

## **Semiannual Social Monitoring Report**

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**Loan No- G0582- BAN  
December 2018**

### **Semi-annual Social Monitoring Report on Emergency Assistance Porject**

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**G0582-BAN: Emergency Assistance Project (EAP) -**

**From July to December 2018**

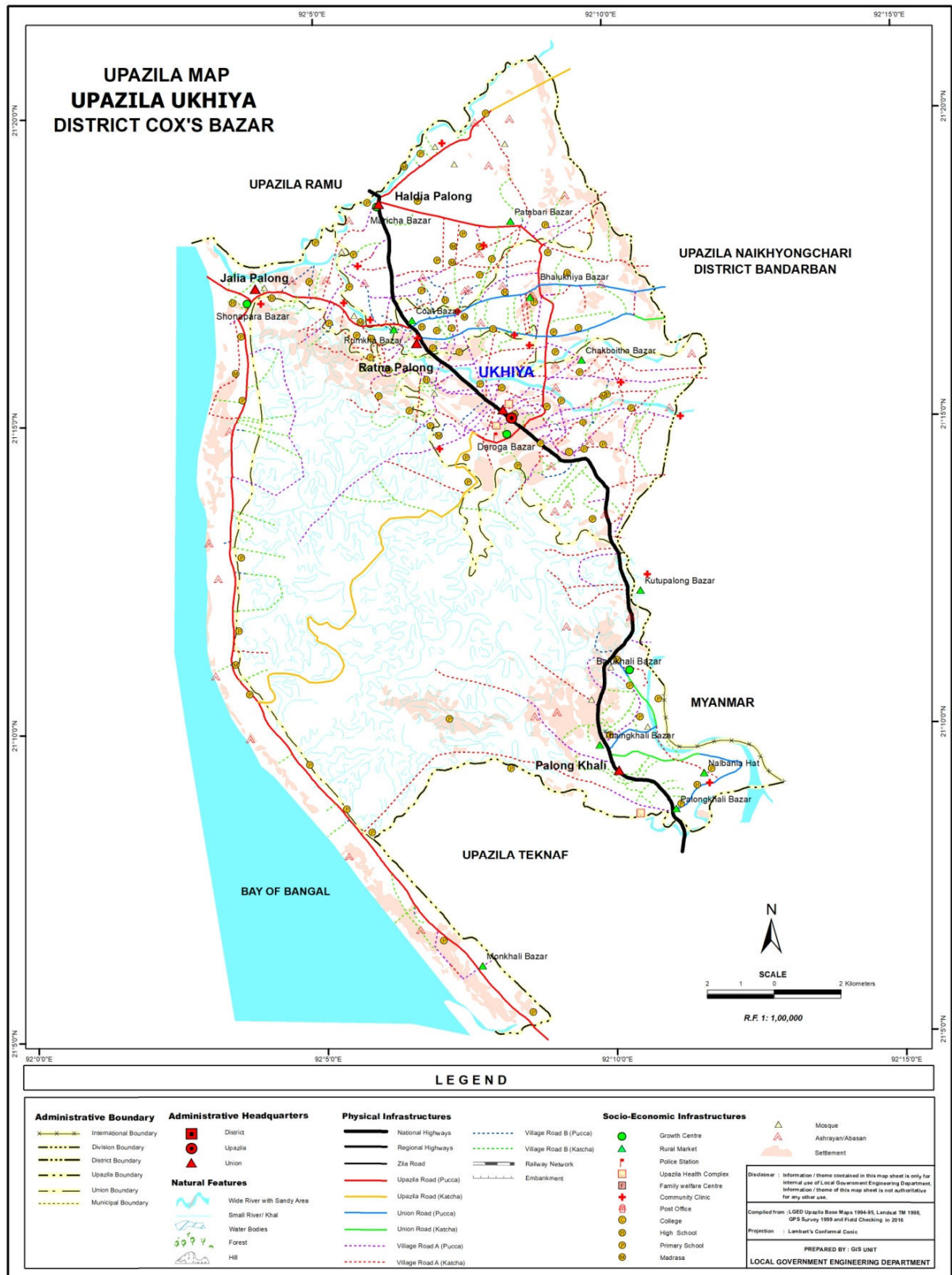
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<sup>1</sup>This Social Safeguards Semi-annual Report has been prepared by the National Consultant –Social Safeguards Specialist with the assistance, and on be behalf of the Executive Agencies (LGED, DPHE, and BREB& RHD) for the Emergency Assistance Project. The report will be made publicly available in accordance with ADB's public communications policy (2011). It does not necessarily reflect the views of ADB.

## Table of Contents

Map :Ukhiya Upazila .....	3
<b>A. The Project Background .....</b>	<b>5</b>
<b>B. Objectives of the Proposed Project .....</b>	<b>5</b>
<b>C. Project Rationale and Linkage to Country /Regional Strategy .....</b>	<b>6</b>
<b>D. ADB Fact Finding Mission .....</b>	<b>6</b>
<b>E. ADB Inception Mission .....</b>	<b>6</b>
<b>F. Outputs of the Project.....</b>	<b>7</b>
<b>G. ADB Social Safeguards Requirements .....</b>	<b>8</b>
<b>H. Indigenous People Impact (IPP).....</b>	<b>8</b>
<b>I. Grievance Redress Mechanism (GRM).....</b>	<b>9</b>
<b>J. Scope of social Safeguards Activities.....</b>	<b>10</b>
<b>K. Obligation of the Brower / EA for Social Safeguards .....</b>	<b>11</b>
<b>L. Status of Sub-projects &amp; Resettlement Impacts under DPHE .....</b>	<b>12</b>
<b>M. Status of Sub-projects under LGED &amp; Resettlement Impacts .....</b>	<b>14</b>
<b>N. Status of the Sub-projects &amp; Resettlement Impacts under BREB .....</b>	<b>19</b>
<b>O. Status of Sub-projects &amp; Resettlement Impacts under RHD.....</b>	<b>21</b>
<b>P. Stakeholders Consultations .....</b>	<b>22</b>
<b>Q. Due Diligence Reports .....</b>	<b>23</b>
<b>R. Conclusion .....</b>	<b>23</b>
<b>S. Way Forward – Proposed Activities.....</b>	<b>24</b>
<b>T. Annex 01: List of the Packages of Sub-projects .....</b>	<b>25</b>

### Map :Ukhiya Upazila





## **A. The Project Background**

1. In August 2017, Bangladesh has received more than 700,000 Displaced Myanmar Nationals from Myanmar (displaced persons<sup>2</sup>). These people, reached Bangladesh by crossing the nearby border on foot, joined about 400,000 other refugees who had arrived in waves from Rakhine State earlier. The vast majority of displaced persons who have arrived in Bangladesh are living in 32 camps in Cox's bazar District, with more than 600,000 living in the Kutupalong–Balukhali mega camp.<sup>1</sup> This large influx has caused a huge strain on the local infrastructure and economy. The 2:1 ratio of displaced persons to the local population poses significant challenges to the food supply, shelter, health, sanitation, water, and other essential services. Although United Nations (UN) agencies and other donors are providing humanitarian relief such as food, water, medical aid, and temporary shelter, the existing services are stretched, and large gaps remain. In these circumstances, on 7 May 2018, the Government of Bangladesh requested the Asian Development Bank (ADB) for grant support to provide high-priority basic infrastructure and essential Services to help address the humanitarian crisis caused by the arrival. The Emergency Assistance Project supports the Government of Bangladesh in addressing the immediate and urgent needs of the displaced persons. The project will mainly support the improvement of water supply and sanitation, disaster risk management, sustainable energy supply, and access roads.

