
**CLIMATE RESILIENT PARTICIPATORY
AFFORESTATION & REFORESTATION
PROJECT**

**SOCIAL MANAGEMENT
FRAMEWORK (SMF)**

MAY 2013

**BANGLADESH FOREST DEPARTMENT &
ARANNAYK FOUNDATION**

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ABBREVIATIONS & ACRONYMS

ACF	Assistant Conservator of Forests
ADB	Asian Development Bank
AF	Arannayk Foundation
AIGA	Alternative Income Generation Activities
BCCRF	Bangladesh Climate Change Resilience Fund
BCCSAP	Bangladesh Climate Change Strategy Action Plan
BFD	Bangladesh Forests Department
BO	Beat Officer
CBO	Community-Based Organization
CCF	Chief Conservator of Forests
CHT	Chittagong Hill Tracts
DFO	Divisional Forest Officer
FGD	Focus Group Discussion
GOB	Government of Bangladesh
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
TP	Tribal Peoples
IUFR	Interim un-Audited Financial Reports
MOEF	Ministry of Environment & Forests
NGO	Non-Government Organization
OP	Operational Policy
OP 4.10	Indigenous Peoples
OP 4.12	Involuntary Resettlement
PIC	Project Implementation Committee
PIU	Project Implementation Unit
PMC	Project Management Committee
PMU	Project Management Unit
RO	Range Officer
RP	Resettlement Plan
STG	Small Tribal Group (refers to Tribal peoples)
STGP	Small Tribal Group Plan
SMF	Social Management Framework
SFR	Social Forestry Rules
TSS	Targeting and Selection Strategy
UP	Union Parishad
UZP	Upazila Parishad

A. SOCIAL SAFEGUARD ISSUES AND IMPLICATIONS

Introduction

1. This Social Management Framework (SMF) is proposed to deal with any social safeguard issues that may arise during implementation of the Climate Resilient Participatory Afforestation and Reforestation Project. The project is being prepared to help selected local communities in the coastal areas of Bangladesh to improve their resilience to climate change impacts. The project development objective is to reduce forest degradation through participatory planning/monitoring and to contribute in building the long-term resilience of selected coastal and hilly communities to climate change. It will be achieved by (i) increasing the afforested and reforested areas; (ii) supporting alternative livelihoods of forest-dependent communities; and (iii) strengthening the institutional capacity of the forest department to manage forests in participatory and sustainable manner. The BFD, under the Ministry of Environment and Forests (MOEF), Government of Bangladesh (GOB) is preparing the project and will implement it with a grant from a multi-donor trust fund administered by the World Bank. Arannayk Foundation (AF)¹ will implement the component 2 in coordination with BFD. The SMF is proposed to support BFD to prepare and implement the project taking into account the relevant GOB policies and social safeguard compliance requirements of the World Bank and other development partners (DPs) contributing to the climate change trust fund.

Project Background

2. Bangladesh is known to be one of the most climate-vulnerable countries in the world, and the impacts of climate change are already a significant challenge to its development. The agricultural sector is increasingly threatened by overpopulation, natural disasters and climate change effects leading to erratic weather patterns, frequent drought, exhaustion of natural resources and saline intrusion into the fresh water sources along the coasts. Vulnerability to water-related impact is likely to be the most severe, with two third of the country below 5 meters above the mean sea level. Rise in sea level caused by potential rise in temperature may inundate a significant portion of the country's land mass. Frequent natural disasters like cyclones, storm surges and floods adversely impact the country's growth and development.

3. The southern part of the country, the target region of the proposed project, is nestled in the Bay of Bengal, extending on a 710 km long coastal belt which is home to nearly 35 million people. The low-lying coastal areas are exposed to the high risks from tidal floods and severe cyclones. On average once every three years, a severe cyclone hits the coastline, before or after

¹ AF (also known as the Bangladesh Tropical Forest Conservation Foundation) is a not-for-profit making company (limited by guarantee and not having a share capital). It was established in 2003 by the joint initiative of the Governments of the People's Republic of Bangladesh and the United States of America based on the provisions of the US Tropical Forest Act of 1998, which seeks to contribute to the conservation of biodiversity assets of tropical forests. AF's mandate is to promote conservation and restoration of tropical forests and forest biodiversity through promoting alternative income-generating activities (AIGAs). It has Board of Directors with representatives of civil society, and of Bangladesh and US Governments. Its Secretariat is comprised of eight people, including four technical experts. It has started grant giving activities in 2006 and by January 2012 it awarded more than 60 grants to organizations (i.e. NGOs, Universities, local government agencies) to implement field-based projects in or around forests and protected areas. The average grant size provided to partner NGOs is around US\$100,000, with some grants higher than US\$500,000.

the monsoon, creating storm surges that are sometimes higher than 10 meters.² As the Bay of Bengal narrows towards Bangladesh in the north, storm surges are higher along the Bangladesh coastline than in the neighboring countries.³ Although various measures taken in the past decades have made the country better prepared to respond to these disasters and make them less deadly than before, there is a strong consensus that the country must also plan to deal with the climate change impacts that are increasingly experienced all over the country.

4. With only 0.02 ha per capita, about 17.5% of the land in Bangladesh is classified as forest lands, while it is only about 10% in terms of tree cover. About 60% of this is owned and administered by the BFD. However, persistent population pressure and lack of alternative livelihood for the poor, coupled with its continuing lack of manpower and resources, it has been extremely difficult for BFD to administer and develop the country's forest resources. The poor and vulnerable living in and around the forests earn their livelihood by collecting and selling non-timber forest products like fuel-wood, bamboos and others that have a market value. Because of increasing scarcity of such natural resources due to overexploitation, people often destroy planted and naturally regenerated tree saplings and turn the forest lands into agricultural. Due to the increased demand for timber and fuel wood for brick kilns and the like, there are others who engage in illegal felling of trees. It is estimated that more than 73,000 ha of forest lands had been turned into agricultural uses by 1983, and as of 2010 nearly 0.3 million ha of the forests were already degraded.⁴

5. Since the early 1970s there had been a growing realization among the policymakers that without the participation of local communities, BFD alone could not manage the country's forest resources. With the experience gained from some experimental projects, the Forestry Act of 1927 was amended to formulate the Social Forestry Rules 2004 (which were modified up to 2011) to include provisions that would facilitate participation of local poor to benefit from afforestation/reforestation of public lands, protect against environmental degradation, and adapt to the climate change impacts. Between 1981 and 2006, BFD reported to have successfully implemented 5 projects in collaboration with the local communities. It is observed that while traditional forest management resulted in a net loss of forest cover, Social Forestry has been playing a vital role expanding the forested areas (e.g., 40,387 ha of new forest cover and 48,420 km of new strip plantation since the mid-1980s) benefiting thousands of poor people⁵.

6. In 2009 GOB prepared the *Bangladesh Climate Change Strategy and Action Plan (BCCSAP)* to address the climate change impacts, in extensive consultations with the stakeholders, including government, sector ministries, academia, civil society representatives, and various DPs. The BCCSAP has six main pillars: food security, social protection and health; comprehensive disaster management; infrastructure; research and knowledge management; mitigation and low carbon development; and capacity building. A multi-donor trust fund, -- *Bangladesh Climate Change Resilience Fund (BCCRF)* -- has already been established to help

² World Bank with support from Government of the Netherlands, DFID and SDC: *Economics of Adaptation to Climate Change, Bangladesh Case Study*, , 2010.

³ Government of the People's Republic of Bangladesh: *Bangladesh Climate Change Strategy and Action Plan 2009*,

⁴ Jashimuddin, M: "Community Forestry for Poverty Reduction in Bangladesh", Bangladesh Forest Research Institute, Chittagong, Bangladesh (no date)

⁵ Muhammed, Noor et al, "Reckoning Social Forestry in Bangladesh: Policy and Plan Versus Implementation", October 2005 (oxfordjournals.org/content/78/4/373.full)

implement the BCCSAP. The BCCRF is designed to have two funding windows: an on-budget window for funding public sector projects, and an off-budget window for funding projects proposed by NGOs and the private sector. As a public sector project, it will be funded through the on-budget window.

7. The BCCRF will be managed and implemented by the GOB through the MOEF. On behalf of the contributing DPs, and in consultation with the GOB, for a limited period the World Bank will ensure due diligence requirements on the BCCRF (including fiduciary management, transparency and accountability) and ensure that all afforestation/reforestation activities are selected and implemented in accordance with the relevant GOB policies and in compliance with the World Bank and other DPs' operational policies, including those on environmental and social safeguards.

