

Social Compliance Audit Report

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BAN: Bibiyana II Gas Power Project

Prepared by ENVIRON UK Limited for Summit Bibiyana II Power Company Limited

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PROJECT SITE SOCIAL COMPLIANCE AUDIT REPORT

SUMMIT BIBIYANA II POWER COMPANY LTD

AT

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OCTOBER, 2014

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List of Acronyms

ADB	:	Asian Development Bank
BBS	:	Bangladesh Bureau of Statistics.
BCAS	:	Bangladesh Centre for Advanced Studies
BPDB	:	Bangladesh Power Development Board
CDO	:	Community development Officer
CPR	:	Common Property Resources
CDP	:	Community Development Plan
DC	:	District Commissioner
DESA	:	Dhaka Electric Supply Authority
DLAO	:	District Land Acquisition Officer
DoE	:	Department of Environment
GoB	:	Government of Bangladesh
GRM	:	Grievance and Redress Mechanism
IEE	:	Initial Environmental Examination
IFC	:	International Finance Corporation
IFS	:	Income and Expenditure Survey
JGFC	:	Jalabad Gas Field Company Ltd.
KII	:	Key Informant Interviews
JCCR	:	Joint Commission for Community Relations
LA	:	Land Acquisition
LLA	:	Land Lease Agreement
LAO	:	Land Acquisition Officer
LLA	:	Land Acquisition Act
LRP	:	Livelihood restoration Plan
N2	:	National Highway-2
NGO	:	Non-Government Organization.
PAH	:	Project Affected Household
PAP	:	Project Affected People
PDB	:	Power Development Board
PPA	:	Power Purchase Agreement
RAP	:	Resettlement Action Plan
RHD	:	Road & Highway Department
RP	:	Resettlement Plan
SBIIPCL	:	Summit Bibiyana II Power Company Limited
SED	:	Small Enterprise Development
SDP	:	Social Development Plan
ESIA	:	Environmental and Social Impact Assessment

EXECUTIVE SUMMARY

A social compliance audit was undertaken on behalf of Summit Bibiyana II Power Company Limited (SBIIPCL) in fulfillment of its obligations to ADB under the terms of ADB financing for the Bibiyana II Power Plant.

The audit was undertaken for the main plant only – which is located on 11 acres of land. The audit focused on the land acquisition procedure and its adequacy and compliance with Bangladesh laws and ADB's Safeguard Policy Statement (SPS) 2009, the extent of stakeholder consultations and participation and the basis for selecting key informants.

The procedures followed for compensation for land acquisition was found to be satisfactory in terms of compliance with the Land Acquisition Act 1982 of the GOB and ADB's SPS 2009. The numbers of consultations held were adequate as there were many key informants interviews (KII), focus group discussions (FGD) and general consultations. Female participation in the meetings was ensured.

SBIIPCL has developed a grievance redress mechanism, although improvements have to be made to the process. SBIIPCL has appointed a Community Development Officer who will be responsible for implementing this mechanism.

A livelihood restoration plan has been developed. A socio-economic study was carried out to assess the living standards of the PAHs in the study area. The livelihood restoration plan includes training of male and female PAHs at institutes outside the project area and in the project site. The training for men will be on electrical repair, welding and mechanical fitting while for females training will be on sewing, poultry etc.

A budget for the livelihood restoration plan has been prepared and a monitoring and reporting timetable has been included.

1. Introduction

1.1 Overview

Bangladesh is now facing an acute electricity shortage. This has been due to lack of proper planning and acute demand growth. The Gross Domestic Product (GDP) growth has stagnated over the years due to absence of electricity both in terms of quality and quantity.

The policy of the Government of Bangladesh ('GoB') has been to ensure extension and stabilization of the power sector, through both public and private sector undertakings, towards not only meeting the existing power deficiency throughout the country but also ensuring unhindered power provision in view of the projected future demand.

A Request for Proposal (RFP) was issued by Power Cell (the Power Division of the GoB Ministry of Power, Energy and Mineral Resources) on 3rd May 2010 (and subsequently amended on 2nd September 2010) for the sponsor to develop a 330-450 MW CCGT power station at Bibiyana on a 'build, own and operate' basis. The RFP was signed by SBIIPCL on 6th September 2010 and in May 2011 SBIIPCL signed: Implementation Agreements (IAs) with the GoB and the Power Grid Company of Bangladesh (PGCB); Power Purchase Agreements (PPAs) with the Bangladesh Power Development Board (BPDB); Land Lease Agreements (LLAs) with the BPDB; and Gas Supply Agreements (GSAs) with the Jalalabad Gas Transmission and Distribution System Limited ('the Gas Supplier'). In addition, an Engineering, Procurement and Construction (EPC) contract was signed with a joint venture comprising the First Northeast Electrical Power Engineering Co. and Northeast China International Electric Power Corporation (herein referred to as 'the EPC Contractor') in June 2011.

To comply with ADB Safeguard Policy Statement (SPS), IFC Performance Standards as well as requirements of Department of Environment (DOE) of Bangladesh, Bangladesh Centre for Advanced Studies (BCAS) was engaged to prepare an Environmental & Social Impact Assessment (ESIA) for SBIIPCL. The ESIA Report has been prepared and submitted to Asian Development Bank (ADB). ADB Social & Environment Safeguard experts recently visited the project site (August, 2014). This **Project Site Social Compliance Audit Report** has been prepared for fulfilling the requirement of ADB. The audit is in compliance with the 2009 ADB Safeguard Policy Statement (SPS) requirement 4 covering special requirements for different Finance Modalities (SPS, SR4, paragraph 12).

1.2 Structure of Report

The structure of the report reflects the major issues covered in the Social Compliance Audit. Chapters 1 and 2 address the general background and the description of the project component that has been audited, which is the SBIIPCL plant area.

Chapters 3 and 4 outline the objective and the methodology of the project site Social Compliance Audit. Activities and methodology for the audit including site visits, key informant interviews and consultations including the basis on which the interviewees were selected is included in these chapters.

The audit findings are included in Chapter 5 based on the relevant regulations and policies which includes the scope of involuntary resettlement resulting in economic displacement and compensation issues. Other aspects that have been covered in this chapter are indigenous people and minority ethnic groups, and the grievance redress mechanism. A livelihood restoration plan and budget and a monitoring plan of the livelihood restoration plan is also included in this chapter.

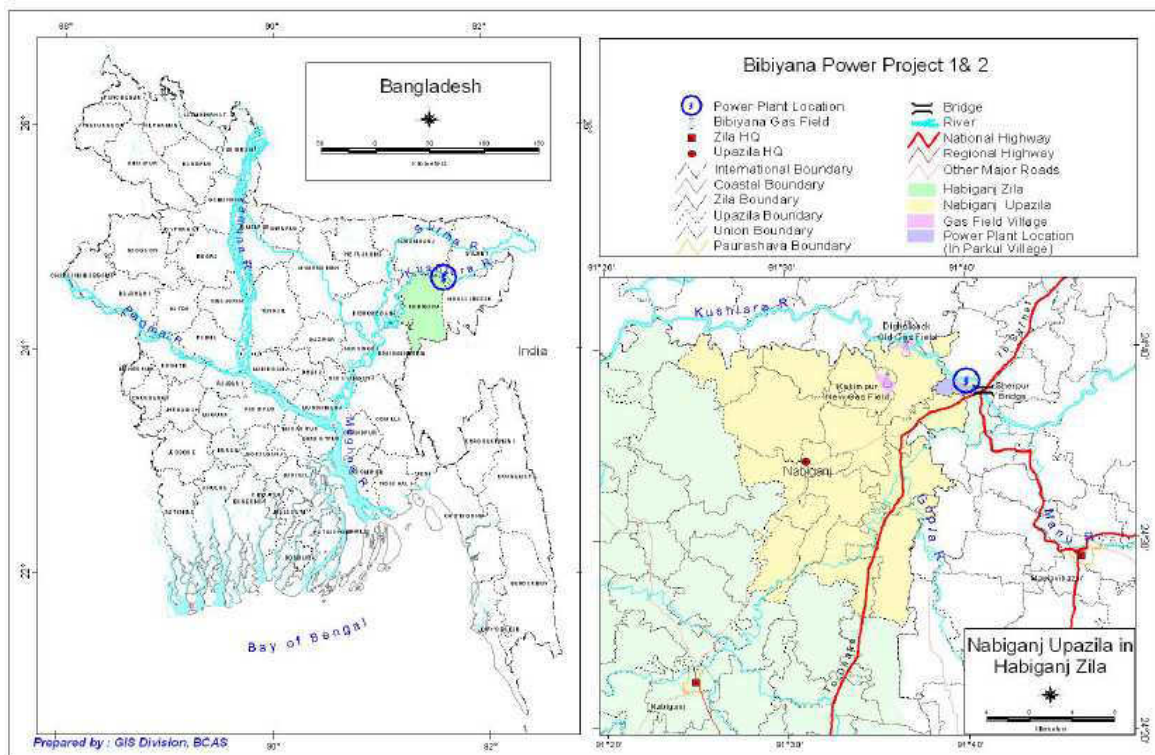
The conclusion and recommendations focus on involuntary resettlement and a corrective action plan is included in chapter 6.

2. Project Description

2.1 Project Location

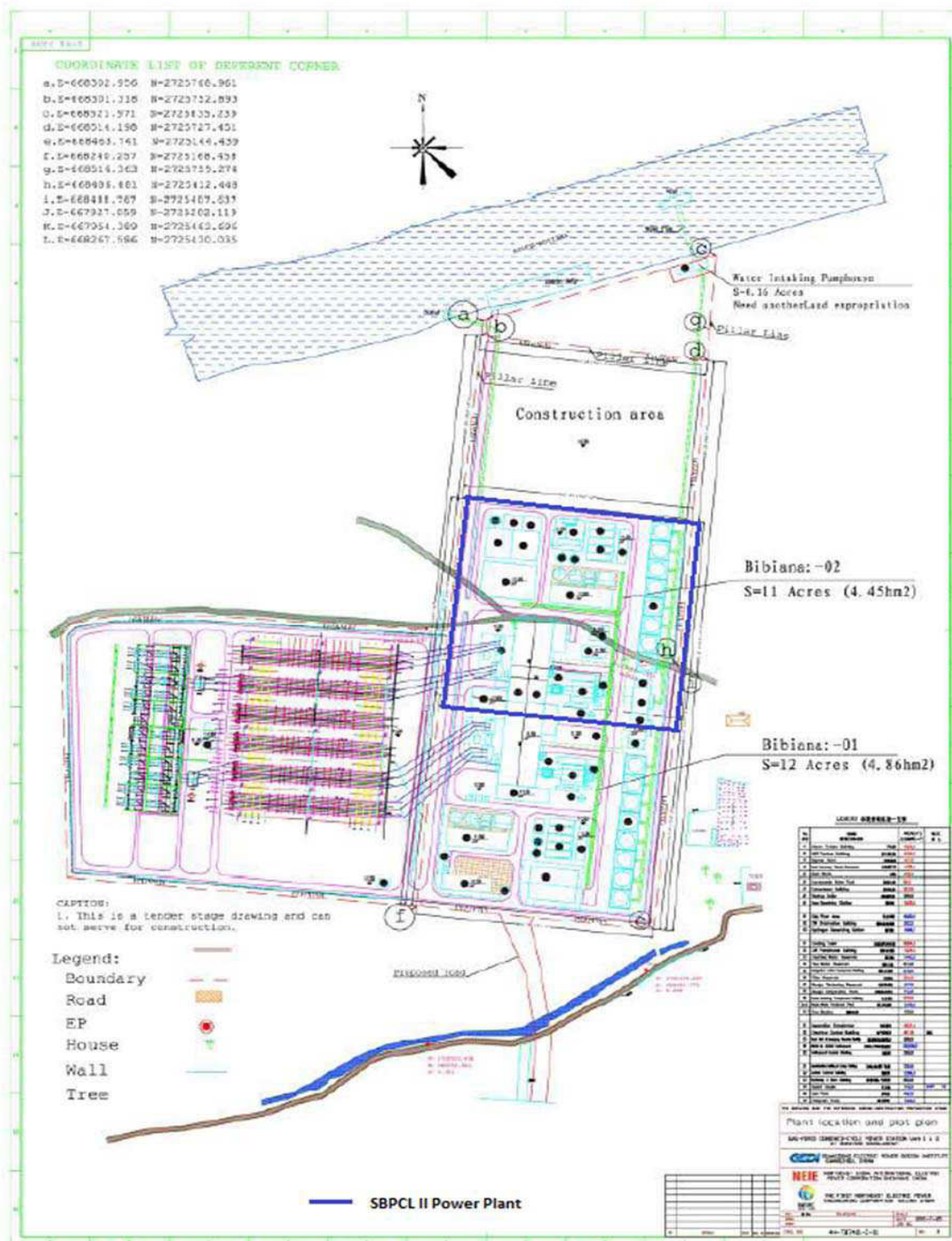
The SBIIPCL project site is located on the southern bank of the river Kushiya, at Longitude 91° 39' 37" E. and Latitude 24° 38' 18" N. The site is approximately 2 km to the west of the Sherpur bridge, and lies west of the Dhaka - Sylhet National Highway (N2), approximately 180 km north-east of Dhaka and approximately 45 km south-west of the Sylhet district headquarters. Administratively, it is located in the village of Parkul in the Aushkandi Union, in the Nabiganj sub district of the Habiganj district.