## **B. Objectives of the Proposed Project**

The object of the Emergency Assistance Project is to support the Government of Bangladesh in addressing the urgent needs of the displaced persons from Myanmar in Cox's Bazar District, as identified by the United Nations (UN) in its Joint Response Plan (JRP). The project will have the following outcome: living conditions and resilience of displaced persons improved. The project is aligned with accelerating the social recovery of displaced persons in Teknaf and Ukhia camps and will have the outcome of improving living conditions and resilience of displaced persons. The ultimate goals of the project to improve water supply and sanitation, disaster risk management, sustainable energy supply, and access roads within the camp and surrounding host communities. The possible intervention areas to support the refugees are: (a) multipurpose cyclone shelters (b) food godowns; (c) hill protection walls to resist land-slides; (d) flood embankment (e) storm water canal to evacuate rain water from Kutupalong Camp to Naaf River; (f) secondary transfer stations for managing solid waste management; and (g) 1,000 lightening arresters in access roads to Kutupalong refugee camp from Palongkhali; (h) capacity development on emergency preparedness and disaster management to improve response readiness in camps and host communities; and (i) preventive community-based risk management focusing on environmental risk.

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<sup>2</sup> UN, Strategic Executive Group. 2018. 2018 JRP for Rohingya Humanitarian Crisis, March–December 2018. Cox's Bazar. Various terminology is used in media, official and unofficial documents to describe the affected people. Terminology used herein is intended solely to identify such people for the purposes of this paper, and not to assert any view regarding the manner or circumstances of such persons' displacement. Such terminology may not reflect the terminology used or accepted by any government or any agency thereof. ADB expresses no view and takes no position herein regarding the legal rights or political assertions or the characterization of any such persons. The use of the term "displaced persons" in this paper is not intended to have the same meaning as the term "displaced persons" defined in ADB's Safeguard Policy Statement (2009).

## **C. Project Rationale and Linkage to Country /Regional Strategy**

2. On 7 May 2018, the Government of Bangladesh requested the Asian Development Bank (ADB) for grant support to provide high-priority basic infrastructure and essential services to help address the humanitarian crisis caused by the arrival of the displaced persons<sup>3</sup>. The project meets the requirements for emergency assistance financing.

## **D. ADB Fact Finding Mission**

3. Asian Development Bank fielded a consultation mission to Cox's Bazar, Ukhiya, and Teknaf on 22-24 July 2018 for Emergency Assistance Project (EAP). The objectives of the Mission were:

- i. Visit Project sites ( Teknaf and Ukhia Upazila) and conduct technical and safeguards due diligence for the first batch of subprojects for immediate procurement;
- ii. Coordinate with the offices of Refugee Relief and Repatriation Commissioner ( RRRC) , Deputy Commissioner Cox's Bazar, Inter-sector Coordination Group
- iii. Explore a suitable office space for ADB site office

The Mission met officials of the different Govt. agencies like RHD, LGED, BREB, DPHE, DC of C. Bazar, RRRC, UN agencies working in Cox's Bazar. The Mission visited sites of the proposed subprojects. In consulting with RRRC, CIC, EAs/IAs and UN agencies, the Mission conducted sub-projects selection, and Mission confirmed the sub-projects:

## **E. ADB Inception Mission**

4. ADB fielded an inception mission to Bangladesh from 11 to 21 August 2018 for the Grant 0582-BAN: Emergency Assistance Project (EAP). The Mission met the Ministry of Finance, Economic Relations Division (ERD), Road Transport and Highway Division (RTHD), LGED and DPHE. The mission visited the project sites in Ukhiya and Teknaf in Cox's Bazar District to conduct further due diligence in developing selected subprojects. The mission also met with the office of the refugee relief and repatriation and commissioner (RRRC), the inter-sector coordination group (ISCG) and other development partners.

5. Inception activities: The mission discussed with all four EA/IAs, in a workshop, on various activities such as (i) subproject selection process; ( ii) procurement and recruitment process , and progress ; ( iii) counterpart funding and maintaining independent project records/ accounting ; (iii) reporting, and monitoring requirement(iv) safeguards and gender implementation and compliance ( v) compliance requirement of grant covenants (v) financial management and disbursement ; ( vi) updating of procurement plan and PAM; and ( vii) progress.

6. The social safeguards team covered both actual and sample subprojects sites by visiting camps in Ukhiya and Teknaf. Minimal or no impacts are anticipated from the proposed sub-projects as these will be mostly improving existing facilities, such as the RHD and LGED road components. The subprojects visited were mainly : (i) internal roads and

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<sup>3</sup> Stated as above

stairs with drainage facilities ( ii) storm water drainage networks ; ( iii) mini pipe water supply systems ( iv) community bathing facilities ( v) hill slope protection works ( vi) construction of Food Distribution Centers ( vii) RHD road subprojects ( phase 1 & 2) ( viii) surface water treatment and pipe water supply in Teknaf. The Mission requested EAs/IAs to secure land free of encumbrance for these sub-projects. The Mission also reconfirmation categorization of RHD road sub-projects. Minimal impacts from this subproject are anticipated. As per the selection criteria, land acquisition and resettlement impacts will be avoided to the extent possible.

### **ADB Review Mission**

7. On 18-20 November 2018, a Review Mission of the ADB BRM led by Mr. Tika Limbu had visited the Cox's Bazar, and sub-projects area. The ADB Review Mission conducted meetings with the Project Directors, the key officials of the executive agencies at the district and Upazila level, representatives of the UNCHR and also ADB consultants of the respective expertise in order to assessing the progress, and expediting the implementation process of the sub-projects. During the meeting at a discussion points, the mission raised the constraints in progressing the implementation process like floating and awarding tenders on timely manner. The Mission, also raised key issues in line with the social and environmental safeguards that need to be brought in to the light before implementation stage of the sub-projects. Mission also emphasized on the coordination among the respective officials of the Executive Agencies (EAs) and ADB consultants in order to expediting the implementation process on schedule. In conclusion, Project Directors of LGED, DPHE and BREB briefed on the progress of the subprojects during the meetings with ADB Mission in which they showed their determination to expedite the implementation process to complete the implementation on schedule.

## **F. Outputs of the Project**

With a view to implementing the planned activities as per agreement with the government of Bangladesh, the following outputs under the different sub-projects which will be implemented by the respective executive agencies:

**Output 1: Institutional capacity strengthened.** The TA will focus on enhancing the project implementation capacity of government and implementing agencies by providing capacity building and resource support in (i) procurement; (ii) financial management and audit; (iii) project management; (iv) environmental and social safeguards, (v) disaster risk management and climate resilience; and (vi) gender empowerment and social inclusion. In addition to a full-time financial management consultant, ADB staff will provide capacity support to project implementation unit staff on ADB's financial management requirements and disbursement guidelines to ensure robustness and transparency. A project liaison office in Cox's bazaar has already been established to coordinate and facilitate subproject development, implementation, and monitoring. The TA will support the government's RRRC and the liaison office on logistics including vehicles, office equipment, and capacity building.