Social Safeguard Issues And Implications

8. The project has four components: *Participatory Afforestation and Reforestation; Alternative Livelihood Support to Forest Communities; Capacity Building of BFD for Resource Planning and Management; and Project Management*. Of these four, the first and second components are likely to involve social issues that are to be addressed in project design and implementation. The activities under the afforestation/reforestation component will mainly focus on the degraded forest lands, marginal and fallow lands, and most importantly on the newly accreted lands in the coastal areas. The target geographic areas will be selected in the following 9 of the 19 coastal districts: Cox's Bazaar, Chittagong, Noakhali, Lakshmipur, Feni, Barisal, Barguna, Patuakhali and Bhola. In the coastal areas, afforestation and reforestation will cover 6,767 ha of lands and 1,672 km of roads. In the hilly areas, the project will cover 3,878 ha of core zone and 6,352 ha of buffer zone of the Reserved Forest Lands of Chittagong and Cox's Bazaar districts. Afforestation/reforestation in the targeted areas is expected to contribute to (a) better protection of lives and properties in the coastal areas against cyclones and storm surges, and (b) improved soil stability and water retention in the hilly areas.

9. The Alternative Livelihood component will be closely linked to afforestation/reforestation and target the communities/villages located in the buffer zones of hilly and coastal forests in the 9 districts where plantation activities will be carried out. Its main objective is to improve non-forest based livelihood opportunities for the communities and groups living in and around the forests and depend heavily on illegal and unsustainable harvesting of forest products.⁶ The project will facilitate mobilization of poor forest dependent households into groups, engage them in afforestation and reforestation activities, provide them with relevant training, as well as technical and financial support to improve their livelihoods. It is expected that this will lessen pressure on the forests and contribute to sustainable use, conservation and protection of forest resources in the project areas. The Alternative Livelihood component will be implemented by the Arannayak Foundation (AF) and its partner NGOs to be selected through a competitive process.

⁶ While influential and richer people are often responsible for deforestation, it is also widely documented that the poorest living in and around the forests often depend on forest-degrading livelihood activities like collection and selling of fuel woods and other forest products. Given the restriction on degradation under the project, it is thus possible that the forest-dependent poor in general might face a difficult situation where there are no livelihood alternatives.

10. Most of the livelihood activities to be financed by the project are expected to be of small and medium scale. The likely adverse impacts may include loss of, or reduced, access of peoples belonging to Small Tribal Groups (STGs – refer to Tribal peoples) and other poor and vulnerable to traditional forest-based livelihood. It is also possible that some livelihood development activities may have to use public lands and convert them into uses for agricultural, gardening, fisheries and similar activities. To avoid or minimize the potential adverse social impacts, the AF and its partner NGOs -- in addition to following the principles, guidelines and procedure adopted (below) for afforestation/reforestation -- will develop any necessary guidelines taking into account the ground reality of the livelihood activities.

11. The project will engender engagement with local communities throughout the project cycle. A community participation model will be based on the *Social Forestry Rules 2004* (as modified up to 2011)⁷, but it will be further developed to respond to the project's objectives and, design and implementation arrangements. It is estimated that the program as a whole will generate some 700,000 person-days of work for men and women. In addition, about 15,000 poor and vulnerable people, including women will be selected as core program beneficiaries through a transparent and inclusive process. In groups, they will be responsible for maintaining the plantations carried out in the individual sites and will share in the earnings generated by the afforestation/reforestation activities as per the guidelines adopted in the Social Forestry Rules.⁸

12. The site-specific afforestation/reforestation activities in the 9 districts will be selected in upazilas that are rated poorest by the *2009 Updated Poverty Maps of Bangladesh*.⁹ All plantation activities will be undertaken on available public lands, including the offshore islands that are still not included under any projects being, or will be, implemented by BFD and other DPs. BFD has decided that no private lands would be acquired for plantation, but still to adopt certain guidelines to obtain private lands where they are absolutely necessary to maximize and sustain the benefits of afforestation/reforestation works. On the other hand, it is unlikely that all public lands everywhere could be found free of encumbrances. Possibilities are there that some of these lands may have been under authorized and unauthorized use by local peoples for living and livelihood.¹⁰ It is also likely that some of the coastal districts, especially Cox's Bazaar, Patuakhali, Barguna and Barisal may have STGs living in settlements among the mainstream peoples. Social safeguards compliance requirements are as such likely to involve the issues addressed in the World Bank's Operational Policies on Involuntary Resettlement (OP 4.12) and Indigenous Peoples (OP 4.10). The former will be applied where activities in afforestation/

⁷ These rules have been incorporated into the *Forest Act 1927* for socioeconomic development and poverty reduction in rural Bangladesh and to protect against degradation of environment and biodiversity, and adapt to the climate change impacts.

⁸ The Social Forestry rules specify benefit sharing guidelines in terms of species of trees, distribution of earnings before and at harvest on maturity between the beneficiary groups, BFD and any other parties like NGOs involved in the afforestation/reforestation program.

⁹ The Bangladesh Bureau of Statistics and the World Bank, in collaboration with the World Food Program updated the *2005 Poverty Maps of Bangladesh* in 2009.

¹⁰ It was seen during field visits, plantation in one degraded hilly site (Chunati Range in Cox's Bazaar) has been carried out without displacing the two poor households that have been living in the site. Rather, they have been accepted among the beneficiaries. In another potential site (Kumira Range in Chittagong), there is a small number of households living in the narrow strips of valleys between the hills. BFD has decided not to displace them, but accept them as beneficiary of the plantation program.

reforestation sites are implemented by using private and public lands, and the latter in areas/localities inhabited by peoples of small Tribal/tribal groups.

13. Although the compliance requirements would remain unknown until specific plantation sites are identified and screened, BFD has nevertheless decided to prepare this SMF to address any social safeguard issues that may arise due to the activities implemented in the selected sites. The SMF will also apply to the income generating activities that AF and its partner NGOs will implement under the Alternative Livelihood component. Consistent with the Bank's OP 4.12 and OP 4.10, pertinent provisions of GOB's Social Forestry Rules 2004 (as modified up to 2011) and those of other DPs, the SMF proposes principles, policies, guidelines and procedure to identify and address impact issues concerning involuntary resettlement and peoples of small Tribal/tribal groups. The SMF will apply to the project as a whole and provide the bases to determine applicability of the safeguard policies, and prepare and implement impact mitigation measures as and when site-specific activities, including those undertaken by AF and its partner NGOs are found to cause adverse impacts on public land users and private landowners, as well as peoples of STGs.

14. Section A of this framework outlines the objectives of the SMF, project activities that may give rise to social safeguard issues and impacts, safeguard screening requirements, grievance redress mechanism, implementation arrangement, etc, which will be used for both OP 4.12 and OP 4.10. Sections B and C provide respectively the guidelines and procedure to identify and address any involuntary resettlement issues and impacts, as well as those for adverse impacts on STGs under the individual site-specific afforestation/reforestation activities.

SMF Objectives

15. The principles, guidelines, and procedures provided in this SMF are intended to ensure that the site-specific activities are screened, designed, and implemented to achieve the following objectives:

- Enhance positive social outcomes of the participatory afforestation/reforestation activities, and alternative income generating support activities financed under the project;
- Ensure participation of the target communities, including poor, women, vulnerable and marginalized groups, while identifying the location, beneficiaries, and site-specific activities;
- Ensure selection of core afforestation/reforestation beneficiaries in a transparent, socially inclusive and verifiable process;
- Avoid or minimize negative social impacts;
- Prevent or compensate for loss of livelihood, which may result from displacement of public land users and use of private lands, and severely restrict access to common property resources (like rivers and other water bodies, wetlands, grazing lands, forests, etc, which people use for free); and
- Ensure compliance with the relevant GOB policies and those of the World Bank and other DPs on social safeguards and social inclusion issues, including those with gender implications.

