives and Rural Development (MoLGRD&C) and Ministry of Disaster Management and Relief (MoDMR).
2. The project will be implemented by LGED, DPHE, and MoDMR with three Project Implementation Units (PIUs). All activities will be coordinated by the Refugee, Relief and Repatriation Commissioner (RRRC) at the field level. The rationale for adopting the proposed implementation structure is to be in accordance with the mandate of government agencies, in-line with the rules of business for DRP assistance and coordination, and in order to enable most efficient decision making taking into account internal government fiduciary clearance procedures.
3. Following the Government’s Rules of Business, the PIUs will report to their respective Ministerial Project Steering Committee (PSC). There will be a PSC chaired by the Sr. Secretary/Secretary, LGD, MoLGRD&C and a PSC chaired by Sr. Secretary/Secretary MoDMR, representatives of each PIU will be present at both PSC meetings.



4. PSCs will include representatives from ministries, division, departments/agencies that are part of overall implementation, coordination, and strategy. PSCs will be responsible for: (i) providing implementation advice and operational guidance; (ii) reviewing financial and physical progress; (iii) resolving any implementation problems (iv) providing any other necessary direction for effective implementation. Each PSC will meet at least every six



months and at least once every year there will be a joint PSC meeting, chaired by both Sr. Secretary/Secretary LGD, MoLGRD&C and MoDMR.

5. Each project implementation agency will have a Project Implementation Committee (PIC), chaired by the head of agency (Chief Engineer LGED, Chief Engineer DPHE, and Additional Secretary, MoDMR), which will assist in the supervision of the respective components. The PIC is expected to include relevant representatives from ministries, division, departments/agencies. The PIC will ensure that implementation follows both Government and Bank rules and regulations. Specifically, the PIC will be responsible for: (i) supervising and reviewing implementation and providing necessary advice for timely delivery; (ii) monitoring and evaluating implementation progress and suggesting necessary course corrections; (iii) resolving issues and conflicts that may emerge during implementation; (iv) facilitation coordination and convergence with other line ministries, division, and departments/agencies; and (v) keeping the PSC apprised on overall performance and key issues relating to the project.

6. DPHE will be the implementing agency of Component 1.A and part of Component 3.B. DPHE PIU will have a dedicated Project Director and two DPDs. DPHE will hire a Procurement Specialist, Financial Management Specialist, Water Supply Specialist, Sanitation Specialist, Waste Management Specialist, Hydrologist, Environmental Specialist, Social Development and Gender Specialist, M&E Specialist, Training Consultant. A Monitoring & Supervision as well as feasibility study Firm, Social Impact Assessment Firm and an Environmental Impact Assessment Firm will also be hired.

7. LGED will be the implementing agency of Component 1. B and part of Component 3.B. Currently, as LGED is already implementing the IDA financed US\$375 million Multi-Purpose Disaster Shelter Project (MDSP), with an existing Project Director, PIU and interventions in the Cox's Bazar district, it was agreed the existing MDSP PD will be the PD of the proposed project's LGED related component and the existing MDSP PIU and MDSP Procurement Panel would provide necessary support to the project. This setup is not expected to have any implications for the continued successful implementation of MDSP.

8. This existing MDSP PIU would be strengthened to implement additional activities proposed under the proposed Project. MDSP and this proposed Project would maintain separate Deputy Project Directors (DPDs). LGED will hire a Senior Technical Specialist, Senior Procurement Specialist, Senior Financial Management Specialist, Senior Environment Specialist, Field level Environmental Specialist, Senior Social Development Specialist, Field level Social Development Specialist, Gender Specialist, Field level Gender Specialist, Communication Specialist, Disaster and Climate Change Specialist, Senior Monitoring and Evaluation (M&E) Specialist, M&E Specialist, and a GIS specialist. LGED will also hire a Design and Supervision (D&S) Firm, which will include an Environmental Safeguards Team and a Social Safeguards Team who will be responsible for carrying out the environmental and social assessments and prepare all necessary safeguards documents and will monitor the implementation of the safeguards requirements. LGED will hire the CESIA Firm. LGED will also hire a UN Specialized Agency to address Gender and Social Inclusiveness and Preventing Gender Based Violence.

9. MoDMR will be the implementing agency for Component 2 and 3.A. A dedicated PD, not below the rank of Joint Secretary, and two DPDs will be appointed to ensure smooth project implementation and supervision. A



PIU will be set up within the Refugee Cell and at the field level to assist the PD in project management and supervision. The PIU will include a Procurement Specialist and a Financial Management Specialist for fiduciary management; Program Specialists (one of whom will be the gender focal point); Information Management/ Database Specialist, and Training and M&E Specialist, and a field based environmental safeguards specialist and a social safeguards specialist. MoDMR will enter into a partnership agreement with a UN Specialized Agency, which will include the necessary expertise in Environmental and Social Safeguards, to carry out the safeguards compliance requirements. One forestry specialist will be employed within the UN Specialized Agency who will ensure only endemic species are introduced and organic fertilizer is applied as part of the tree plantation.

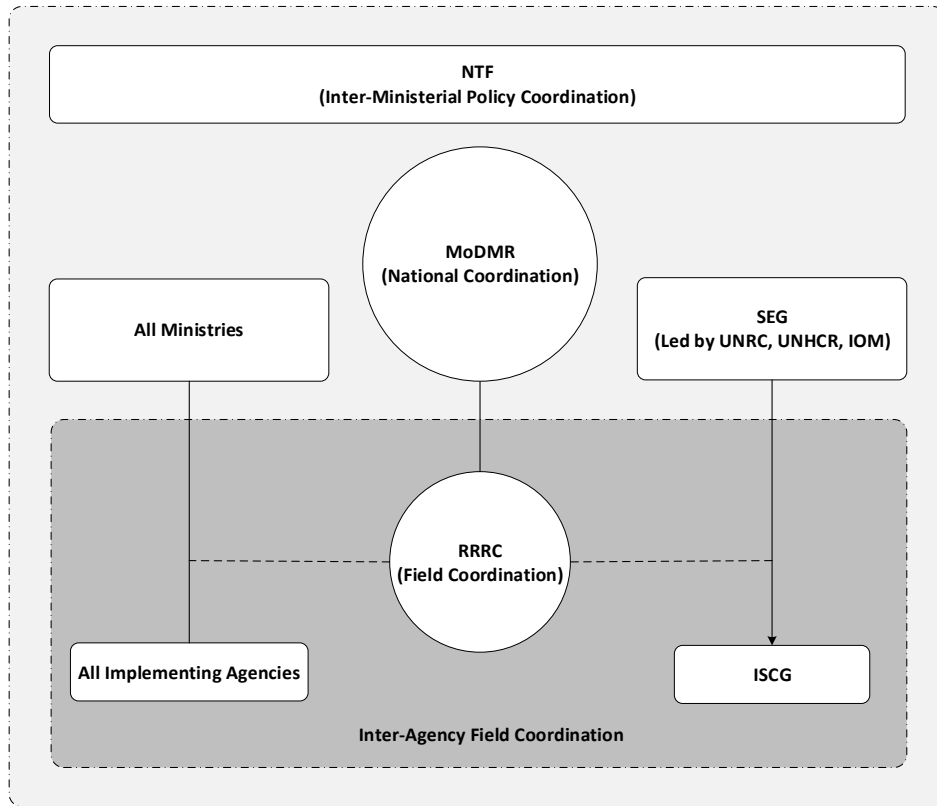
10. The Refugee Cell and its field level team represented by Camp-in-Charges/Refugee, Relief and Repatriation Commissioner (RRRC) will also be supported by qualified service provider(s), including specialized agencies, to coordinate and administer day-to-day activities under this component. This will of comprise beneficiary enrollment; compliance and sub-project monitoring; payments; and training and administrative systems development and management.

11. For Component 2, at the field level, the Office of the RRRC will be the focal point for implementation and coordination. CiCs will be the primary officials responsible for all program-related processes with the camps. CiCs will be supported by two Cyclone Preparedness Program (CPP) volunteers and a team of 10-12 staff, including sub-assistant engineer, computer operator, and technician, who are in the process of recruitment under existing Government operations.