Figure 2.1: Location of SB II PCL IN Bangladesh and Habiganj district



The Bibiyana II Power Plant which is located on 11 acre single crop agricultural land is the component of the project that is being considered in this audit report (see Figure 2.3). However, key information on associated facilities i.e. the gas pipeline, the switchyard and the access road will be provided, even though these are not being funded by ADB. The project will have a capacity of 341MW and will use a combined cycle technology and will be based on natural gas. The main associated facilities of the project are a 8.8km gas pipeline from the nearby gas field and a switchyard, located adjacent to the plant. A 2km access road connecting the main plant with the Dhaka-Sylhet highway has been built.

Figure 2.2: Plant Layout for SBIIPCL Power Plant



2.2 Project Components

The main plant is located on 11 acre single crop agricultural land which is the main component of the project. SBIIPCL has received this land from BPDB for 22 years under a Land Lease Agreement (LLA). SBIIPCL is responsible for all kinds of development (land filling, machinery setting and electricity production) related to power generation.

The project comprises of the following associated facilities, which are summarized in the table below. ADB will fund the power plant which is located on the 11 acres of land in Parkul village, while the associated facilities are to be developed by the parties identified in the table below from their own financial sources.

Table 2.1: Summary of associated facilities which are not financed by ADB

Components	Area (acre)	Responsibilities	Status of construction	Impacts
Switchyard	26.0	PGCB	Completed land filling, civil works under construction	15 squatters (landless) including 1 land owner have been resettled adjacent to switchyard and given 7 decimal of land for 99 years lease and Tk. 60,000 for housing structure loss and Tk. 7500 as moving allowance.
Access road	2.0	BPDB	Completed earth filling, road requires surfacing	Loss of land and landowners have been compensated
Gas Pipeline	8.5	Jalalabad Gas	Completed 70 % of works	Loss of land and landowners have been partially compensated. Compensation ongoing
Construction lay down yard	14.0	BPDB/SBIIPCL	Developed	Loss of land and landowners have been compensated
Transmission line	70 meters to switchyard	PGCB	Completed	

3. Objectives and Scope of the Project Site Social Compliance Audit

The audit objectives are:

- (i) Identify past or present concerns related to impacts on involuntary resettlement (economic displacement only as no physical displacement/relocation involved in the project) focusing mainly on the status and issues related to the land acquisition process of 11 acres of paddy land from 14 landowners/households, impact on share croppers and agricultural laborers and ongoing construction activities in the area;
- (ii) Determine whether actions were in accordance with ADB's SR 2 and SR4 principles and requirements, the replacement cost was applied and the livelihood restoration plan planned for displaced persons; and
- (iii) Prepare a corrective action plan (CAP) containing necessary remedial actions, the budget for such actions, and the timeframe for resolution of non-compliance.

4. Methodology

4.1 Data Sources

For the social compliance audit both primary and secondary data was used. As primary data, the census carried out by BCAS were used to assess the status of land acquisition, compensation paid to date, the socio-economic profile of the PAHs and putting in place a Livelihood Restoration Plan for the PAHs.

Secondary data on the land acquisition process were collected from the District Land Acquisition Office (LAO), District Commissioner's (DC) office and Bangladesh Bureau of Statistics (BBS) and was used for socio-economic data presented up to Union level. In addition to this the Bangladesh Land Acquisition Act 1982 and 2009 ADB SPS with special emphasis on the SR4 paragraph was consulted.

4.2 Site Visits

Site visits were undertaken by BCAS between August 2010 and September 2014 at different stages of the project for collection and subsequently validation of environmental and social baseline data collected in 2010.

Three site visits were made in 2011 and in September 2013 during the validation of the 2013 baseline there were 6 site visits. The visits covered all the project components as in 2014 i.e. the SBIIPCL power plant and the associated facilities which are the 8.8 km gas pipeline from the gas field, the 26 acres for construction of the switchyard located adjacent to SBIIPCL and the access road. For the preparation of Project Site Compliance Audit Report field visit were conducted in August 11- 14, 2014. Another field visit was made in September 10-14, 2014 for verification and collection of data.

4.3 Questionnaire Survey

A questionnaire survey was conducted among the PAHs of the project area in 2011 & 2013 (revised) in all the project components which cover 100% PAHs of the project area. In 2014 the revised survey was conducted among 31 PAHs of the SBIIPCL project for preparation of the Social Compliance Audit. A sample questionnaire has been attached in ***Annexure-A***. Photographs of the project site activity are attached in ***Annexure-B***.

4.4 Key informant Interview (KII)

Key Informant Interviews (KIIs) and consultations were carried out with stakeholders at different stages of the project i.e. pre-construction and during the ongoing construction phases. The major interviewees within the Government were the District Commissioner (DC), Land Acquisition Officer, Assistant Land Commissioner, Director for the Department of Environment, Member Bangladesh Power Development Board (BPDB), Managing Director Jalalabad Gas Fields Limited and Managing Director Power Grid Company Bangladesh. The key interviewees from the Local Government were Upazila Chairman and Ward Commissioners. Within the local community high status individuals such as school teachers, journalists were also interviewed.

SBIIPCL provided various project related data, including number of workers, community involvement in the project pre-construction and ongoing construction phases and other related technical data. BCAS has collected various social data through structural questionnaire, KIIs and through Focus Group Discussions (FGDs) from the project affected peoples through site visits since August, 2011.

4.5 Review of relevant documents

The reviews of the following documents were carried out for the social audit:

- National laws/regulations and procedures relating to land allocation.
- Official land allocation documents and permits.
- Ethnic/cultural profile of project impact area (including the socio economic survey of 14 PAHs/landowners and review of official statistics describing socio-economic characteristics).
- Compensation payments.
- Grievance redress mechanism.
- Livelihood restoration plan.
- Community consultation meeting records.

4.6 KIIs and FGDs

These were held at different times of the project development in general and particularly for the preparation of the environmental and social assessment of the project. It is to be noted that all the KIIs and the FGDs were carried out for the main plant and the associated facilities. The basis of selection of the key interviewees and the participants for these consultations was:

- Government agencies directly related to the land acquisition process having the maximum contact with the acquisition and compensation process i.e. the DC and the Land Acquisition Officer.
- Other Government agencies directly involved with project development for example the electricity and the transmission entities responsible for transmission of electricity from SBIIPCL and transmission natural gas to SBIIPCL and the Department of Environment.
- Local Government including the elected Upozila Chairman and Ward Commissioners who have direct contact with the local village dwellers and are fully aware of the local area problems and active in providing solutions by approaching the local Member of the Parliament who has access to the policy makers.
- Local high status individuals like school teachers, journalists and Government officials who live in the area and have established close links with the local people.
- There is no presence of NGOs or CBOs in the immediate vicinity of the SBIIPCL Power Plant. Consultation with one NGO in Nabinagar was held on 14th September 2014 and they deal with microcredit. The NGO could provide microcredit facilities to vulnerable women in the project area.
- There were a number of FGDs over the assessment period especially for women. The women's group and the youth of the area participated in the large consultation meetings.



Key Informant Interview (KII) at Project site

4.7 Project Site Compliance Audit Team

The compliance audit was conducted by site visit on 11-14th August 2014 by the BCAS Team members. During that time ADB Environment & Social Specialist and other team members from ADB and SBIIPCL and were also visited the site. The audit team members from BCAS were:

1. Mr. Mohammed Ikbali Hossain, RAP & Social Expert

2. Dr. Moinul Islam Sharif EIA & Energy Expert

The following personnel from SB II PCL coordinated the site audit: 1. Mr. Zahir Uddin Mollah, Project Manager, 2. Mr. Nazmul Alam, Project Site Officer. The audit team members were briefed on the present status of the areas to be audited to check RAP compliance.

5. Audit Findings

The project will be located in the southern bank of the river Kushiya, village of Parkul in the Aushkandi Union, in the Nabigonj upazilla of the Habiganj district. A total 11 acres of land was acquired under SBIIPCL Power Plant project. Total of 14 landowners lost some or all (1 owner only) of their agricultural land due to this project. There were also 6 sharecroppers and 11 day agricultural laborers are also affected by the project.

5.1 Involuntary resettlement - scope of prior land acquisition

For acquisition of land for the main plant of SBIIPCL, the Government served three notices to the land owners in line with the Bangladesh Government Requisition and Acquisition Act 1982

- First Notice was served by the Government on 10 March, 2008 to inform landowners and land users about the areas of land that will be subject to acquisition according to orientation of the plant.
- Government served second Notice for land acquisition, specifying the average land value (Tk. 4500/decimal) on 6 July, 2008 based on land transaction registered values at that time. Following the announcement of the proposed land price, the land owners arranged to meet with the DC for price negotiation. At this stage, the land owners conducted several meetings with the DC. The price of Tk. 29,200/decimal/household was agreed on, including 50% supplementary premium. An agreement was reached with landowners who found these values acceptable; and
- Government served a third Notice to the land owners on 18 January, 2009 stating the negotiated compensation price (Tk. 29,500/decimal) and providing necessary legal documents for the land acquisition, including copies of the Notice.

Compensation for landowners relating to the 11 acre main plant started in November 2010 and was completed December 2013. In some cases land compensation was delayed due to lack of land documents for acquired land and disputes over ownership among the family members of the landowners. Now all landowners, have received their land compensation amounts from SBIIPCL

Land Acquisition process

Land for this project has been acquired by the Bangladesh Power Development Board (BPDB). The Government has granted the lease of this land to the project sponsor SBIIPCL – for the total period of 22 years for installation and generation of power. The acquisition of land for the main plant by BPDB was implemented as per the Acquisition Act of 1982, and at the time of leasing the land to SBIIPCL by the Government there were no outstanding issues or unresolved encumbrances resulting from the acquisition process.

The sequence from submittal to the Government of a project proposal requiring land acquisition to the issuance of a land acquisition notice is outlined below:

1. Submission of a proposal for project preparation by project sponsor (developer) to the relevant Ministry for administrative approval.
2. Preparation of a Land Acquisition Plan along with a Topographic Survey, Rights-of-Way Plan and mapping on Mouza¹ level by the Roads and Highways Department (RHD) for submission to the DC.
3. Granting of approval by the District Land Acquisition Committee (DLAC).
4. Review of the submitted Land Acquisition Plan and the Mouza-level maps by the DC to verify the locations of communal infrastructure and amenities such as graveyards, places of worship, Khas land sites, etc.
5. Land Acquisition Officer (LAO) on behalf of the DC together with project sponsor/Power Development Board (PDB) assesses the losses of entitlements and compiles an inventory of affected assets, including structures, trees, ponds, standing crops, etc by conducting a joint survey (JS).
6. DC prepares a 'Ward List' where a 'ward' represents a cluster of villages. The DC makes a list of wards where people will be affected, as the acquired land may fall under different wards.
7. LAO on behalf of DC issues a primary Land Acquisition Notice under section 3 of the 1982 Ordinance (Reference No. 3 of the Notice) against each Award following the Acquisition and Requisition of Immovable Property Ordinance, 1982 with subsequent amendments in 1993 and 1994.
8. Project Affected People receive Second and Third Notice where Negotiated Land price is mentioned.
9. Landowner collect land price from LAO office proving them valid document against their land through Cheque.