**Output 2: Planning, design, and implementation of the proposed subprojects supported.** The TA will mobilize adequate national consultants to help implementing agencies overcome their capacity constraints and low readiness on subproject selection, technical and safeguard due diligence, design, procurement, and contract management. TA consultants for each sector will support (i) the preparation of development project proforma,

technical assistance project proforma including technical and economic due diligence and bid documents; and (ii) bid evaluation. Similarly, project implementation units will be reinforced with consultants to help with construction supervision, safeguard application, sound application of communication strategy, gender equity and social inclusion action plan, and reporting. In addition, pilot testing of project approach will be supported.

**Output 3: Effective monitoring and evaluation established.** A well-functioning project monitoring and management information system will be established in four project implementation 3 units and their district counterparts to monitor progress on procurement, quality of equipment and civil works, contract management, implementation, fund flows, accounting, audit, and reporting functions. TA consultants will operationalize the system through a project liaison office in Cox's Bazar. Quarterly coordination meetings among ADB, RRRC, the local deputy commissioner, UN agencies, and development partners will be held at the liaison office.

## **G. ADB Social Safeguards Requirements**

As per ADB Safeguard Policy 2009, three safeguard policies involve a structured process of impact assessment, planning, and mitigation to address the adverse effects of projects throughout the project cycle. The safeguard policies require that (i) impacts are identified and assessed early in the project cycle; (ii) plans to avoid, minimize, mitigate, or compensate for the potential adverse impacts are developed and implemented; and (iii) affected people are informed and consulted during project preparation and implementation.

In line with the ADB Social Safeguards Policy Statement (SPS), 2009, the safeguards requirements that displaced persons dealing with the lands in a project area could be of three types:

Persons with formal legal rights to land lost in its entirety or in part;

persons who lost the land they occupy in its entirety or in part who have no formal legal rights to such land, but who have claims to such lands that are recognized or recognizable under national laws; and

Persons who lost the land they occupy in its entirety or in part who have neither formal legal rights nor recognized or recognizable claims to such land. The involuntary resettlement requirements apply to all three types of displaced persons.

## **H. Indigenous People Impact (IPP)**

The Asian Development Bank (ADB) determines the rights of Indigenous people to assist them in the way of improving their livelihoods and own development. In general, Indigenous people are being suffered and threatened due to their exiting social stratification that violate into areas they traditionally own, occupy, use or view as ancestral domain. Therefore, special efforts are required to engage Indigenous people in the planning process of development programs that affect them for fulfilling their specific needs and aspiration.

ADB categorically outlines in the Safeguard Policy Statement (SPS) that a proposed project is assigned to one of the following categories depending on the significance of the potential impacts on Indigenous Peoples:

Category A: A proposed project is classified as category A if it is likely to have significant impacts on Indigenous Peoples. An Indigenous Peoples plan (IPP), including assessment of social impacts, is required.

Category B: A proposed project is classified as category B if it is likely to have limited impacts on Indigenous Peoples. An IPP, including assessment of social impacts, is required.

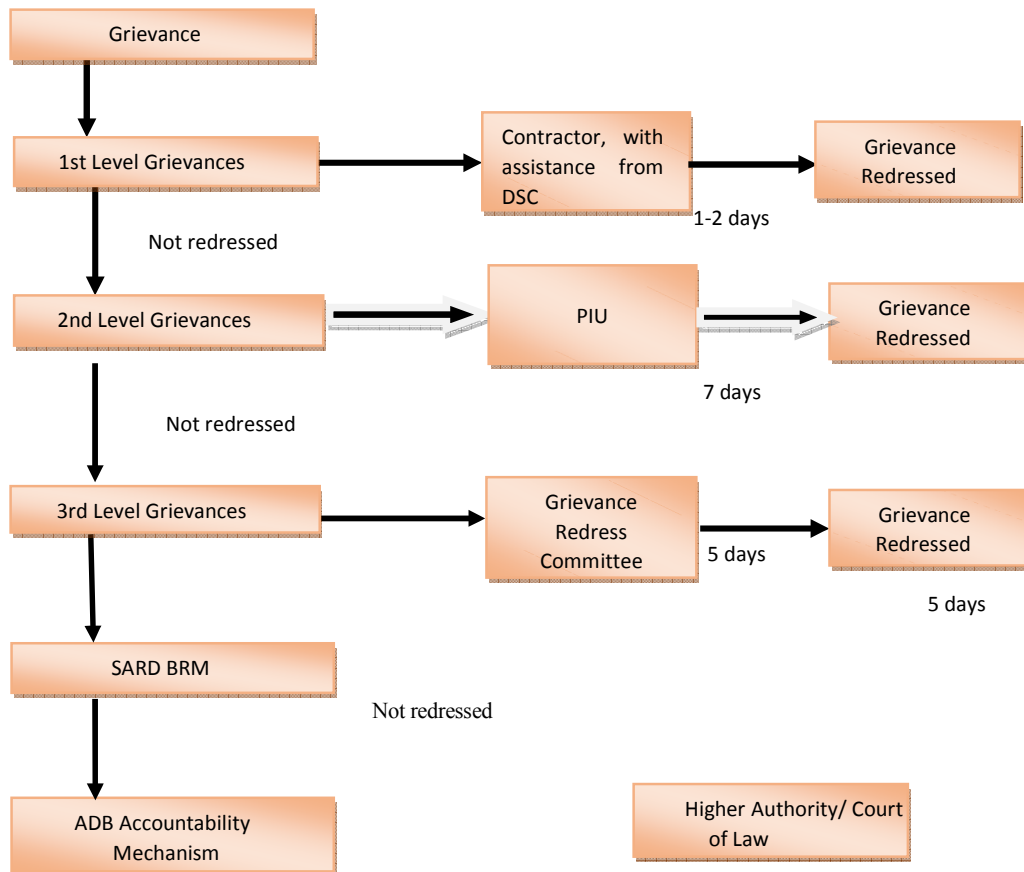
Category C: A proposed project is classified as category C if it is not expected to have impacts on Indigenous Peoples. No further action is required.

## **I. Grievance Redress Mechanism (GRM)**

A Resettlement Framework (RF) for Emergency Assistance Project (EAP) disclosed in June 2018 in which about the GRM is spelt out in details.

The objective of the Grievance Redress Mechanism (GRM) is to resolve complaints as quickly as possible and at the local level through a process of conciliation; and, if that is not possible, to provide clear and transparent procedures for appeal. A well-defined grievance redress and resolution mechanism will be established to resolve grievances and complaints in a timely and satisfactory manner. All affected persons will be made fully aware of their rights and the detailed grievance redress procedures will be publicized through an effective public information campaign. During the Implementation of the sub-projects, the Grievance Redress Committee (GRC) will be formed at the Upazila level to District / National level by following by the approved Resettlement Framework. And, it will be done through discussion at all the respective levels of the Executive Agencies like LGED, DPHE, RHD and BREB. Following figure shows an example of the Grievance Redress Mechanism as per Resettlement Framework for the EAP

**Flow Chart 01: Grievance Redress Mechanism**



Note: ADB = Asian Development Bank; BRM = Bangladesh Resident Mission; DSC = Design and Supervision Consultant; PIU = Project Implementing Unit; SARD = South Asia Regional Department

## J. Scope of social Safeguards Activities

In accordance with the ADB SPS 2009, it is required to strengthen coordination among the project stakeholders to enhance identification and fast track implementation of resettlement and rehabilitation measures. Mobilization of the Social Safeguards Specialist was done on 18 September 2018, and ADB has been supporting executive/implementing agencies (EA/IAs) and their project implementation units (PIUs) in screening projects for involuntary resettlement (IR) and indigenous peoples (IP) in accordance with categorization based on SPS. The screening should ensure compliance with the subproject selection criteria, frameworks, and SPS. Screening by the EAs/IAs will be verified by the Specialist after which

the EA/IAs will include these in monitoring reports provided to ADB (BRM). Where screening compliant with the subproject selection criteria shows non-significant IR impacts (Category B), the Specialist will guide the EA/IAs in the preparation of a resettlement plan (RP) for approved subprojects. The Specialist will review the RP ensuring compliance with ADB's Safeguards Policy Statement, 2009 (SPS) for involuntary resettlement safeguards, the resettlement framework, and national laws and regulations. The reviewed RPs will then be sent to ADB (BRM) for concurrence. The Specialist will guide the EA/IA in incorporating safeguards planning in bidding documents. The Specialist will monitor safeguards implementation ensuring compliance with the safeguards plans and frameworks, SPS, loan agreement, and national laws and regulations. The Specialist will guide EAs/IAs in conducting monitoring, conduct verification of monitoring reports—and provide reviewed reports to ADB.

