



STAKEHOLDER ENGAGEMENT PLAN

FOR

**Private Investment and Digital Entrepreneurship Project (PRIDE)
Project – Components 1-3**

Project ID no: P170688

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**Bangladesh Economic Zones Authority
Prime Minister's Office**

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Executive Summary

SEP on BEZA PRIDE Project

Bangladesh Private Investment & Digital Entrepreneurship Project (PRIDE) aims to promote private investment and job creation in economic zones and digital entrepreneurship in hi-tech parks in an environmentally sustainable manner. The project aims at leveraging Bangladesh’s rapid economic progress, supply of huge working age population, the need to attract private and foreign investment and the concept of Digital Bangladesh by providing technical assistance in policy formulation, human development and building resilient infrastructure and support services. The project has four components and several sub-components. Component 1 aims at creating an enabling environment for private investment and job creation at Bangabandhu Sheikh Mujib Shilpa Nagar. Component 2 plans to support phased development of the BSMSN Green Industrial City. Component 3 aims at creating a dynamic private market for serviced industrial land while Component 4 plans to strengthen the digital entrepreneurship and innovation ecosystem. The first three components will be implemented by Bangladesh Economic Zone Authority (BEZA) and the fourth component will be implemented by Bangladesh High Tech Park Authority (BHTPA). Under the umbrella of BSMSN at Mirsarai supported by PSDSP, the PRIDE project will strengthen Bangladesh Economic Zones Authority’s (BEZA) core competence through development of policies and implementation capacity, building a PPP Special Operations Unit; supporting phased development based on the recently approved Master Plan for BSMSN through financing works, goods and technical assistance for three areas—BSMSN-2A (380 ha), BSMSN-2B (192 ha) and BSMSN-IMD (100-200 ha) including construction of road, power, sewer service and other utility service network, effluent treatment plant, desalination plant, solar network, landfill and biogas plants.

The purpose of this Stakeholder Engagement Plan is to identify various stakeholders (Project Affected and Interested Parties) for this project and build and maintain a constructive relationship with them, The SEP also aims to assess the level of stakeholder interest and support for the PRIDE project and to enable stakeholders’ views to be taken into account in project design and environmental and social performance. It also plans to inform stakeholders of the project related information especially issues that could potentially affect them in a timely, understandable, accessible and appropriate manner and format as well as provide them with accessible and inclusive means to raise issues and grievances, and allow IA to respond to and manage such grievance.

BEZA has been working on PSDSP since 2014 and is regularly engaged with the relevant stakeholders at BSMSN. During the **previous consultation meetings**, a number of key lessons were learnt through stakeholder engagement. Foremost, the development of EZs and the creation of employment adds to the economic growth of the local community including the affected parties and thereby the Project gets wholehearted cooperation from the larger community. Further, the need for early notice for meetings with the affected people and local communities needs to be ensured. To ensure active participation of stakeholders, local language and dialects always helps in achieving efficiency of communication. To ensure that the voice of the vulnerable people is heard separate meetings in small groups need to be held with women, poor people, laborers, etc. at project influence area. The senior officials of BEZA need to be aware of the needs and concerns of the project affected people (PAP) and local populace and should be present to disseminate project information and get direct feedback from the stakeholders. In this way affected people and other stakeholders would feel comfortable to discuss potential impacts on them and get plan of the BEZA regarding mitigation measures.

Stakeholder Engagement Plan for **PRIDE** Project – Components 1-3

Various stakeholders identified through the SEP process include people living in or beside the planned IMD land; communities in the vicinity of the project's planned activities; the local population and local communities including the vulnerable group that include the elderly, physically and mentally disabled persons, single mothers, adolescent girls, minority transgender community and the children; workers and their families including school going children; residents, business entities, and individual entrepreneurs in the area of the project who are adversely affected owing to the project activities, and others that can benefit from the employment, training and business opportunities offered due to implementation of the project. Officials from BEZA and other government and NGOs and partner organizations, investors and potential factory owners, provider of basic services like hospital, schools, market/ bazar traders, also form part of stakeholders as project interested parties.

The Stakeholders have been communicated and interacted through a number of engagement process including websites, newspaper advertisement, District and Upazila administration notice board, face to face and door to door meeting, FGD, town hall, workshops, survey and polls etc. Through stakeholder engagements at various times, the suggestions and comments of the various stakeholder groups have been recorded, given due importance during project planning and implementation and used.

The management, coordination and implementation of the SEP and its integral tasks will be the responsibility of dedicated team members within BEZA PIU, its regional offices and local sub-contractors. The project will ensure necessary logistics and budget to implement the SEP. The stakeholder engagement activities will be incorporated into the project management system with the formation of PIU where one social development specialist (National), Social Development Officer (Field level), Design and Supervision consultancy firm will assist to implement the day-to-day activities.

A GRM to address complaints and grievances throughout the lifecycle of the project has been designed that is intended to address issues and complaints in an efficient, timely, and cost-effective manner. Project-affected-people in the PRIDE project and any other stakeholder may submit comments or complaints at any time by using the project's Grievance Redress Mechanism (GRM). Various levels of GRM has been planned including Community level, Project Level, EZ Level and BEZA level to delineate responsibilities in accordance with the nature and graveness of the complaints. Committees at various levels have been set to address and manage grievance cases.

For reporting and monitoring purposes, monthly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the senior management of the project(s). The summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner. The progress and results of the stakeholder engagement activities will also be shared with the World Bank quarterly and annually where Stakeholder related activities will be described. These reports will also include detailed reports on the GRM effectiveness, including a list of grievances received, addressed and the pending ones.

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Acronyms and Abbreviations

Acronyms

Abbreviation

BEZA	Bangladesh Economic Zones Authority
BSMSN	Bangabandhu Sheikh Mujib Shilpanagar
BWDB	Bangladesh Water Development Board
CPA	Chittagong Port Authority
E&S	Environmental & Social
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard of the 2018 World Bank ESF
GRC	Grievance Resolution Committee
GRM	Grievance Redress Mechanism
HHs	Households
HSE	Health and Safety, Social, and Environment
IMD	International Master Developer
KGDC	Karnofuly Gas Distribution Company Ltd
kV	Kilovolt
LNG	Liquefied Natural Gas
LMP	Labour Management Plan
LGED	Local Government Engineering Department
PD	Project Director
PRIDE	Private Investment & Digital Entrepreneurship
PSDSP	Private Sector Development Support Project
PGCB	Power Grid Company of Bangladesh
NGO	Non-Governmental Organization
PAP	Project-Affected Person (or Project-Affected Party)
PEZ	Private Economic Zone
RHD	Road & Highways Department
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
SEP	Stakeholder Engagement Plan
WB	World Bank

1. Introduction and Project Overview

Bangladesh Private Investment & Digital Entrepreneurship Project (PRIDE) aims to promote private investment and job creation in economic zones and digital entrepreneurship in hi-tech parks in an environmentally sustainable manner. The PRIDE project covers four components of which the first three would be implemented by Bangladesh Economic Zones Authority (BEZA), and is included in the present Stakeholder Engagement Plan (SEP). The activities build on the experience from, and work done to date, under the IDA-funded Bangladesh Private Sector Development Support Project (P120843) and the joint WB-IFC Bangladesh Investment Climate Fund 2. The project is designed as an Investment Project Financing operation with disbursement-linked indicators (DLIs) to strengthen focus on achieving important institutional and regulatory reforms. For BEZA, the project is designed to help reduce the risk of operations and significantly scale up its activities to deliver on commitments to private and public partners.