Due to land acquisition no physical displacement has occurred. In total 31 PAHs were affected (14 landowners, 6 sharecroppers and 11 agricultural laborers) by economic displacement. Table 2 shows the breakdown and status of land allocation per component.

Table 5.1: Summary of Inventory of Loss (land acquisition of 14 landowners who were direct PAHs) and compensation received

Sl. no.	Name of Household Head	Total land owned(Acre)	Total acquired land (Acre)	Percent (%) acquired	Total Payment Received (Tk.)	Status of Payment	Remarks (land based)
1	Mr. Tara Miah	2.5	0.75	30.0	219300	Full paid	Vulnerable
2	Mr. Ansar	14.4	1.5	10.4	4386000	Full paid	Vulnerable
3	Mr. Ripon	2.7	0.3	11.1	877200	Full paid	Vulnerable
4	Mr. Mosaid	10.8	0.12	1.1	350880	Full paid	
5	Abdul Mosabbir	2.1	0.6	28.6	1754400	Full paid	Vulnerable
6	Tanjubullah	1.2	0.37	30.8	1081880	Full paid	Vulnerable
7	Lablu	0.9	0.3	33.3	877200	Full paid	Vulnerable
8	Mosadder	5	0.3	6.0	877200	Full paid	
9	Mr. Dulal	1.73	0.3	17.3	877200	Full paid	Vulnerable
10	*Yakubullah	4	0.3	7.5	877200	Full paid	
11	Reasatullah	15	1.5	10.0	4386000	Full paid	Vulnerable
12	Hazi Asmat	7.2	4	55.6	11696000	Full paid	Vulnerable
13	Abdul Aziz	0.3	0.3	100.0	877200	Full paid	Vulnerable
14	Sonjobullah	1.2	0.37	30.8	1081880	Full paid	Vulnerable

* Living in London

Category A: Land Owners

Due to land acquisition for the SBPCL II Power Plant project a total of 14 landowners are affected. Among the 14 PAHs Mr. Yakubullh lives in London; the UK economic condition of his family is good. From 14 PAHs, 11 PAHs have lost 10% and more productive land and 122 PAPs have been affected due to land acquisition for the project. Mr. Dulal is working as a supplier contractor to the SBIIPCL Power Plant project. In terms of significance of impact, households were identified to be significantly impacted due to acquisition of more than 10% of productive land that will be used for the SBIIPCL Power Plant. Table 2 describes the Summary of Inventory of Loss (land acquisition of PAHs) and compensation received.

Table 5.2: Types and HH population of PAHs of SBIIPCL Power Plant Power Plant project

Types of PAHs	Category	Total number of HH	HH affected status	Total HH affected person	Impact Types
Landowner	A	14	Direct	122	Permanent
Sharecropper	B	6	Indirect	37	Temporary
Agricultural Laborer	C	11	Indirect	59	Temporary
Total		31		218	

Category B: Sharecroppers

A total 6 PAHs have lost sharecropping opportunities due to the land acquisition for the project. 37 PAPs have been affected due to this project. The average HH size of this group is 6.17. Share croppers have not received any compensation for loss of their share cropping opportunities from the project sponsor. Currently no one from this group is employed in the main plant construction

work. A livelihood restoration plan has been undertaken for each PAHs. More information on the loss calculation for a sharecropper is presented in section 5.3.1.

Category C: Agricultural Laborer

Agricultural laborers are seasonal workers. During crop plantation and harvesting period a large number of temporary workers come from other districts as agricultural laborers. The number of working days during plantation and harvesting is 40 days (approx). A local agricultural laborer worker will not fully depend on agricultural work; they are also involved as a daily laborer in construction, earth works and other kinds of domestic work. Ideally agricultural laborers in the project area maintain their livelihood from other sources of income where working as an agricultural laborer is a supplementary source of income. A total 11 PAHs have been identified as agricultural laborers in the project site. The total number of family members is 59. The Average HH size of this group is 5.36. Currently 8 people working at the SBIIPCL Power Plant as a construction worker are from the agricultural laborer group. A livelihood restoration plan has been undertaken for each PAHs.

Table 5.3. Status of SBIIPCL Power Plant Construction and other project facilities

Component		Description/Status of Construction
A.	SBIIPCL Power Plant	Land Filling and development: completed
		Plant site civil construction: completed 90%
		Imported machinery: all machinery are now in the plant site
		Overall progress of work: 80 %
		Date of commissioning and operation: June 2015

5.2 Socio Economic profile

5.2.1 Household size and Sex

According to the household survey, the average household size is 6.8 (i.e. the average number of persons per household). Overall, the average household size is higher than the national average household size which is 4.9 persons (BBS, 2006). The average household size in the area has increased from 6.2 to 6.8 in the last four years.

Males and females constitute 47.9% and 52.1% respectively of the population in the study area. The sex-ratio (i.e. the number of males per 100 females) in the project area is 93.3%, which indicates prevalence of females in the study area. The national sex-ratio was found to be 103 according to the population census of 2001. The sex-ratios do not reflect any significant variations among the three impact zones covered by the survey. The percentage of female population is now higher (2013), compared to the male population in the study area, than was reported in 2011.

5.2.2 Religious and dwelling houses

In terms of religion the population of the project area can be broadly grouped into Muslims and Hindus. Throughout the three kinds of impact zone (high, medium and low) Muslims and Hindus comprise 93% and 7% respectively. No scheduled tribal populations were identified in the project area.

5.2.3 Age distribution of the population

Age distribution of the population obtained from survey data shows that 6.2% of the population is children (0-4 years), 25.3% are adolescents in the 5-14 years old group, 36.1% are 15-30 years of age, 12.9% are of age 31-45, 10.3% are of age 46-60 and the remaining 9.2% are above 60 years. The age structure of the population is marked by more or less a similar pattern in the three impact zones under the study area. Between the two surveys (2011 and 2013) there has been a significant decrease in the percentage of children (0-4 years) and an increase in the percentage of the population above 60 years.

5.2.4 Educational status

11.6% of the population in the study area are illiterate. 14.3% of the population can sign their name, although they can neither read nor write. The population having primary level education (up to 5 years of schooling) and secondary level education (up to 10 years of schooling) are 36.8% and 29.2% respectively. Only 4.3% of the population has a Secondary School Certificate (SSC) and higher academic attainment. It has been found that 0.8% of population has an academic degree in the high impact zone. The percentage of illiterate among the population in the study area has decreased from 14.1% (2011) to 11.6% (2013). There has also been an increase in the percentage having achieved a Secondary School Certificate (SSC) and higher academic attainment. Demographic Structure & Education of the PAHs has been given in the Table 5.

The table below also shows that there are 6 sharecroppers combining the household size of 37. Among the 6 sharecroppers, Masum Mia has the maximum household size of 8 in which 4 of them have gone to primary school and 2 of them attended secondary school. The table shows that sharecropper Hazi Abdul Nur has 7 household members. Among them 2 of them have gone to primary school, 1 has attended S.S.C and 2 of them completed Degree and above.

The table below also shows that there are 11 Daily laborers combining the household size of 59. Among the 11 daily laborers, Johir Mia and Mohibur have the maximum household size of 7 each. Only 3 of them (Johir Mia's HH members) have gone to secondary school. However, having 3 household members, daily laborer Shayasta Mia has 1 illiterate and 2 people who can sign only in his household.

Table 5.4: Education levels of the household members of PAHs

Sl. No.	Name of Household Head	Types of PAHs	Household size	Educational Status					
				Illiterate	Can sign only	Primary (I-V)	Secondary (VI-X)	S.S.C .	Degree and above
1	Mr. Tara Miah	Landowner	14	1	1	4	6	2	0
2	Mr. Anhar	Landowner	8	0	2	3	1	1	1
3	Mr. Ripon	Landowner	4	1		1	0	0	2
4	Mr. Mosaid	Landowner	6	1	0	1	4	0	0
5	Abdul Mosabbir	Landowner	11	6	1	2	1	1	0
6	Tanjubullah	Landowner	8	1	0	4	3	0	0
7	Lablu	Landowner	9	1	2	3	1	1	1
8	Mosadder	Landowner	10	2	1	5	1	1	5
9	Mr. Dulal	Landowner	13	2	0	4	5	1	1
10	Yakubullah	Landowner	5	1	0	4	0	0	0
11	Reasatullah	Landowner	7	1	0	6	0	0	0
12	Asmat	Landowner	10	2	0	4	4	0	0
13	Abdul Aziz	Landowner	5	0	0	3	2	0	0
14	Sonjobullah	Landowner	12	2	6	3	1	0	0
15	Lokaman mia	Sharecropper	7	3	0	0	4	0	0
16	Era mia	Sharecropper	5	2	2	3	0	0	0
17	Nunu mia	Sharecropper	5	3	0	1	1	0	0
18	Hazi Abdul Nur	Sharecropper	7	1	2	2	0	1	2
19	Masum mia	Sharecropper	8	1	1	4	2	0	0
20	Hurmot Ullah	Sharecropper	5	1	3	1	0	0	0
21	Ashik Mia	Daily Laborer	7	1	6	0	0	0	0
22	Joynul Ullah	Daily Laborer	6	1	1	0	0	4	0
23	Sayed Mia	Daily Laborer	3	0	2	1	0	0	0
24	Johir mia	Daily Laborer	7	2	1	1	3	0	0
25	Audud Mia	Daily Laborer	6	1	4	1	0	0	0
26	Mohibur	Daily Laborer	7	3	2	2	0	0	0
27	Monfor Mia	Daily Laborer	6	1	2	3	0	0	0
28	Faruq Mia	Daily Laborer	4	2	0	1	1	0	0
29	Shalai	Daily Laborer	5	2	1	1	1	0	0
30	Idrias Ali	Daily Laborer	5	2	2	1	0	0	0
31	Shayasta Mia	Daily Laborer	3	1	2	0	0	0	0

5.2.5 Status of employment of PAHs

The table 5.5 shows that the gender and age wise employment status of land owners, sharecroppers and daily laborers. Among the 14 landowners, 5 males have employment at the SBIIPCL Power Plant, including 2 male members from Sonjubullah's family. The rest of the

landowners (9 PAHs excluding one PAH currently living in London, UK) do not have any kind of employment at the SBIIPCL Power Plant.

Among the 31 PAHs there are 6 sharecroppers. Among them no one is employed at the SBIIPCL Power Plant. Out of 11 PAHs of daily laborers 7 males have employment at the SBIIPCL Power Plant. The rest of the 4 daily laborers do not have any kind of employment.

Table 5.5: Household population and employment statistics of PAHs

Sl. no.	Name of Household Head	HH Size	Man + 15	Women + 15	Children 15 and below	60 +	Employed on SBIIPCL project
1	Mr. Tara Miah	14	7	3	4	0	1
2	Mr. Anhar	8	2	3	1	2	0
3	Mr. Ripon	4	1	1	2	0	0
4	Mr. Mosaid	6	2	1	3	0	0
5	Abdul Mosabbir	11	2	3	5	1	0
6	Tanjubullah	8	4	3	0	1	1
7	Lablu	9	3	4	1	1	0
8	Mosadder	10	4	4	2	0	0
9	Mr. Dulal	13	4	4	4	1	1
10	Yakubullah	5	1	1	3	0	0
11	Reasatullah	7	1	1	4	1	0
12	Hazi Asmat	10	2	2	5	1	0
13	Abdul Aziz	5	1	2	2	0	0
14	Sonjobullah	12	7	3	2	0	2
15	Lokamn miah	7	1	2	3	1	0
16	Era mia	5	1	1	3	0	0
17	Nunu mia	5	1	2	3	0	0
18	Hazi Abdul Nur	7	2	2	1	2	0
19	Masum mia	8	1	3	4	0	0
20	Hurmot Ullah	5	3	2	0	0	0
21	Ashik Mia	7	2	1	4	0	1
22	Joynul Ullah	6	2	3	1	0	1
23	Sayed Mia	3	1	2	0	0	1
24	Johir Ullaha	7	3	2	2	0	1
25	Audud Mia	6	1	1	4	0	1
26	Mohibur	7	1	1	0	0	0
27	Monfor Mia	6	2	1	3	0	1
28	Faruq Mia	4	1	1	2	0	1
29	Shalai	5	1	1	3	0	0
30	Idrias Ali	5	1	1	3	0	0
31	Shayasta Mia	3	1	1	1	0	0

5.2.6 Requirement of livelihood restoration based on income-expenditure of PAHs

The table below shows that annual income and expenditure and the percentage of savings before and after land acquisition (LA) of the PAHs to determine the requirement of livelihood restoration of the affected PAHs due to the project. The requirement of restoration is based on the decrease of savings after LA and landlessness of the PAHs as per the ADB Safeguard Requirement 2.