12. To ensure the proper management of safeguards aspects under the Project, field level officers will be responsible for liaising with the UN agencies and other entities which may be sub-contracted, and ensuring that the Bank's policies are adhered to, similar arrangements will have to be established at every layer of contracting. LGED, DPHE, and MoDMR will support to conduct the CESIA. The LGED, DPHE, MoDMR PIUs may be strengthened with additional staff as required and as agreed with the Bank. LGED (incorporating the update from DPHE) and MODMR both will prepare separate monitoring reports and will share with World Bank quarterly.

13. **Coordination Arrangement:** The Project will use existing implementation arrangement of the GoB and all implementation on ground will be coordinated through the existing Government mechanism. The existing Development Partner/Multi-Lateral/Bi-Lateral/UN Agencies coordination mechanism in the field will be through the Inter Sector Coordination Group (ISCG) and coordinated in Dhaka by the Strategic Executive Group (SEG). There will be inter-agency field level coordination on project activities with the RRRC, the ISCG, and the implementing agencies.

14. Overall policy coordination at the national level will be by the National Task Force (NTF), which is an Cabinet approved inter-ministerial body with secretarial services provided by the Ministry of Foreign Affairs. National level coordination will be through MoDMR and field level coordination through the RRRC. This is in-line with the overall coordination and communication arrangements in the country regarding the Rohingya influx. Furthermore, the activities for all the investments will be complementing that of the GoB, Asian Development Bank, and other Agency interventions, to avoid any duplication or overlap.





## ANNEX 2: Safeguards Action Plan

### I. Background

1. The goal of the action plan is to provide guidance on how the project manages safeguards risks during project implementation. The content of the Safeguard Action Plan (SAP) is dictated by the dual objective of ensuring that there is a legally binding commitment of Government for safeguards compliance during project implementation and providing clear guidance on the types of actions and instruments required so as to facilitate speedy implementation of emergency services.

### II. Objectives

2. The objective of the SAP is to provide a time-bound plan to ensure that: (a) project activities-related Environmental and Social (E&S) assessment and management instruments and processes will comply with the national legislation of Government of Bangladesh as well as the World Bank's operational safeguards policies; and (b) these instruments and processes are duly and diligently implemented in a logical sequence with the environmentally and socially relevant project activities. This means that, as a general principle, E&S assessments and instruments should be completed, disclosed and consulted on before (a) project-funded activities with relevant E&S footprints may commence; and (b) in case of more complex or large-scale activities, before designs are finalized and contracts awarded. This Action Plan provides an overview of the general requirement and guidelines that need to be adhered to and actions to be completed for the proposed multi-sectoral project.

### III. Project Scope and Context

3. The scope of the Emergency Multi-Sector Rohingya Crisis Response Project (P167762) is described in detail in the corresponding Project Appraisal Document. The proposed Project will support interventions that aim to restore critical services in the Cox's Bazar district of Bangladesh across the following sectors: water supply and sanitation, urban services, environmental protection and disaster risk management which includes gender and social inclusion issues. (See Table 1 for a summary of Sector Highlights). The project aims to support the Government of Bangladesh to address immediate and medium-term service delivery needs of these sectors arising out of the influx of Displaced Rohingya Population (DRP) from Myanmar, improve socioeconomic and community resilience, and enhance disaster resilience in the project area.

4. Country Context: The proposed Project is being processed under the provision set forth in paragraph 12 of the World Bank Policy relative to Investment Project Financing, given the instability, social tensions and environmental vulnerability currently affecting the DRP in Bangladesh. Since August 25, 2017, extreme violence in Rakhine State, Myanmar, has driven an estimated 720,000 people from the Rohingya community across the border into Cox's Bazar district of Bangladesh. This exodus brings the total number of Displaced Rohingya Population (DRP) in the district to about 923,033<sup>34</sup> in what is one of the fastest developing forced displacement

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<sup>34</sup> IOM Needs and Population Monitoring round 12 as of October 10, 2018.



crises in the world. In Ukhia and Teknaf, the two upazilas where most of the DRP have settled, they outnumber the host community by almost a factor of three, with 85% of the DRP settled in collective sites, 13% in collective sites with host communities, and 2% in dispersed sites in host communities. They are sheltered in makeshift settlements and extremely congested shelters, in areas that have minimal access to basic infrastructure and services and are prone to natural disasters, especially cyclones and floods. Setting up of camps has led to rapid deforestation, further increasing vulnerability of the DRP to disasters and approaching monsoon. Relocation of households of most at-risk from landslides and flooding is underway but there is insufficient suitable land available to accommodate even the highest-risk category. The influx is straining existing infrastructure and degrading an already resource-constrained social service delivery system and the environment in Cox's Bazar district.

5. The project activities will be primarily concentrated in Ukhia and Teknaf Upazilas of Cox's Bazar district, which are the southernmost Upazilas of the country. Deforestation and forest degradation have taken place concurrently as forest resource extraction has become a secondary occupation for coastal households. The region, now a degraded forest land, includes three Ecologically Critical Areas - the western, coastal zone of Teknaf Peninsula, St Martin's Island, and Sonadia Island, and two Protected Areas - the Himchari National Park and the Teknaf Wildlife Sanctuary. Camps are surrounded by an important habitat of critically endangered Asian Elephant in Bangladesh and also fall within active elephant migration routes. The area of the camps has a history of occurrence of landslides, earthquakes, flash floods and tidal surges. Although the main area of the DRP camps is located outside of the flood zone, the camps are vulnerable to extreme weather events such as cyclones and floods. The steep slopes may become unstable in the monsoon seasons and cause landslides. This situation has aggravated due to clearance of the vegetation cover to accommodate DRP camp. In fact, with the advent of monsoon, several small-scale landslides have occurred in the camps and the general vicinity. Some settlements have been moved from the most precarious slopes to a new extension area (Camp 4 extension). In general, neither the structures in the DRP camps nor those in the makeshift settlements are able to withstand cyclones or floods. The main registered camp at Kutupalong is entirely on public land (under oversight or management of various entities including Bangladesh Forest Department), some of the unregistered camps in Teknaf are on private lands (needs further assessments to ascertain the amount of private land, specific ownership types, number of DRP in the different camps). DRP are in some cases paying nominal rent for staying on these lands.

#### **IV. Compliance with World Bank Safeguards Policies**

6. The project will support relatively small-scale rehabilitation works with the objective of ensuring better environment and social outcomes and similar type of activities that are already being implemented, the impacts are not expected to be unprecedented and/or irreversible. However, considering the sensitivity of the situation, global political attention and existing humanitarian vulnerability, the proposed Project is classified as category 'A' and the activities supported by the Project are expected to have certain site-specific adverse environmental and social impacts such as disturbance of the forest areas, Human Elephant Conflict/Human Wildlife Conflict (HEC/HWC), GBV, voluntary shifting/land donation and relationship between DRP and host communities and introducing small scale infrastructural development in the historically reserved forest area. The proposed activities during the first year of the project are not expected to entail involuntary taking of land resulting in (i) relocation or loss of shelter, (ii) loss of assets or access to assets; or (iii) loss of income sources or means of livelihood, whether the affected persons must move to another location or not. The project complies with the World Bank safeguards



policies, specifically Environmental Assessment OP/BP 4.01, Natural Habitats OP/BP 4.04, Forests OP/BP 4.36, Physical Cultural Resources OP/BP 4.11, and Involuntary Resettlement OP/BP 4.12, in addition to the national legal and regulatory framework on environmental and social issues. OP7.50 is also triggered there is a potential that water would be sourced from an international river and there is a potential feasibility study for water treatment plant. Approval for exception to riparian notification defined under paragraph 7 of OP 7.5 was obtained from Regional Vice President of the Bank on September 6, 2018.

7. Environmental Assessment OP/BP 4.01: The preparation of the safeguard instruments is deferred to the project implementation. The Project is processed as per the emergency procedures defined by IPF Bank Policy paragraph 12. Therefore, the preparation of the safeguard instruments is deferred to the project implementation.