Project components implemented by BEZA include (see Annex A for further details):

Component 1: Creating an Enabling Environment for Private Investment, Sustainability and Job Creation (US\$100m): The first component will inform and implement institutional, regulatory and administrative reforms; strengthen BEZA’s core competence in technical functions that would allow it to be an effective partner to leading private investors; and embed resilience and sustainability concepts into its development of infrastructure and associated services.

Component 2: Supporting phased development of the BSMSN Green Economic Zone (US\$300m): This component would catalyze the development of a state-of-the-art green economic zone and set an example for sustainable, resilient and environmentally sound industrial development in Bangladesh. The second component will support the phased development of the BSMSN Green Economic Zone along the Dhaka- Chattagram corridor, following the formal adoption of the Master Plan for the greater industrial city of BSMSN. BEZA has an investment pipeline covering 1,610 ha for 58 investment projects that are estimated to be worth US\$12.3bn and could employ more than 150,000 workers if realized. While BSMSN could ultimately cover approximately 40,000 ha by 2040, the project would focus on three plots of land: BSMSN-2A (380 ha), 2B (182 ha) and 200 ha of GoB land that have not yet been allocated. The project will also finance last mile infrastructure to connect BSMSN-2A, BSMSN-2B and BSMSN-IMD to local roads and grids, and in some cases factory units within these sites.

Component 3: Creating a dynamic private market for serviced industrial land (US\$75m): The third component will help create a dynamic private market for serviced industrial land that serves external investors unaffiliated with the developer or operator, including review and revision of the regulations and procedures around the licensing of PEZs; technical assistance to help identify, evaluate, design and integrate resilience and sustainability in the infrastructure investments and services provided by PEZ operators; and grant mechanism program to help raise labor productivity by incentivizing firm investment in skills formation by accredited institutions.

1.1. Project Background

Bangladesh has one of the world’s most cost competitive, sizable supply of labor, ideal for labor-intensive production in sectors such as garments, footwear, leather products and toys. However, increasing private investment and promoting export diversification in Bangladesh has both challenges and opportunities. Despite large development success, Bangladesh has failed to attract foreign direct investment (FDI), especially compared to countries in East Asia. Of late, Bangladesh is

trying to reap benefit of its geo-strategic location to emerging markets in east Asia and India through strengthening road and port infrastructure to ensure connectivity to the growing regional market. Government of Bangladesh (GoB) has launched an ambitious zones agenda to provide industrial land and infrastructure to increase private investment to support the government’s development goals. The Government’s national strategy is focused on manufacturing, and it plans to reach a goal of \$50 billion of exports in 2021. It also wants private investment/GDP to reach close to 30 percent from the current below 25 percent. GoB has an ambitious agenda to create 100 economic zones over the next decade using a wide variety of arrangements. One of the key legislative accomplishments of the Government was to create two authorities to spearhead the push towards industrialization with greater involvement of the private sector. The Bangladesh Economic Zones Authority Act and the Bangladesh Hi-Tech Park Authority Act—both in 2010—created two new semi-autonomous agencies—the Bangladesh Economic Zones Authority (BEZA) and the Bangladesh Hi-Tech Park Authority (BHTPA)—tasked to oversee the expansion of economic zones (EZs) and hi-tech parks (HTPs) in the country. BEZA and BHTPA would rely mainly on private capital and expertise to build and operate the new zones but with important government oversight.

Within this context, **PRIDE** would build upon the foundation laid by the Private Sector Development Support Project (PSDSP), which helped establish BEZA and BHTPA as semi-autonomous institutions, and strengthened capacity to start delivering on their new mandates. Activities of BEZA under the current PSDSP are mostly to support land development and some onsite and off-site infrastructure at Mirsharai and Mongla EZ. In addition, PSDSP supported the preparation of a master plan to set up Bangabandhu Sheikh Mujib Shilpa Nagar (BSMSN) at Mirsharai which is at the final stage of completion. BSMSN would be built up on an area of around 30,000 acres encompassing 2000 acre of land that has been developed under PSDSP. It is expected that setting up of this large industrial city would take time and will be accomplished in phases.

BSMSN is one of the most suitable sites of Bangladesh for setting up industrial establishments. It is along the strategic location of Dhaka-Chittagong industrial corridor. Chittagong, with all its potentialities, is an attractive destination for setting up large number of industries, commercial establishments and financial institutions. With a high-quality business friendly environment, it has positive impacts and contributions in shaping Chittagong into a leading regional business hub. BSMSN, the first planned industrial city of the country, will pave the way for establishing a world-class business and industrial center. BEZA is in the final stage of developing a comprehensive master plan for developing this self-contained Industrial City including, incorporating Sea Port, Rail Connectivity, Marine Drive, Residential Area, Tourism Park, Power Plant, Hospital, School and University etc. to attract, assist, encourage and facilitate investment in BSMSN. Land demand in BSMSN is expected to be approximately 15834 acres in base case by the year 2040. The employment projection made for 2040 is more than 1.44 million considering all the direct, indirect and informal employment opportunities. The vision of BSMSN are as follows:

- BSMSN will be the first planned industrial city of Bangladesh;
- It would be developed into an Eco-Friendly, Smart and Inclusive Industrial City Maintaining Quality Environment;
- Ensure quality and efficiency supported by state-of-the-art technology, including providing all the infrastructure and services required for its effective functioning;
- Ensure quality environment all through its development and functioning

1.2. Project Location

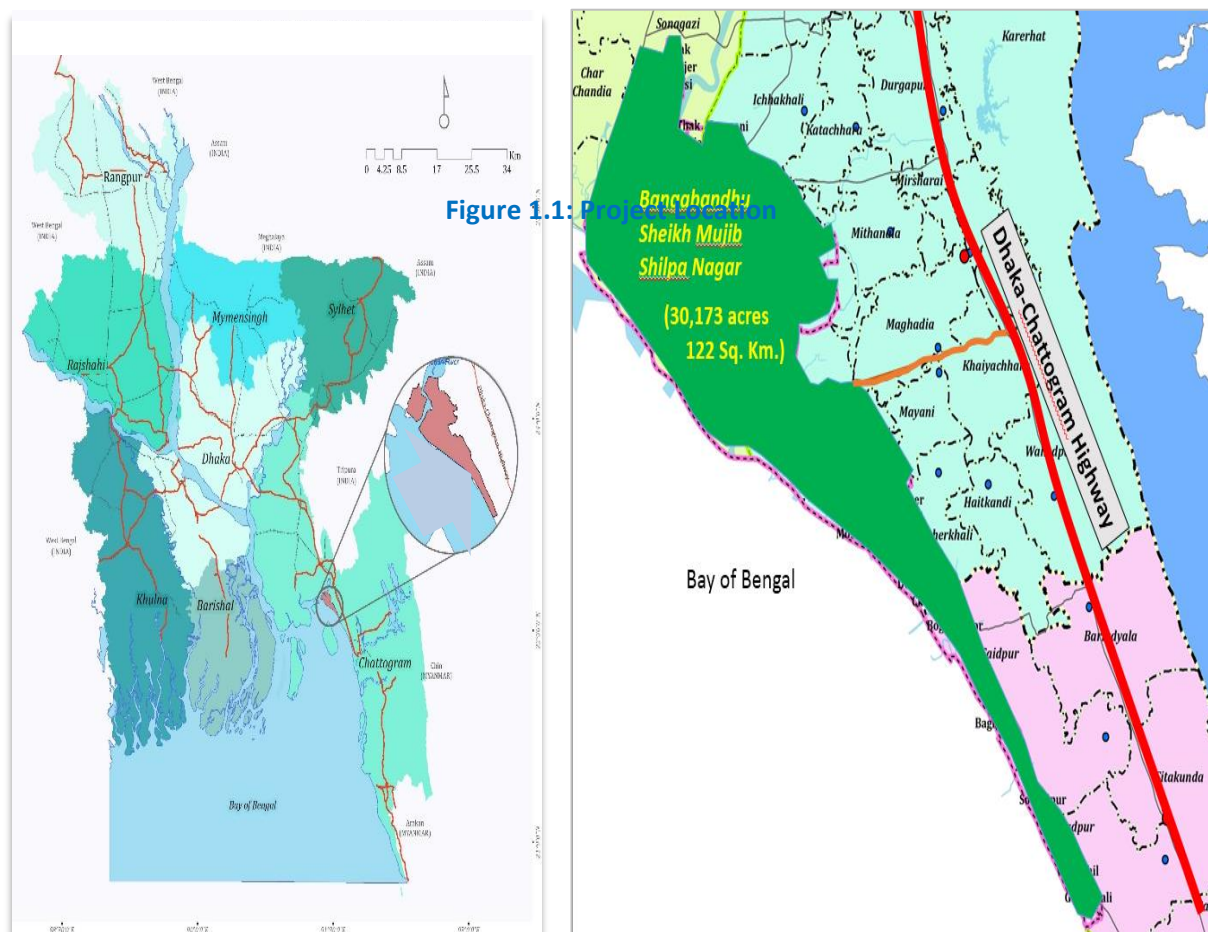
BSMSN is in Mirsharai and Sitakunda Upazilas of Chattogram district and Sonagazi Upazila of Feni district. The total land area demarcated for the proposed Mirsharai EZ is 30000 acres, the whole of