**Social safeguards:** The consultant is required to monitor the activities of both actual and sample subproject sites by visiting camps in Ukhia and Teknaf to identify the anticipated impacts of the subprojects which will mostly be improving the existing facilities such as the RHD and LGED road components.

#### **K. Obligation of the Brower / EA for Social Safeguards**

EA/IAs are required to consult with the local community, refugees (who live in the camps area) , traders who are found in conducting business beside the access roads, in order to disseminate the information immediately before the civil works of sub-projects are started. Finally, the Executive Agency will have to ensure that social safeguards issues are considered and determined before and during the implementation of sub-projects for which following points are to be brought in to the account :

Need to fulfill the minimum Right-of-Way (ROW) requirement to avoid land acquisition and involuntary resettlement in case of access roads under the respective Executive Agency

Avoid acquisition of land and involuntary resettlement through alignment shifts, and modifications in cross-sections.

Ensure that meaningful consultations are conducted with the community living in the Right of Way at time of cross sections survey / preliminary design stage that help make public aware of the project, and to obtain necessary information from the public/ community to be incorporated in to road designs.

Ensure that consultations are conducted with the individuals or community and obtain their written agreements in case of requirement, needs of shifting temporary structures on Govt. land will be discussed in advance during consultations at different level. If community agrees for voluntary shifting of temporary movable structure without compulsion, this part should be well documented by the EA.

In case of Access Road under RHD, it is required to bring attention to the affected vendors / small shop-keepers, who have been trading besides the road, to pay proper compensation to them before civil works are started.

In case of the Mini Pipe Water Supply System under DPHE, it is required to avoid the relocations<sup>4</sup> of Rohingya refugees from their existing dormitory in order to implement the sub-projects. Secondly, community mosques are used by the settlers cannot be displaced for which consultation with the refugees are required during the survey.

It is required to finalize negotiated agreement with the landowners in case of using private land like sub-project for the construction of integrated waste management and resources recovery system at Shayamlapur in Teknaf under DPHE.

In case of establishing the 33/11 KV Substation at Palongkhali, Ukhiya, BREB is required to ensure the negotiation ( negotiated settlement) with the land owner before starting the construction works

Ensure that a Grievance Redress Mechanism is in place to address any grievance by the affected community/ settlers.

Ensure gender participation in the project from preliminary design stage through construction and maintenance period.

NOC is required for using those lands which are owned by the Department of the Forest or other government agency by maintaining appropriate procedures of the Govt.

## L. Status of Sub-projects & Resettlement Impacts under DPHE

8. The following table reflects the planned activities of the subprojects, and the resettlement impacts that be will be implemented by DPHE:

Table 01:Planned activities under sub-projects& Resettlement Impacts

Outputs	Planned activities	Social Safeguards/ resettlement impacts	Status of DDR/ Remarks
Improved Water Supply & Sanitation	Water Carries		
	Bathing facilities	Locations are being determined by the DPHE. However, it is assumed no resettlement impacts will be seen for the sub-projects as bathing facilities will be established in the existing camps area for which additional or private lands are not required.	In progress
	Ground water-based mini pipe water supply.	Land acquisition, and resettlement is not required as lands are owned by the government. However, relocation of the Rohingya refugees may be required in some cases during the implementation for which DPHE needs to contact the respective authority like RRRC if necessary.	Consultant submitted DDRs to DHPE
	Integrated waste management facilities.	It is observed that the selected location/ land for this sub-project is owned by a private land owner for which an agreement with the landowner is required.	DPHE is yet to contact the landowner
	Small surface	Apparently it is understood that no private land	Implementation

<sup>4</sup>**Relocation:** means displacement or physical moving of the Displace Persons from the affected area to a new area/site and rebuilding homes, infrastructure, provision of assets, including productive land/employment and re-establishing income, livelihoods, living and social systems

Outputs	Planned activities	Social Safeguards/ resettlement impacts	Status of DDR/ Remarks
	water treatment plants.	will be affected to implement the proposed sub-project area is owned by the government authority / Forest Dept.	process is yet to be taken.

Since August 2017, 702,160 Rohingya refugees arrived in Bangladesh's Cox's Bazar District from Myanmar. The unplanned and spontaneous nature of the post-August Rohingya refugee camps have combined with high population densities and challenging environmental conditions to produce a crisis with especially acute water, sanitation and hygiene (WASH) needs. In particular, acute watery diarrhea and other water-borne diseases present a serious threat to an extremely vulnerable population already affected by high endemic rates of malnutrition. Under the leadership of the Department of Public Health Engineering (DPHE) and co-chaired by UNICEF and Action against Hunger, the Cox's Bazar WASH Sector is tasked with the coordination, oversight, monitoring and strategic planning for all WASH aspects of the humanitarian response<sup>5</sup>.

With the aim of improving the water supply and sanitation system as well as waste management, DPHE will implement 23 sub-projects under the EAP in dealing with water carries, bathing facilities, ground water-based mini pipe water supply, integrated waste management facilities and small surface water treatment plant.

DPHE has already identified the 6 (six) locations for installing the 40 Mini Pipe Water Supply System in the different camps for which design has also been completed. However, implementation steps are is being progressed in inviting tender for the remaining sub-projects. Among subprojects for installing 600 bathing facilities, in all 50 locations have already been identified as of 31 December, 2018. However, DPHE is going to find locations for the remaining locations for establishing bathing facilities.



Pictures show the proposed locations for Mini Water Pipe Supply at mega camp 8 area.

9. **Land Acquisition/ Resettlement & Social Safeguards Issues:** No land acquisition and resettlement is required for the Mini Water Supply System as government land will be used for implementing the sub-projects. Despite, it is understood during the survey that relocation of the refugees may require in some case during the implementation, however DPHE will try to avoid relocation for which permission and assistance would be required

<sup>5</sup> Source: Water, Sanitation and Hygiene baseline assessment, REACH, April 2018

from Relief Refugee Relief and Repatriation Commission (RRRC) and Camp In-Charge (CIC).

10. Meanwhile, sites have been identified for the sub-project of Integrated Waste Management facilities at Shayamlapur, Teknaf and small Surface Water Treatment Plant at Unchiprang, Teknaf, and ADB consultant visited the selected locations. It is observed that land for the proposed location is found in belonging to a private ownership for which Negotiated Agreement is required. The issue has been brought to the knowledge of the XEN of Cox's Bazar, DPHE who is aware of the matter, and agreed to take initiative in this connection.