8. Since the exact camp location and design of each investment is unknown, in order to ensure the proper management of potential environmental impacts from the Project activities, an Environmental and Social Management Framework (ESMF) will be prepared, consulted with DRP, host communities and relevant stakeholders, and disclosed in country and on the World Bank's external website before the project's effectiveness. The ESMF will guide specific mitigation measures for potential environmental and social impacts from Project activities, based on the result of environmental and social screening of each activity. In addition, environmental and social assessment instruments such as Environmental and Social Impact Assessments (ESIAs), site specific Environmental and Social Management Plans (ESMPs) and Resettlement Action Plans (RAPs) will be prepared and implemented, as necessary, before the commencement of any physical activities. It is important that screening exercise will ensure to exclude the remaining forest areas, elephant corridors and water intake from international rivers. In addition, ESMF will ensure due diligence and consistent treatment of environmental and social issues by the implementing agency (DPHE, LGED, MODMR) in proposed activities, the United Nations Specialized Agency working with MoDMR, and its local partners. The Implementing Agencies have Environmental, Health and Safety (EHS) procedures and practices that include: (a) a Project Health and Safety Plan (PHSP), which is a management framework to ensure safer construction practices and to prevent on site accidents; (b) standard contracts to which the PHSP is attached as an integral part; and (c) training programs for on-site staff on EHS aspects before the commencement of projects.

9. In relation to the wide range of activities carried out by the different organizations, cumulative environmental and social impact is a growing concern in the DRP camps and surrounding areas. Therefore, it is imperative that CESIA is carried out early during project implementation, and the ToR for the assessment is included in ESMF.

10. Natural Habitats OP/BP 4.04: The registered camps are located in the areas converted from forest lands including the Teknaf Wildlife Sanctuary and other Reserved Forest areas. These camps are situated on or near the original elephant migration routes and the incidents of human elephant conflict have been reported after influx of DRP in the last year. The camp areas have been already developed and currently there are only limited small forest patches and remaining trees within camp sites. However, this policy is triggered as the camp sites are surrounded by the remaining forest areas which elephants use as their habitat. Therefore, ESMF will include the screening procedure to ensure to exclude the remaining forest areas and elephant migration routes from the



location for each specific investment. When necessary, screening exercise would suggest to prepare further mitigation measures to protect natural habitat.

11. Forest OP/BP 4.36: Similar to OP/BP4.04, since the project area is located in the degraded forest areas close to the remaining forest area, this policy is triggered. The screening procedure included in ESMF will ensure each investment will not affect remaining forest and propose additional mitigation measures when necessary.

12. Physical Cultural Resources OP/BP 4.11: This policy is triggered because the investment activities to be financed under the project may be located in areas containing physical cultural resources. The ESMF for the proposed project contains specific measures relating to avoid and/or managing potential impacts on PCRs, compliant with the requirements of this policy. A chance find procedure is also included in ESMF.

13. Involuntary Resettlement OP/BP 4.12. The project activities will include small-scale infrastructural development like construction of interal/access roads, disaster shelters, WASH intervention, solid waste collection and management facilities, reduction of pressure on fuel wood, etc. The proposed infrastructure will be developed within the camp sites, but there will be requirements for access roads and some supporting infrastructure outside the camps (for lack of space within the camps and for access ability purposes). The main registered camp at Kutupalong is entirely on public land (various entities including Department of Forest), some of the unregistered camps in Teknaf are on private lands (needs further assessments to ascertain the amount of private land, specific ownership types, number of DRP in the different camps). DRP are in some cases paying nominal rent for staying on these lands. Since acquisition cannot be an option for the project (given the emergency nature of the intervention, and necessity to manage the relationship between host and DRP), voluntary arrangements such as MOUs and/or renting leasing (where appropriate, because the interventions may not all be discrete, but take the form of network laying, water supply pipes, etc.) will be considered. No land acquisition will be permitted under the project.

14. In all the camps, it may be necessary to shift or re-align some structures (expected to be few in terms of scale, involving quick rebuilding in nearby spaces within the camps) to make way for the infrastructure and service provision envisioned by the project. All such activities will be done on a purely voluntary basis, and after the shifting and rebuilding activities are completed (the tents and bamboo structures with plastic sheeting for roofs are makeshift in nature and can be quickly rebuilt) by the responsible agencies. It may be mentioned that some UN agencies (being considered for implementation of activities) have similar (in some cases stricter) policies on the above-mentioned issues as the Bank. A gap analysis will be undertaken. OP 4.12 will be triggered as a precaution, and especially for the private lands in case it is absolutely necessary to compensate local owners (for crop-losses, or losses accruing from dumping/moving construction materials etc.). The government will in all probability not allow any kind of cash compensation for DRP for any impacts incurred, hence all adverse, involuntary resettlement related impacts on DRP have to be avoided.

15. The situation within the camps is extremely congested and the DRP is very vulnerable. All aid workers are required to leave the premises by 5:00 pm. This exacerbates the risk of gender based violence – rape, trafficking, prostitution, forced/child marriages, forced labor, and raises other social issues such as child protection, inclusion of the elderly and differently abled persons. The project components include interventions specific to gender and



social inclusion (workfare program; gender, child, elderly and disability sensitive infrastructure development, training for skills and volunteering etc.). Associated risks are also analyzed and addressed through gender mainstreaming and tagging. National labor laws will be applicable, including guidelines for engaging women and adolescents in community workfare sub-projects.

16. The project will hire a firm (TORs have been developed) to implement standalone gender and inclusion interventions (operation of women and child friendly spaces, establishing a referral system for GBV and trauma victims, establishing grievance redress mechanism) and monitoring of all project activities to ensure the same (ensuring that all infrastructure developed under the project are inclusive and accessible to the target population, etc.).

17. The ESMF will include RPF and lay out the guidelines for all the above proposed activities, based on a detailed assessment and field level consultations. Given that there will be numerous and simultaneous civil works related activities involving labor from within the camps, but mostly from outside (immediate host communities, or from other parts of the country depending on required skill sets) the ESMF will contain an influx management plan, with particular focus on interactions and dynamics between the DRP in the camps and labor from outside, GBV issues, forced labor etc. In addition, other assessments will be carried out for gender and gender based violence, host community and DRP dynamics, social inclusion dimensions identifying vulnerabilities such as women and children, elderly and people with disabilities, among others. TORs for the latter mentioned studies will be prepared as annexures to the ESMF.

18. Projects on International Waterways OP/BP 7.50. This policy is triggered since groundwater extraction for water supply will be sourced from an interconnected aquifer and a feasibility study of centralized water treatment facility may potentially be conducted as a part of the project and water would be sourced from international rivers, OP7.50 is triggered and an approval for exception to riparian notification was obtained from Regional Vice President of the Bank on September 6, 2018.

19. The Task Team has not identified any meaningful alternatives to the current project design, as the project contents, geographic scope and activities are predefined by pre-existing infrastructure.

## **V. Sequencing and Tentative Implementation Schedule for Safeguards Processing**

20. The following time-bound steps describe the schedule for preparing, reviewing, clearing and implementing the environmental and social safeguards documents, which is anticipated to help manage and mitigate the potential limited impact that may result from the proposed interventions.

21. As a general principle, the implementing agencies will agree to apply the following minimum standards during implementation: (a) inclusion of standard Environmental Codes of Practice (ECOP), labor standards and influx management guidelines in the bid documents for rehabilitation, improvement, and reconstruction activities for all project activities; (b) review and oversight of any major construction/reconstruction works by specialists to ensure access, inclusion, gender sensitization in addition to ensuring social and environmental compliance in terms of documentation and implementation; (c) implementation of environmentally and socially sound options



for management and disposal of any hazardous waste (e.g. debris or drain spoils, oil-contaminated soils or rubble, etc.); (d) conducting the cumulative impact assessment; (e) conducting studies relevant to safeguard assessment; and (f) provisions for adequate and satisfactory budget and institutional arrangements for monitoring effective implementation.