which is under ownership of BEZA. The BSMSN site is at a distance of 10km west of the Dhaka-Chittagong Highway and 67 km from Chittagong City on the south. Barotakia Railway station and Mirsharai Railway station are at 9.5 and ~10km respectively on the east. The Shah Amanat International Airport in Chattogram is located south of the site at a distance of about 79km, and the seaport is about 67km south of the site. Azampur Bazar, the nearest market, is only 2 km north of the site. The 10 km Barotakia to Mirsharai EZ Approach Road with four lanes carriageways from Barotakia to CP mor intersection will be the main entrance for BSMSN and connect it with Dhaka-Chittagong National Highway.

BSMSN will be developed in an area of 30000 acres of public land; till 26 November 2019 some 15,605.35 acres of land has been handed over to BSMSN authority while another 6995.09 acres of land has newly been acquired and is in the final stage of being transferred to BEZA. The entire tract of land is barren without vegetation and is not used by private citizens in the locality. The Ichchakhali channel that originates from the Feni River flows through the site into the Bay of Bengal.

The Master Plan study of BSMSN has estimated that the population of BSMSN area would range from about .92 million to more than 1 million by the year 2040. The estimation has been made based on the workforce likely to be generated by the industrial enterprises and other supporting amenities and services, and family members of the BSMSN workers.

While BSMSN could ultimately cover approximately 40,000 ha by 2040, the project would focus on three plots of land: BSMSN-2A (380 ha), 2B (182 ha) and International Master Developer (IMD) zone (200 ha). The land for first two zones has already been secured under the ongoing Private Sector Development Project (PSDSP) financed by the World Bank. The land development for 2A and 2B is in progress and will be ready before the effectiveness of the project. As the first areas in BSMSN that will host largescale production it is critical for BEZA to use 2A and 2B to set expectations of quality and managerial standards at a high level for subsequent phases of development. It is also essential to get 2A and 2B right to ensure synergies with expected developments of residential areas and a commercial center in the greater BSMSN region. This entails shared environmental and social infrastructure such as water, waste water, solid waste and social facilities. GoB support to crowd in



investments by private developers and operators is partly motivated by the public good that shared facilities must bring to workers and new residents in the area. The project will also finance last mile infrastructure to connect BSMSN-2A, BSMSN-2B and BSMSN-IMD to local roads and grids, and in some cases factory units within these sites.

2. World Bank Requirements

The World Bank's Environmental and Social Framework (ESF) came into effect on October 1, 2018. The Framework includes Environmental and Social Standard (ESS) 10, "Stakeholder Engagement and Information Disclosure", which recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice". ESS10 emphasizes that effective stakeholder engagement can significantly improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

As defined by ESS10, stakeholder engagement is an inclusive process conducted throughout the project life cycle. Where properly designed and implemented, it supports the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. Key elements of ESS10 include:

- "Stakeholder engagement is most effective when initiated at an early stage of the project development process, and is an integral part of early project decisions and the assessment, management and monitoring of the project."
- "Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts."
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not."

Borrowers are required to develop a Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts. Stakeholders have to be identified and the SEP has to be disclosed for public review and comment as early as possible, before the project is appraised by the World Bank. ESS10 also requires the development and implementation of a grievance redress mechanism that allows project-affected parties and others to raise concerns and provide feedback related to the environmental and social performance of the project and to have those concerns addressed in a timely manner.

3. Brief Summary of Previous Stakeholder Engagement Activities

3.1. Summary of Previous Stakeholder Engagement Activities

As a part of development of BSMSN, a total of 120 public consultation, meeting, focus group discussion were carried out where affected persons, community leaders, local politicians, local government administration, women's groups and relevant government department representatives has participated. Details are given at **Annex C**. The Public consultations were held at different villages of Mirsharai and Sonagazi Upazila. The people were generally enthusiastic about the project and believed that it will bring social and economic development in the region. There is scarcity of employment opportunities and health facilities within the Union and village which is affecting overall social and economic development. People believed that the establishment of the EZ will enhance the employment opportunities of the local community. Agriculture being the main economic activity in the project area, the farmers believes that the EZ will give them additional employment opportunities, and thereby enhance their standard of living. People were particularly concerned about the influx of additional people coming to their areas as well as giving employment opportunities to outsiders.

As a part of stakeholder engagement, BEZA authority participated in different level of public consultations/stakeholder's engagements at Mirsharai, Sitakunda and Sonagazi including district level consultations at Chattogram and Feni districts. The different tiers at which these consultations took place including participants include:

- District level stakeholder at Chattogram and Feni district: about 300 persons participated in the meeting where Member of Parliaments, Executive Chairman of BEZA, government officials, businessman, journalists and elected representative of local government including PAPs participated.
- Upazila level stakeholder at Mirsharai, Sitakunda and Sonagazi: about 1500 persons participated in the meeting where Member of Parliaments, Executive Chairman of BEZA, government officials, businessman, teachers, freedom fighters, farmers, NGOs, journalists and elected representative of local government including PAPs participated.
- Union Level stakeholder at Mirsharai, Sitakunda and Sonagazi: about 3000 persons participated in the meeting where Executive Chairman of BEZA, government officials, businessman, teachers, freedom fighters, union chairman, Upazila Administration, farmers, NGOs, journalists and elected representative of local government including PAPs participated.

The following issues and documents have been disclosed in the consultation meetings

- Information related to PSDSP and other BEZA activities in the project areas including potential impacts, benefits, opportunities and mitigation measures in case of adverse impacts have been disclosed by ESMFs, EIA and SIA of the PSDSP both in BEZA and the World Bank websites.
- Project documents including Environmental and Social Management Framework (ESMF) and Tribal Peoples Plan of PSDSP prepared through consultation have been made disclosed and available for public at the Union Parisad and Upazila Parisad offices and BEZA website and project office at Mirsharai and Mongla

- SIA of Mirsharai, Mirsharai EZ-2 and Mongla conducted through consultation have been disclosed and made available for public at the Union Parishad, Upazila Parishad offices and BEZA website and project office at Mirsharai and Mongla.
- Abbreviated Resettlement Plan for Mongla and Mirsharai EZs prepared through consultation have been disclosed and made available for public BEZA website and project office at Mirsharai and Mongla.