The table shows that 17 PAHs out of 31 PAHs falls under livelihood restoration based on their Income-Expenditure and their Savings after LA. The table also shows that 4 PAHs have Zero percentage of savings after LA though they have employment at the SBIIPCL Power Plant.

Table 5.6: Income Expenditure Data of HH

Sl. no.	Name of Household Head	Annual Income (Tk.) Before LA	Annual Expenditure (Tk.) Before LA	Annual Income (Tk.) After LA	Annual Expenditure (Tk.) After LA	Percentage of Savings Before LA	Percentage of Savings After LA	Restoration Required Status of vulnerability
1	Mr. Tara Miah	500000	400000	400000	360000	20%	10%	Yes
2	Mr. Anhar	456000	420000	800000	480000	7.8%	40%	No
3	Mr. Ripon	1800000	1200000	1500000	1000000	33.3%	33.3%	No
4	Mr. Mosaid	276000	186000	480000	480000	32.6%	0%	Yes
5	Abdul Mosabbir	390000	300000	400000	185000	23%	53.7%	No
6	Tanjubullah	143496	126000	180000	165000	12.2%	8.3%	Yes
7	Lablu	126996	114000	240000	240000	10.2%	0%	Yes
8	Mosadder	1290000	840000	300000	200000	34.8%	33.3%	No
9	Mr. Dulal	459996	360000	225000	192000	21.7%	14.6%	Yes
10	Yakubullah	97800	96000	120000	120000	1.8%	0%	Yes
11	Reasatullah	195000	156000	124000	108000	20%	12.9%	Yes
12	Asmat	274980	180000	300000	180000	34.5%	40%	No
13	Abdul Aziz	274980	180000	300000	180000	34.5%	40%	No
14	Sonjobullah	91500	90300	54000	54000	1.3%	0%	No
15	Lokamn mia	120000	108000	135000	135000	10%	0%	Yes
16	Era mia	90000	78000	180000	120000	13.3%	33.3%	No
17	Nunu mia	64800	62200	10800	9600	4%	11.1%	No
18	Hazi Abdul Nur	170000	168000	160000	160000	1.1%	0%	Yes
19	Masum mia	169920	156000	300000	280000	8.1%	6.6%	Yes
20	Hurmot Ullah	165000	110000	180000	180000	33.3%	0%	Yes
21	Ashik Mia	120000	96000	90000	90000	20%	0%	Yes
22	Joynul Ullah	145200	120000	96000	84000	17.3%	12.5%	Yes

Sl. no.	Name of Household Head	Annual Income (Tk.) Before LA	Annual Expenditure (Tk.) Before LA	Annual Income (Tk.) After LA	Annual Expenditure (Tk.) After LA	Percentage of Savings Before LA	Percentage of Savings After LA	Restoration Required Status of vulnerability
23	Sayed Mia	95000	75000	84000	84000	21%	0%	Yes
24	Johir Ullaha	152000	112000	72000	72000	26.3%	0%	Yes
25	Audud Mia	150000	126000	180000	120000	16%	33.3%	No
26	Mohibur	84000	65000	144000	108000	22.6%	25%	No
27	Monfor Mia	175000	168000	108000	108000	4%	0%	Yes
28	Faruq Mia	970200	96000	108000	108000	90%	0%	Yes
29	Shalai	84000	72000	120000	12000	14.2%	90%	No
30	Idrias Ali	75000	72000	12000	9600	4%	20%	No
31	Shayasta Mia	75000	6000	240000	18000	92%	92.5%	No

5.3 Impact of Land Acquisition

5.3.1 Loss of agricultural income

i) Income loss for sharecroppers

Under traditional sharecropping arrangements landowners received 50% of harvest yield as land rent. Subsequently, the 1984 Land Reform Act fixed the land rent at 33% of harvest yield (without input sharing) and at 50% if landowners paid 50% of material input costs. Recently, price of fertilizer and irrigation labor has increased, and realizing this situation landowners in the project area contribute, on average 25 % cost of agricultural input where 75 % of total cost is borne by the share cropper. However, agricultural product is shared by 50% among the land owners and sharecroppers.

Six sharecroppers cultivated agricultural land in the 11 acre project area and on average each sharecropper cultivated 1.0 acre of land. The area was a single crop agricultural land. Yearly production per acre was 2.0 metric tonnes. Total agricultural input per acre is estimated at Tk.10000. Share croppers contributes Tk. 7500 for producing rice from 1 acre of land. The sharecropper receives 50 % of the production with a value of Tk. 15000 so net profit for share cropper is (Tk. 15000 - Tk. 7500) = Tk. 7500. This profit per acre will be lost and there will be a corresponding income loss for the land owner.

ii) *Income loss for agricultural laborers*

Eleven agricultural laborers worked in the project area. The paddy cultivation of the area was a single crop and input required for labor for the 1 year including plantation and harvesting was for maximum 40 days on the average (single crop). The daily rate of labor varies in Bangladesh, but rate is comparatively high especially in the planting and harvesting time. Average rate of agriculture laborer is Tk. 400. Therefore, the potential loss of the income per agricultural worker is Tk. 16,000.

5.3.2 *Loss of Community property or structures*

The only community property lost in the project construction is the closure of the village road connecting Parkul village with Sherpur Bridge. The road has been paved and widened recently by a contractor selected by a competitive bidding system. The road is 2.75 km long. Construction work started in March 2013 and was completed August 2014. Total cost of the project was Tk. 35 million. Approximately 1200 person days labor was used to complete the project. Most of the labor was hired from the nearby villages. Local Government Engineering Department (LGED) a Department under the GoB implemented this project. Though SBIIPCL did not finance the road project it worked closely with the Ministry and local administration to facilitate its implementation as speedily as possible.

However, an alternative paved and smaller road has been repaired by SBIIPCL. For the improvement of the road from Sherpur to Bongaon (approximately 3 km) SBIIPCL allocated Tk. 2.6 million. The existing road was upgraded and work was completed in December, 2013.

5.3.3 *Vulnerable PAHs*

Vulnerable PAHs are considered to be those losing more than 10% of their productive assets: A total 11 PAHs are considered vulnerable out of 14 PAHs. A list of the Vulnerable PAHs is given in Table 5.1.

Mr. Yakubullah is currently living in London, UK, which is a comparatively affluent country and he is not considered vulnerable based on land acquisition as well as considering his current economic condition.

As per Bangladesh current calculations the poverty line is considered to be \$US 1.25 *per capita* (Tk 100 approximately) per day. The household income data collected from the PAHs of the project area show that no PAH income was found to be below this threshold as mentioned above. There are no female headed households. The elderly heads have no official pension but they live in joint extended families and are looked after by their children according the social system in Bangladesh.

5.4 Compensation and Resettlement

Status of land acquisition of 14 PAHs: Land Acquisition of 14 PAHs has been completed and payment has also been completed. A list of the PAHs given in Table 5.1. Compensation can be summarized as follows:

- Valuation of land undertaken by the LAO with reference the 1 one year's land registration value obtained from the land registration value. In the first notice the value offered was Tk. 4500 per decimal which was an addition of 50% from the base value. The final settlement was agreed upon was Tk. 29500 per decimal.
- Payment for landowners (14 PAHs) has been completed. Share croppers and agricultural laborers have not received any compensation from the project sponsor.

The land acquisition procedure started in 2008 and completed in 2009 (serving first, second and third notice) and negotiation with the PAHs took place after the 2nd notice and agreement was reached after the 3rd notice.

5.5 Indigenous Peoples

In the project area there is no ethnic minority or tribal population identified and therefore ADB SPS SR3 is not triggered. Among the 31 PAHs all of them are Muslim in terms of religious Group. They are native Bangali People, Bangla is their native language.

5.6 Public Consultation

A series of public discussion activities were undertaken by BCAS as part of Social Compliance Audit. This process includes rapid appraisal and discussions and meetings with the PAPs and community leaders. Public consultation has been carried out during different activities in the project cycle, using different techniques such as large consultation/public meeting, small group meeting, informal meeting as per environmental social and procedures of BCAS. These consultations were conducted in the pre-project situation in 2008, during the ESIA study stage in 2011 and after completion of draft ESIA study as well as disclosure of this report in 2014. During such consultations the public was informed about the project in general and in particular about the following:

1. Finalization of the project plan.
2. Disclosure of draft ESIA.
3. SBIIPCL design standards in relation to the applicable international standards.
4. Health Impacts and their mitigation as part of the Environmental and Social Management and Monitoring Plan (ESMMP).

5. Measures taken to avoid public utilities and other social infrastructure such as school, hospital, roads, Kushiya dyke, as well as to generate employment
6. Opportunities and assist with the development of a small enterprise.
7. Temporary lease (requisition) and acquisition details, proposed compensation packages and policies.
8. Compensation for land, affected structures, and crop.
9. Any other compensation for any damages associated with the project development.

A summary of a number of focus group discussions are included in *Annexure-D*.

5.7 Grievance Redress Mechanism

Presently there is no formal grievance redress mechanism in place. In the past the redress was undertaken informally by a SBIIPCL site manager. The EPC contractor has a complaint book but use of it is limited. SBIIPCL has developed a Grievance Redress Mechanism Procedure (GRMP) which they will put in place and towards this end a Community Development Officer has already been appointed. The GRMP is included as *Annexure-C*.

5.8 Livelihood Restoration Plan

Thirty of the 31 PAHs are considered vulnerable according to three criteria (see below), however the Livelihood Restoration Plan will be undertaken for all 31 PAHs. The total number of capable workers of the 31 PAHs is 128 (15+ age), among them 66 are male and 62 are female. 31 females and 40 males were considered for Livelihood Restoration Plan. The following Livelihood Restoration Plan has been undertaken for the selected PAPs from the 31 PAHs.

5.8.1 Identification of PAHs for livelihood restoration plan

According to ADB Safeguard Requirements 2, the objective is to avoid involuntary resettlement wherever possible; to minimize involuntary resettlement by exploring project and design alternatives; to enhance, or at least restore, the livelihoods of all displaced persons in real terms relative to pre-project levels; and to improve the standards of living of the displaced poor and other vulnerable groups.

For SBIIPCL, the involuntary resettlement requirements apply to full or partial, permanent or temporary economic displacement (loss of land, assets, access to assets, income sources, or means of livelihoods) resulting from involuntary acquisition of land.

Table 5.1 shows the land based vulnerabilities of PAHs due to the SBIIPCL Power Plant. People who are entitled to restoration are the vulnerable due to loss from 10% or more of productive land or loss from 10% or more of income source from livelihood activities, relocated households and the vulnerable households.

The table shows that 3 PAHs out of 14 PAHs did not lose more than 10% of land due to the project and are not considered as vulnerable and do not require restoration. The rest of the 11 PAHs lost 10% or more and are considered as vulnerable. All the 14 PAHs fully received the compensation from the DC Office which is in total of Taka 3, 02,19,540 (US\$ 377,744.25).

The table also shows that one of the PAHs, Abdul Aziz, had 30 decimal of land before the project with 100% of land acquired by the project and was paid full compensation and he falls under livelihood restoration. However, Asmat, who lost 56.6% land got Tk 1,16,96,000 (US\$ 146,200) as compensation and considered as vulnerable.