22. The following time-bound deployment of the above described safeguards instruments is anticipated to manage and mitigate the potential adverse impacts of the Project:

a. During project preparation: A conceptual approach (which has been incorporated in the ISDS and subsequently approved), and the Terms of Reference (TORs) for an ESMF have been prepared by the implementing agency in order to swiftly initiate the preparation of these safeguards instruments before the project's effectiveness.

b. Before project effectiveness: The ESMF, containing the RPF, will be prepared. No land acquisition or any action resembling involuntary resettlement will be permissible. Any shifting, realignment required within the camps will be carried out in a completely consultative and voluntary manner. Where private lands are concerned, the permission for use has to be obtained from the owners via a formal/written MOU. The ESMF will describe all processes, procedures and documentation necessary for carrying out the above actions, if they are required. The ESMF will be prepared and disclosed, and will become the overarching safeguards document governing approach, processes and specific instruments for project activities. The ESMF will cover the following topics: (a) scope of project activities; (b) typologies of expected risks and impacts, such as GBV, labor issues, risks on security forces, conflict with host community, social vulnerability, impact on remaining trees, Human Elephant Conflict, impacts on PCRS, as well as magnitudes and durations; (c) types of E&S assessment/management instruments including the range of mitigation measures tailored to the identified risk/impact typologies; particularly for the first year works program; (d) methodology for activity-level E&S screening, classification and allocation of specific E&S instruments; (e) review of relevant institutions, key players, roles and responsibilities and administrative processes; (f) capacity analysis and training requirements; (g) update of cost estimates for E&S management measures; (h) Grievance Redress Mechanism; (i) Consultation; and (j) arrangements for monitoring and evaluation. The ESMF will also contain a positive and negative list of eligible and non-eligible project activities. No project activities that present environmental and/or social risks and impacts can be implemented prior to the preparation of E&S instruments (e.g. site-specific ESMPs) for that activity. The project will not involve any land acquisition as it supports the rehabilitation and reconstruction of damaged infrastructures and all activities are planned to take place on existing footprints. OP 4.12 is triggered in case building of access roads and multi-purpose disaster shelters outside the camps (strictly on public lands) result in any livelihood impacts, crop damage, impacts on squatters. There are no squatters/encroachers within the camps, the target population are described as Displaced Rohingya Population. Activities undertaken within the camps are expected to have positive impacts on livelihoods. Where there are camps on private lands, the project will work based on written MOUs, as described above. In case there are unexpected damages to private property, compensation for the loss will be provided by the contractor, at replacement cost.

c. Immediately after project effectiveness and during the implementation: This period will include continuous development of E&S management instruments and assessments for the expected interventions



mentioned in more detail in the PAD. For the expected scope of activities, comprehensive ESIA's will most likely not be required since the project will only finance the small scale infrastructure and services. The expected activities would mostly require simple, checklist-type ESMPs that would become part of the works contracts, define the E&S standards and compliance mechanisms, and serve as a contractual basis for supervision and enforcement of good E&S practice during the works. The GRM to be defined in the ESMF will be fully in place and effective.

d. Preparation time for safeguards instruments. The preparation of the ESMF is expected to be completed, reviewed, cleared, and disclosed in country and on the World Bank's external website before the Effectiveness Date. The preparation of ESIA's, ESMPs, and RAPs, if needed, will require between one and six months, including the World Bank review and approval, disclosure, consultations and finalization.

23. Implementation of safeguards instruments. After finalization of the site-specific ESIA's, ESMPs, and RAPs, if needed, will be implemented. No tender package will be issued without an attached ESMP and no contract signed without respective clauses obliging the contractor to the use and implementation of the site specific safeguards instruments.

23. Implementation Monitoring: The monitoring of safeguards compliance will be carried out during project implementation. LGED and MoDMR will deploy permanent environmental and social specialists at the central/local level, supported by a specialized expert/firm, to oversee the overall implementation, monitoring and reporting of safeguards aspects. In addition, each local partner will have a safeguards focal point to ensure on-site compliance with environmental and social mitigation measures and health and safety requirements for the various project activities. The environmental specialists hired by LGED will also support the environmental safeguard activities implemented by DPHE. DPHE will have an environmental focal person who will coordinate with LGED environmental specialists. LGED and MoDMR will prepare and share with the World Bank regular monitoring reports for component 1 and 2 respectively in compliance with the ESMF and subsequent environmental and social instruments.

## **VI. Consultation and Disclosure**

24. This SAP is subject to public disclosure as part of the Project Appraisal Document (PAD). The SAP will be shared with the relevant implementing agency, relevant stakeholders and concerned governmental and nongovernmental organizations in Bangladesh. In addition, the SAP will be disclosed both in-country (in the appropriate communication channels and on the LGED and MoDMR websites) as well as on the World Bank's external website during project preparation.

25. Consultations and Disclosure. The ESMF (including the translated summary of the ESMF) will be disclosed in-country and on the Bank's external website after the World Bank review as the final draft versions. Consultation is a continuous process which has already been initiated with the beneficiaries, host community and the local officials of the implementing agencies. Throughout the preparation and implementation of the project, the implementing agencies will conduct consultations with the affected and key stakeholders in the four main sectors (tertiary municipal services and solid waste management, water and sanitation, electricity for critical services,



urban roads). In addition, as sentiments of distrust and tension between the host population and the DRP are building up in the region, and concerns of subsequent radicalization are running high, the project integrates measures to avoid aggravating conflict as a consequence of the project interventions, while also addressing the drivers of conflict through community consultation and participation which have proven to help support social cohesion and foster inclusion of marginalized groups, including women, DRP and minority clans. The Project thereby will employ consultative approaches for determining beneficiaries, and in implementing other aspects of the project in collaboration with local stakeholders, district-level authorities and civil society organizations.

26. Key stakeholders include project beneficiaries, Government entities, development partners as well as community based organizations. For Component 1, the proposed activities are indicative and may be adjusted in consultation with these key stakeholders as the situation evolves. For Component 2, in each camp, a community workfare implementation committee will be formed, through community consultation, consisting of the Camp-in-Charge (CiC) who are the GoB's officials assigned for camp administration at the last mile, representatives of the specialized agency/NGO appointed by MoDMR and members of the camp with female representation. Labor Intensive Public Workfares (LIPWs) will be identified by this committee. The committee will also be responsible for implementing and monitoring the community workfare and maintaining it following completion. Separate women interviews will be held by a female consultant, if possible.

## **VII. Roles and Responsibilities**

27. LGED, DPHE and MoDMR are responsible for the implementation of the above described safeguards instruments and processes, including for compliance with national environmental regulations, as well as the World Bank E&S safeguard policies. LGED and MODMR will be staffed with qualified full-time environmental and social specialists who will be responsible for ensuring compliance with the environmental and social safeguards requirements. The PD will be the focal person for overall communication on safeguard at the central level, supported by specialized firm, to oversee the overall implementation, monitoring and reporting of safeguards aspects. In addition, each subsector/PIU will have safeguards specialist at the field for ensuring on-site compliance with environmental and social mitigation measures and health and safety requirements as well as monitoring and reporting at subproject level. LGED and MODMR have a track record of successful implementation of safeguards requirements and compliance with the World Bank safeguards policies; these management units have retained their capacity and functionality despite the current conflict.

28. The World Bank task team will review TORs as well as the ESMF and site-specific safeguards instruments to ensure that their scope and quality are satisfactory to the Bank. In addition, PIUs will review tender documents and construction contracts regarding due consideration of the safeguards instruments, and the inclusion of effective and enforceable contractual clauses. Finally, the task team will monitor the implementation of the different prepared instruments through regular supervision missions (which will include an environmental and/or social specialist).

## **VIII. Estimated Costs for Safeguards Preparation and Implementation Process**



29. The cost of preparing the required safeguards instruments is estimated to be about US\$10,000 for the ESMF. The rest of the cost is presented in Table 2. The total requirement of environmental and social safeguard implementation and safeguard enhancement is costed as US\$3.5 million.

**IX. Safeguard Screening and Mitigation**

30. The selection, design, contracting, monitoring and evaluation of the project activities will be consistent with the following guidelines, codes of practice and requirements. The safeguard screening and mitigation process includes the following:

- A breakdown of safeguard implementation cost in Attachment 1;
- A list of negative criteria rendering a proposed intervention ineligible for support, Attachment 2;
- A tentative checklist of likely environment and social impacts to be filled out for each intervention or group of interventions, Attachment 3.