The first two pictures from left-hand show the proposed location (Private land) for waste management at Shyampapur, Teknaf, and Identified location for Surface Water Treatment Plants(Third one at the right corner).

## M. Status of Sub-projects under LGED & Resettlement Impacts

11. The following table reflects the planned activities of subprojects will implement LGED:

**Table 02: Planned Activities under Sub-projects**

Output	Planned Activities	Social Impacts Categorization	Status of DDR/ Remarks
Access Roads Improved	8.8 km from Palongkhali Bazar to Chaptkhali Marine Drive road	Resettlement impacts are not found during the survey/visit of the sub-projects. The roads will be improved on the existing earthen/HBB network as no additional lands will be required	DDR submitted to LGED.
	5.3 km connecting road from C.Bazar	No additional land is required as no resettlement impact will	DDR submitted to LGED, and yet to get feedback

Output	Planned Activities	Social Impacts Categorization	Status of DDR/ Remarks
	Taknaf Highway to U-B road	be seen within the right of way.	
	1.3 km for Folipara Road	No additional land will be required. LGED will avoid any resettlement impacts in case removing the existing trading shops beside the road	DDR submitted to LGED, and yet to get feedback
<b>Disaster risk management strengthened.</b>	Cyclone shelters.	Private land acquisition is not required at all as cyclone centers will be established on the existing premises of the Govt. Primary Schools in which lands belong to the Govt.	DDR submitted to LGED, and yet to get feedback
	Food Distribution Center (FDC)	Land acquisition is not required as WFP identified the new locations/ lands belong to the government for establishing 07 FDCs. However, WFP/ LGED requires to get NOC from the respective authority for using those lands.	DDR submitted to LGED , and yet to get feedback
	Hill slope protection.	No resettlement impact is found in case of implementing the hill slope protection	Selection of the locations are being determined
	Storm water drainage.	Stated as above	Locations are yet to be determined

12. In all, 23 sub-projects in dealing with improvements of the access roads, construction of the cyclone centers, food distribution centers, hill slope protection, and storm water drainage are going to be implemented by LGED under EAP.

#### **Access Roads:**

13. Presently, the access roads leading to the refugee camps are narrow, congested and heavily overburdened due to increase in traffic to provide support and relief materials. It is evident that the Average Daily Traffic (ADT) in the major road from Cox's Bazar to Teknaf has increased since August 2017 owing to increasing traffic movement of relief supplies and personnel. Traffic jams are observed frequently in lasting several hours. Marketplaces are overcrowded along the road with high pedestrian traffic. Within the camps, the mud roads have skipped up, which are very narrow and get washed away with heavy rains. It is difficult to provide supply and emergency services to the people living in the camps for which it is required for widening and brick-lining. Therefore, improvement of the existing earthen/HBB road to paved road for improving the road network from and to camps and to decongest the main highways. Moreover, some proposed access roads are not accessible to the camps due to disrupting and remoteness within the hilly areas which will be improved in connecting

to the Marine Drive under the above sub-projects, eventually it will help in improving traffic jams towards the Rohingya camps. It will also provide better access to the surrounding communities in terms of economic activities. The significant outputs of Access Roads in nutshell are:

- Improvement of the access roads will facilitate the vehicle for carrying the commodities, and foods for the Rohingya community easily.
- It will save times during movement due to reducing traffic obstacles that help in supplying of foods and other commodities to the refugee on time
- The new traffic control system and signals will facilitate to the safe movement of the pedestrians mainly old and children who frequently cross the roads.
- Improvement of access roads will connect to food storage centers, food distribution centers, field hospitals, primary health care centers, cyclone shelters, and primary education centers



Pictures show the proposed access roads of 8.8 km link road connecting to Cox's Bazar to-Teknaf& Marine drive Highways, Ukhiya

#### **Land &Involuntary Resettlement Impacts:**

14. The above sub-projects dealing with construction of Access Roads will improve the existing earthen/HBB road network in which subprojects do not have require any additional lands for acquisition or negotiated settlement during the implementation. LGED indicates that the existing roads are covered by the government lands that observed 2-3 meter in and average, and will be paved 3.7 meter. It is confirmed by the respective Upazila officials of LGED that any other properties like shops and houses will not be affected during the rehabilitation works as no resettlement impact is observed within the right of way.

15. In the proposed Foliapara sub-project, some small trading shops are seen close to the right alignment at the point of Technical School and College. The issue was brought to the knowledge of the Upazila Engineer, LGED who has agreed to avoid any negative impacts on the trading shops and traders, who have been trading beside the roads since long. However, this matter will have to be monitored by the social safeguards consultant while the project is implemented.



Picture of the proposed access roads sub-project Folia Para & N.I Chowdhury Road

### **Sub-projects for the Construction of multipurpose Cyclone Centers:**

16. The frequent natural disaster like cyclone hits the Cox's Bazar, a coastal region of Bangladesh, which remains the people in vulnerable situation at the time of cyclone happens in this area. Cyclone Centers give the opportunity for the vulnerable people in taking shelter for saving themselves during the disasters. In dealing with this aim undertaken by the Emergency Assistance Project, LGED has already identified locations for constructing 10 cyclone shelters at the periphery of the Rohingya camps sites in order to fulfilling the need of both the displaced persons from Myanmar and host community. The purpose of the cyclone shelters is to reduce vulnerability of the population to natural disasters. In addition, these sub-projects will support the preparation of a gender sensitive disaster risk management plan by adopting community based risk reduction approach

### **Resettlement Impacts:**

17. Cyclone Centers will be established on the existing premises of the Govt. primary schools in which lands belong to the Govt. as no resettlement impacts are observed.



Proposed locations of Cyclone Centers at Foliapara&MorichaPagliar

### **Construction of Food Distribution Center:**

18. As per Agreed plan, 7 Food Distribution centers will be constructed at the different locations around the Rohingya camps which will be managed by the WFP. Meanwhile, WFP has identified the 7 locations for constructing Food Distribution Centers (FDCs), and also performed the design of the food distribution centers which had submitted to LGED, the Executive Agency.

19. It is known that WFP provides fortnightly rations, calculated for households up to 3 members, consist of 30 kg of rice, 9 kg of pulses and oil. The above-mentioned foods are provided through the existing Food Distribution Centers which are not well-designed, and enough for this purposes. Therefore, after constructing well-designed Food Distribution Centers, these will facilitate in distributing foods to the refugees in an efficient manner for which WFP is going to introduce e-vouchers roll-out plan in March 2019.

#### **Resettlement Impacts of the Food Distribution Center**

20. LGED will construct the food distribution centers for which the locations have been identified by the WFP as per agreement with ADB. Among the 7 Food Distributions center, initially, WFP identified 4 locations belong to the private landowners to establish food distribution centers, and the remaining on the government lands. In case of private lands, they could not make any “negotiated settlement “with the landowners. Due to raising constraints in negotiating with the private landowners, and avoiding resettlement impacts, WFP further identified the new locations/lands belong to the government after holding meeting with the Safeguards Specialists of ADB.