Basic Planning Principles

16. In consideration of the potential adverse impacts associated with displacement of authorized and unauthorized private activities from public lands (including MOEF's own), and use of private lands, BFD will select, design and implement all site-specific activities in accord with the following principles:

- Prior to selection of specific plantation sites (and other activities, if any), BFD will undertake community and stakeholder consultations, separately with men and women, about their objectives, work scopes, and social safeguard implications, especially with respect to displacement from public lands and use of private lands. Consultations will inter alia include,
 - All formal/informal local entities like Union Parishads (UPs), Upazila Parishads (UZPs), NGOs which may have been working in those areas, community-based organizations (CBOs), local persons who are concerned about the climate change impacts and others with stakes in the project and are deemed key actors to influence design and implementation of the afforestation/reforestation activities.
 - The persons, such as public land users, private landowners and others, who would be affected by the plantation activities.
 - The persons who would be affected in terms of loss of livelihood and/or loss of access to common property resources.
- Unless absolutely required, BFD will avoid private land use and keep the afforestation and reforestation activities limited to the public lands.
- Where applicable, BFD will avoid, to the extent feasible, undertaking activities that will threaten STGs' cultural way of life; severely restrict their access to common property resources and livelihood activities; and affect places/objects of cultural and religious significance (places of worship, ancestral burial grounds, etc.).
- BFD will actively facilitate inclusion of poor women and other socioeconomically disadvantaged persons/households as core beneficiaries of the plantation programs.
- BFD will undertake social screening of all site-specific activities to identify potential social safeguard issues, and adopt and implement impact mitigation measures consistent with the Bank's OP 4.12 and OP 4.10.

Safeguards Screening & Mitigation Guidelines

17. BFD and AF with partner NGOs will use the following guidelines to select the sites and implement the plantation, livelihood improvement and any other activities:

Plantation and Livelihood Improvement Activities with Negative Social Attributes. Given the restriction on acquisition, BFD and AF with its partner NGOs will ensure that no activities are undertaken to use public and private lands that will result in the impacts described below:

Involuntary Resettlement Impacts: Plantation, alternative livelihood and any other activities that may,

- Require involuntary contribution/donation by private landowners

- Affect private homesteads (land, houses/structures, etc)
- Require lands that are not available on ‘contribution against compensation’ or other means not acceptable to the landowners
- Render households using public lands homeless/destitute
- Affect mosques, temples, graveyards, cremation grounds, and other places/objects that are of religious and cultural significance
- Significantly restrict access to common property resources and livelihood activities of groups and communities

Impacts on Small Tribal Groups: Site-specific activities that will affect STGs with long-term negative consequences in the following manner:

- Threaten cultural tradition and way of life
- May severely restrict access to common property resources and livelihood activities
- May affect places/objects of cultural and religious significance (places of worship, ancestral burial grounds, etc.)

Guidelines for Using Public and Private Lands (Section B). Provide principles, policies and guidelines for use of public and private lands and adverse impact mitigation; impact assessment procedure; and implementation and monitoring.

Guidelines for Small Tribal Group Plan (Section C). Contain principles and guidelines to identify and deal with adverse impacts on STGs, and a consultation framework for adoption of mitigation and development measures, where site-specific activities affect them adversely.

18. BFD and AF with its partner NGOs will screen all proposed activities in each site to identify the potential safeguards issues and impacts that might be associated with the afforestation/reforestation and alternative livelihood activities, and determine applicability of the OP 4.12 and OP 4.10 and the required impact mitigation measures. Together with the community members, BFD and AF will complete the Social Safeguard Screening Form (*Attachment A1*) for activities in each site and submit it to the World Bank while asking for clearance.

Community/Stakeholder Consultation

19. Consultations¹¹ with the local communities and other stakeholders, such as CBOs, local governments, upazila level government agencies, NGOs already working in the coastal regions and those which have been selected as AF partners, members of the Co-Management Councils and Committees, and others knowledgeable of forestry and climate change issues, will be a key to identifying the plantation sites that would best serve the project objectives. Consultations will be held in open community meetings and in an environment where the participants, irrespective of their social status, would be able to express their experiences, observations and opinions

¹¹ Consultation is defined as a continuous two-way communication process consisting of: “feed-forward” the information on the program’s goals, objectives, scope and social impact implications to the program beneficiaries, and their “feed-back” on these issues (and more) to the policymakers and program designers. In addition to seeking feedback on program specific issues, participatory planning approach also serve the following objectives in all development programs: public relations, information dissemination and conflict resolution.

freely. In order to identify and integrate gender issues into project design and implementation, BFD and AF will also hold separate consultations/focus group discussions with women for a better understanding of their needs and how they could benefit from and contribute to afforestation/reforestation. AF and partner NGOs will disseminate information about alternative livelihoods and targeting and selection strategy prior to these consultation meetings. Partner NGOs will participate in these consultations as well and facilitate discussions on alternative livelihood issues.

20. Among other location-specific issues, consultations will focus on the following:

- Learn about how the communities have been affected by climate change impacts (loss of lives, assets, livelihood, outmigration from the area, etc.) caused by cyclones and storm surges in the selected coastal regions and landslides in the hilly areas, and perceive of the emerging trends which would affect their lives, especially with respect to economic and livelihood activities, and their views of benefits from afforestation/reforestation, as well as from livelihood improvement activities.
- Collectively identify and agree on the plantation sites that would maximize benefits for the local communities, including women and the disadvantaged.
- Discuss the social safeguard implications/impacts, if any, that might be associated with the use public and private lands in the plantation sites under consideration.
- Determine landownership in the chosen plantation sites and explore the ways and means as to how the lands could be made available for plantation (Guidelines are provided in Section B).
- Identify alternative livelihood options to reduce dependence on forest and wetland resources, with inputs from any livelihood options that may have been in operation in the areas.
- Explain provisions of the Social Forestry Rules about community participation in afforestation/reforestation, focusing on management structure at the local level, and the criteria that would be used for selection of core beneficiaries and the benefits.
- Make an assessment of how gainfully women can participate in the planned afforestation/reforestation activities.
- Explain linkages between afforestation/reforestation activities and alternative livelihood improvement component, and its objectives, principles and processes, as well as the targeting and selection principles and seek feedback from the participating communities.

21. BFD and partner NGOs will document, separately for men and women, as well as for STG communities the consultation details indicating community experience and perceptions about the climate change issues and impacts and their inputs/feedbacks; alternative livelihood options suggested by the community including women; land availability for proposed plantation and any agreement that may have been reached with the communities about it; and any other information that confirms community participation and ownership of the afforestation / reforestation activities.

Beneficiary Selection

22. The process leading to the selection of core beneficiaries for afforestation/reforestation and alternative livelihood activities will be transparent and socially inclusive. BFD and AF will ensure that the beneficiaries are selected in open community meetings, which are to be

conducted in environments and manners so that the participants – irrespective of their socioeconomic status – can freely express their opinions and preferences. Selection of beneficiaries will be completed prior to the start of the plantation works. As provided in the Social Forestry Rules (as modified up to 2011), BFD and AF will ensure that beneficiaries are selected with priority given to the groups living within one km of the plantation sites, or from those living in the nearest settlements beyond one km. The selected beneficiaries must have the ability to carry out the assigned responsibilities and obligations for the afforestation/reforestation activities. The priority groups are:

- Landless, including those who may only have homestead land (*vita*);
- Those who own less than 0.2 ha (50 decimals) of land, other than the homestead land;
- Destitute women (widows, deserted by husband and the like, who are living poverty);
- Socially backward/disadvantaged in terms of socioeconomic condition, etc;
- Poor households belonging to the Small Tribal Groups;
- Poor forest villagers, who have been living within the forests and deforested lands; and
- Insolvent freedom fighters, or their insolvent heirs.

23. The process and criteria for selection of beneficiaries for the Alternative Livelihoods component will follow the Targeting and Selection Strategy (TSS). Priority will be given to already formed grass root level co-management organizations. If there are no such groups in selected areas, the project would form only the lowest tier of co-management structure -- village level forest-dependant groups based on rules stipulated in Co-Management Government Order. Selection criteria will be similar to those stipulated in Social Forestry Rules (as amended up to 2011), and selection will be made with a scoring system, based on poverty and well being level; level of dependency on forest resources; commitment to participate in the planned activities; etc. Single woman-led poor households should have a priority in beneficiary selection. Partner NGOs will organize village meetings to affirm the lists of selected beneficiaries for the livelihood improvement program. All selected beneficiaries will be interviewed during the baseline surveys following the format specified in the TSS and the results will be used for monitoring and cross verification of eligibility of the selected participants.