Attachment 1. Environmental and Social Cost

No	Items	Roles/Purposes	USD (thousands)
<b>Component 1</b>			<b>2,600</b>
1	Environmental Specialist (field based, full time)	<ul style="list-style-type: none"> <li>Review/ field verification of Environmental Screening of each physical intervention</li> <li>Preliminary endorsement of environmental impacts and mitigation</li> <li>Environmental Monitoring and drafting reports</li> <li>Training provision and support</li> <li>Drafting Consultation planning in consultation with the environmental safeguard support under design and supervision firm</li> <li>Coordinate with the field based environmental specialists of the other components of the project</li> </ul>	60
2	Social Specialist (field based, full time)	Field level Sub-projects' screening, monitoring and reporting, organize field level training	60
3	Gender Specialist (field based)	Field level Sub-projects' screening, monitoring and reporting, organize field level training	60
4	Senior Environmental Specialist (field based, full time)	<ul style="list-style-type: none"> <li>Overall coordination and supervision on environmental safeguard</li> <li>Review and endorsement of Environmental Screening</li> <li>Support and supervision of EMP implementation</li> <li>Monitoring and Reporting</li> <li>Management of contractual obligation on environmental safeguard</li> <li>Training provision</li> <li>Finalizing the ToR of CIA</li> <li>Provide guidance to environmental safeguard support to the firm</li> <li>Technical advice to PD on environmental safeguard</li> </ul>	90
5	Senior Social Specialist (field based, full time)	Oversee and coordinate on social safeguards, consolidate information and reporting to WB, manage contractual obligation on social safeguard	90
6	Environmental safeguard support firm	<ul style="list-style-type: none"> <li>Preparation of Environmental Screening and monitoring reports</li> <li>Identification of impacts of the project activities</li> <li>Preparation and implementation of site and activity specific EMPs</li> <li>Information consolidation and reporting to PIU</li> </ul>	600



No	Items	Roles/Purposes	USD (thousands)
		<ul style="list-style-type: none"> <li>Assist PIU Environmental specialists regarding management of contractual obligation on environmental safeguard</li> <li>Training provision</li> <li>Assist in data collection of Cumulative Impacts due to the entire activities in/around DRP camps</li> <li>Working with field based environmental specialist of PIU</li> <li>Arrange and conduct public consultations</li> <li>Will provide support in wild life and forestry management</li> <li></li> </ul>	
7	Social safeguard support firm	Review of Social Screening and monitoring reports, SMPs preparation, social safeguard training	600
8	Cumulative Environmental and Social Impact Assessment	Assess the cumulative impacts due to the entire activities in/around camps	500
9	Implementation of the EMP	Air, water, noise quality measurement, purchase of PPE, labor camp establishment	30
10.	Tree plantation	Street side, around the shelter, outside the camp	10
11.	Fire hazard equipment	Part of the project component but the task should be reflected as part of environmental enhancement	-
12.	Cash compensation for non-acquisition costs in case of crop damage, damage to personal property or livelihood losses		500
<b>Component 2</b>			<b>900</b>
1	Environmental Specialist (field based)	<ul style="list-style-type: none"> <li>Review the Environmental and Social Management Framework (ESMF) and supervise implementation of the environmental management part parts in coordination with the Social Safeguards Specialist;</li> <li>Provide basic orientation and training to the PIU and field staff involved in project implementation, on the ESMF;</li> <li>Ensure the quality of environmental screening which can be completed by UN environmental focal person, firms hired by LGED;</li> <li>Ensure adherence of project implementation with the World Bank's environmental safeguards policies;</li> <li>Supervise the preparation of site specific Environmental Management Plan (EMP) and ensure the quality of implementation of the EMP;</li> </ul>	150



No	Items	Roles/Purposes	USD (thousands)
		<ul style="list-style-type: none"> <li>Coordinate with and supervise any firm/s and their subcontractors where applicable, assigned to support the Project’s compliance to environmental safeguards;</li> <li>Provide technical advice to the Project Director on ensuring environmental safeguards compliance and support troubleshooting;</li> <li>Maintain coordination with the activities implemented by LGD under the same Project;</li> <li>Consolidate information and prepare reports for the World Bank;</li> <li>Assist in policy dialogue with counterpart agencies;</li> </ul>	
2	Social Specialist (field based)	Filed level Sub-projects’ screening, monitoring and reporting	60
3	Gender Specialist (field based)	Filed level Sub-projects’ screening, monitoring and reporting; liaising with the firm hired to ensure gender and social inclusion across the project	30
4	Social safeguard support firm	Review of Social Screening and monitoring reports, SMPs preparation, social safeguard training	300
5	Implementation of the EMP	Air, water, noise quality measurement, purchase of PPE, solar fencing for elephant movement protection;	30
6	Implementation of SMPs	Ensuring shifting activities if required take place only after consultations, proper documentation and building of alternative shelter/infrastructure at a suitable location within the camp; ensuring compensation where required and as per SMP/RP. Carry out and document regular consultations; operate and report on the GRM etc.	30
7	Forestry Specialist	Inside the camp. Part of the project component but the task should be reflected as part of environmental enhancement Ensure indigenous species are being planted; Oversee the overall technical aspect of the forestation program; Prepare a forestry plan in the camp area; Coordinate with environment specialist of LGED	-
8	Alternative fuel supply	Inside the camp. Part of the project component but the task should be reflected as part of environmental enhancement	-



Attachment 2. List of Negative Attributes

Subcomponent and activities with any of the attributes listed below will be ineligible for support under the proposed project.

Attributes of Ineligible Activities
GENERAL CHARACTERISTICS
Land acquisition; any actions related to shifting structures or using private lands, that are involuntary in nature
Concerning significant conversion or degradation of critical natural habitats.
Damages cultural property, including but not limited to, any activities that affect the following sites: <ul style="list-style-type: none"> <li>• Archaeological and historical sites; and</li> <li>• Religious monuments, structures and cemeteries.</li> </ul>
Requiring pesticides that fall in WHO classes IA, IB, or II.
Solid Waste New disposal site
Irrigation Construction of new or the expansion of existing irrigation and drainage schemes.
Income Generating Activities Activities involving the use of fuelwood, including trees and bush. Activities involving the use of hazardous substances.



Attachment 3. Checklists of Possible Environmental and Social Impacts of Project Activities

Sub-Project Description Form

Name of Sub-Project:

Implementing Agency/Agencies:

Estimated total cost of sub-project (in Taka):

Estimated construction period duration:

Estimated Operation and Maintenance period (life of sub-project):

District:

Sub-district:

Union:

Name of Community/Local Area:

Description of proposed sub-project activities (incl. type of activities, footprint area, natural resources required, etc.):

Brief description of sub-project site: (e.g. present land-use and status of ownership/title, characteristic of people/community living there, livelihood activities, Important Environmental Features (IEFs) near site, etc.)

Overall Comments

Types of waste to be generated during construction and operation phase:

Sensitive environmental, cultural, archaeological, religious sites near (within 1km) of site:

Prepared by: (Name, designation, mobile number, signature, date)

Reviewed by: (Name, designation, mobile number, signature, date)

Instructions: Attach completed environmental and social screening forms with this form.  
Information Acquired from Environmental Screening Form



Project Intervention

- a. Description of sub-project/component interventions;
- b. Description of project intervention area and project influence area with schematic diagram;

Pre construction Phase

1. Information on Ancillary Facilities;
2. Requirement of accommodation or service amenities to support the workforce during construction;
3. Possible location of labor camps;
4. Requirement and type of raw materials;
5. Location of environmentally important and sensitive areas;
6. Location identification for raw material storage;
7. Identification of access road for transportation;
8. Possible composition of the raw material and wastes;
9. Presence of cultural properities;

Construction Phase

10. Type of waste generation from implementation phase;
11. Type of raw material used;
12. Air, water, noise and soil quality of the neighboring environment;
13. Water quality of the surface and ground water;
14. Destruction of vegetation and soil in the right-of-way, borrow pits, waste dumps, and equipment yards;
15. Creation of stagnant water bodies in borrow pits, quarries, etc., encouraging for mosquito breeding and other disease vectors;
16. Disturbance or modification of existing drainage channels (rivers, canals) or surface water bodies (wetlands, marshes);
17. Destruction or damage of terrestrial or aquatic ecosystems or endangered species directly or by induced development;
18. Activity lead to landslides, slumps, slips and other mass movements in road cuts;
19. Erosion of lands below the roadbed receiving concentrated outflow carried by covered or open drains;

Operation Phase

20. Activity lead to health hazards and interference of plant growth adjacent to roads by dust raised and blown by vehicles
21. Lead to long-term or semi-permanent destruction of soils;
22. Air, water, noise and soil quality of the neighboring environment;
23. SWM and FSM disposal system performance with odor and water, soil quality;
24. Status of wildlife movement;
25. State of cleared lands during construction;
26. State of stagnant water bodies in borrow pits, quarries, etc., encouraging for mosquito breeding and other disease vectors;
27. State of forestation;
28. State of economic development in the project areas by the project and other sources;



29. Disturbance or modification of existing drainage channels (rivers, canals) or surface water bodies (wetlands, marshes);
30. Destruction or damage of terrestrial or aquatic ecosystems or endangered species directly or by induced development;
31. Activity lead to landslides, slumps, slips and other mass movements in road cuts;
32. Erosion of lands below the roadbed receiving concentrated outflow carried by covered or open drains;
33. State of traffic movement in light of noise and air pollution.