3.2. Lessons Learned on Stakeholder Engagement

BEZA has been working on PSDSP since 2014 and is regularly engaged with the relevant stakeholders at BSMSN. In the consultation meetings, the key lessons that were learnt are as follows:

- The development of EZs when create jobs and adds to the economic growth of the local community including the PAPs, gets wholehearted cooperation from the larger community.
- The meetings with the affected people and local communities should be held with prior notice to the people through miking, personal contact, public announcement in mosque and bazaars, etc. for mass awareness of the people about goals and objectives of the project.
- To ensure active participation of stakeholders, local language (Bengali) always should be used during consultation.
- To ensure voice of the vulnerable people separate meetings in small groups need to be held with women, poor people, laborers, etc. at project influence area.
- The senior officials of BEZA need to be aware of the needs and concerns of the PAPs and local populace and provide necessary support to the PAPs; the senior officials from BEZA should be present to disseminate project information and get direct feedback from the stakeholders. In this way affected people and other stakeholders would feel comfortable to discuss potential impacts on them and get plan of the BEZA regarding mitigation measures.
- Whenever there is a scope of creating jobs for the local PAPs that must include women. Skills development training should start at the earliest to engage the PAPs in the relevant jobs
- The stakeholder's engagement process should be continued during construction and operation phase of the project through grievance redress mechanism, labour management procedure, physical relocation assessment committee in case of displacement by the project.

In view of the lessons learned, PD BEZA has already taken certain measures while other measures would be put to use as the project implementation progresses. These include:

- ✓ PD BEZA has already contacted relevant personalities of the local Upazila, Municipalities and local elected leadership and through discussion has made changes in the execution of project related works suiting local needs and needs of the VGs/PAPs;
- ✓ The contractors will be instructed to recruit suitable labor force from the PAPs (including women, when interested);
- ✓ BEZA officials are remaining present in all such meetings and addressing questions/queries of the stakeholders. GRM is functional and issues are addressed promptly;
- ✓ At BEZA level, engagements are on to encourage local and international investors to BSMSN and other private EZs on encouraging terms;
- ✓ Regular Meeting/Discussion is being arranged by BEZA/BSMSN authority with relevant stakeholders and discussion related decisions are communicated to all concerned using all planned means including updates through website.

4. Stakeholder Identification and Analysis

The stakeholders of a project vary depending on the details of the project. They may include local communities, national and local authorities, neighboring projects and nongovernmental organizations.¹

Stakeholders refer to project-affected parties and other interested parties:²

- Project-affected parties: those who are or are likely to be affected by the project, and
- Other interested parties: those who may have an interest in the project and who could, for example:
 - Influence the opinions of affected parties either positively or negatively, or
 - Affect the implementation process or the sustainability of the project's outcomes

Where possible, stakeholder engagement will utilize engagement structures within the national system, e.g., community meetings, supplemented as needed with project-specific arrangements.³

Community representatives may provide helpful insight into the local settings and act as main conduits for dissemination of the Project-related information and as a primary communication/liaison link between the Project and targeted communities and their established networks. The legitimacy of such representatives may stem both from their official elected status and their informal and widely supported standing within the community that allows them to act as focal points of contact in Project's interaction with its stakeholders. Examples of legitimate stakeholder representatives include and are not limited to:

- elected officials of regional, local, and village councils and self-governance bodies;
- leaders of informal or traditional community institutions such as word member or UP chairman;
- non-elected leaders that have wide recognition within their community, such as chairpersons of local initiative groups, committees, local cooperatives etc.;
- leaders of community-based organizations, local NGOs and women's groups;
- the elders and veterans within the affected community;
- religious leaders, including those representing traditional faiths;
- teachers and other respected persons in the local communities, etc.

Verification of stakeholder representatives (i.e. the process of confirming that they are legitimate and genuine advocates of the community they represent) remains an important task in establishing contact with the community stakeholders.

4.1. Project-affected parties

Affected Parties include local communities, community members and other parties that may be subject to direct impacts from the project during development phase. Specifically, the following individuals and groups fall within this category:

- Affected Persons who are living in or beside the planned IMD land;
- Communities in the vicinity of the project's planned activities;

¹ ESF 2018, Note 1, page 98

² ESF Training for Environmental and Social Specialists, Participant Binder, August 2018

³ ESF 2018, Note 4, page 98

- The local population and local communities including the vulnerable group that include the elderly, physically and mentally disabled persons, single mothers, adolescent girls, minority transgender community and the children;
- Local health, education and like services that would have to provide basic support to the BSMSN/EZ staffs, workers and their families including school going children like basic healthcare, schooling etc.
- Residents, business entities, and individual entrepreneurs in the area of the project who are adversely affected owing to the project activities, and others that can benefit from the employment, training and business opportunities offered due to implementation of the project;
- During the operation phase, when the factories are in place and functioning, staffs and workers of the factories, buyers of the product, suppliers of raw material, vendors, utility service providers and local community who would be affected by the factory generated pollutants of all forms
- During operation phase the Entrepreneurs/Businessmen investing in the project could also be adversely affected by staffs/workers who may adopt illegitimate means like arson, workers agitation, destruction of machineries etc. to coerce the authority to meet their ends etc.
- At times unilaterally adopted BEZA policies may also go against the interest of the entrepreneurs investing in the EZ/PEZ including BSMSN.

Local NGOs and initiative/advocacy groups represent the considerable capacity that the project(s) may tap for disseminating the information and raising awareness of the planned activities among the potentially affected communities in the project area. NGOs typically have well established interaction with the local communities, are able to propose the most effective and culturally appropriate methods of liaising based on the local customary norms and prevailing means of communication, and possess the facilitation skills that may be utilized as part of the project's consultations. In addition, NGOs may lend assistance in disseminating information about the proposed project(s) to the local communities, including in the remote areas (e.g. by placing information materials about the project in their offices, distributing the project information lists during events that they are organizing), and provide venues for the engagement activities such as focus-group discussions.

Table 4.1: Project Components & Stakeholder Group and its impacts including influence

Project component	Stakeholder Group	Impact	Influence
Component 1: Creating an Enabling Environment for Private Investment and Job Creation			
<i>Sub-component 1.1: Promoting good governance and administrative efficiency</i>	• Investors of BEZA	Low	Low
	• BEZA Officials	High	High
	• BSMSN/EZ/PEZ authorities and staffs	High	High
	• Utility Service Providers at the EZ/PEZ/BSMSN	High	High
	• Local Administration		
Sub-component 1.2: Promoting public private participation			
a) PPP for Green Zone Master Developer	• Households besides the proposed zone	Low	Low
	• Local community from the influence area of the proposed zone	High	High
	• BEZA Authority		
	• Private companies planning to invest in the zone	Low Low	Low Low