5.8.2 Livelihood restoration plan for male of PAHs through vocational training

Vocational training will be provided for all the interested male members from the PAHs. Two Types of training programme are planned for the interested Groups.

i) Outside Vocational Training with full scholarship

The nearest Youth Development Centre from the project site is Habiganj Youth Development Centre & Technical School & College, Habiganj (Phone: 0831-52465).

Selected members from PAHs family will receive 3 - 6 months residential training with full scholarship. Following training has been planned for the participants:

1. Electrical Technician
2. Freeze, TV Air Cooler Technician
3. Welding
4. Poultry and Livestock rearing

From each PAH at least 1 member will be selected for this training. During the training period each participants will get scholarship for living expenses, training materials and pocket money. At the end of the each training session participants will receive tool kits (electrical, welding) free of cost.

ii) Project site Vocational Training

The project sponsor will provide technical training from their training center. A training center will be developed with modern equipped training kits. A professional trainer on electrical repair, welding and plumbing will be recruited. From the project sponsor side a Community Development Officer will coordinate these training sessions. The participants who are not interested to enroll in the Technical School and Youth Development Centre located in Habiganj will get an opportunity to participate in training from the nearby training center, the selected PAHs will receive hands on training on:

1. Electrical Works.
2. Welding.

3. Plumbing.

The participants will receive a daily allowance for training. The duration of this training will be 3 Months. After successful completion of the training each participant will receive tool kits (electrical, and plumbing) free of cost.

5.8.3 Special plan for 100% landless

Due to land acquisition for SBIIPCL Power Plant 1 PAH (Mr. Abdul Aziz) has lost all of his productive agricultural land. A special plan has been proposed for the 1 affected PAH. Mr. Abdul Aziz has lost 30 decimal of agricultural land. He has received Tk 877,200. Currently he is expanding this amount to bear his family expenses as 2 of his children are in school. He is around 50 years old. Under the Livelihood Restoration Plan his family members will get technical training. Beside this, he will be given special consideration for vocational training on poultry or goat raising. After training, start-up finance by SBIIPCL amounting to Tk. 200,000 will be given as a grant.

5.8.4 Working opportunities and job training for the local people in the plant

Economic opportunities and job creation are the most important benefits of the project during the construction period. All of the villages in the project area suffer from lack of employment opportunities. At the meetings with villagers, the first expectation from the project was to provide job opportunities for project affected villages. During public meetings, employment was the most voiced request from the project. Currently 12 PAPs are working at the SBIIPCL Power Plant during site construction. Among them no women are working at the plant. Under the job training males from the PAHs will be trained on job related and technical training for employment in current construction work in the plant. The SBIIPCL power plant Community Development Officer (who is currently residing at the project area) has been coordinating with Labor contractors for more employment for the PAHs families.

5.8.5 Livelihood restoration training for the women

A total 62 women have been identified from 31 PAHs. All the interested women will get training opportunities. For the women group enterprise based training has been offered.

Within the 5 km from the project site a large garment industry has been developed and interested women will receive training for working in the garments factory or to develop shops independently. The women group will get following training for their livelihood restoration plan.

i) Sewing Machine operation

Selected women will get training on sewing machine operation in the project site training center, where an expert trainer will provide training for these women. During the training period each of the participants will receive a daily allowance and at end of the training participants will get a

sewing machine free of cost. Besides this, interested women will gain employment in the nearby garments factory located in Auskhandi.

ii) *Poultry and Goat rearing training*

Interested women from the 31 PAHs will receive training on poultry and goat rearing in the SBIIPCL rented training center. During the training period each of the participants will receive a daily allowance. The duration of this training will be 1.5-2 months. At the end of the training each participant will receive a loan of Tk.25000 (first installment) for starting poultry or goat rearing enterprises (a loan without any interest). The amount will to be required to be paid after 1 year. After one year each participant will receive further funds (without interest) from the project sponsor through a local micro credit NGO. The program will continue for next 5 years.

5.8.6 *Livelihood restoration plan budget*

A five-year plan for livelihood restoration will be implemented by SBIIPCL. The budget for the Livelihood Restoration Plan detailed budget is given in Table 5.7

Table 5.7 Proposed Budget for Livelihood Restoration

Sl. No.	Category of Expenditure	Cost (Tk)	Cost	Timing	Responsibility	Remarks
1	Vocational Training Centre establishment	3,600,000	Rental of Training Room, Salaries of Technical Trainers 36 Months @ Tk. 1,00,000	10/2014	SBIIPCL	(Rental, Hiring Technical Staff,
2	Vocational Training for male Outside plant (30 person)	1,500,000	30 person @ Tk. 50,000 each (including, lodging training cost and kits)	1/2015	SBIIPCL	Habiganj Technical College
3	Vocational Training for men nearer to plant - 30 persons	1,200,000	30 person Tk. 40,000 each (including, training cost and kits)	10/2014	SBIIPCL	Local Training Center
4	Vocational Training for women - 30 persons	900,000	30 person Tk. 30,000 each (including, training cost allowance and sewing machine)	10/2014	SBIIPCL	Local Training Center
5	Small Enterprise Training and business startup for women (poultry, goat rearing)	1,800,000	30 person Tk. 60,000 each (including, Tk. 10,000 training cost allowance and loan Tk. 50,000)	10/2014	SBIIPCL	Local Training Center
6	Special Grant for 100% landless (1PAH)	200,000	1 Person Mr. Abdul Aziz	12/2014	SBIIPCL	
7	Compensation for Share Cropper	45,000	6 Person @ Tk. 7500 for 1 Season	12/2014	SBIIPCL	
8	Compensation for daily laborer	88,000	11 Person @ Tk. 8,000 (50% loss of their work)	12/2014	SBIIPCL	
Total		9,333,000				
Miscellaneous (1% of the total)		93,330				
Grand Total		9,426,330 Tk US\$ 117,829 US\$ One Hundred and Seventeen Thousand Eight Hundred and Twenty Nine				

5.9 Community Development Program

SBIIPCL have already undertaken a number of community development initiatives around the project site and vicinity. It assisted GOB to improve a 3 km road from the plant site to Sherpur Bridge point which has been widened and paved. Before the project all the people from the locality would go to the Sherpur center by walking or by Rickshaw. After completion the project people now travel by Auto Rickshaw within 30 minutes from the project site to Sherpur center. There are plans to enhance school education, supply medicine to the Union health center, a plantation program and setting up a library for the local people. SBIIPCL has undertaken the following initiatives for community development in the project site.

5.9.1 Enhance medical facilities

SBIIPCL will provide selected medicines in the local satellite clinic established by the Government. Coordination with relevant Government agency project authority will strengthen the capacity of the existing center through providing a doctor, health service personnel and necessary medicine for the well-being of the local community. SBIIPCL will support these activities for the next 5 years starting from December 2014.

5.9.2 Enhancement of a local hospital (30 bed)

The project sponsor will enhance a local hospital by providing 30 beds in the nearest clinic in the area or an appropriate location to provide modern medical facilities to the PAPs in particular and generally for the local people as a whole. Tk 3.0 crore (Tk. thirty million) will be allocated for this purpose. This will be done in coordination with the present hospital and district level health administration.

5.9.3 Enhancement of high school education

SBIIPCL will enhance local education through skill training for the teachers, a scholarship for the students, and yearly free supply of bags, pens and food incentives for the poor students for reducing the dropout rate from school. SBIIPCL will construct a new school building, modern toilet and drinking water supply facilities for the school students. Beside this, a non-formal education program will be provided for the local people, especially for the elderly people in the school premises in the night shift.

5.9.4 Establishment a Library documentation and internet based education facilities

SBIIPCL will enhance local education through establish a modern library and documentation centre in the school and supply books for the school students as well as the local community. Internet facilities will be provided for access information, familiar with internet based modern education system as well as solving various subject wise problems with the help of School Teacher.

5.9.5 Dug Tube well for safe drinking water

A total of 5 Tube wells will be dug in the project area for safe drinking water supply among the local community especially for the poorest community members. One Tube well will be located in the new residential area, 1 in the Health center premises another 3 wells dug in Parkul village. Local people will get free access of safe and pure drinking water from these tube wells. Table 5.8 presents the budget for the Community Development Program.

Table 5.8 Proposed Budget for Community Development Program and Monitoring Plan

Sl. No.	Category of Expenditure	Cost (Tk)	Cost	Timing	Responsibility	Remarks
1	Enhancement of Local Education	10,000,000	Free education materials, for reduce dropout of students and enhance construction of new building (modern toilet and drinking water facilities)	1/2015	SBIIPCL	Local School
2	Establishment of a Library	3,000,000	establishment of library , Furniture, Book Shelf, new books, Scientific Journal, Setting up Internet for access to information data and related materials for modern education	1/2015	SBIIPCL	Local School
3	Enhance Health Service in existing centre	1,500,000	Doctors and technical staff in the existing Center for 5 years	12/2014	SBIIPCL	Existing Health Center
4	Enhancement of a Local Hospital	13,500,000	Civil structure, beds, medical equipment, lab facilities	6/2015	SBIIPCL	New health Centre
5	Improvement of 3 km Road	26,00,000	Paved Road Sherpur- Bongaon	6/2015	SBIIPCL	Road 3 km
6	Installation of 5 Wells	1,00,000	Parkul Tk. 20,000 x 5 Tube well		SBIIPCL	Completed
7	Plantation Programme	1,000,000	Along the access road and plant boundary	6/2015	SBIIPCL	2 km access road & plant boundary
8	Monitoring & Evaluation of development activities	1,20,00,000	Total 13 Report for 5 years	12/2014-12/2019	SBIIPCL	Independent NGO
Total		437,00,000				
Miscellaneous (1% of the total)		437,000				
Grand Total		Tk 44,137,000 US\$ 551,712 US\$ Five Hundred and Fifty One Thousand Sven Hundred and Twelve Only				

6. Corrective Action Plan

Based on this audit of the construction phase, a corrective action plan (CAP) has been prepared by prioritizing the key issues and recommendation from the audit results (see table 6.1). Given the nature of the project, BCAS recommends that the implementation of the CAP should be monitored along with the LRP on a quarterly basis starting from December 2014 to December 2019. The CAP has been organized to include the followings:

- Corrective Actions
- Responsibilities
- Deliverable Action Taken
- Timeline for completion the Task

Table 6.1:Corrective Action Plan .