24. BFD, AF and partner NGOs will keep the following documentations for review by MOEF, World Bank and other DPs, as well as researchers/organizations interested in social forestry and climate change issues:

- Detailed records of these meetings with venues; dates; number of local people in attendance; names of local government representatives, and NGOs/CBOs that participated in the meetings; opinions and feedback received from the participants; including any disputes regarding selection of particular beneficiaries;
- Socioeconomic background information, as embodied in the above selection criteria, for each selected beneficiary (a data form is provided in *Attachment A2*); and
- Prepare a summary (a format is provided in *Attachment A3*) of the information for each selected plantation site, indicating location, amount of land, total number of beneficiaries selected in different categories, etc, and submit it to the World Bank as a part of the procurement plan for each work package.

Institutional & Implementation Arrangements

25. BFD will be responsible for overall execution and implementation of the project, and ensure that the SMF is implemented in its entirety or to the extent applicable for all afforestation/reforestation activities. *Arannayk* Foundation (AF) will implement the Component 2 on Alternative Livelihood. Headed by a Project Director, a full-fledged Project Implementation Unit (PIU) will be formed within BFD equipped with qualified specialists to perform the tasks required to prepare and implement the site-specific activities, including social safeguard requirements. A Project Manager will be appointed to coordinate the day-to-day managerial activities and provide technical guidance and input for the different project components. BFD officials will work closely with the specialists and will receive appropriate on-the-job training to develop individual and institutional capacity to prepare and implement large scale forestry projects.

26. A *Project Implementation Committee* (PIC) with AF representation will also be formed at BFD to ensure overall coordination of project implementation issues and activities. The PIC, chaired by the Chief Conservator of Forests (CCF), will be responsible for: (a) reviewing the quarterly and annual progress of the project based on reports prepared by the PIU and AF; (b) guiding the PIU and AF on implementation; (c) reviewing and approving updated procurement plans and interim un-audited financial reports (IUFRRs); and (d) making independent field visits to the project areas to assess implementation issues and status on the ground.

27. Headed by the Divisional Forest Officers (DFOs), BFD's 10 Divisional Forest Offices, which are equipped with other supporting staff, will be responsible for implementing the site-specific afforestation/reforestation activities. Each DFO will be supported by a Community Mobilization Officer and an Accounts Officer as Junior Consultants who will work closely with the Range and Beat Officers.

28. The PIU will support AF in implementing Component 2 and be responsible for coordination of Alternative Livelihood activities with other project components. AF will develop the project concept for the component, will issue Request for Proposals (RFP) and will advertise it in the mass media. Using the World Bank procurement guidelines, AF will competitively recruit specialized partner NGOs to implement the component in the project areas. On a short term basis, AF will recruit a full-time Project Coordinator and an Alternative Income Generation Specialist (AIGS) to provide support and supervise implementation of the Alternative Livelihood component. AF will ensure quality supervision of all Component 2 activities. It will conduct periodic monitoring of project implementation status using the established indicators, and review progress against the work plans, budgets and other terms and conditions of the BCCRF grant agreement. The partner NGOs will submit quarterly and annual progress reports to the PIU and AF, and completion report to the AF Secretariat.

29. BFD has past experience in implementing World Bank- funded projects and successfully completed three forestry sector projects during 1980 -- 2001. BFD is currently implementing the APL for Strengthening Regional Cooperation for Wildlife Protection in Asia. However, most of the present mid-level staff, such as Divisional Forest Officers (DFOs) and others who would support project preparation and implementation at the local level, are not familiar with Bank-supported operations. Thus, there would be a need to train the present BFD staff on the Bank

procedures and requirements. On the other hand, with a network of partner organizations AF has long experience with promoting projects/programs on alternative livelihood for forest conservation. But it is likely that AF and its partner NGOs would also need an orientation to the Bank procedure and requirements.

Monitoring and Evaluation

30. Along with other project activities, BFD and AF will supervise and monitor SMF implementation. Under the guidance of DFOs, its offices at the local level will perform all process tasks specified in the SMF, especially those related to community consultations, site selection for plantation; obtaining lands (if required) from private ownerships; issues concerning small Tribal groups; and most importantly transparency and social inclusiveness used in core beneficiary selection. Once the sites and beneficiaries are selected, the local BFD office will provide the DFOs with monthly updates on all activities undertaken for implementation in all sites in their respective divisions. On their part, the DFOs will visit the plantation sites periodically and verify, among other issues, the socioeconomic background information of at least 10% of randomly selected core beneficiaries in each plantation site (*Attachment A2*). In addition, the Assistant Conservator of Forests (ACFs) will also periodically undertake visits of the afforestation/reforestation sites and verify the information compiled by the local offices.

31. Information on all afforestation/reforestation activities in a division will be collated at the division level and sent to the PIU at the BFD headquarters. BFD will in turn process them for the entire project and share with the MOEF, World Bank and other DPs on a quarterly basis. Jointly with BFD, the DPs will evaluate the progress during the formal Review Mission twice a year. BFD will set up computerized databases that will include division- and upazila-wise information on the community consultations, beneficiary selection, plantation activities, options used to obtain lands, as well as others performed to implement the SMF.

32. The social safeguards compliances and other social issues for all plantation sites, along with other activities, will be evaluated at completion. A mid-term review of the activities in each site will also be conducted to evaluate implementation and monitoring performance and undertake any necessary corrective measures. The project, as a whole, will be subject to independent impact assessment at mid-term and completion. BFD, the World Bank and other DPs will jointly formulate the terms of reference.

Grievance Redress Mechanism

33. Bangladesh Forest Department (BFD) will establish a grievance redress mechanism (GRM) for all subprojects undertaken in a range, to address complaints and grievances about any irregularities in application of the SMF guidelines for community consultation; impact assessment and mitigation; beneficiary selection; plot size and quality; eviction from public lands; and other personal/community concerns. Land-related complaints may include disputes over ownership, inheritance, current use of the required lands; affected non-land assets; voluntary contribution and “contribution against compensation” (ref: Section B) under threats; compensation determination and payment; etc. Based on discussion and consensus, the GRM will help to resolve the issues/conflicts amicably and quickly to ensure unhindered project preparation and implementation process.

34. BFD will constitute a Grievance Redress Committees (GRC) for all subprojects undertaken in a range. While hearings will be held at the range level, depending on the nature and significance of the complaints the GRC may also hold hearing meetings in the subproject localities. To ensure impartial hearings and transparent decisions, GRCs are proposed to have the following memberships:¹²

Range Officer	Convener
Union Parishad Member (or Ward Commissioner) from Complainant's Ward	Member
A representative of local NGO (not partner NGO of AF)	Member
Headmaster of the High School of the Complainant's Area/Union	Member
Headmaster of the Primary School of the Complainant's Area/Union	Member
A Professor of College in the Upazila Headquarters (Nominated by Principal)	Member
A Representative of AF's partner NGO	Member Secretary

If the aggrieved person/complainant is a woman, the GRC convener will ask a female Union Parishad/Pourasava Member to participate in the hearing. If the complainant belongs to the STG, a member of his/her community will be asked to be present at the hearing.

35. If resolution attempts at the range level fail, the concerned Range Officer (RO) will refer the complaints to the DFO -- or next higher authority along with the minutes of the hearings. If a decision made at this level is found unacceptable by the aggrieved person, DFO can refer the case to Project Director with the minutes of the hearings at both range and division levels. A decision agreed with the aggrieved person at any level of hearing will be binding on the project.

36. To ensure impartiality and transparency, hearings on complaints will remain open to the public. The GRCs will record details of the complaints and the reasons that led to acceptance or rejection of the particular cases. The RO will keep records of all resolved and unresolved complaints and grievances and make them available for review as and when asked for by BFD, World Bank and other development partners.

SMF Disclosure

37. BFD and AF have disclosed the SMF along with Bangla translation in their Website before project appraisal, and authorized the World Bank to disclose it at its Country Office Information Center and Infoshop. Hard copies of the document were made available at its headquarters, local level offices, and other places accessible to the general public.

¹² Social Forestry program has a conflict resolution arrangement in terms of parties involved in the conflict. It works as follows: (a) Management Committee for Social Forestry resolves the conflicts among the beneficiaries; (b) Concerned local Forestry Officer resolves the conflicts between the Management Committee and the beneficiaries; and (c) A designated Forestry officer resolves the conflicts between the concerned local Forestry Officer and the Management Committee, or between the concerned Forestry Officer and beneficiaries. If not satisfied with the decision made in the process, the complainants can appeal to the Upazila Chairman or the Upazila Nirbahi Officer (if the UZ Chairman is unavailable). A decision reached at this level is taken as final.