### **Preliminary Social Screening Form**

#### Project Intervention

1. Description of sub-project/component interventions
2. Description of project intervention area and project influence area

#### Land Use Planning

3. Land ownership status of the above
4. Land use status of the above
5. Will the activity affect land use zoning and planning or conflict with prevalent land use patterns?
6. Will the activity involve significant land disturbance or site clearance?
7. Will the interventions affect any structures (residential, commercial, communal, public/private, or any other type), require shifting of the same? Will the activity involve land expropriation or demolition of existing structures? No land acquisition or involuntary resettlement is permitted for the project.
8. Will the activity require the setting up of ancillary/associated facilities?
9. If camps are on private land, have the owners been identified, consulted with, and have requisite permissions/MOUs been signed giving the project permission to operate on those lands?
10. Will there be any crop damage or damage to private property deeming compensation? Will a Resettlement Action Plan (RAP) or an abbreviated version of the same be required? (screening formats for these will be attached to the ESMF)

#### Livelihood Impacts

11. Will there be any resultant livelihood impacts? Are these within the camps or outside, or both?
12. Has a socio-economic baseline been carried out for the project area?
13. What are the gender dimensions of the livelihood activities to be affected?
14. Are there any adolescents/Children involved in livelihood activities to be affected?
15. Are there any livelihood activities where elderly, persons with disabilities are involved?

#### Labor Influx Management and labor standards

16. Will the activity require significant levels of accommodation or service amenities to support the workforce during construction (e.g., contractor will need more than 20 workers)?
17. Will the activity lead to induced settlements by workers and others causing social and economic disruption?
18. Will the activity lead to environmental and social disturbance by construction camps?
19. Does the project have/plans to have a Labor Influx Management Plan?
20. Are there adequate measures included to prevent child labor and forced labor?
21. Have adequate consultations taken place to diminish any outbreak of hostilities/tension between the host communities and DRP regarding jobs ensuing from project related construction works or other works?

#### Consultation and Communication

22. Has a stakeholder analysis been done?
23. Is there a consultation strategy available?



24. Have adequate levels of consultation taken place with the host and DRP and other stakeholders (please mention how many sessions and participants, if known)?
25. Have any other communication materials been used?
26. Are there secondary sources available from where lessons can be drawn?

Grievance Redress

27. Are there localized, existing grievance redress mechanisms already in place? Are there any assessments/evaluations as to the effectiveness of these?
28. Will the project require a new GRM (built from scratch)?



### ANNEX 3: Economic Analysis

1. An economic analysis was undertaken to assess the potential impacts of the proposed interventions targeted to the displaced DRP population in Cox's Bazar. The analysis grouped the interventions according to four main development objectives: (i) improving access to safe water and sanitation (WASH); (ii) improving connectivity; (iii) improving resilience to weather shocks; and (iv) improving incomes and livelihoods. The economic assessment focused on the investments comprising the largest share of the project's budget.

#### Improving access to safe water and sanitation (WASH)

2. Three broad categories of WASH services are being provided in the camps and host communities: (i) temporary water supply with tube wells and hand pumps; (ii) sanitation services by provision of emergency latrines; and (iii) hygiene promotion services generating awareness on safe handling of water, water storage, sanitation behaviors, and supply of handwashing kits. The recent Joint Response Plan (JRP, 2018) highlights investing in WASH as one of the priorities, particularly due to the enhanced risks during the monsoon season.

3. Thousands of poorly installed shallow tube wells have contaminated shallow aquifers with major impacts on health and nutrition. Of the existing 5,731 tube wells, some 21 percent are estimated in need of immediate rehabilitation or replacement.<sup>35</sup> In addition, many existing water sources are losing the capacity to supply the minimum water requirements, and soon may no longer be viable sources of water supply. In some areas, as much as 30 percent of the water points need immediate rehabilitation or replacement. Close to 40 percent of latrines are about to get filled. It is estimated that out of the 48,000 emergency pit latrines installed after the crisis, about 17 percent are full or not functioning.<sup>36</sup> WASH needs estimates indicate that about 50,000 latrines with more reliable substructures and at least 30 sludge management facilities need to be constructed.

4. The proposed project will support a series of interventions that aim to: (i) provide sufficient quantity and quality of safe water through mini-piped water systems and deep-set tube wells from ground water; (ii) improved access to sanitation; and (iii) improve solid waste collection and management within the camps and co-composting plants with fecal sludge management facilities for outside the camps.

5. In humanitarian crises, WASH is one of the main challenges. Poor WASH conditions increase the likelihood of contracting waterborne diseases such as diarrhea. Evidence from other DRP crisis suggests that diarrhea can account for the majority of deaths, particularly of young children (SHARE Research Consortium, 2012). Fecal-oral diseases may account for more than 40% of deaths in the acute phase of an emergency, with greater than 80% of deaths in children under 2 years of age (Connolly et al., 2004). Water related pathogens (cholera, *Shigella*) were responsible for 85% of the deaths occurring after the influx of 800,000 DRP from Rwanda into the Democratic Republic of Congo in 1994 (Connolly, 2004; Goma Epidemiology Group, 1995). Large-scale outbreaks of cholera (e.g. Haiti, 2010) and hepatitis E (e.g., South Sudan, 2011) also showed the importance of rapid and efficient deployment of WASH interventions in complex emergency settings (Centers for Disease C, Prevention, 2013;

<sup>35</sup> WASH Sector Strategy for Rohingya Influx March to December 2018

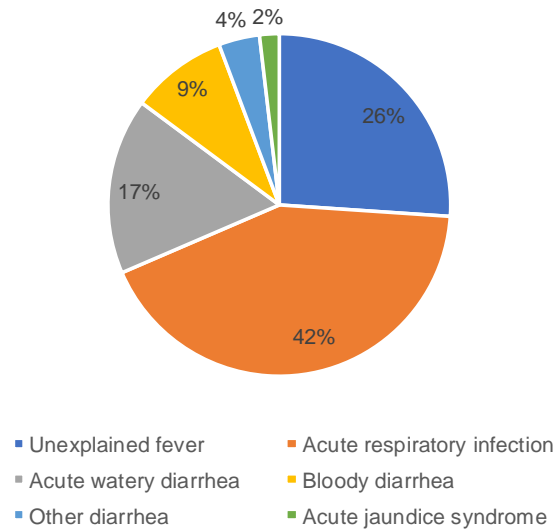
<sup>36</sup> WHO 10/12/2017- REACH data "WASH Fact Sheet" 8th Oct 2017; WASH Sector, 27 January 2018



Tappero, 2011).

6. In the case of Cox’s Bazar, diarrheal diseases are common in the DRP camps, and a total of 109,730 acute watery diarrhea cases were reported through Early Warning Alert and Response System (EWARS) between epidemiological week weeks 1 and 22 (ending 03 June 2018). The consequences of diarrhea are perhaps the most pronounced for children. Figure 1 shows that diarrhea reports comprise 29% of all disease reports for children under 5 in EWARS.

Figure 1. Main diseases reported in EWARS for children under 5 years old



Note: EWARS epidemiological weeks 1 to 22 ending in June 03, 2018 for Cox’s Bazar.