No	Corrective Actions	Responsibilities	Deliverable Action Taken	Time Line
1	Strengthening of record keeping of grievance redress of SBIIPCL	SBIIPCL	Putting GRMP in place	December 2014
2	Strengthening of record keeping of grievance redress of EPC Contractor	EPC Contractor	Make present GRMP more efficient through more access to employees	December 2014
3	Prioritization of employment opportunities to affected persons, especially vulnerable households	SBIIPCL in coordination with EPC Contractor	Review of present status to maximize opportunities for employment of PAHs specially venerable people	December 2014
4	Development of a skill development and livelihood Improvement plan.	SBIIPCL in coordination with independent NGO	Based on recommendation of Social Compliance Audit finalize the implementation plan	January 2015
5	Income Loss of 6 Sharecroppers & 11 Agricultural Laborers	SBIIPCL in coordination with independent NGO	Priority to be given to this group for training and small enterprise development through facilitating interest free micro credit loan Tk. 40,000 for two years and direct employment	January 2015
6	Outstanding Compensation Payment	SBIIPCL in coordination with LAO	CDO to arrange legal assistance to expedite compensation payment	December 2014
7	Appoint Trained Community Development Officer (CDO) to implement monitoring the Livelihood Restoration Plan as well as any other issue raised by community.	SBIIPCL	In TOR of CDO it would clearly mentioned the desired education Level (URP, Geography, Social Science Background) having Theoretical and practical experience in LRP implementation in Bangladesh	October 2014
8	Develop and maintain all legal register of the all project components & Documents the	SBIIPCL	CDO office will be established, where all the documents related to land Acquisition, Legal Notice,	October 2014

	Stakeholder engagement Records		Payment Status, Stakeholder engagement and all contractual records should be maintained for future reference	
9	Training of SBIIPCL official for preparation of Training calendar and Implement the LRP and CAP	SBIIPCL authority through engagement of a Independent Consultant or Consulting firm	Hands on Training on monitoring the implementation of LARP, CAP	December, 2014
10	Prepare Specific Training Module for Vocational Training and SED for the PAHs	SBIIPCL	Engagement a Technical Expert (Vocational Training Expert)	December, 2014
11	Formation and activate The Joint Committee for Community Relation (JCCR)	SBIIPCL, CDO will take initiatives	From each components of the Project at least 2 representatives, Local Government and SBIIPCL representatives will form the committee for discussion and resolve any kind of Grievances and compensation	November, 2014
12	Maintain proper Record of employment and vendor opportunity provided to the PAPs and local community & Recording the engagement of Local community in the ongoing construction project and in the associates components	SBIIPCL CDO, EPC Contractor,	List the local Vendors Daily Register of labor specially labor engaged from PAHs. Total Number of working days of each labor. Documents of each Labor contract .Record daily & Overtime payment sleep having signature and finger sprint of each labor	October, 2014
13	Prepare Green Belt around the project site and plantation program along the access road	SBIIPCL	Plantation around the project boundary and Access Road. Suitable Species will be selected consultation with a botanist	May, 2015

7.0 Monitoring & Reporting

SBIIPCL recognizes the importance of monitoring in tracking the progress of resettlement and measuring the effectiveness of the measures designed to mitigate the impacts of the project. It is also important that SBIIPCL demonstrates its commitment to cooperating with the local communities to ensure the successful implementation of the project. In the fourth quarter of 2014, SBIIPCL will engage an experienced entity to monitor and evaluate the corrective actions implementation. The monitoring program will be focused both on short-term and long-term impacts. In the short term, the programme will track, at minimum, whether the following actions proposed in the action plan are carried out according to the agreed timetable and procedures:

- Implementation of livelihood restoration plan and the improvement of the living conditions of PAHs;
- Training programmes for small enterprise development are organized and carried out;
- Separate grants are provided to vulnerable households; and
- Grievance procedure is in place and functioning with analysis of grievances raised and resolution reached.

In the long-term monitoring will focus on the effectiveness of the mitigation measures by assessing income levels and standards of living of the PAPs. The following indicators, at minimum, will be monitored:

- Total monthly household income and sources of income;
- Total monthly expenditure per household and main items of expense;
- Number of household members employed by the project;
- Satisfaction and standard of living of the PAHs; and
- Monthly income being generated from household enterprise schemes.

The entity hired to carry out the monitoring plan will conduct follow-up surveys with affected households once every three months for the first year (beginning in December 2014 and ending in December 2015), and once every six months for the next three years (2016 to 2019). The findings of the surveys will be submitted as monitoring reports to Lenders. Table 7.1 given the Monitoring Schedule of LRP and Community Development Plan

Table 7.1: Monitoring Schedule of LRP & Community Development Program

1st Quarterly monitoring survey and submission of report	- December 2014
2nd Quarterly monitoring survey and submission of report	- March, 2015.
3rd Quarterly monitoring survey and submission of report	- June, 2015.
4th Quarterly monitoring survey and submission of report	- September 2015
5th Quarterly monitoring survey and submission of report & Annual Monitoring Report (AMR)	- December, 2015.
6th monitoring survey and submission of report (Bi-annual)	- June 2016
7th monitoring survey and submission of report & Annual Monitoring Report (AMR)	- December, 2016.
8th monitoring survey and submission of report (Bi-annual)	- June 2017
9th monitoring survey and submission of report b & Annual Monitoring Report (AMR)	- December, 2017.
10th monitoring survey and submission of report (Bi-annual)	- June 2018
11th monitoring survey and submission of report & Annual Monitoring Report (AMR)	- December, 2018.
12th monitoring survey and submission of report (Bi-annual)	- June 2019
13th monitoring survey and submission of report Final Monitoring & Evaluation Report	- December, 2019

8. Conclusions

The Social Compliance Audit was carried out as per ADB SPS 2009, IFC PS-5, ADB's SR 2 and SR4 principles. The acquisition of 11 acres of land is complete following the procedures of the Land Acquisition Act 1982. The compensation amount of Tk 29,500 per decimal of land has been agreed upon and payment to all PAHs has been made in full.

The social compliance audit reveals that grievance has been tackled by the Site Manager and there was no fully-fledged Grievance Redress Mechanism in place. SBIIPCL has initiated the implementation of the mechanism and have appointed a Community Development Officer (CDO) who will be responsible for implementing the mechanism following the plan that has been developed and attached as *Annexure C*.

At present SBIIPCL has no Livelihood Restoration Plan in place for the PAHs which includes landowners, share croppers and agricultural laborers in the 11 acres of the project site. A plan, as recommended in this Social Compliance Audit report, should be immediately implemented.

A socio-economic survey has been carried out in order to design a Livelihood Restoration Plan. The plan identified through a categorization process 31 PAHs from the male and female groups who will be eligible to be included in the plan. In the group of PAHs one land owner Abdul Aziz has become landless after acquisition and falls under a special category. It is recommended that he should be included for training in small enterprise development and after the training he should be given Tk 200,000 as a grant by SBIIPCL to start a small poultry or goat raising enterprise.

The male members among the 31 PAHs should be trained in a nearby vocational training center as electricians, welders and mechanical workshop workers for a period of six months with full sponsorship from SBIIPCL. A training center is to be set up in Parkul or adjacent area in a rented house for both males and females. The female PAHs should be trained in stitching and at the end of the training be given one sewing machine each. They will also have the opportunity in receiving training in poultry and goat raising in the training center located in Parkul. SBIIPCL should give interest free loans for one year after the training of the females and additionally for longer term sustainability SBIIPCL should facilitate micro credit especially for the female group.

SBIIPCL will take immediate action through allocation of budget for implementation of LRP and CAP as planned in this Project Site Social Compliance Audit Report. SBIIPCL have authority to set up a CDO office from where all the development activities as mentioned in this report will be undertaken. Under the CDO office the LRP and CAP should be implemented. Review the monitoring activities should be carried out as per the plan outlined in this report. For monitoring of the community development and associated activities an experienced consultant

should be used having experience in LRP and CDP following ADB SPS and IFC PS. The framework of the monitoring report should be finalized including selective indicators for meeting the desired lenders requirement. SBIIPCL, CDO along with his team should clearly understand their tasks including proposed plan, lenders requirement (ADB, IFC) , proper use of allocated budget, Grievance Redress Mechanism through formation of JCCR , conflict resolution and generating confidence among the PAHs for successful implementation of plans.

Annexure A

ANNEXURE-A

FGD & Household Survey Questionnaire

Summit Bibiyana I&II Power Company Limited

Bangladesh Centre for Advanced Studies (BCAS)

Section-1: Identification of the Interviewee

Interview Sl. No.:, Name of Household Head:..... Religion (code):

.....

Father's /Husband's Name:Village:

.....

Union:, Upazila:, District:

.....

Name of the Respondent:, Relationship with HH. Head:

.....

Strata: High Impact Zone----- Medium Impact Zone----- Low Impact Zone----- Fishing Community-

Section-2: Socio-Demographic characteristics

1. Household profile (Start with Head of Household)

SL	Names of the household members	Sex Male=1 Female =2	Relation with HH (code)	Age	Marital Status (code)	Education (code)	Occupation (code)	
							Primary	Secondary
1								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								

Code of Religion: Muslim – 1, Hindu – 2, Buddhist – 3, Christian – 4, Others (specify)

Marital Status: Married – 1, Unmarried - 2, Divorced – 3, Widower - 4, Widow – 5 Separated – 6, Others (specify) – 6

Education: Illiterate - 1, Can sign only – 2, Primary – 3, Secondary -4, S.S.C and equivalent- 5, H.S.C and equivalent - 6, Degree and above - 7.

Relationship: Father – 1, Mother - 2, Husband – 3, Wife - 4, Son - 5, Son in-law - 6, Daughter – 7, Daughter in-law – 8, Brother - 9, Brother in-law –10, Sister - 11, Sister in-law – 12, Nephew - 13, Niece -14, Grandson - 15, Granddaughter - 16, Uncle - 17, Aunt -18, Grand father-19, Grand mother-20, Cousin-21, Others (specify) -22.

Occupation: Agriculture – 1, Wage labor – 2, Household work-3, Work in abroad-4, Fishing – 5, Van /Rickshaw puller – 6, Service – 7, Business – 8, Handicraft – 9, Student – 10, Unemployed – 11, Carpenter\ blacksmith – 12, Others (specify)

2. Amount of Household Own Land by Use Pattern

Land Use Pattern	Area (decimal)	Average sale price (per decimal)
Homestead		
Kitchen garden/Homestead garden		
Horticulture/Nursery		
Agricultural land		
Pond /Ditch		
Market/Hat/Bazar		
Agro-forestry		
Bushes/Jungle		
Fallow land		
Others (Specify)		

3. Share cropping/leasing of land

Type	Decimal	Mode of sharing (by value)
Share-in		
Share-out		
Leasing-in		
Leasing-out		
Others(specify)		

4. Employment Status

Sex of Household Member	Employment (No. of HH. Members)			
	Full-time employment	Part-time employment	Un-employment	Remarks
Male				
Female				
Children				
Others (Specify)				

5. Annual Household Income and Expenditure

Source of income	Annual gross income (TK)	Cash sale income (TK)	HH consumption expenditure Item	Annual cash expenditure (TK)
Rice/Wheat production			Rice/Wheat	
Vegetables			Pulse	
Daily wages			Meat	
Service			Fish	
Business/shop owner			Vegetables and Fruits	
Fruits			Cloths	
Timber and Timber products			House construction/ Repairs	
Fuel wood			Social Entertainment	
Fish			Education	
Livestock			Transport	
Poultry			Health/Medicine	
Handicrafts			Kerosene	
Remittance			Electricity/Lighting	
			Fuel wood + straw+ cow dung+ biogas	
			Labor employment	
Others (Specify)			Others (Specify)	

6. Economic status of the households

Sectors	Status (code)	Remarks
Food availability		
Clothing		
Accommodation/ houses		
Educational facilities		
Medical facilities		
Transport facilities		
Entertainment		
Others (Specify)		

Status Code: Good = 1, Satisfactory = 2, Unsatisfied = 3.

7. Identify your family problems with duration and intensity (use problem code) you face during crisis.

Factors	Duration (month)	Intensity of the problem	Remarks
Employment Opportunity			
Availability food			
Availability of safe water			
Problems for purchasing cloths			
Problem for treatment			
Problem for children education			
House construction			
Others (Specify)			

Intensity of the problem code: Severe = 1, Moderate = 2, Low= 3, No problem = 4.