Attachment A1: Social Safeguard Screening Form

[BFD will complete this form for each plantation site and submit it to the World Bank while asking for review and clearance]

PLANTATION LOCATION

1. *Location of the afforestation/reforestation and target/beneficiary communities*

Union: Upazila: District:

Mouza: Dag Nos:

2. *The plantation activities is proposed for communities where residents are:*

- All mainstream peoples
- All peoples are of small Tribal groups
- Majority mainstream peoples
- Majority peoples are of small Tribal groups

3. *Names of development organizations (like NGOs/CBOs), if any, that may have been working in the general area of the proposed afforestation/reforestation:*

.....
.....
.....

4. *Brief description of ongoing plantation activities and alternative income generating programs, if any, sponsored under Social Forestry program, or by Arannyak Foundation, or any civil society organizations like NGOs:*

.....
.....
.....

AFFORESTATION/REFORESTATION ACTIVITIES

5. *Type of land to be planted:*

- Deforested Degraded Forest Accreted Char Khas Strip
- Other (describe):

6. *Total amount of land to be planted (in acre):*

7. *Brief description of physical features of the afforestation/reforestation site:*

.....
.....
.....

8. *Description of physical/construction activities, if any, that will be required by the plantation works:.....*

(Applicable where STGs are among the people living in or around the plantation sites)

19. Do the plantation activities (including any other related works) affect or restrict STGs' access to any resources that they use for livelihood?
 Yes No
20. Consultations with STG communities were conducted on the following dates:
21. Consultation minutes are available for review: Yes No
22. Names of BFD, AF and NGO officials participated in STG consultations:
.....
.....
23. Names of STG community members and organizations participated in consultations:
.....
.....
.....
24. Is there a traditional STG grievance redress mechanism (GRM) in the project locality?
 Yes No
25. If 'Yes', did any member of this GRM participated in social screening?
 Yes No
26. The STGs, who might be affected, have the following forms of rights to the required lands (more than one may apply):
 Legal (No. of STG households:)
 Customary (No. of STG households:)
 Lease agreements with the government (No. of STG households:)
 Others (describe):
(No. of STG households with other form of rights:)
26. The following are the three main economic activities of the would-be affected STG households:
a.
b.
c.
27. Social concerns expressed by STG communities and organizations
.....
.....
28. The STG community and organizations perceive the social outcomes of the afforestation/reforestation activities:
 Positive

Negative

Neither positive nor negative

29. *In respect of the social impacts and concerns, is there a need to undertake an additional impact assessment study?*

Yes

No

This form is filled in by (Name of BFD official):

Signature:

Date:

Attachment A2: Beneficiary Information Recording Form
[To be filled one form for each selected core beneficiary household]

PLANTATION LOCATION

Union: Upazila: District:
Mouza: Dag Nos.:

1. *Type of Plantation Land:*

Deforested Degraded Forest Accreted Char Khas Strip

2. *Land is divided into plots/strips:* Yes No

If 'Yes': Plot size: Strip length (km):

BENEFICIARY INFORMATION

1. *Name:*

2. *Father's/Husband's Name:*

3. *Beneficiary sex:* Male Female 4. *Age of beneficiary (years):*

5. *Address (village/para, etc) where the beneficiary lives:*
.....
.....

6. *Distance between plantation site and beneficiary's place of residence (km):*

7. *Total amount of land (decimals) legally owned by the beneficiary household:*

Homestead land or vita: Other lands (agricultural, fallow, ponds, etc):

8. *Number of household members:* 9. *Number of school going children:*

10. *Number of income earners in the household:*

11. *Income sources:* Primary: Secondary:

12. *The beneficiary is selected in the open community meeting:* Yes No

13. *The selected beneficiary household is categorized as a member of one of the following groups who are to be given priority as per Social Forestry Rules:*

- Landless, including those who may only have homestead land;
- Those who own less than 0.2 ha (50 decimals) of land, other than homestead land;
- Destitute women (widows, deserted by husband, and the like, who are living poverty;
- Socially backward/disadvantaged, in terms of Tribality, socioeconomic condition, etc;
- Poor Tribal households living in areas as described above;
- Poor forest villagers, who have been living within the forests and deforested lands; and
- Insolvent freedom fighters, or their insolvent heirs.

14. *The beneficiary is a member of the local level Management Committee:* Yes No