7. Aside from humanitarian and emergency contexts, there is a well established literature documenting the positive impacts of improved WASH on welfare. First, improvements in water and sanitation can positively impact health outcomes. Considered one of the primary drivers of child mortality in Bangladesh until recently (Chowdhury et al., 2013), diseases such as diarrhea, especially when it becomes chronic due to recurrence or prolonged exposure, reduce the children’s ability to absorb micronutrients, thereby increasing the likelihood of malnutrition (Crane et al., 2015, Smith et al. 2012). Malnutrition, especially during the first 1000 days cause growth faltering and has been strongly associated with poor human development outcomes in later life including diminished cognitive abilities, susceptibility to chronic illnesses such as acute respiratory infections and lower lifetime earning potential (Alderman, 2010; Crookson et al, 2010). Moreover, malnourished girls are more likely to have poorer pregnancy outcomes later in life, creating an intergenerational cycle of malnutrition (Black et al., 2008). In addition, morbidity bears both time and financial cost to the affected in terms of the time spent treating the illness and the financial implications of receiving care (Sachs et al. 2002).

8. Studies repeatedly show interventions in the WASH sector to be highly cost-effective (WHO, 2004; WHO, 2008). For instance, the World Health Organization (WHO, 2004) find that the returns to improving access to water



supply and sanitation are between \$5 to \$28 for every dollar invested. Focusing solely on preventing morbidity through the introduction of safe water and hygienic facilities reaching approximately 215,000 individuals, we calculate the net present value (NPV) to be USD 14 million with an internal rate of return (IRR) of 16%. The following assumptions, based on previous work done by the World Bank (2012), are made to inform the calculations:

- Cost of the project: USD 32 million
- Time span: 15 years
- Reach: 215,000 individuals
- Statistical value of a life: USD 9000
- Value of morbidity in the absence of WASH facilities: 1% of statistical value of life per year
- Discount rate: 12%
- Efficiency loss of installments: 30% per year

9. The assumptions used in the calculations are conservative and do not consider gains to be made from, for instance, improved cognitive abilities among children in the long term, preventing a loss of productivity and working days among economically active adults. The benefits of the component are therefore likely increase over the medium to long terms.

#### Improving connectivity

10. As per the Local Government Engineering Department database, about 50 percent of upazila Roads and 70 percent of the other roads in Teknaf and Ukhia require some sort of maintenance. Out of this, 25 percent of the road length need rehabilitation to make them suitable for traffic during the monsoon season. In addition, 1,585 meters of bridges and culverts also need to be maintained or rehabilitated to make them motorable throughout the year. Although the displaced Rohingya population settlements are connected by about 567 km of various roads as shown below, they are not reachable throughout the year.

11. The scale and congestion of sites, especially in the Kutupalong-Balukhali Expansion Site, seriously complicates connectivity and movement of goods and assistance. Limited secondary transport infrastructure has been established within the main DRP settlements and makeshift sites, but the network is insufficient to the needs and vulnerable to rains. Footpaths and tracks are relied upon for the movement of almost all materials/goods to large areas of the main settlement at Kutapalong, but the network is insufficient to the needs and vulnerable to rains. Similarly, the main road in Kutapalong is potentially vulnerable in the event of severe and/or prolonged rains.<sup>37</sup>

12. The proposed project plans to conduct key investments to improve connectivity (about 29 percent of the project budget):

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<sup>37</sup> WFP, Logistics Cluster, Jan 2018.



Table 1. Proposed investments by the project

Investments	Extension (unit)
Improvement of internal roads in camps	25 km
Construction of access and evacuation bridges	10 (number)
Construction of access and evacuation roads	205 km
Improvement of markets	6 haats
Construction of emergency shelters	23 (number)
Construction of multi-purpose service centers	30 (number)

13. Given the current situation, the investments proposed by the project will likely improve service delivery by humanitarian actors and allowing easier access from DRP across the year. About 28 percent of DRP are experiencing issues in access to assistance distribution sites and World Food Programme (WFP) shops.<sup>38</sup> The two main reasons are that the sites are too far (48%) or too crowded (35%). Congestion and distance are also impacting access to health and education services. For instance, in 30 percent of locations it was reported that distance was a challenge and has an impact on children’s ability to reach school.<sup>39</sup>

14. In addition, improved connectivity within camps will likely help reducing time to reach key services. For instance, about 17 percent of the DRP locations the population had to travel over 30 minutes to reach the nearest health facility on foot. In terms of access to education, in 18 percent of locations formal and non-formal education services were not reachable within 30 minutes on foot.<sup>40</sup> Similarly, the average walking time to food distribution points for recent is 30 minutes.<sup>41</sup> The time savings in accessing services can be potentially allocated to more productive activities.

15. Moreover, most of the Rohingya DRP have settled into locations that do not have easy access to the larger markets in the area. About 9 percent of DRP indicated that they had issues accessing markets, 17 percent of those with issues reported the markets being too far or congested as the main issue.<sup>42</sup> Accessibility due to improved external roads can also contribute to market access and reduce price dispersion across markets.

16. The investments may also facilitate the distribution and storage of products and help reducing upward pressure on prices of goods. This will likely benefit both hosts and DRP as they often use the same markets. The six markets primarily serving Rohingya DRP reported that road congestion and delays in deliveries were significant challenges for traders in their market. The new influx gave small and medium traders, particularly at markets located close to settlements such as Kutapalong and Balukhali, the chance to grow their businesses. However, as transportation costs have increased, their margin of profit is at risk of decreasing (WFP, 2017).

<sup>38</sup> WFP-World Bank monitoring survey round 1 (May 2018).

<sup>39</sup> IOM Needs and Population Monitoring round 9

<sup>40</sup> IOM Needs and Population Monitoring round 9

<sup>41</sup> WFP Rohingya Crisis Emergency Vulnerability Assessment (REVA, Nov 2017).

<sup>42</sup> WFP Rohingya Crisis Emergency Vulnerability Assessment (REVA, Nov 2017).



### Improving resilience to weather shocks

17. The region hosting displaced Rohingya population camp sites is particularly vulnerable to climatic hazards and environmental degradation. Displaced Rohingya families and individuals reside in extremely congested shelters in areas that are highly vulnerable to flooding, landslides and other weather-related hazards. Estimates suggest that between 30,000 (50% probability) to nearly 140,000 (1% probability) DRP could be affected by cyclones, flood and landslides.

18. Some of the proposed interventions in this project can help improve resilience to weather shocks, in particular the: (i) Construction of climate resilient multi-purpose disaster shelters/primary schools; (ii) Construction of multi-purpose disaster shelters/community service centers; (iii) Infrastructure protective works; (iv) Construction of storm water drain network to prevent flooding, landslides and accessibility; (v) Early warning and dissemination systems and community emergency preparedness; (vi) Reforestation with Rohingya camp degraded forest cover areas with shaded trees and hedges. The biggest investment is the construction of shelters and their access roads in Ukhia and Teknaf, and the improvement of additional shelters in the same area for an approximate cost of USD 16.02 million.

19. The economic and social impacts of the investments will depend on the occurrence and severity of the weather events but are likely to be positive. Particularly the construction of disaster shelter in combination with early warning systems can produce substantial benefits from saving human lives, as shown by previous evidence. Between the 1950's and early 2000's the number of disasters and related economic losses from weather events increased by nearly 10-fold at the global level; however, the reported lives lost fell from 2.7 million in the 1950's to 0.2 million in the 1990's. Similar patterns are found in Bangladesh where total fatalities from a super cyclone in 1971 were estimated at around 300,000, compared to 3,000 during Super Cyclone Sidr in 2007, despite similar wind speeds and storm surge patterns. Both early warning systems and the increasing accessibility of disaster shelters are largely credited with this decline.

20. Focusing on the construction of shelters, their main benefit is to save human lives at the time of cyclones. A cost-benefit analysis for the investment of 23 new shelters and 30 multi-purpose service centers under conservative assumptions produces an IRR of 14 percent and a NPV of USD 9 million. These calculations only focused on the main benefit of the shelters which is saving lives and injuries.

21. The NPV and IRR are calculated using the following parameters and assumptions. The assumptions are aligned with similar investments done in Bangladesh (World Bank, 2014).