	<ul style="list-style-type: none"> Local municipality Local Administration NGOs working in the area on environmental issues including afforestation Local Forest Office, private Horticulture nurseries etc. 	Low	Low
b) PPP for Sea Port, Port Facilities and Land Reclamation	<ul style="list-style-type: none"> Households besides the proposed zone Local community from the influence area of the proposed zone BWDB CPA PPP developer Transport companies Local municipality 	Low	Low
		High	High
		High	Low
c) PPP for Desalination and Wastewater Treatment	<ul style="list-style-type: none"> Labour Households besides the proposed zone Contractors Influence area of the proposed zone BWDB PPP developer 	Low	Low
		High	High
		High	High
		High	Low
Component 2: Supporting phased development of the BSMSN Green Industrial City			
<i>Sub-component 2.1: Developing environmentally sustainable and resilience infrastructure</i>	<ul style="list-style-type: none"> Labour Contractors Investors Local communities & businesses 	Medium	Low
		High	Low
<i>Sub-component 2.2: Last mile infrastructure to implement the Master Plan for BSMSN</i>	<ul style="list-style-type: none"> Squatters in or beside the proposed IMD area Labour Contractors Impacted communities 	Medium	Low
		High	Low
Component 3: Creating a dynamic private market for serviced industrial land	<ul style="list-style-type: none"> Private EZs Firms receiving grants in the form of Soft Services from BEZA Investors 	High	High
		Low	Low

In the process of project implementation, whenever certain 'Project-affected party/parties' are identified, they would be included and the SEP would be updated.

4.2. Other interested parties

The projects' stakeholders also include parties other than the directly affected communities, including:

- Civil society groups and NGOs on the regional, national and local levels, which pursue environmental and socio-economic interests and may become partners of the project.

Organizations within this group are likely to be located outside the project’s Direct Area of Influence;

- Community-based groups and non-governmental organizations (NGOs) working on Labor, or Gender issues including GBV and Human Rights in the locality that work for and represent local residents and other local interested groups, and act on their behalf;
- GoB officials, permitting and regulatory agencies at the national and regional levels, including environmental, technical, social protection and labor authorities.
- GoB officials at the District level and below including DoE: local Union Parisad, Upazila Parisad in the project area, village administrations; local MP etc.
- Business owners and providers of services, goods and materials that will be involved in the project’s wider supply chain and transportation business or may be considered for the role of project’s suppliers in the future;
- Residents of the other rural settlements within the project area that can benefit from employment and training opportunities stemming from the project;
- Mass media and associated interested groups including District and local Press Club, local, regional and national print and broadcasting media, digital/web-based entities, and their associations.
- Foreign investors & companies, Development Partners (at National and International levels) etc.

Table 4.2: A general list of stakeholder groups identified below

Other interested parties	Interest in the project
International Level	
Environmental and societal NGOs (including those working on Labor, Human rights, environment and Gender and GBV matters)	Understanding of the range of problems and opportunities associated with the project(s).
Foreign Investors	The BSMSN has all the potentials to attract FDI as the most attractive destination for investment in Bangladesh.
Multinational or foreign companies	Interested in operating or partnering with companies in the area.
Donor agency	This zone is environmentally and socially sustainable and the lesson and learned may share for international community
Academics and researchers	They may involve with various research work at the project site to provide scientific knowledge of the impacts of the project.
National Level	
Bangladesh Garment Manufacturers and Exporters Association	They have shown interest to establish one garments park at BSMSN complying with required potential environmental and social issues including setting up ETPs
Bangladesh Export Processing Zones Authority	They will establish BEPZA Economic Zone in this city and complying with required potential environmental and social issues including setting up ETPs
59 foreign and local investors	They will establish their industries and complying with required potential environmental and social issues including setting up ETPs
Chittagong Port Authority	Plan to construct a sea port under PPP within BSMSN complying with potential environmental and social issues
Business and workers’ organizations	Interest in procurement and supply chain, potential environmental and social as well as community health and safety, including occupational health and safety of the Labor force
Academic institutions (e.g. universities, think tanks, schools)	There would be a large influx of migrant workers/Managers/staffs with family in the project area. Students from this group would

Other interested parties	Interest in the project
	need schooling and healthcare facilities in situ. This demands the establishment of educational institutions within and near the project area. In addition, academic institutions and think tanks would be interested in the project due to its large development impacts (economic growth, social impacts, etc.)
Training service providers	They would be providing the training and skill development programs for workers
Urban Development Department	They are working for preparing a comprehensive Master Plan for influence area of BSMSN and would need help from the local government to implement the plan
Roads and Highways Department	The approach road will play vital role to ensure efficient transportation links with BSMSN, they may help BEZA and local community through ensuring its proper maintenance
Environmental and societal NGOs	Understanding of the range or problems associated with the project(s)
Other NGOs (HR, Gender, Labor Issues)	Represents the interests of different interested parties and vulnerable groups
Mass media	They are intermediaries for informing the general public about the planned activities of the project developer(s) and for information disclosure in connection with the proposed project(s)
Business community	Economically interested business entities (conclusion of contracts, economic damage due to competition, etc.); they can be also be potential customers of the project developer
Project employees and Project's sub-contractors	Technical understanding of the range or problems associated with the proposed project(s) including Health and Safety issues
Regional and District level	
Administration of Chattogram Region	Legislative and executive authorities. Functions of supervision and monitoring
Administrations of Chattogram and Feni districts (for WB financed projects)	Legislative and executive authorities. Functions of supervision and monitoring
Local NGOs (HR, Gender, Labor Issues)	Represents interests of different interested parties and vulnerable groups
Mass media	They are intermediaries for informing the general public about the planned activities of the project developer and for information disclosure in connection with the proposed project.
Business community	Economically interested business entities (conclusion of contracts, economic damage due to competition, etc.);
Local communities	Interested parties living in regions of BSMSN that could be indirectly affected by the realization of the projects
Local small business man	Small scale businessmen in the project vicinity would benefit from the project related workers/staff and managers and the raised purchasing power of the local populace getting jobs in the project through selling daily necessities
Mirsharai, Sitakunda and Sonagazi Upazila Administration	The influence area of this city will be busier. The administration of these Upazillas may help to BEZA to control the unplanned development
Union Level	
UP Chairman	Elected Union Porisad Chairman would be interested to have influence over resettlement, compensation and providing jobs to

Other interested parties	Interest in the project
	the needy local population around the project area thereby improving own influence for future local and national elections
Ward Members	Represent interests of the affected communities (land users) and vulnerable groups
Local land users and other local population	Potential vulnerable groups, affected communities and other interested parties living in the close proximity of the project area

In the process of project implementation and operation phase when goods would be produced at the factories at BSMSN/EZ/PEZs and, whenever certain 'Interested Party/Parties' are identified, they would be included, and the SEP would be updated.

4.3. Disadvantaged/vulnerable individuals or groups

BEZA will take special measures to ensure that disadvantaged and vulnerable groups have equal opportunity to access of information, participate in the engagement activities, provide feedback, and submit grievances. The deployment of the Social Development Officers will help to ensure proactive outreach to all population groups, and they will make a special effort to engage with those identified as vulnerable or disadvantaged. If necessary, BEZA will provide transport to public meetings for vulnerable people, and will also deliver brochures and informational material to such households in the language appropriate. To reach the elderly and the disabled in the community and the single mothers and the transgender community, dedicated efforts would be undertaken to reach them at their convenience by the Social development Officer. BEZA will take necessary supportive measures for the vulnerable groups within the overall process. The vulnerable groups may include and are not limited to the following:

- Elderly people, especially if they are living alone;
- Persons with physical and mental disabilities and their care givers ;
- Low-income families dependent on state support;
- Women-headed households or single mothers with underage children, adolescent girls;
- Children and adolescent girls
- The unemployed persons (men and women).
- Squatters
- Poor farmer and fishermen
- Minority Transgender community within the area of influence of the project area

It is anticipated that, among the above vulnerable groups, working age group who will be getting jobs in construction activities and suppliers of goods and services will be benefitted. Preferential employment of vulnerable people from the zone of influence should be ensured. Equal remuneration for the male and female workers for similar types of assignment will encourage the female to do job. Social security and protection against gender based violence can benefit the poor women particularly adolescent girls.