15. *The information recorded above was verified by the concerned BFD official:*

Yes No

16. *If 'Yes', name of the BFD official:*

~~~~~

*This form completed by (Name of BFD official):* .....

*Signature:* .....

*Date:* .....

**Attachment A3: Summary Information on Beneficiaries**

*[To be filled in for each afforestation/reforestation site, based on Attachment A2 and submitted to the World Bank while asking for review and clearance]*

**PLANTATION LOCATION**

Union: ..... Upazila: ..... District: .....  
 Mouza: ..... Dag Nos.: .....

3. *Type of Plantation Land:*

Deforested       Degraded Forest       Accreted Char       Khas       Strip  
 Other (describe): .....

4. *Total amount of land proposed for plantation (in acre):* .....

5. *Does the proposed site include any private land?*       Yes       No

6. *The site is divided into plots/strips:*       Yes       No

*If 'Yes':*      Average plot size: .....      Average strip length (km): .....

**BENEFICIARY INFORMATION**

7. *Total number of male and female beneficiaries selected under the plantation works:*

Male: .....      Female: .....

8. **Number of Beneficiary by Category:**

| Beneficiary Category                                                                        | Number |
|---------------------------------------------------------------------------------------------|--------|
| <i>Landless, including those who may only have homestead land</i>                           |        |
| <i>Those who own less than 0.2 ha (50 decimals) of land, other than homestead land</i>      |        |
| <i>Destitute women (widows, deserted by husband, and the like) who are living poverty</i>   |        |
| <i>Socially backward/disadvantaged, in terms of Tribality, socioeconomic condition, etc</i> |        |
| <i>Poor Tribal households living in areas as described above</i>                            |        |
| <i>Poor forest villagers, who have been living within the forests and deforested lands</i>  |        |
| <i>Insovent freedom fighters, or their insolvent successors</i>                             |        |
| <b><i>Total number of beneficiaries</i></b>                                                 |        |

Remarks, if any: .....  
 .....  
 .....  
 .....

***This form is prepared by (Name of BFD official):*** .....

***Signature:*** .....      ***Date:*** .....

## B. Guidelines for Using Public & Private Lands and Impact Mitigation Needs and Issues

### Land Needs & Impact Mitigation Issues

1. In most cases, the plantation activities are expected to be undertaken on degraded forest lands, and newly accreted and other available public lands that are not yet covered by other planned or ongoing projects. However, given the land scarcity and high population density, it is unlikely that the available public lands (degraded, accreted and others) would all be free of encumbrances. There might be people using these lands for living and livelihood, with or without authorization. Even though BFD has decided not to acquire private lands, there is still an anticipation that use of private lands cannot be completely ruled out. Some plantation works may have to use private lands for technical reasons or to maximize and sustain the plantation benefits. Pending identification of the specific plantation sites and depending on the actual situation on the ground, BFD will consider the following options to use public and private lands, where plantation is critical to saving lives and properties of the local communities.

#### 2. USING PUBLIC LANDS

- Under Authorized Use: If the required lands are under lease from the Land Ministry or any other GOB agencies, BFD may seek to use such lands by fulfilling the lease conditions.
- Under Unauthorized Use: Where the current users are well-off and an end to further use would be socioeconomically inconsequential, BFD/AF and communities may persuade them to relinquish occupancy of the lands for greater benefit of the community. However, where the lands are presently used for living and livelihood by the poor and vulnerable, BFD/AF can take them back only by mitigating the adverse impacts in accord with the OP 4.12 and OP 4.10 provisions, or in manners acceptable to the affected persons. The following condition will however apply:

*The current users will have the option to refuse to relinquish occupation of the lands without the fear of any adverse consequences.*

3. **USING PRIVATE LANDS:** Where use of private lands is absolutely necessary, BFD/AF will consider the following options:

- Under Social Forestry: If the required private lands are presently not under use, BFD/AF and partner NGOs and local communities can persuade the landowners to offer (legal titles remain with the owners) them for plantation.<sup>13</sup> The landowners, according to the social forestry rules, will be entitled to a share of the incomes generated from plantation (Section 24: Social Forestry on Privately Owned Lands, p. 23).

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<sup>13</sup> Landowners may also voluntarily offer their lands for afforestation. During a field trip to Char Allen in the Sonagazi upazila of Feni, it was learned the Feni Freedom Fighters' Association requested BFD to enlist 500 acres of its land under social forestry.

- On Voluntary Contribution. As is often the practice in the rural areas, the concerned members of the community, if requested, may elect to contribute the lands without compensation. In accepting contribution, BFD/AF will ensure that
  - There are no encumbrances on the contributed lands;
  - The contributions do not affect the livelihood of vulnerable persons and, if it does, BFD and community devise and implement mitigation measures acceptable to the affected persons; and
  - The contributors give up all claims on the lands and the titles are transferred to BFD through the legal process.
- On “Contribution Against Compensation”. Voluntary contributions are seen more feasible where the landowners are well-off and very few in number. If the site-specific activities involve a larger number of landowners, some of whom might be quite marginal and vulnerable. In such cases, the beneficiary communities can offer this option as an incentive. The following condition will however apply:

*The landowners will have the option to refuse to accept the ‘contribution against compensation’ offer without the fear of any adverse consequences.*

4. BFD/AF will apply the principles and guidelines as proposed in this SMF to all afforestation/reforestation works, regardless of their location and scope of work, which will require use of public and private lands that are to be obtained by using the above options.

### **Impact Mitigation Objectives**

5. The principles and guidelines provided in this framework are to avoid or minimize adverse impacts on public land users and private landowners, mitigate the unavoidable impacts, and assist to improve, or at least restore, the affected persons’ living standards and income earning or production capacity to the pre-project levels. To achieve these objectives, BFD/AF will adhere to the following strategic guidelines.

- Avoid or minimize displacement of persons/households who may have been using public lands for residential and livelihood purposes;
- Adhere to the guidelines adopted in this SMF while using the options to obtain private lands (under Social Forestry Rules, Voluntary Contribution and Contribution Against Compensation); and
- Identify and mitigate the unavoidable adverse impacts associated with displacement from public lands and use of private lands, and any other impacts identified during implementation of the actual plantation works.

### **LAND USE PRINCIPLES**

6. BFD/AF will select the plantation sites and any other activities with alternative considerations to avoid or minimize displacement from public lands and use of private lands as per the following principles:

- Where lands are required, BFD/AF will consider,
  - Use as much of public lands as possible
  - Completely avoid displacement from private homesteads

- Avoid or minimize displacement of homesteads from public lands
  - Use lands of lower value in terms of productivity and uses
  - Avoid affecting premises that are used for business/commercial activities
  - Avoid affecting religious sites like places of worship, cemeteries, and buildings / structures that are socially and historically important.
- Not undertake works that will significantly restrict access of the communities, especially the socioeconomically vulnerable groups, to common property resources that may have been a primary source of their livelihood.

### **Impact Mitigation Principles**

7. Adverse impacts are unlikely where private landowners would be willing to enlist their lands under the social forestry program, or landowners make voluntary contributions. Impact mitigation issue will arise where public lands are resumed from private uses, or sought from private owners on “contribution against compensation”. In such cases, BFD/AF will adhere to the following principles to avoid/minimize adverse impacts and adopt appropriate mitigation measures:

- As a first step toward mitigating adverse impacts, BFD/AF will always try to avoid adversely affecting persons/households who are socioeconomically vulnerable.
- Where adverse impacts are absolutely unavoidable, BFD/AF will ensure that the beneficiary communities collectively rehabilitate the affected persons / households with measures acceptable to them.
- Where displacement from public lands is unavoidable, BFD/AF will assist the affected persons/households to relocate on available public lands in the vicinity.
- BFD/AF and partner NGOs will mobilize the communities to collectively provide financial and material assistance to the affected persons/households to move and rebuild their houses.
- Where business activities of any kind are displaced, BFD/AF and partner NGOs will mobilize community assistance to relocate them in the vicinity to ensure that they remain operational and do not lose income.

### **Eligibility for Compensation/Assistance**

8. The persons/households affected by the plantation and other activities in a site are eligible for compensation and assistance. The most likely eligible groups are:

- *Private Landowners*: Persons who have legal rights to the affected lands and other assets, such as houses/structures, trees, etc, built and grown on them.
- *Squatters*: Persons/households who do not have legal rights to the affected lands, but use them for residential and livelihood purposes.
- *Others*, who do not have legal rights to the affected lands and any assets built or grown on them, but whose livelihood activities are significantly affected by the afforestation/reforestation activities.

## Compensation/Assistance Principles

9. Compensation/assistance will apply to persons/households displaced from public lands and the private landowners who agree to make “contribution against compensation”. Depending on an affected person’s preference, BFD/AF and the beneficiary communities may consider using both financial and material forms of compensation and assistance. BFD/AF will ensure delivery of the agreed compensation/assistance in a timely and transparent manner. Compensation for the affected assets will be determined according to the following principles (see the Entitlement Matrix below):

- *Lands of All Kinds*: Replacement cost for an equal amount of land of same productive quality, including the registration costs and stamp duties.
- *Built Assets*: Replacement cost of houses/structures at the current prices of same building materials, plus the current cost of labor to build them. Depreciation and value of the salvageable building materials will not be deducted while computing the compensation.
- *Trees & Other Irreplaceable Items*: Current market prices of affected trees and other assets which are irreplaceable.
- *Loss of Access to Livelihood Resources*: Provide alternative access in consultation with the affected persons/households.

10. BFD/AF and partner NGOs, beneficiary communities, and the affected landowners will jointly determine the replacement costs of land based on the most recent transactions made in the same or adjacent localities, in view of the land type, productive quality and accessibility. Current prices of other assets, such as building materials, trees, etc, will be in accord with those in the local markets.

11. BFD/AF and partner NGOs will document the impacts and affected persons/households, mitigation measures agreed with them, and verifiable evidence that the agreed measures have been implemented. The cases of voluntary private contributions and “contributions against compensation” will also be documented with appropriate evidence and will remain open to verification by the World Bank, other DPs and persons/entities in the project or climate change issues (Documentation formats for impact assessment and mitigation; contribution of lands and other assets; and a schedule of compensation for using public and private lands are provided in *Attachments B1, B2 and B3*).

## ENTITLEMENT MATRIX

### 1. LOSS OF PRIVATE LANDS & EVICTION FROM PUBLIC LANDS

| Ownership Type                                    | Entitled Person                                              | Entitlement                                                                                                                                                                                             | Responsibility                            |
|---------------------------------------------------|--------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|
| <i>Private</i>                                    | <i>Legal Owners</i> , as recorded in the ownership documents | Replacement costs, as determined by BFD/AF, beneficiary communities and affected landowners, for an equal amount of land of same productive quality, including the registration costs and stamp duties. | Local Community – to be ensured by BFD/AF |
| <i>Public Lands</i> (including BFD's) under lease | <i>Leaseholders</i>                                          | Fulfilment of contractual obligations with the public agencies, as recorded in the lease documents.                                                                                                     | Local Community – to be ensured by BFD/AF |

### 2. LOSS OF HOUSES/STRUCTURES ON PRIVATE & PUBLIC LANDS

| Type & Location                                                      | Entitled Person                                               | Entitlement                                                                                                                                                                                                                                                                                                                                     | Responsibility                            |
|----------------------------------------------------------------------|---------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|
| <i>All Houses/ Structures on the Lands to be Used for Plantation</i> | <i>Legal owners</i> , as recorded in the ownership documents. | <ul style="list-style-type: none"> <li>• Replacement cost of houses/structures (outside the homestead) at the current prices of same building materials, plus</li> <li>• The current cost of labor to build them. Depreciation and value of the salvageable building materials will not be deducted while computing the compensation</li> </ul> | Local Community – to be ensured by BFD/AF |
| <i>Structures on Public Lands</i>                                    | <i>Vulnerable Squatters</i>                                   | <ul style="list-style-type: none"> <li>• Arrangements for physical relocation on public lands in the vicinity</li> <li>• Assistance in cash and/or kind to rebuild the houses/structures</li> <li>• Allowed to keep the salvageable materials.</li> </ul>                                                                                       | Local Community – to be ensured by BFD/AF |

### 3. LOSS OF TREES ON PRIVATE & PUBLIC LANDS

| Location                | Entitled Person                                                                                                    | Entitlement                                                                                                                                                                                                                                                                    | Responsibility                            |
|-------------------------|--------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|
| <i>On private Lands</i> | <i>Legal owners</i> as recorded in the ownership documents                                                         | <ul style="list-style-type: none"> <li>• Current market value of trees, based on species, size and maturity.</li> <li>• Current market prices of fruits on trees, if they are felled before harvest.</li> <li>• Owners are allowed to fell the trees and keep them.</li> </ul> | Local Community – to be ensured by BFD/AF |
| <i>On public Lands</i>  | <ul style="list-style-type: none"> <li>• <i>Squatters</i></li> <li>• <i>Private groups, NGOs, etc.*</i></li> </ul> | As those stipulated above for trees and fruits.                                                                                                                                                                                                                                | Local Community – to be ensured by BFD/AF |

### 4. LOSS OF ACCESS TO LIVELIHOOD RESOURCES

| Impact Type | Entitled Person | Entitlement | Responsibility |
|-------------|-----------------|-------------|----------------|
|-------------|-----------------|-------------|----------------|

|                                        |                                                                 |                                                                                      |                            |
|----------------------------------------|-----------------------------------------------------------------|--------------------------------------------------------------------------------------|----------------------------|
| Loss of Access to Livelihood Resources | To be identified during preparation of site-specific activities | Provision of alternative access in consultation with the affected persons/households | BFD/AF and Local Community |
|                                        |                                                                 |                                                                                      |                            |

## 5. UNFORESEEN LOSSES

| Impact Type                                                                                         | Entitled Person      | Entitlement                                                  | Responsibility             |
|-----------------------------------------------------------------------------------------------------|----------------------|--------------------------------------------------------------|----------------------------|
| <i>As may be identified during preparation &amp; implementation of the site-specific activities</i> | <i>As identified</i> | As determined in consultation with IDA and the stakeholders. | BFD/AF and Local Community |

\* Public lands, especially along the roads, are sometimes leased out to private groups and NGOs for tree plantation under income generation programs.

## Stakeholder Consultations

12. In addition to the community consultations suggested in Section A, consultations here will focus more on the persons/households that would be affected. Depending on actual situation on the ground, consultation topics will include,

- Activities that would be carried out in a site and their impacts on the persons/households who would be displaced from the public lands chosen for plantation
- Specifics of the mitigation measures and the process that will be followed to implement them (mitigation principles, compensation eligibility and standards, compensation determination and payment, etc.)
- The rights and responsibilities on the parts of the stakeholders themselves and the agencies involved in the project (BFD, World Bank, other DPs, Consultants, partner NGOs, etc.)
- Functions and limitations of GRM, and how the aggrieved persons/complainants could lodge their complaints and grievances
- Financial benefits expected for the participants in the afforestation/reforestation activities

13. BFD/AF and partner NGOs will prepare consultations minutes, indicating dates, venues, compensation issues discussed, and the details of the agreements reached. The affected persons will be provided with copies of the minutes signed by the affected persons and BFD/AF. Copies of all such signed minutes will be kept by BFD/AF and will be made available for review by the World Bank and other DPs.

## **Documentation**

14. BFD/AF will ensure availability of the following documentations for review by the World Bank and other DPs:

- Minutes of stakeholder consultation on matters like social safeguards implications of using private and public lands; alternative means of obtaining the required lands; mitigation measures adopted in this SMF; compensation procedure; etc.
- Agreements where private lands, if any, have been obtained under Social Forestry program.
- Records of persons/households who may have been displaced from public lands
- Records of voluntary contribution and “contribution against compensation” of private lands
- Agreements made on compensation and the evidence of payment
- Records of complaints and grievances and the decisions given in the hearing process

**Attachment B1: Impact Assessment and Mitigation Data Sheet**  
*[To record information on lands and other assets to be used for site-specific activities]*

1. *Location of the afforestation/reforestation and the target/beneficiary communities*

Union: ..... Upazila: ..... District: .....

Mouza: ..... Dag Nos: .....

2. *Description of the plantation and other activities that will be implemented in the chosen site:*

3. *Description of lands to be used for afforestation/reforestation:*

4. Public Lands Used: Total amount (acre/decimal): .....

| Squatters | Encroachers | Others (specify) |
|-----------|-------------|------------------|
|           |             |                  |

*Number of affected users*

*Other assets affected on public lands:* .....

*Livelihood activities of vulnerable persons affected:* .....

5. *Private Lands Used:* Total amount (acre/decimal): .....

Total number of affected landowners: .....

*Other private assets affected:* .....

*Livelihood activities affected:* .....

6. *How the private lands obtained:*

|                                   | Amount | No. of Contributors |
|-----------------------------------|--------|---------------------|
| Voluntary contribution            |        |                     |
| Contribution against compensation |        |                     |
| Other means (specify): .....      |        |                     |
| .....                             |        |                     |

7. *Compensation payment*

|                                   | No. of persons paid | Total amount paid (Tk) |
|-----------------------------------|---------------------|------------------------|
| Contributors against compensation |                     |                        |
| Squatters                         |                     |                        |
| Others (specify) .....            |                     |                        |
| .....                             |                     |                        |

9. **Documentation:** Types of evidence of voluntary contribution obtained:

Signed written statement witnessed by community members

Others (specify) .....