8. Involvement of household members involved in NGOs/CBOs

Yes - 1 No - 2

9. If yes, how many persons of your HH are involved in NGOs/CBOs?

Number of persons involved:

10. What benefits are you getting from NGOs/CBOs?

Subject	Received Training	Source of fund	Others
Poultry rearing			
Livestock rearing			
Nursery/Kitchen Gardening			
Handicrafts (specify)			
Pond Fishing			
Small enterprise			
Tailoring			
Fish drying			
Net weaving			
Health, Sanitation and Water supply			
Others (specify)			

11. Did you receive any loan from bank or other sources?

Yes – 1 No - 2

Sources of loan/facilities	Amount of total loan(TK)	Present of amount loan(TK)	Purpose of loan	No. of loans received
12. If yes, describe your loan receiving status by sources				
Bank				
NGOs				
Money lender				
Relatives				
Others(specify)				

13. Household Stock of Durable Assets

Assets	No.
Bicycle	
Motorcycle	
Cot/Khat	
Table	
Chair	
Car	
Refrigerator	
T.V.	
Radio	
Computer	
Mobile set	
Boat	
Power tiller /Tractor	
Tube well	
Others (specify)	

14. Housing Structure

Status of Housing	No
Building (Brick floor+ wall + roof)	
Brick floor + tin wall + tin roof	
Earthen floor + tin wall + tin roof	
Earthen floor + thatch wall + tin roof	
Thatch	
Others (specify)	

15. Sources of fuel for cooking

Types	Source			
	Own land	Collect from other land	Common property resources	Market
Wood				
Tree branches				
Tree leaf				
Straw				
Dung				
Bushes				
LPG				
Others(specify)				

16. Status of biomass fuel supply

Types	Status of Supply
Wood	
Tree branches	
Tree leaf	
Straw	
Dung	
Bushes	
Others (specify)	

Status Code: Sufficient -1, Insufficient -2

17. Sources and availability status of lighting (please v)

Sources of lighting	Status of availability	Remarks
Electricity		
Kerosene		
Candle		
Solar PV		
Others (specify)		

Availability status code: Adequate -1: Inadequate – 2 Not available - 3

18. Extent of environmental problems, which affect livelihood (by source and status of problem)

Factors	Status of Problem
Water pollution	
Air pollution	
Industrial pollution	
Burning fuel, trees and agriculture residue	
Over population	
Deforestation	
River/canal bank erosion	
Land erosion	
Flash floods	
Arsenic contamination	
Sedimentation of water bodies	
Health and Sanitation problem	
Disease	
Noise pollution	
Others (specify)	

Environmental problem status code: No problem -1, Low problem -2, Moderate problem -3, Severe problem -4

19 Sources of water pollution and status of problem

Source	Status of Problem
Industrial waste	
Human waste	
Water transport	
Chemical feature/personnel	
Siltation	
Animal waste	
Pollution from upstream	
Urban waste	
Others (specify)	

Water Pollution problem status code: No problem -1, Low problem -2, Moderate problem -3, Severe problem -4

20. Sources of noise pollution and status of problem

Factors	Status of Problem
Vehicles	
Big industries	
Small industries	

Construction work	
Households sources (Generator)	
Power supply(Irrigation engine)	
Commercial areas	
Others (specify)	

Noise Pollution problem status code: No problem -1, Low problem -2, Moderate problem -3, Severe problem -4

21. Sources of air pollution and status of problem

Factors	Status of Problem
Brick field	
Vehicles	
Construction work	
Small Industries	
Big Industries	
Diesel engine	
Commercial areas	
Gas Field	
Burning fuel, trees and agriculture residue	
Open defecation	
Others (specify)	

Air pollution problem status code: No problem -1, Low problem -2, Moderate problem -3, Severe problem -4

Perception about the Bibiyana Power Project and its Impact on Household

22. Do you know about the proposed Bibiyana Power Project?

Yes – 1 No – 2

23. If yes, would you (your family) be personally affected due to the project ?

Yes – 1 No – 2

24. If yes, identify the Negative Impacts on your family livelihood, economic assets and others.

Expected Negative Impacts/loss items of family	Please (✓) appropriate places	Quantity of loss	Amount loss (present value Tk)
Loss of homestead land			
Loss of cultivable land			
Loss of annual crops			
Loss of trees			
Loss of annual fish catch from river			
Employment loss per year			
Income loss per year			

Health loss per year			
Communication problem			
Livestock loss per year			
Noise pollution			
Air pollution			
Water pollution			
Others(specify)			
Business (shop keeper) loss			

25. If your family lose any assts or is negatively impacted by the power project, how will you mitigate the loss?

26. Will you expect any help from government or project to mitigate your loss?

Yes – 1 No – 2

27. If yes, please describe.

28. Expected Positive Impact of the Power Project.

Positive Impact	Please (v) appropriate places
More employment opportunity	
Access to electricity	
Access to infrastructure road	
More local socio economic activities	
Availability of irrigation water	
National development	
Reliable supply of electricity in the area	
Others(specify)	

29. Health situation of Household Members (During last 1 year)

Name of Diseases	No. of affected members				Source of Treatment	Level of satisfaction with medical treatment
	Male	Female	Children			
			Boy	Girl		
Cold fever						
Skin disease						
Jaundice						
Asthma						
Diarrhoea						
Typhoid						
Chicken Pox						
Tuberculosis						
Viral Hepatitis						
Malaria						

Hypertension						
Stroke						
Diabetes						
Others (specify)						

Source of Treatment Code: No treatment =1, Kobiraj = 2, Homeopathy = 3, Medicine Shop = 4, Upazila Health Complex = 5, Private Practitioner Doctor = 6, Village Doctor = 7, Others = 8.

Level of satisfaction with medical treatment: Good = 1, Satisfied = 2, Unsatisfied = 3

Annual School days lost due to illness : Boy: Girls:
(persons)

Annual working days lost due to illness : Male: Female:
(persons)

Name of the interviewer: Name of the Supervisor:

Remarks: Date of Interview:

Annexure B

PHOTOGRAPHS OF SBPCL-II POWER PLANT PROJECT ACTIVITIES



ADB Site Visit at project site August 2014



Consultation with 14 PAHs



Consultation with Local Persons



Consultation with Local Persons



Large Consultation Meeting



Consultation Meeting



Previous site of Resettler



Existing site of Resettler



Consultation with resettlers



Consultation with resettlers




Site location of SBPCL II



Consultation Meeting with the
Stakeholders

Annexure C

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GRIEVANCE REDRESS MECHANISM PROCEDURE



AMENDMENT RECORD

Page2



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GLOSSARY OF TERMS

Not Applicable

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ABBREVIATIONS

CDO	Community Development Officer.
EHS	Environment Health Safety
GRM	Grievance Redress Mechanism
GRC	Grievance Redress Committee
JCCR	Joint Committee for Community Relations


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1.0 PURPOSE & SCOPE

The purpose of this procedure is to have a clear understanding as to how any grievance raised by project affected party will be addressed and resolved and sets out the Grievance Redress Mechanism by which SBIIPCL shall receive, evaluate and facilitate resolution of affected communities concerns and complaints about SBIIPCL's operations. This procedure is applicable to the Project Affected People (PAPs) and would also involve the process by which SBIIPCL will not only receive grievances of PAPs but would also receive questions, requests for information and suggestions in relation to the its operations from the affected community. .

2.0 GRIEVANCE REDRESSAL MECHANISM & SOCIO-ECONOMIC ENVIRONMENT PROTECTION

SBIIPCL shall develop a two tiered grievance redress procedure to address grievances raised by PAP. Two committees will be formed titled GRC-Plant & GRC-Corporate.

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3.0 GRC-PLANT COMMITTEE

Responsibility:

SBIIPCL is planning to set up a Joint Committee for Community Relations (JCCR). The JCCR will comprise of representatives of the PAPs, a representative of SBIIPCL local management and elected local representatives. The committee will include representatives from Khas land resettlers, sharecroppers, women and other members selected by the community groups. This Committee will also act as a Grievance Redress Committee (GRC). Community Development Officer (CDO) shall duly communicate and publicize to the PAP the company grievance mechanism and shall include, inter alia, at least the following information:

- What the project level mechanism is capable of delivering and what benefits the complainants can receive from using the company grievance mechanism as opposed to other resolution mechanisms,
- Who can raise complaints
- Where, when and how community members can file complaints,
- Who is responsible for receiving and responding to complaints and any external parties that can take complaints from communities, and
- What sort of response complainant can expect from the company including timing of response

The CDO shall also inform the project affected community about the compensation disbursed, resettlement process and any impacts generated by the Project and acknowledge the various levels of risks and impacts

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reported by the community and in order to report back to GRC-Plant Committee through EHS Head. The committee will also address those issues raised by contractor, subcontractor personnel in the Plant.


Formation of the Committee

- SBIIPCL representative
- Elected local representative
- Representative of PAPs.
- Plant Manager
- EHS Manager (will act as Secretary of the Committee)
- Operation Manager.
- Maintenance Manager
- Community Development Officer. (will act as Grievance Redress Officer)

REDRESS MECHANISM

Publicizing Grievance Management Procedures

SBIIPCL Grievance Redress Mechanism will be posted in English & Bangla in the Plant Main Gate with flow chart and drawings ensuring that they are visually easy to understand. Before the Plant operation, GRC-Plant & GRC-Corporate will make a cell from the two committee members who will conduct meetings with PAP (on a group or individual level) to share the SBIIPCL Grievance Redress Mechanism. A notice about the meeting will be announced before a week. During the meeting, Hand note written in Bangla (For better understanding of the PAP as their Mother tongue is Bangla) stating the mechanism of SBIIPCL Grievance Redress

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will be circulated. This Hand notes will also always be available in the Plant Main Gate for distribution. During meeting, this Committee will elaborately describe the SBIIPCL Grievance Redress Mechanism so that they can understand that they can raise the grievance to appropriate authority easily and with no cost and the process and time required to redress the grievance.


Receiving Concerns and Complaints

Two register, one in the Plant Main Gate and the other one in the Community Development officer office, will be kept for registering the grievance raised by the PAP. Resettlement and compensation issue shall be received through the RAP (Resettlement Action Plan) implementing agency. All operational, construction issue can be logged at the Main Gate register or CDO office register. All incoming grievances shall be acknowledged as soon as possible with one month and a formal confirmation in the forms of a complaint number r other identifier and a timeline for response shall be properly communicated to the complainant with one month from the time of lodgment of the complaint.

i) For the resettlement and compensation issues :

The JCCR will have the authority to resolve resettlement and compensation issues outside legal courts. The JCCR will receive grievance cases from the PAPs through the RAP implementing agency.


The grievance mechanism and jurisdiction of the JCCR through individual contacts and village consultation meetings - Through public consultations, the PAPs will be informed that they have a right to grievance redress that will be implemented by SBIIPCL. SBIIPCL's Community Development Officer jointly with the RAP implementing agency will assist the PAPs in lodging their complaints related to resettlement, entitlements and losses in

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a required format. Illiterate people will also be able to submit their grievance either verbally, or with the assistance from CDO. All complaints from the PAPs will be received at the office of the CDO, the member secretary of the JCCR with a copy to the union Parishad representative. Upon receipt of a complaint, the representative of the JCCR in the GRCs will organize a GRC hearing session to discuss the complaint. The GRC will review the proceedings and convey resolutions in a confidential manner to the concerned individuals, either directly or through their selected representatives. If the matter requires arbitration through the courts, the case will be referred to the court. The JCCR will strive to settle the disputes within shortest possible time (i.e. within 1 month) of receiving the complaints from the PAPs.

ii) For the construction & Operational issues :

These issues will be collected by the Community Development officer weekly. The Community Development officer will sit with the Project affected People (PAP) or Plant neighbor's community once in a three month to receive the grievance face to face, discuss the action plant and status of already raised grievance/s. In addition to this, telephone number of the Community Development officer & EHS Head will be posted in the Main Gate and Hand note, allowing PAP to communicate any time through remote access methods. Further, grievance collection boxes will be installed in locations as decided in the 1st meeting of JCCR.


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Reviewing and Investigating Grievances

GRC-Plant will sit with the PAP in six monthly to acknowledge the SBIIPCL health, safety and environment policy. The Community Development officer will report all the issues to the EHS Head.

EHS Head will put the grievance to the GRC Committee on merit basis. The Plant GRC committee will sit together once in three months, the Plant GRC may also sit any time upon the request of EHS Head. The issue will be elaborately discussed and try to solve by taking mitigation action which caused to raise the issue. They will follow up the action up to three months after first sitting and action plan. On next meeting follow up will be done of previous action and take new step if necessary. In the mean time, Development officer will acknowledge all the events to neighbors. He will be in close contact with the neighbors. After four months GRC Plant committee may send this issue to the GRC corporate. The issues which remain unresolved by this team will be escalated to next level at GRC-Corporate

- The first step in any grievance redress is to ensure collection of any grievance that may exist
- Choose a system designed to handle complaints and concerns and be sure to log all grievances you receive;
- Make sure to get all the facts and talk to all parties involved so you have a clear picture of what took place;
- Do not dismiss any grievance without giving it proper attention and do not imply that any person's grievance is unfounded;
- Deliver your decisions as quickly and efficiently as possible, stating whatever facts you can so those involved know you based your decision on facts, not emotions;

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- Follow up with the parties involved in each grievance to ensure the problem has not reoccurred and that no retaliatory acts have been taken.
- Report half yearly to GRC-Corporate stating the grievance no, mitigation action, affected parties response with further mitigation plan.