As the SEP is a living document, vulnerable groups within the community affected by the project will be further confirmed, included and consulted with, as appropriate. Description of the methods of engagement that will be undertaken by the project will be provided in the upcoming Regional Environmental and Social Assessment of BSMSN. In future, BEZA will take following steps to provide support vulnerable peoples in collaboration with developers and unit investors:

- BEZA will give priority to vulnerable family members to provide skills development training and on successful completion would provide jobs on priority basis.

- BEZA will create and ensure jobs for women-headed households as well as low-income families and persons with disabilities
- BEZA will ensure active participation of all stakeholders including the vulnerable groups in the project-related decision-making consultation meetings.

4.4. Summary of stakeholder needs

In the stakeholder consultation meetings, people were consulted at the community level about project components, timeline, adverse and beneficial impacts, opportunities of the local people to get preferential employment, equal salaries for similar types of works irrespective of gender, grievance mechanism, gender based violence risks and mitigation measures. Needs of the people to be engaged in the project preparation and implementation process for their interest was discussed in the meetings. This section describes the needs of the key stakeholders for engagement in the project activities.

Table 4.3: Summary of stakeholder needs for engagement in project activities

Community and Other Entities	Stakeholder Group	Key Characteristics	Language Needs	Preferred notification means (e-mail, phone, radio, letter, etc.)	Specific needs (accessibility, large print, child care, daytime meetings, etc.)
Icchakhali Union	Women with young children Fisherman Farmers Local residents The Elderly Religious leaders, teachers, village chiefs, disabled persons	Approximately 36 households affected;	Bangla	FGD Written information, Local newspaper, through Local administration- Ward Commissioner, political leaders of the locality At the Masjid during prayers Through village Defense party representatives	Late afternoon or Friday morning is preferred for meetings Meeting at a central place within the union. Transport support to gather the people PA equipment for ease of communication Supply of Flyers/ Brochures A spokesperson who could speak in local dialect should be present
South Mogadia	Women with young children Fisherman Farmers Local residents The Elderly	135 persons including 28 small business owners, 18 women, Union Porishod Chairmen and Members	Bangla	FGD Written information, local newspaper Through Local administration- Ward Commissioner,	Late afternoon or Friday morning is preferred for meetings Meeting at a central place within the union.

Community and Other Entities	Stakeholder Group	Key Characteristics	Language Needs	Preferred notification means (e-mail, phone, radio, letter, etc.)	Specific needs (accessibility, large print, child care, daytime meetings, etc.)
	Religious leaders, teachers, village chiefs, disabled persons that were accompanied by family members			political leaders of the locality At the Masjid during prayers Through village Defense party representatives	Transport support to gather the people PA equipment for ease of communication Supply of Flyers/ Brochures A spokesperson who could speak in local dialect
Sonagazi Upazila	Women with young children Fisherman Farmers Local residents The Elderly Religious leaders, teachers, village chiefs, disabled persons	50 Fishermen	Bangla	FGD Written information, local newspaper Through Local administration- Ward Commissioner, political leaders of the locality At the Masjid during prayers Through village Defense party representatives	Late afternoon or Friday morning is preferred for meetings Meeting at a central place within the union. Transport support to gather the people PA equipment for ease of communication Supply of Flyers/ Brochures A spokesperson who could speak in local dialect
Sitakunda Upazila	The Elderly Religious leaders, teachers, village chiefs, disabled persons Women, laborers, Fisherman Farmers Local residents,	150 individuals including 35 women, 20 fishermen	Bangla	FGD Written information, local newspaper Through Local administration- Ward Commissioner, political leaders of the locality At the Masjid during prayers Through village Defense party	Late afternoon or Friday morning is preferred for meetings Meeting at a central place within the union. Transport support to gather the people PA equipment for ease of

Community and Other Entities	Stakeholder Group	Key Characteristics	Language Needs	Preferred notification means (e-mail, phone, radio, letter, etc.)	Specific needs (accessibility, large print, child care, daytime meetings, etc.)
	shopkeepers			representatives	communication Supply of Flyers/ Brochures A spokesperson who could speak in local dialect
International Agencies/ Organizations including NGOs	Donor agency, Foreign Investors, Environmental and societal NGOs (including those working on Gender and GBV matters),	Development Partners, potential investors of BSMSN and INGOs working on compliance issues relating environment, Labor Laws and Gender related Issues	Bangla and English	FGD, Key Informant Interviews, Meetings, Face-to-Face interviews, Discussions etc.	Venue and Program to be informed well ahead of time BEZA to assist in obtaining Visa Uploading relevant information in BEZA/BSMSN website etc.
National and International Level	Academic institutions (universities, thinktanks etc.), Researchers and Academicians	Academics meant to undertake research on the project related issues and recommend BEZA on better efficiency in its performance	Bangla and English	FGD, Interviews, Discussions	Identifying appropriate researchers/Think Tank organizations Some Fund may be required to assist the researchers to undertake the research work
	BGMEA, BEPZA,	Umbrella organization of RMG sector in Bangladesh and Export Processing Zone	Bangla and English	FGD, Key Informant Interviews, Meetings, Face-to-Face interviews, Discussions etc.	Venue and Program to be informed well ahead of time Uploading relevant information in BEZA/BSMSN website etc.
	Foreign and local investors	Potential Investors who would invest in BSMSN	Bangla and English	FGD, Key Informant Interviews, Meetings, Face-to-Face interviews, Discussions etc.	Venue and Program to be informed well ahead of time BEZA to assist in obtaining Visa Uploading relevant

Community and Other Entities	Stakeholder Group	Key Characteristics	Language Needs	Preferred notification means (e-mail, phone, radio, letter, etc.)	Specific needs (accessibility, large print, child care, daytime meetings, etc.)
					information in BEZA/BSMSN website etc.
	Chittagong Port Authority	A major stakeholder of Sea Port under PPP at the Project site	Bangla and English	FGD, Key Informant Interviews, Meetings	Venue and Program to be informed well ahead of time
	Business and workers' organizations	Representative of Workers and Laborers in the project	Bangla	FGD with the labor and workers' leadership; Meeting	Venue and Program to be informed well ahead of time
	Training service providers	BEZA/BSMSN employed agencies for imparting training	Bangla	Meeting, Workshop	When necessary
	Urban Development Department, Department of Environment	GoB Agencies involved with the project	Bangla, English	FGD, Meetings,	Venue and Program to be informed well ahead of time
	Roads and Highways Department	GoB agency involved with Approach Road leading to the project	Bangla, English	FGD, Meetings,	Venue and Program to be informed well ahead of time
	Environmental and societal NGOs including NGOs working on HR, Gender, and Labor Issues	Non-governmental organizations with focus on compliance and voicing on related issues	Bangla, English	FGD, Meetings,	Venue and Program to be informed well ahead of time
	Mass media (both electronic and print media) including local press clubs	An important partner in propagating the positive sides of the project nationally and internationally	Bangla, English	FGD, Meetings,	As and when needed by BEZA/BSMSN authority