~~~~~

This form filled in by (Name):

Signature:

Date:

Attachment B2: Format for Documenting Contribution of Assets

[For each person who has made voluntary contribution and 'contribution against compensation']

Location of afforestation/reforestation and the target/beneficiary communities

Union: Upazila: District:

Mouza:Dag Nos:

The following agreement has been made on (Day-Month-Year) between (the Owner(s), resident of and the BFD (Recipient).

- 1. That the Owner(s) holds the legal right to the land (Dag No., Khatian No., Mouza, etc) and other assets situated on it.
2. That the Owner(s) hereby voluntarily contributes to the Recipient portion (in decimal) of this asset for afforestation/reforestation (and any other related activities) for the benefit of the villagers and the public at large. There are no vulnerable groups losing livelihood as a result of this contribution of land, nor are there any other encumbrances on the land.

Either, in case of Voluntary Contribution:

- 3. That the Owner(s) will not claim any compensation against the contribution of this asset.

Or, in case of Contribution Against Compensation:

- 4. That the Owner(s) will receive compensation against the contribution of this land and other assets as per the attached Schedule.
5. That the Recipient agrees to accept this grant of assets for the purposes mentioned above.
6. That the Recipient shall implement plantation and other facilities (name) and take all possible precautions to avoid damage to adjacent land/structure/other assets.
7. That both the parties agree that the plantation and other facilities (name) so developed on the land shall be public/community properties.
8. That the provisions of this agreement will come into force from the date of signing of this document.
9. That the owner gives up all claims to the land and the title of the land will be transferred to the recipient through the existing legal process in the country.

Signature of the Owner(s)

Signature of the Recipient

Witnesses (Name, signature, father's/husband's name, and address):

- 1.
2.

Attachment B3: Schedule of Compensation for Private & Public Lands

[For each person who has made ‘contribution against compensation’ and squatter and encroacher who has been paid compensation or assisted in any other form]

Location of afforestation/reforestation and the target/beneficiary communities

Union: Upazila: District:

Mouza: Dag Nos:

1. *Name(s) of Compensation Recipient:*

Father’s/Husband’s Name:

2. Compensation for: Contribution of land against compensation

Displacement from public land (squatter/encroacher)

3. Compensation Schedule

<i>Affected Items</i>	<i>Amount/units Compensated for</i>	<i>Agreed Compensation</i>
Land (in decimal)		
Houses/structures (Floor area in sft):		
<i>Structure type</i> (bamboo, mud, brick, etc.):		
Trees (Number)		
Others (Specify):		
Total Agreed Compensation:		

Agreed compensation in words:

Agreed Compensation Paid:

Agreed Compensation Received:

.....
Name & Signature of BFD Official

.....
Signature of Recipient
(Contributor/Squatter/Encroacher)

Date:

Date:

C. Guidelines for Small Tribal Group Plan

Introduction

1. The largest concentration of the country's small STG population is in the Chittagong Hill Tracts which are not covered by the project. In small proportions, the rest are dispersed in most of the plains districts where they live in small, often isolated, settlements with the mainstream peoples. Of the 9 districts selected for the project, Cox's Bazaar, Barguna, Barisal and Patuakhali are known to have a small proportion of peoples who belong to the STGs. Yet, applicability of Bank's OP 4.10 in Indigenous Peoples will in general depend on (a) the presence of STGs in the selected plantation sites and their prevalence in the vicinities; and (b) whether or not the plantation and livelihood activities and any other related works would affect them in manners that may threaten their cultural way of life and restrict access to their present livelihood activities. Although the impacts on STGs would remain largely unknown until the specific plantation sites are identified, BFD has nevertheless decided to adopt the following guidelines to deal with any potential STG issues and prepare Small Tribal Group Plans (STGPs) for the afforestation/reforestation that are undertaken in areas and localities inhabited by STGs.