4.0 GRC-CORPORATE COMMITTEE

For managing serious and adverse grievances, there will be a Grievance Redress Committee (GRC)-Corporate. In general, the members of GRC-Committee will meet half- yearly and evaluate the overall grievance redress mechanism and on the request of Plant Committee as per Table 3.2. But they can meet at any time to solve any critical grievance.

- Review the status of GRM;
- Resolve the critical grievances as is required;
- Provide required suggestion and guidelines to make the GRM more effective.

4.1 Formation of the Committee

- Chief Executive officer, SBIIPCL
- Chief Operating Officer, Summit Turbine Division
- DGM-Operation & Compliance, Summit Turbine Division
- EHS Manager
- Plant Manager.
- Community Development Officer
- Safety Officer.

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- PAPs /Community Representative.
- Elected local representative.

4.2 **Redress Mechanism:**


GRC-Plant is responsible to address first all grievance raised by any party. If the GRC-plant fails to resolve the grievance after taking action or the affected party is not pleased with the mitigation measure or the GRC-Plant feels that this issue need to be escalated to the GRC-corporate then the issue will be placed to GRC-Corporate for mitigation action. GRC-Corporate can independently select any grievance to redress in the GRC-Corporate. When GRC-corporate is engaged in redressing any grievance then through EHS Head, Community Development Officer will acknowledge all the status to the affected party and take feedback for reporting to the GRC-Corporate through EHS Head.

5.0 **ARRANGEMENTS TO RECEIVE GRIEVANCES**

SBIIPCL will make following arrangement to ensure satisfactory collection grievances from affected parties (PAP) as is mentioned in Table1.

Table 1: Mode of placing grievance and contact/placing arrangement

Mode of placing grievance	Place/contact mode
Grievance box	One grievance box will be placed in the entrance of the plant
Grievance Log	One log book will be kept at the entrance of the plant to receive verbal grievances & the other one in the CDO office.
Phone number	Phone number of Community Development Officer/Safety Officer
e-mail	e-mail of Community Development Officer/ Safety Officer

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6.0 Time for Response and Dealing Responsibility

GRM is a time bound process. The PAP cannot be made to wait for a response of a placed grievance for an uncertain time period. In the following Table 2, a tentative time period to response against a grievance by different entity is mentioned.

Table 2: Time to response and dealing entity

The maximum day to response	Dealing responsibility
Within 2 week from the date of receiving any grievance	Community Development Officer
Within 3 weeks/ NEXT schedule meeting from the date of receive the grievance from EHS Head	GRC-Plant
After 4 weeks issue placed to GRC-Corporate	GRC-Corporate

7.0 Identification of Stake holders and Setting Goals, Objectives and Scope

Identification of stake holder is very important for ensuring effective implementation of GRM and sustainability of a Project. SBIIPCL deals with two types of major stakeholders as are mentioned in Table3


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Table 3: Type of stakeholders and tentative respondents

Type of stakeholder	Tentative respondent
External stake holder	<ol style="list-style-type: none"> 1. PAPs 2. Relevant govt. agencies like the DOE, BPDB and so on. 3. Villagers adjacent to the plant 4. Fishing Community of adjacent Villages 5. Local govt. representatives 6. Lending partners


The scope of this GRM will mainly focus on the villagers/community adjoining the Plant, PAPs and available local government agencies like Union Parishad, Upazila Parishad and so on.

8.0 Documenting and Publicizing Grievance Management Procedures

SBIIPCL's Community Development Officers, or individuals working in analogous positions, should be responsible under the supervision of EHS Head for publicizing the procedure through mentioned methods.

Table 4: Proposed communication methods to publicize GRM

Methods	What to consider
Face-to-Face Meetings (group or individual)	<ul style="list-style-type: none"> • Group meetings work especially well where each impact of operations on communities affects at least several people. • Individual meetings would be more appropriate when an issue is specific to one person. • Use project-related public consultation to publicize the mechanism.


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Printed Materials, Grievance	<ul style="list-style-type: none"> Hand note printed Bengali & English. Grievance forms for written complaints can also include key facts about
Displays(stands, wall mounts, billboards)	<ul style="list-style-type: none"> As there are three villages live in approximately more than 1km away
Company Representatives (community Development officers, employees)	<ul style="list-style-type: none"> Establish a personal connection with communities through a local presence or visits by company representatives responsible for handling grievances. Equip employees with necessary information about grievance procedures; where grievance procedures are fairly complex, consider providing training for employees.
Online (Web site)	<ul style="list-style-type: none"> If information about the mechanism is provided on the company Web site, then publicize the Web site to communities through methods described above.
Training Sessions/ CSR (for communities)	<ul style="list-style-type: none"> Consider bringing project management staff and communities together during training sessions to facilitate understanding of project operations.

9.0 Receiving and Keeping Track of Grievances

SBIIPCL will practice the following procedure while receiving any grievance:

All incoming grievances will be acknowledged in accordance with the mentioned procedure and time limit. A formal confirmation—with a complaint number, or other identifier, and a timeline for response—assures the complainant that the organization is responding properly, and it gives the project a record of the allegation. If a complaint is received in person, there will be a practice to acknowledge it on the spot.

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If any more complex investigation is required, the complainant should receive an update explaining the actions required to resolve the complaint, and the likely timeline.

SBIIPCL will explain up front what claims clearly are outside the scope of the mechanism and what alternative avenues communities can use to address these potential issues.

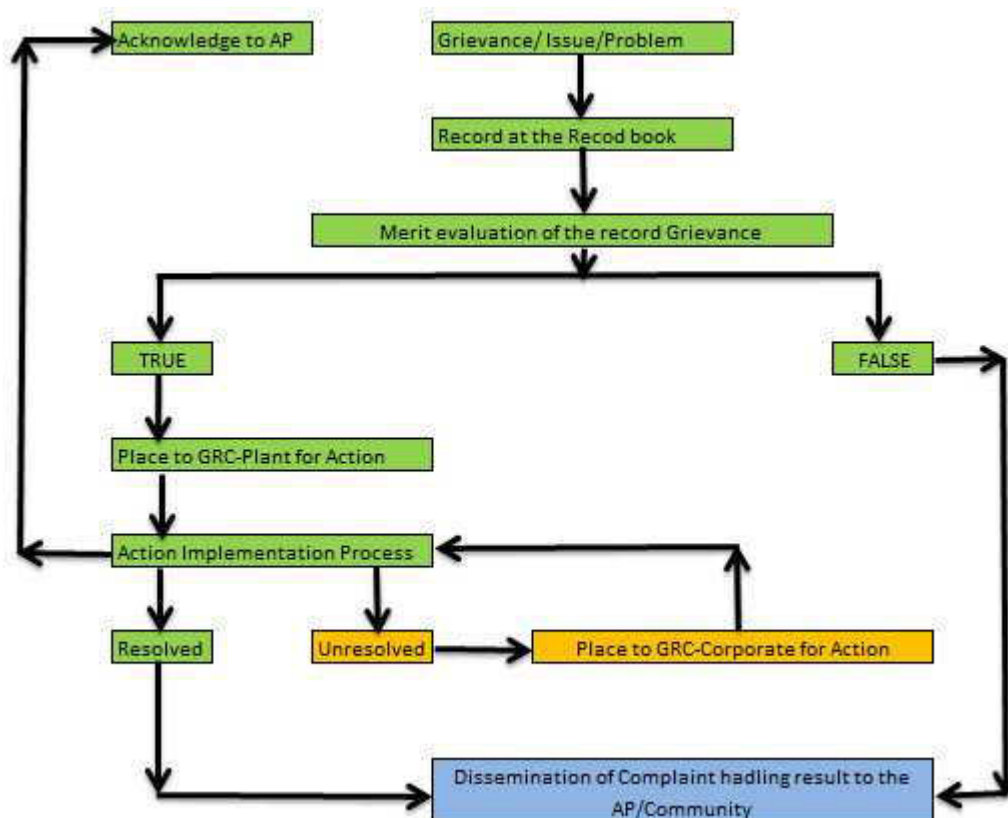
Table 4 shows proposed methods for receiving grievances, from least to most formalize as are to be practice in SBIIPCL 341MW project. SBIIPCL will choose one or several of methods, depending on their particular situations.


Table 4: Level of formalization and process to practice

Level of formalization	Process to practice
Least formalized: Oral complaints Received face to face	Staff charged with collection of grievances (e.g., , Community Development, or Community representative to take grievances) or writes down complaints at group or individual meetings, during field visits, or at designated locations.
Somewhat formalized: Oral complaints received through remote-access methods	Staff accepts grievances through a designated telephone line.
More formalized: Written complaints received face-to-face	Staff accepts written submissions from an individual or a group at group or individual meetings, during field visits, or at designated locations.
Most formalized: Written complaints received through remote-access methods	Complaints come in via regular mail, Internet (Website, email), or grievance collection boxes (consider having multiple locations).

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10. FLOW CHART OF GRIEVANCE REDRESS MECHANISM



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11.0 COMPLAINT FORM

Appendix1: Comments and Complaints Sample Form

Reference No:	
Full Name	
Contact Information and Preferred Method of Communication	<input type="checkbox"/> By Post: <input type="checkbox"/> By Telephone: <input type="checkbox"/> By E-mail:
Description of Incident or Grievance:	
Date of incident/Grievance	
	<input type="checkbox"/> One time incident/grievance(date-----) <input type="checkbox"/> Happened more than once (how many times? -----) <input type="checkbox"/> On-going(currently expecting problem)
What would you like to see happen to resolve the problem that causes Grievance?	

Annexure D

Annexure-D

List of FGD Discussion Summary

FGD Groups	Date of Meetings	Location	Number of participants	Venue of FGD Village	Issue discussed
Resettlement	3 September 2013	Resettle site, Parkul	19	Parkul	Received Land, Assistance to relocate and reconstruct the house, PAHs Demand
Women Vulnerable	5 September 2013	Resettle site, Parkul	12	Parkul	Women Vulnerability for the project, IGA Training,
Landowner	12 September 2013	West of project site	16	Parkul	Land Compensation, PAPs Livelihood, Demand
Share Cropper	17 September 2013	project site	10	Parkul	Share agri land, Livelihood, Demand
Local Elite	13 September 2013	project site	20	Parkul	Advantage, Disadvantage and demand of the project
Day Laborers	9 March, 2011	Bongaon	12	Bongaon	
Agricultural and day laborers	29 March, 2011	Parkul	14	Parkul	
Vulnerable Women Group	20 March, 2011	Paharpur	16	Paharpur	
Share Cropper	1 May, 2011	Bongaon	14	Bongaon	
Day Laborers	24 March, 2011	Lama Tajpur	9	Lama Tajpur	
Mixed group	2 May, 2011	Lama Tajpur	12	Lama Tajpur	
Fisherman	22 March, 2011	Char Tajpur	14	Char Tajpur	
Fisherman	20 August 2011	Monumukh	12	Monumukh	Sand Mining Impact
Fisherman	20 May 2011	Monumukh (Fish landing site)	10	Monumukh	Sand Mining Impact
Land Owner	19 August 2014	Local Health Centre , East of plant site	27	Monumukh	Land Compensation, Livelihood. Other issues
Construction Worker	19 August 2014	Local Health Centre	18	Parkul	Agri laborer, working Environment
Resettler (male)	19 August 2014	Local Health Centre	12	Parkul	Status of Newly Resettled Site, Water Logging Problem, Job Opportunity
Resettler (female)	19 August 2014	Local Health Centre	8	Parkul	Status of Newly Resettled Site, Water Logging Problem, Job Opportunity

List of Large Consultation Meeting held in the following locations and venue

Consultation Meeting	Date	Location	Number of participants	Issue discussed	Impacts
Public Consultation Meeting	14 August, 2014	Auskandi Union Parishad Bhaban	67	Social & Environmental Impact, Grievances	
Public Consultation Meeting	5 March, 2014	Auskandi Union Parishad Bhaban	59	Completion the Draft ESIA Report for getting the opinion of the people residing around the project	
Public Consultation Meeting	19 May, 2011	Mokatab (Arabic Institution) in Parkul village	100		
Public Consultation Meeting	28 May, 2011	Hafiza Community Centre, Sherpur, nabigonj, Habigonj	115		