Community and Other Entities	Stakeholder Group	Key Characteristics	Language Needs	Preferred notification means (e-mail, phone, radio, letter, etc.)	Specific needs (accessibility, large print, child care, daytime meetings, etc.)
	Business community including Local small business man	A group, some amongst them could be adversely affected owing to the project. They would also wish to benefit financially from the project	Bangla, English	FGD, Meetings,	As and when needed by BEZA/BSMSN authority or demanded by the businessmen community
	Project employees and Project's sub-contractors	Important partners of the project implementation	Bangla, English	FGD, Meetings, Consultations	As and when needed by BEZA/BSMSN authority or requested by the contractors/sub-contractors
Divisional, District, Upazila and Union Parishad Level	Administration of Chattogram Division, various service providers, DoE etc.	Legal and Administrative supportive/regulatory authority	Bangla, English	FGD, Meetings, Public Consultations, Key Informant Interviews	As and when needed by BEZA/BSMSN authority or requested by the Administrative Authority
	Local land users and other local population	The affected group whose land might have been acquired for the Approach Road. They also include squatters and petty businessmen whose livelihood has been affected negatively	Bangla	Public consultations, meetings, FGD, Visiting them in situ by the staffs/consultants of BEZA/BSMSN	At regular intervals in the implementation phase (to be decided by BSMSN authority) and when approached by the affected community

Engagement with all identified stakeholders will help ensure the greatest possible contribution from the stakeholder parties toward the successful implementation of the project(s) and will enable the

project(s) to draw on their pre-existing expertise, networks and agendas. It will also facilitate both the community's and institutional endorsement of the project(s) by various parties. Access to the local knowledge and experience also becomes possible through the active involvement of stakeholders.

5. Stakeholder Engagement Program

5.1. Purpose and timing of stakeholder engagement program

The main goal of the Stakeholder engagement program is (i) building and maintaining a constructive relationship with various stakeholders that have been identified; (ii) to assess the level of stakeholder interest and support for the PRIDE project and to enable stakeholders' views to be taken into account in project design and environmental and social performance; (iii) to inform stakeholders of the project related information especially issues that could potentially affect them in a timely, understandable, accessible and appropriate manner and format; (iv) to provide them with accessible and inclusive means to raise issues and grievances, and allow IA to respond to and manage such grievance.

For the sake of the identification, the following criteria, adjusted to take account of local specific conditions, are proposed to be used for the identification of stakeholders:

- **Liability:** project implementation or on-going operations may result in legal, financial or other liabilities of the proponent to a social group;
- **Influence:** a social group may be able to substantially influence project implementation or on-going operations;
- **Partnership:** there are opportunities for building partnership relations between the project developer and a given social group in the framework of the project implementation or on-going operations;
- **Dependency:** project implementation may significantly affect a given social group, in particular, it may affect vital interests of its representatives if they are dependent on the project on-going operations in economic or financial terms;
- **Representation:** a social group may have a right to represent interests with regard to a project or on-going operations, and this right is legitimated through legislation, custom and and/or cultural specifics;
- **Expressed interest:** a social group and/or individual may express interest to a project or on-going operations, and this group is not necessarily directly affected by the planned or current activities

5.2. Information disclosure

As a standard practice, the Project materials (PAD, Implementation progress reports, monitoring reports, on-site construction specific information and E&S reports/documents including ESMF, ESMP, ESCP, SEP, LMP, RFP or RAP) released for disclosure are accompanied by making available the registers of comments and suggestions from the public that are subsequently documented by BEZA in a formal manner.

The project director will continue applying the similar approach to disclosure for any additional appraisal materials that will be prepared as part of the project development.

The ESMF report (together with the associated environmental and social management plan – ESMP) in Bangla, and English will be made available for public review in accordance with the international

requirements. The SEP will be released in the public domain and will be available for stakeholder review during the same period of time.

Distributions of the disclosure materials will be through making them available at venues and locations frequented by the community and places to which public have unhindered access. Free printed copies of the SEP in Bangla and English will be made accessible for the general public at the following locations:

- The Headquarters of BEZA
- The District Administration office of Chattogram and Feni
- The Project office in Mirsharai;
- Upazila Headquarters of Mirsharai, Sitakunda and Sonagazi
- Union Parisad Office
- Local NGO offices Mirsharai; and
- Other designated public locations to ensure wide dissemination of the materials.
- Newspapers, posters, radio, television;
- Information centers and exhibitions or other visual displays;
- Brochures, leaflets, posters, nontechnical summary documents and reports;
- Official correspondence, meetings

Electronic copy of the SEP will be placed on the project web-site <http://www.beza.gov.bd>. This will allow stakeholders with access to Internet to view information about the planned development and to initiate their involvement in the public consultation process. The web-site will be equipped with an on-line feedback feature that will enable readers to leave their comments in relation to the disclosed materials.

The mechanisms which will be used for facilitating input from stakeholders will include further in the report and will disclose materials to local, regional and national NGOs as well as other interested parties.

The following table provides a summary of the schedule for the proposed stakeholder activities during the various stages of the project life (*preparation, construction and operation phases*)

Table 5.1: Information Disclosure Mechanism

Project stage	List of Information to be disclosed	Methods proposed	Timetable: Locations/Dates	Target stakeholders	Stakeholders Engagement Mechanism	Responsibilities
Project Preparation Phase	Bidding Documents, SEP/ ESMF/ LMP/ Commitment Plan/ Updated ESIA of Mirsharai EZ-2 Regional ESIA	BEZA website, Newspaper advertisement , District and Upazila administration website and notice board	As soon as the concerned documents are uploaded in the website/published	Expert in the field of ES Journalists NGOS/CBOs PAPs Local Population	Information will be disseminated to all level stakeholders through consultation, announcement in printed/ electronic media, brochure, leaflet. Feedback will be obtained from the stakeholders through email, letter and phone call/SMS, etc. and documented accordingly. Opinions will be reflected in the safeguard documents.	BEZA/ PD/Social Specialist
Construction	Bidding Documents, Payment Plan and Shop Drawing Traffic management plan Labor management Plan Implementation Progress report Site specific construction information	Meeting Signboard Brochures Traffic Police FGD	Monthly 02 numbers 01 As per need As per need	Contractors, Suppliers, Villagers, including pedestrians and drivers Local and Migrant Workers of the project	Poster, information brochure, leaflet etc. will be circulated and displayed in the public palaces. Consultation and group discussion will also be held. Feedback will be obtained in written or verbal form and documented accordingly.	Social Specialist/Asst. Engineer/TAS/DS firm Contractors
Operation	Environment and Social Commitment Plan, Labour Management Plan, Skills development	Meeting Brochures FGD	Monthly 01 As per need	Contractor, Sub-Contractor, Suppliers, PAPs, Youth, Women	Information will be disseminated to all level stakeholders through consultation,	Social/Asst. Engineer/TAS/DS firm

	Program				announcement in printed/ electronic media, brochure, leaflet. Feedback will be obtained from the stakeholders through email, letter and phone call/SMS, etc. and documented accordingly. Opinions will be reflected in the safeguard documents.	
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5.3. Proposed strategy for stakeholder engagement

Stakeholder engagement activities will provide stakeholder groups with relevant information and opportunities to voice their views on issues that matter to them/affect them. Table 5.2 presents the stakeholder engagement activities that BSMSN authority will undertake for their project(s) which also includes how people would be made aware and opportunities for participation including location and frequency. The activity types and their frequency are adapted to the three main project stages: project preparation (including design, procurement of contractors and supplies), construction, and operation and maintenance.