Objectives of STG Plan

2. The main objectives are to ensure that afforestation/reforestation and livelihood improvement activities funded by the project do not adversely affect STGs, and that they do not threaten their traditional way of life. This will require BFD/AF to determine whether the plantation and livelihood activities would include STGs who may live as separate communities or parts of the mainstream communities. Depending on their presence in the afforestation/reforestation areas and their needs and concerns, BFD/AF will prepare the site-specific activities with the following strategic objectives:

- Select the plantation sites and other related activities and determine their scopes to avoid or minimize, to the extent feasible, adverse impacts on STGs.
- Where adverse impacts on STGs are unavoidable, adopt and implement socially and culturally appropriate measures to mitigate them.
- Wherever possible, adopt measures – in addition to those for impact mitigation – to strengthen and promote any available opportunities for socioeconomic development of the STGs.

Identifying the Small Tribal Groups

3. Although the STGs of Bangladesh are well recognized locally, BFD/AF and partner NGOs will examine the following characteristics to make formal identification:

- Self-identification as members of a distinct Tribal cultural group and recognition of this identity by others;

- Collective attachment to geographically distinct habitats or ancestral territories in the afforestation/reforestation areas and to the natural resources in these habitats and territories;
- Customary cultural, economic, social or political institutions that are separate from those of the mainstream society and culture; and
- A language, often different from the official language of the country or region.

STGP Basic Planning Principles

4. To avoid or minimize adverse impacts and, at the same time, ensure benefits for STGs, BFD will use the following principles for selection, design and implementation of the afforestation / reforestation and alternative livelihood improvement activities:

- Ensure that STGs in general and their organizations, if any, are fully included in the process leading to selection, design and implementation of the plantation programs and livelihood improvement activities.
- Together with STGs, screen the proposed plantation sites for a preliminary understanding of the nature and magnitude of potential impacts and, if necessary, explore alternatives to avoid or minimize the adverse ones.
- Where alternatives are infeasible and adverse impacts are unavoidable, BFD, together with STGs and others knowledgeable of STG culture and concerns, will immediately make an assessment of the key impact issues.
- AF and partner NGOs will identify STG communities which live in vicinities of the plantation sites and undertake consultations on their participation in the alternative livelihood activities. Partner NGOs will provide detailed information on the component's objectives, processes and activities.
- BFD and AF and partner NGOs will undertake the tasks necessary to adopt appropriate mitigation measures. The most important in this respect is intensive consultation with the STGs, STG elders/leaders, and formal and informal STG organizations, civil society organizations like NGOs, and others who are interested in and have knowledge of STG issues.

Consultations will include the objectives and scope of the proposed site-specific activities; the likely key adverse impacts on and benefits for STGs; STGs' own perception of the impacts and feedback; and a preliminary assessment of economic opportunities which BFD could promote – in addition to mitigating the adverse impacts.

Identifying STG Social Concerns

5. Impacts on STGs will vary in terms of scopes of afforestation/reforestation activities, presence and size of the STG population in the area, and the magnitude of potential adverse impacts and social risks. To the extent applicable for particular plantation sites, information on the cultural and socioeconomic characteristics, and potential vulnerability will be used to identify the STG social concerns and adopt alternative mitigation measures (major issues and indicators suggested in *Attachment C1*).

STG Consultation Strategy

6. BFD/AF and partner NGOs will hold free, prior and informed consultations with the STGs in the process leading to selection, design and implementation of the afforestation/reforestation activities. As required for informed consultations, BFD/AF with the support of partner NGOs will provide STGs with all information related to the proposed activities, including that on potential adverse impacts. To facilitate consultations BFD/AF and partner NGOs will,

- Prepare a time-table for STG consultations leading to selection, design and implementation of the site-specific afforestation/reforestation activities, and consult them in manners so that they can express their views and preferences freely.
- In addition to the communities in general, consult STG organizations, STG elders/leaders and others with adequate gender and generational representation; and civil society organizations like NGOs and groups knowledgeable of STG issues.

7. In addition to the selection of plantation sites, consultations will concentrate on the adverse impacts, if any, perceived by the STGs and the probable (and feasible) mitigation measures, as well as exploring alternative livelihood and any other additional development activities that could be promoted together with the plantation activities. This will provide the inputs necessary to prepare and implement the impact mitigation plans for afforestation/reforestation works in areas/localities inhabited by STGs. BFD/AF and partner NGOs will keep minutes of these consultation meetings and make them available for review by the World Bank and other DPs.

Contents of STG Plan

8. STGPs will primarily aim at mitigating adverse impacts and reinforcing and promoting any available development opportunities in the plantation areas, with a particular focus on the STGs who might be affected. Depending on nature and magnitude of impacts, an STGP may generally consist of the following:

- Baseline data, including analysis of cultural characteristics; education; social structure and economic activities; land tenure; customary and other rights to the use of land and other natural resources; relationship with the local mainstream peoples; and other factors that may have been suggested by STGs during consultations and are to be addressed in the design and implementation of plantation activities.
- Strategy for local participation, indicating timing of consultation and the participants, such as affected STG, STG organizations, and individuals and entities which have provided useful feedbacks and inputs during initial consultations.
- Mitigation measures and activities, which will generally follow STG preferences and priorities, including those agreed between the STG/STG organizations and BFD/AF during consultations.
- Institutional capacity, taking into account BFD/AF's staff experience, consulting services, and STG and other civil society organizations in designing and implementing STGPs.

- STGP implementation schedule, taking into consideration least disruptions to the STG livelihood and other activities.
- Monitoring and evaluation, with the participation of STG representatives and organizations, and other civil society organizations that may have been working in these areas.
- Financing the STGP. Budgets and sources of fund needed to implement the mitigation measures and development activities, if any, agreed between the STGs and BFD.

Impact Mitigation & Development Measures

9. To use private and public lands and avoid or minimize adverse impacts on STGs, BFD will apply the same principles and guidelines proposed in the preceding section for involuntary resettlement (Section B). Eligibility and standards for compensation will also use those proposed therein. In addition, particular attention will be paid not to intrude into the STG localities by non-local workers, or resort to actions and behavior that could be construed culturally insensitive and disrespectful by STGs.

10. Choice of appropriate and culturally compatible development measures will largely depend on preferences and priorities of the affected STGs. Wherever feasible and opportunities exists, these measures will be undertaken beyond those meant for adverse impact mitigation. In general such measures might vary from one area to another and may include providing credits where STGs are likely to engage in the production of marketable goods, such as handicrafts, handlooms, small-scale horticulture; employment in plantation works; inclusion into the afforestation/reforestation beneficiary groups; etc.

Attachment C1: Major Impact Areas and Indicators

The following major impact areas and indicators are suggested for assessment of STG concerns and social risks.

CULTURAL CHARACTERISTICS

- Relationships with areas where they live -- relating to religious/cultural affinity with the ancestral lands, existence of livelihood opportunities, etc.
- Presence of customary social and political organizations – characteristics indicating internal organization and cohesion of the communities, and their interaction with those of the non-Tribal population.
- Interactions and relationships with other peoples of small Tribal groups in the same and other areas.
- Presence of STG organizations, like NGOs and CBOs, working with STG development issues, and their relationship with mainstream organizations engaged in community development activities.
- Identification of any cultural aspects which are likely to be affected or made vulnerable because of the proposed afforestation/reforestation activities.

SETTLEMENT PATTERN

- The extent to which the STG settlements are physically separated from those of the mainstream peoples, indicating interactions and mutual tolerance between the groups.
- Characteristics indicating physical organization of homesteads, and the existing community facilities, such as schools, water supply, etc.
- Present distance between the settlements and the proposed plantation activities and the sea.

ECONOMIC CHARACTERISTICS

- Prevailing land tenure -- indicating legal ownership and other arrangements that allow them to reside in and/or cultivate the lands in the area.
- Access to common property resources -- prevailing conditions under which they may have been using natural resources like fishing grounds, water bodies, forests and others that are considered important sources of livelihood.
- Occupational structure -- indicating relative importance of household's present economic activities, and the extent to which they might be affected or benefited because of the proposed afforestation/reforestation activities.
- Level of market participation -- engagement in activities that produce marketable goods and services, and how and to what extent market participation would be affected or enhanced.