21. The Safeguard Specialist along with WFP and LGED visited all the old and new locations identified by the WFP. In case of selecting the Government lands, there are no resettlement impacts at all. None will be required to be relocated or resettled even compensated. Nevertheless, among the 7 proposed sites, one significant observation is found that WFP identified a location is called **Hakimpara Camp-14** which is seemed to be government land. But, Rohingya refugees have already established trading shops and conducting grocery and selling vegetables as well as other necessities. It is known that although it is found government land; Non-title<sup>6</sup> holders are occupying the lands, and renting the small plots to the refugees to conduct trading. Therefore, it is required to negotiate with the non-title holder/ lands occupier for obtaining the land free. Even, relocations of the Rohingya refugees, who have been conducting trades on this plot, are required. Alternatively, WFP will have to replace the proposed Hakimpara-14 by replacing othersuitable location that must be government land without occupying by nontitle landowner.

22. However, any other involuntary resettlement impacts are not found in case of constructing the proposed food distribution centers at the different locations (locations are mentioned in the annex-1). Before commencing the construction works taken by the LGED, it should be make sure that lease agreement has been completed both of the lands owned by the private and government. Therefore, construction works can only be started subject to finalizing the lease agreement with the private lands owners, and obtaining the NOC from the government authority concerned for which WFP will take appropriate initiative.

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<sup>6</sup>**Non-titled:** means those who have no recognizable rights or claims to the land that they are occupying and includes people using private or public land without permission, permit or grant i.e. those people without legal title to land and/or structures occupied or used by them. ADB's policy explicitly states that such people cannot be denied resettlement assistance.



Proposed revised locations of Food Distribution Centers at Camp-4 Maduchara-2(left corner) & Hakimpur Camp-14, the picture at right shows the land where refugees are conducting small trading by taking rent from the non-title landholder.

### **Sub-projects for Hill slope protection**

LGED will implement sub-projects for Hill Slope Protection in order to protecting the settlers from any disaster caused by landslides. However, LGED is yet to be determined the locations/ sites for these sub-projects dealing with dealing with the hill slope protection.

#### **Resettlement Impacts:**

23. No resettlement impacts are found in case of implementing the sub-projects for Hill Slope Protection as lands belong to the government be used for the proposed sub-projects. However, NOC is required from the respective Govt. department.

### **Sub-projects for Storm water drainage**

24. It has been planned for the construction of Storm Water Drainage Network inside camps and evacuating water outside camps: 1 group in Teknaf, and 2 group in Ukhiya. This component is interlinked to Hill Slope Protection. Storm water drains will be constructed alongside the hill slope protection sites. However, LGED is yet to be determined the locations/ sites for these sub-projects dealing with the Storm Water Drainage Network inside camps and evacuating water outside camps.

#### **Resettlement Impacts:**

25. Primarily resettlement impacts are not observed in case of implementing the sub-projects for hill slope protection.

## **N. Status of the Sub-projects & Resettlement Impacts under BREB**

26. The following table reflects the planned activities of the subprojects will be implemented by BREB:

Table 03: Planned Activities under Sub-projects

Outputs	Planned Activities	Resettlement Impacts	Status of DDR
<b>Energy sources provided.</b>	33/1 1 kV Substation at Palongkhali, Ukhiya	Neither land acquisition nor involuntary resettlement is required as the identified land	Preparation for the DDR is in progress & going to be

Outputs	Planned Activities	Resettlement Impacts	Status of DDR
		has been purchased by the Executive Agency	submitted by 15 January
	50 km 11 KV and below electricity distribution lines:	No resettlement impact is seen	As above
	2000 grid-connected street lights:	No resettlement impact is seen	As above
	4,000 solar PV street lights:	No resettlement impact is seen	As above
	50 solar powered nano-grid systems:	No resettlement impact is seen	As above
	Retained heat cookers:	No resettlement impact is seen	As above

27. Access to safe and sustainable energy is one of the basic needs for Rohingya refugees .without the access to necessary energy these displace people particularly women and children are at increased risk. In dealing with the UNCHR, government of Bangladesh is committed to addressing energy needs of refugees, improving access to sustainable fuel, powering health centers and utilizing solar-poweredlightening under the Emergency Assistance Project (EAP) by receiving technical assistance from ADB.

28. Improving access to a clean and sustainable source of energy can transform broken lives. It can power health centers and ensure that life-saving medication is refrigerated. Street lighting allows people to move around camps in greater safety at night, particularly women and girls, and solar-powered lamps mean they can work, cook, study, socialize and continue with their lives long after the sun has gone down. Additionally, with a clean, sustainable fuel, or fuel-efficient technologies, refugees can cook meals and avert the malnutrition and ill-health that may occur when using open fires.

29. .Energy sources include in providing the camp areas with (i) retained heat cookers; (ii) stand-alone solar powered street lights with solar photovoltaic panels, battery boxes, and mini grid-connected street lights; and (iii) access to electricity by augmenting substations, distribution lines, and transformers including supply and installation of lightening arresters along the access roads from Palongkhali to Kutupalong camp, and all other camps.

30. With this aim, BREB will implement the 12 sub-projects dealing with the energy sources like 33/11 KV Substation at Palongkhali, Ukhiya, 50 km 11 KV and below electricity distribution lines, 2000 grid-connected street lights, 4,000 solar PV street lights, 50 solar powered nano-grid systems, Retained heat cookers. Meanwhile, BREB has floated the tender for 05 sub-projects which are under evaluation.

31. Land is only required to establish thesub-project for implementing 33/11 KV Substation at Palongkhali, Ukhiya for which BREB already identified private land of 0.41 acres, and completed the legal agreement with the landowners.

### Resettlement Impacts:

32. It is confirmed that no involuntary resettlement impacts are found in case of implementing the sub-projects under BREB.



The picture shows the location/ site for establishing the 33/11 KV Substation at Palongkhali, Ukhiya

### O. Status of Sub-projects & Resettlement Impacts under RHD

33. Following table reflects the planned activities of the subprojects will be implemented by RHD:

Table 04: Planned Activities under Sub-projects:

Outputs	Sub-Project & Planned Activities	Resettlement impacts	Remarks
<b>Access roads improved.</b>	25 km Road from C. Bazar link to Ukhiya	No land acquisition is required for this sub-project as it will be implemented in using the existing alignment of the road belong to the RHD. However, some small traders/ vendors are found in the alignment/ right of way in the market area those who have been trading inside the road since long. Therefore, compensation is required to pay the affected traders for which RHD has already allocated the budget that incorporated in the revised RP.	RHD submitted RP to the Ministry for approval
	25 km Road Ukhiya to Unchiprang	Stated as above	

RHD will implement two subprojects on the rehabilitation of the existing roads that include (i) 25 km road from Cox's Bazar link road to Ukhia and (ii) 25 km road from Ukhia to Unchiprang. The subprojects consist of resurfacing of the existing road, including reconstruction of the critical sections, including market areas in the town limits and junctions at the entrance to the camps from Cox's Bazar to camp areas, to cater the increased traffic volume due to influx of the displaced persons and for smooth transportation of relief materials. The subprojects are within the right of way and no land acquisition is required. However, temporary economic impacts in the market areas are anticipated during construction that addressed in the Resettlement Plan submitted to the Ministry on 15 December by the RHD for its approval. And, budget has been incorporated in the RP to compensate the affected traders. RHD confirmed that no additional adverse social safeguards impacts are found in case of the two subprojects and tree cutting will be avoided during construction. However, with the assistance of the RHD, Social Safeguards Specialist will monitor the resettlement/ compensation issues during the implementation of the sub-projects.