- Cost of the project: USD 17 million
- Time span: 15 years
- Maximum shelter capacity: 1500 people
- Maximum multi-purpose service shelter capacity: 700 people
- Discount rate: 12%
- Shelter efficiency (capacity) loss: 15% per year
- Statistical value of a life: USD 9000
- Statistical value of injury: USD 4500



- Deaths and injuries during a weather/cyclone event in absence of shelters: 10% die and 35% injured
- Probability of cyclone/event: 5%

22. The cost-benefit analysis was done under conservative assumptions; thus, the expected benefits are likely to be larger. For the rest of the year, the shelters will be used as primary schools while community centers that will house varied activities such as immunization drives. The connecting roads will not only allow for quicker evacuation to the shelters during a weather event but will also provide access to the school and services during the rest of the year. In addition, the shelters will also be able to save livestock, though few DRP currently own livestock, this could become more relevant benefit in the medium and longer term.

Improving incomes and livelihoods

23. The community workfare and inclusive community services component will directly impact beneficiary households by providing a source of income. Given the available budget for the transfer (USD 37.5 million) split into the two components, 30 months of operation, and a targeted number of beneficiaries of 100,000 (40,000 men under community workfare and 60,000 women community services), the estimated average transfer size per household is BDT 1297 for those participating in the community workfare program, and BDT 865 for those households participating in the community services program.

24. Eligible beneficiaries will be DRP living in camps or settlements. Priority will be given to youth (ages 16 to 29) but if the number of applicants in this age-range is not enough, other ages would be eligible. One condition of the programs is that only one person in a household can participate. If this condition is enforced, a consequence of the program is that some households may decide to split to be able to participate.

25. Table 2 summarizes the costs of basic needs in the Cox’s Bazar area using three types of baskets: the minimum expenditure basket from ISCG, the cost of a basic-needs basket used to identify in the extreme poor by the Bangladesh Bureau of Statistics (BBS) updated by the price inflation seen in the area, and the cost of a more comprehensive basket used to identify in the upper poor by the BBS also updated by the food and non-food price inflation seen in the area.

Table 2. Cost of basic needs and size of transfer

	BDT per household per month	% covered by the workfare transfer	% covered by the community services transfer
Minimum expenditure basket from ISCG	7,290	18%	12%
HIES lower poverty basket	10,265	13%	8%
HIES upper poverty basket	12,335	11%	7%

**Note:** HIES lower and upper poverty basket costs updated by food-inflation observed after the influx

26. Thus, considering an average household size of 5 people, the workfare program transfer would cover



between 11% and 18% of the cost of basic needs. The community services program would cover between 7% and 12% of basic needs, depending on the basket used.

27. The estimated impact on poverty is presented in Table 3. Panel A presents the poverty rate with and without transfers for the DRP who would benefit from the programs. Panel B presents these figures for all DRP. Overall, the expected impacts of the program are large in terms of the increased share of DRP being able to afford the cost of basic-needs. For instance, using the MEB, the poverty rate would fall 10 percentage points for all DRP. The size of the expected impact stems from the fact that the coverage of the program is relatively large (100,000 beneficiaries). With the condition of one beneficiary per household this could benefit about 50 percent of DRP families.<sup>43</sup>

Table 3. Impact of transfers on poverty rates

	A. Only beneficiaries		B. All DRP	
	No transfer	With transfer	No transfer	With transfer
MEB poor	52%	39%	51%	41%
Lower poor	80%	70%	80%	72%
Upper poor	87%	84%	87%	84%

**Note:** This simulation assumes random allocation of the transfer to DRP households with a member 15-49 years old. It also assumes that the program will not verify if another household member is working and earning income from labor.

28. In addition to the direct monetary impact of the transfer the programs are expected to produce positive indirect impacts in some other respects. First, the programs will allow people to participate in income generating activities which may help reduce the pressure on labor markets and market daily wages, also benefiting the host community. Estimates suggest that daily wages for the host community have decreased in about 24 percent from before the influx to May 2018. The reduction in wages translated into an estimated increase in the upper poverty rate for the host community of 52 percent percentage. And an increase in the lower poverty rate of 56 percent for the host community.

29. Second, the participation in income generating activities can have positive impacts associated with the work and activities done by the workers. The activities under the workfare program will improve sites and their accessibility. The community services beneficiaries will provide child care services to DRP and create awareness of households on an array of topics including nutrition; disaster risk resilience; adoption of clean energy for cooking; safety; etc. This will particularly benefit vulnerable groups and women.

30. Third, this component will be complemented with distribution of Liquefied Petroleum Gas (LPG) stoves and the transfers could be used to purchase LPG. Most DRP and hosts cook using traditional mud stoves (more than 8 in 10 households). The main source of energy for cooking households is firewood, with more than 90 percent of hosts and DRP using it. Expanding the use of LPG stoves can have important positive economic,

<sup>43</sup> UNHCR refugee family count was 204,120 families as of May 31, 2018.



environmental, and health benefits.

31. First, the provision of cookstoves and fuel will likely have a direct positive economic impact on households due to monetary savings in the cost of buying firewood. The estimated annual savings for a household from switching from using firewood and a mud-stove to LPG would imply savings of about BDT 7,800. Moreover, a large share of the host and DRP population collect firewood (about 60%) in nearby forests which also takes time. The time savings could be used for productive tasks or accessing services.

32. In addition, the literature shows that the biomass combustion of traditional cookstoves are a primary cause of indoor air pollution in developing countries, with negative consequences on health.<sup>44</sup> The negative health consequences are particularly relevant for females and young children who are likely to be more exposed due to their household roles. Thus, households that can transition out of the traditional cookstoves are likely to experience health benefits associated with improved indoor air quality.

33. Finally, traditional cookstoves have well established negative environmental impacts. If the transition to non-traditional cookstoves is large enough, this can also translate into positive environmental impacts. Availability of LPG stoves and fuel will ensure that communities are not cutting the trees for fuel and can substantially slowdown forest degradation and support recovery of the forest.

34. One potentially negative externality of the transfer programs may be that the influx of cash will increase the demand for goods and services, leading to an increase in prices of goods in the short-term. Evidence on price inflation since the onset of the crisis, suggests the price impacts have been small, particularly for goods that are important for the consumption basket of the poor.

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<sup>44</sup> Ezzati M, et al. (2004); Smith KR (2000); 3. Ezzati M, Kammen DM (2001); Pohekar SD, Kumar D, Ramachandran M (2005)



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## ANNEX 4: Climate Risks and Vulnerability

### COUNTRY: Bangladesh

1. The team has conducted a screening for climate change and disaster risks. The project's overall exposure to extreme precipitation and flooding, storm surge, as well as geophysical hazard such as landslide is considered high in the project location. Given that climate change may further increase future risks posed by precipitation and flooding, storm surge and high wind, the project took into consideration resilient design features in the project interventions to improve access to basic services as well as increase resilience of the DRP. Overall, the team concluded that the project would equip with adaptive measures and enhance the capacity of GoB to plan and coordinate DRP response during disasters, as well as augment capacity to manage future disasters and climate vulnerability.

#### Impacts of Climate Change on Public Infrastructure as well as Multipurpose Disaster Shelters

- The DRP areas are at risk of extreme precipitation and flood, storm surge, high wind and landslide which can pose a risk to Water, Sanitation, and Hygiene (WASH) interventions supported by the Project. These frequent and recurring disasters can trigger outbreaks of waterborne diseases, destroy existing sanitation facilities, and compromise safe water supplies, compounding existing health issues.
- Cyclone-induced storm surges are likely to be exacerbated by a potential rise in sea level of over 27 cm by 2050<sup>45</sup> which will increase the vulnerability of coastal population across selected coastal districts of Bangladesh to storm- surges.
- 1970 Cyclone, 1991 Cyclone and 2007 Cyclone Sidr had wind speed of 224 km/hr, 225 km/hr and 223 km/hr respectively<sup>46</sup>. Climate change may increase the frequency, peak intensity of cyclones and wind speed which can significantly damage infrastructures such as primary schools and community service centers.
- Extreme precipitation and flooding wash away earthen roads and impairs accessibility of earthen tracks. These roads are prone to washouts during coastal flood resulting in a disproportionately high cost of rehabilitation to bring them back to service especially following high flood events. Flooding risk is expected to increase due to climate change.
- Equitable provision of internal roads inside the DRP camps is critical for social cohesion and resilience to climate change impacts like flooding.

<sup>45</sup> World Bank Climate Change Knowledge Portal (<http://sdwebx.worldbank.org/climateportal/>)

<sup>46</sup> Bangladesh Meteorological Department (BMD) 2007 and Government of Bangladesh (GoB) 2008