## **P. Stakeholders Consultations**

34. Consultations process have been continued with the different stakeholders mainly officials concerned of the Executive Agencies ( EAs) like DPHE, LGED, BREB and RHD at the field ( C. Bazar) and central ( Dhaka) level . During the meetings with the EAs, it was discussed, and exchanged views on land acquisition, resettlement, progress of the implementation process, and social safeguards issues of the sub-projects. Officials of the EAs were aware of the issues of social safeguards in which it is required to avoid land acquisition and involuntary resettlement in any circumstances for implementing the sub-projects under the Emergency Assistance Project (EAP) as the sub-projects must be under 'C' category. Moreover, in case of using the Govt. lands, it will be required to obtain NOC from the respective government agency before commencing the implementation of sub-projects. Officials of the Executive Agencies provided necessary information on the status of the sub-projects to ADB consultant, and also assist the consultant in visiting sub-projects locations along with them. Consultations were also done with the Rohingya refugees at the mega camps 8, 13, 18 and 20 to know their views on the proposed sub-projects dealing with the installation of Mini Pipe Water Supply. Moreover, meetings were held with the representatives of WFP, and discussed on the selection of the locations for constructing Food Distribution Centers. Consultant had visited the proposed sub-projects locations along with the WFP in order to assess the issues of social safeguards, and landownership in dealing with the construction of the food distribution centers.



Picture shows consultations on the proposed Mini Pipe Water Supply with the refugees in the camps

## Q. Due Diligence Reports

35. Due Diligence Reports are required for the sub-project for which RPs are not required. Till December, DDRs have been prepared by the ADB consultant for 29 sub-projects under LGED and DPHE. The remaining DDRs are in progress.

## R. Conclusion

36. In conclusion, it is pointed out that the project has been categorized B for Involuntary Resettlement (IR) dealing with RHD, and C for impact on Indigenous People. Among the project components, the RHD road (national highway) will cause temporary impacts on vendors/ small traders during the construction phase. In considering the issue, a Resettlement Plan (RP) has been prepared, and already approved by the respective ministry for the mitigation of any adverse impact on the income and livelihoods of the traders in the marker areas. Secondly, two private land plots have been identified in the proposed location for the subproject of waste management plant at Shamlapur, Teknaf ( DPHE W/10 ) that might be impacted by project activities. Project will consider avoiding or adequate mitigation measures as per ADB's Social Safeguards Policy, 2009 for which DHPE is aware of taking appropriate measures in dealing with the safeguards policy. Thirdly, the proposed food distribution centers in camp-14 at Hakimpur which selected by the WFP ; a number of small temporary shops owned by the Rohingya refugees have been identified as relocation of those traders will be required. The Executive Agency has been advised to ensure proper relocation or alternative sites for this center in dealing with the WFP. Notwithstanding, no adverse impacts has been identified so far for any other components of the project dealing with the LGED, DPHE, and BREB.

## **S. Way Forward – Proposed Activities**

- Monitor the sub-projects activities in all stages dealing with the respective EA.
- Perform the remaining DDRs in coordinating with the EAs/IAs immediately after determining the locations of the sub-projects
- Ensure the Social Safeguards issues with respect to resettlement impacts are brought in to the account of the EAs
- Ensure pro-active role of the EA/IA to identify the social safeguards/ resettlement impacts in all stages of the sub-projects.
- Ensure that EAs/IAs avoid any Involuntary Resettlement , and Relocation
- Ensure that EA/IAs obtain NOC from the respective government authority in case of using the government lands for implementing sub-projects.
- Ensure that entitlements are properly identified, and payment has been done for sub-projects under RHD
- Ensure that the compensation is paid by following the approved RP for sub-projects under RHD
- Ensure coordination among the respective officials of EAs, and stakeholders' consultations at different level will be continued.
- Formation of the Grievance Redress Committee involving the respective authority will be ensured and functioned
- Community consultation during the implementation is required , and consultant will provide support to the EAs in this respect

## T. Annex 01: List of the Packages of Sub-projects

Sl. No	Package Number	General Description	Safeguards Category	Tender Status		Remarks
				Tender Invitation/ Evaluation	Tender Award	
1	BREB/ W1A	Supply, Installation, Testing & Commissioning of 33/11KV Sub-Station (10/14MVA, Turn Key) at Palongkhali, Ukhiya.	C	Done		
2	BREB/ W1B	Augmentation of Cox's Bazaar Transmission Grid Network to strengthen 33/11KV Sub-Station (10/14MVA, Turn Key)	C	Done		
3	BREB/ W2	Construction of 50 KM of 11 KV and below lines with necessary transformers from proposed two substations to Palongkhali area, Ukhiya	C	Done		
4	BREB/G1	Supply and installation of 200 nos. lightening arresters along the access roads from Palongkhali to Kutupalong camp, and all other camps.	C	Done		
5	BREB/G2 A	Supply, installation and Operation & Maintenance of 2,000 Nos. Solar PV Powered LED Street Lights	C	Done		
6	BREB/G2 B	Supply and installation of 2,000 nos. solar powered 20-watt LED street lights, in	C			

Sl. No	Package Number	General Description	Safeguards Category	Tender Status		Remarks
				Tender Invitation/ Evaluation	Tender Award	
		all Camps.				
7	BREB/G3 A	Supply and distribution of 17,500 retained heat cookers to the displaced people at all camps: Group 1	C	Done		
8	BREB/G3 B	Supply and distribution of 17,500 retained heat cookers to the displaced people at all camps: Group 2	C	Done		
9	BREB/G4 A	Supply and distribution of 17,500 retained heat cookers to the displaced people at all camps: Group 2	C	Done		
10	BREB/G4 B	Supply and distribution of 17,500 retained heat cookers to the displaced people at all camps: Group 2	C	Done		
11	BREB/G5	Supply and installation of 50 nos. solar mini-grid for household electricity supply within the camp (150 household per cluster: to cater 7,500 HH) at Balukhali mega camp	C	Done		
12	BREB/G6	Supply and Installation 2000 units of BREB street lights	C	Done		

Sl. No	Package Number	General Description	Safeguards Category	Tender Status		Remarks
				Tender Invitation/ Evaluation	Tender Award	
		(including flood lights and photocell lights) inside the camps Balukhali, Leda and Noapara				
13	DPHE/ G1	Supply of 7 no. water Carrier for Emergency Water supply, capacity 3000-liter, including operation for 2 years, for Cox's Bazar and Ukhiya, Teknaf	C	Done		
14	DPHE/ G2	Supply and operation of waste management equipment/vehicle for two years. (Vacuu tag, Suction pipe, SWR equipment, drainage management equipment) for Camps in Ukhiya	C			
15	DPHE/ G3	Supply and operation of waste management equipment/vehicle for two yearsfor Camps in Teknaf	C			
16	DPHE/G 4	Supply and operation of 4 no. drilling rigs				
17	DPHE /W1	Construction and operation of 7 nos. mini piped water supply system with Production Tube Well in camps and adjacent affected villages. Group -1 (camp-5)	C	Done		

Sl. No	Package Number	General Description	Safeguards Category	Tender Status		Remarks
				Tender Invitation/ Evaluation	Tender Award	
18	DPHE/ W2	Construction and operation of 7 nos. mini piped water supply system with Production Tube Well in camps and adjacent affected villages. Group -2 (camp-5)	C	Done		
19	DPHE/ W3	Construction and operation of mini piped water supply system with solar powered production well in camps and adjacent affected villages: Group 3 (Camp 17	C	Done		
20	DPHE/ W4	Construction and operation of mini piped water supply system with solar powered production well in camps and adjacent affected villages: Group 4 (Camp2)	C	Done		
21	DPHE/ W5	Construction and operation of mini piped water supply system with solar powered production well in camps and adjacent affected villages:	C	Done		

Sl. No	Package Number	General Description	Safeguards Category	Tender Status		Remarks
				Tender Invitation/ Evaluation	Tender Award	
		Group 5 (KRC and Camp 3)				
22	DPHE/ W6	Construction and operation of  mini piped water supply system with solar powered production well in camps and adjacent affected villages:  Group 6 (Camp 4)	B	Done		
23	DPHE/ W7	Construction and operation of  mini piped water supply system with solar powered production well in camps and adjacent affected villages:  Group 7 (Camp 11)	C			
24	DPHE/ W8	Construction and operation of  mini piped water supply system with solar powered production well in camps and adjacent affected villages:  Group 8 (Camp 13)	C			
25	DPHE/ W9A	Construction and operation of Integrated waste management and resource	C			

Sl. No	Package Number	General Description	Safeguards Category	Tender Status		Remarks
				Tender Invitation/ Evaluation	Tender Award	
		recovery facility with collection system at the outskirts of Kutupalong Balukhali Megacamp, Ukhiya Group-1				
26	DPHE/ W9B	Construction and operation of Integrated waste management and resource recovery facility with collection system at the outskirts of Kutupalong Balukhali Megacamp, Ukhiya Group-1	C			
27	DPHE/ W10	Construction and operation of Integrated waste management and resource recovery facility with collection system at Shayamlapur, Teknaf	B			
28	DPHE/ W11	Construction of Surface Water Treatment Plant for supporting water supply at Cox's Bazar city and surrounding areas	C			
29	DPHE/ W12A	Construction of pipe water Systems including surface water treatment plants for the camps in Nayapara, Teknaf	C			

Sl. No	Package Number	General Description	Safeguards Category	Tender Status		Remarks
				Tender Invitation/ Evaluation	Tender Award	
30	DPHE/ W12B	Construction of pipe water systems for the camps in Unchiprang/ Shamlapur, Teknaf	C			
31	DPHE/ W13	Construction of Community Bathing Facilities for women, Group -1	C			
32	DPHE/ W14	Construction of Community Bathing Facilities for women, Group -2	C			
33	DPHE/ W15	Construction of Community Bathing Facilities for women, Group -3	C			
34	DPHE/ W16	Construction of Community Bathing Facilities for women, Group -4	C			
	DPHE/ W16	Construction of Community Bathing Facilities for women, Group -5	C			
35	DPHE/W 18	Construction of piped water supply with surface water reservoirs, treatment plant	C			

Sl. No	Package Number	General Description	Safeguards Category	Tender Status		Remarks
				Tender Invitation/ Evaluation	Tender Award	
		and other and associated facilities at Ukhiya				
36	LGED/ W1A	Construction of 7.5 km Internal Roads and Stairs with Drainage Facilities Inside the camps in Ukhiya, Group 1	C			
37	LGED/ W1B	Construction of 7.5 km Internal Roads and Stairs with Drainage Facilities Inside the camps. in Ukhiya, Group 2	C			
38	LGED/ W2A	Construction of 7.5 km Internal Roads and Stairs with Drainage Facilities Inside the camps. in Teknaf -Group 3	C			
39	LGED/ W2B	Construction of 7.5 km Internal Roads Internal Roads and Stairs with Drainage Facilities Inside the camps in Teknaf – Group 4	C			
40	LGED/ W3	Improvement of 1.5 km existing Folia Para road connecting Highway to U-B Road UkhiyaUkhiya+  Upgradation of 5.5 km existing  N.I. Chowdhury Road Connecting Marine Drive to U-B road.	C	Done		

Sl. No	Package Number	General Description	Safeguards Category	Tender Status		Remarks
				Tender Invitation/ Evaluation	Tender Award	
41	LGED/ W4a	Upgradation of existing N.I. Chowdhury Road Connecting Marine Drive to U-B road, including construction of Bridge/ culverts at Ukhiya (Group 1: 4.5 km within Ch 0+000 km to 10+000 km)	C			
42	LGED/ W4b	Upgradation of existing N.I. Chowdhury Road Connecting Marin Drive to U-B road, including construction of Bridge/ culverts at Ukhiya (Group 2: 9.6 km within Ch. 10+000 km to 19+600 km)	C			
43	LGED /W5	Upgradation of existing 8.8 km link road connecting Cox's Bazar-Teknaf and Marine Drive Highways, Ukhiya	C			
44	LGED/ W6	Construction of 4 nos. school cum cyclone shelter for affected people, 3 story LGED Prototype, in Ukhiya	C	Done		
45	LGED/ W8	Construction of 3 nos. school cum cyclone shelter for affected people, 3 story LGED Prototype, in Ukhiya	C	Done		

Sl. No	Package Number	General Description	Safeguards Category	Tender Status		Remarks
				Tender Invitation/ Evaluation	Tender Award	
46	LGED/W9	Construction of 3 nos. School cum cyclone shelter for affected people, 3 story LGED Prototype, in Teknaf	C	Done		
47	LGED/W10	Hill Slope Protection Works inside the Kutupalong Balukhali Mega Camp, Ukhiya Group -1	C			
48	LGED/W11	Hill Slope Protection Works inside the Kutupalong Balukhali Inside Mega Camp Ukhiya Group -2	C			
49	LGED/W12	Hill Slope Protection Works inside the Kutupalong Balukhali Inside Mega Camp Ukhiya Group -3	C			
50	LGED/W13	Hill Slope Protection Works inside the Kutupalong Inside Mega Camp Ukhiya Group -4	C			
51	LGED/W14	Hill Slope Protection Inside Mega Camp Ukhiya Group -5	C			
52	LGED/W15	Hill Slope Protection Works inside the Kutupalong Balukhali Mega Camp, Ukhiya Group -6	C			
53	LGED/16	Hill Slope Protection Works inside the Kutupalong Balukhali Inside Mega Camp Ukhiya Group -7	C			
54	LGED/W17	Hill Slope Protection Works inside the Kutupalong	C			

Sl. No	Package Number	General Description	Safeguards Category	Tender Status		Remarks
				Tender Invitation/ Evaluation	Tender Award	
		Balukhali Inside Mega Camp Ukhiya Group -8				
55	LGED/ W18	Hill Slope Protection Works inside the Kutupalong Inside Mega Camp Ukhiya Group -9	C			
56	LGED /W19	Construction of Semi-Permanent Food Distribution Centers and loading /unloading yard in Ukhiya and Teknaf	C	Done		
57	LGED/ W20	Construction of Storm Water Drainage Network inside camps and evacuating water outside camps, 2 groups in Ukhiya	C			
58	LGED/ W21	Construction of Storm Water Drainage Network inside camps and evacuating water outside camps: 1 group in Teknaf	C			
59	RHD/ W1	Rehabilitation of National Highway from Link Road (Cox' s Bazar) (Chainage 381+494) to Ukhia (Chainage- 406+494)	C	Done		
60	RHD/W2	Rehabilitation of National Highway from Ukhia (Chainage 406+494) to Unchiprang (Chainage- 431+494)	C	Done		

Sl. No	Package Number	General Description	Safeguards Category	Tender Status		Remarks
				Tender Invitation/ Evaluation	Tender Award	
61	RHD/W3	Reconstruction of critical sections of major access road connecting Cox's bazar Link Road - Teknaf with the Camps, Package 3: Palongkhali to Nhila Teknaf	C	Done		