The methods used would vary according to the target audience and would include:

- Public/community meetings, separate meetings for women and vulnerable
- Face-to-face meetings
- Focus Group Discussions
- Workshop with the Experts
- Surveys, polls etc.
- Interviewing stakeholders and relevant organizations
- Mass/social media communication (as needed)
- Disclosure of written information: brochures, posters, flyers, website
Information boards or desks at various sites where project work is ongoing - In Mirsharai, Sitakunda and Sonagazi area
- Grievance mechanism
- BSMSN/EZ/PEZ newsletter and website
- BEZA newsletter and website

Table 5.2: Planned stakeholder engagement activities

Stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
STAGE 1: PROJECT PREPARATION (PROJECT DESIGN, SCOPING, RESETTLEMENT PLANNING, ESMF/RPF/SEP DISCLOSURE)	<p>Project Affected People:</p> <ul style="list-style-type: none"> - People potentially affected by land acquisition - People residing in project area - Vulnerable households - Squatters and petty businessmen around the Approach Road - Local administration and local leadership <p>Benefited Group</p> <ul style="list-style-type: none"> - Local laborer's to be engaged in the project work - Suppliers and service providers - Contractors, sub-contractors - Transport owners & workers 	<ul style="list-style-type: none"> - Project scope and rationale - ESMF, ESMP, RPF, SEP, RAP (if triggered) disclosures - Land acquisition process and compensation - Assistance in gathering official documents for authorized land uses - Project E&S principles - Resettlement and livelihood restoration options - Grievance mechanism process 	<ul style="list-style-type: none"> - Public meetings, separate meetings for women and vulnerable - Face-to-face meetings - Mass/social media communication (as needed) - Disclosure of written information: brochures, posters, flyers, website Information boards or desks - In Mirsharai, Sitakunda and Sonagazi area - Grievance mechanism - BEZA newsletter and website 	<ul style="list-style-type: none"> - In Mirsharai, Sitakunda and Sonagazi for disclosure of Drafts ESMF, RPF, SEP, RAP (if relevant) - In Mirsharai, Sitakunda and Sonagazi at beginning of construction that would affect the area - Continuous communication through mass/social media and routine interactions - Throughout SEP development as needed - At a central place along the Approach Road 	<ul style="list-style-type: none"> - BEZA Pride Team - PD and BSMSN point of Contact - Social Specialists -
	<p>Other Interested Parties (External)</p> <ul style="list-style-type: none"> - Mirsharai, Sonagazi and Sitakunda Upazila - Representatives in villages 	<ul style="list-style-type: none"> - Project scope, rationale and E&S principles - ESMF, ESMP, RPF, SEP, RAP disclosures - Land acquisition process - Identification of land plots and uses 	<ul style="list-style-type: none"> - Face-to-face meetings - Joint public/community meetings with PAPs - Public Disclosure 	<ul style="list-style-type: none"> - Throughout SEP development as needed - Project launch meetings in Mirsharai, Sitakunda and Sonagazi - Quarterly meetings in affected villages and 	<ul style="list-style-type: none"> - BEZA E&S Team & management - PD and BSMSN point of Contact - Social Specialists

Stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
		<ul style="list-style-type: none"> - Resettlement and livelihood restoration options (if needed) - Grievance mechanism process 		Mirsharai, Sitakunda and Sonagazi or as an when demanded by the affected community <ul style="list-style-type: none"> - Disclosure meetings in nearby BSMSN 	
	Other Interested Parties (External) <ul style="list-style-type: none"> - Press and media - NGOs - Businesses and business organizations - Workers' organizations - Academic institutions - National Government Ministries - Mirsharai, Sitakunda and Sonagazi Government Departments - General public, tourists, jobseekers 	<ul style="list-style-type: none"> - Project scope, rationale and E&S principles - ESMF, ESMP, RPF, SEP, RAP disclosures - Grievance mechanism 	<ul style="list-style-type: none"> - Public meetings, trainings/workshops (separate meetings specifically for women and vulnerable as needed) - Mass/social media communication - Disclosure of written information: Brochures, posters, flyers, website - Information boards or desks in Mirsharai, Sitakunda and Sonagazi - Grievance mechanism - Notice board for employment recruitment 	<ul style="list-style-type: none"> - Project launch meetings in Mirsharai - Meetings in affected Mirsharai, Sitakunda and Sonagazi Upazilla as needed - Communication through mass/social media (as needed) - Information desks with brochures/posters in affected villages (continuous) - Public forums in Dhaka 	<ul style="list-style-type: none"> - BEZA Pride team - PD and BSMSN authority through their point of Contact
	Other Interested Parties (External) <ul style="list-style-type: none"> - Other Government Departments including DoE from which permissions/clearances are required; - Other project developers, donors 	<ul style="list-style-type: none"> - Legal compliance issues - Project information scope and rationale and E&S principles - Coordination activities - Land acquisition process - Grievance mechanism process - ESMF/ESMP/RPF/SEP 	<ul style="list-style-type: none"> - Face-to-face meetings - Invitations to public/community meetings - Submission of required reports 	<ul style="list-style-type: none"> - Disclosure meetings - Reports as required 	<ul style="list-style-type: none"> - BEZA PRIDE team - PD and BSMSN point of Contact

Stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
		disclosures			
	Other Interested Parties (Internal) <ul style="list-style-type: none"> - Other BSMSN staff - Supervision Consultants - Supervision contractors, sub-contractors, service providers, suppliers, and their workers 	<ul style="list-style-type: none"> - Project information: scope and rationale and E&S principles - Training ESMF/ESMP requirements and other management plans - Grievance mechanism process - E&S requirements - Feedback on consultant/contractor reports 	<ul style="list-style-type: none"> - Face-to-face meetings - Trainings/workshops - Invitations to public/community meetings 	As needed	<ul style="list-style-type: none"> - BEZA PRIDE team - PD and project management team
STAGE 2: CONSTRUCTION AND MOBILIZATION ACTIVITIES	Project Affected People <ul style="list-style-type: none"> - People potentially affected by land acquisition - People residing in project area - Vulnerable households Benefited Group <ul style="list-style-type: none"> - Local laborer to be engaged in the project work - Suppliers and service providers - Contractors, sub-contractors - Transport owners & workers 	<ul style="list-style-type: none"> - Grievance mechanism - Health and safety impacts (EMF, community H&S, community concerns) - Employment opportunities - Project status 	<ul style="list-style-type: none"> - Public meetings, open houses, trainings/workshops - Separate meetings as needed for women and vulnerable - Individual outreach to PAPs as needed - Disclosure of written information: brochures, posters, flyers, website - Information boards in Mirsharai, Sitakunda and Sonagazi - Notice board(s) at construction sites - Grievance mechanism - BSMSN Quarterly newsletter 	<ul style="list-style-type: none"> - Quarterly meetings during construction stage - Communication through mass/social media as needed - Notice boards updated weekly - Routine interactions - Brochures in local offices 	<ul style="list-style-type: none"> - BEZA PRIDE team and project management team along with BSMSN point of Contact - Social Specialist - Supervision consultants - Contractor/sub-contractors

Stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
	Other Interested Parties (External) <ul style="list-style-type: none"> - Governmental committees for land use and compensation (MBC) - Mirsharai, Sitakunda and Sonagazi and representatives in villages 	<ul style="list-style-type: none"> - Project scope, rationale and E&S principles - Grievance mechanism - Project status - World Bank compensation requirements 	<ul style="list-style-type: none"> - Face-to-face meetings - Joint public/community meetings with PAPs 	As needed (monthly during construction stage)	<ul style="list-style-type: none"> - BEZA PRIDE team and project management team - Social Specialist - BSMSN point of Contact - Supervision and RAP consultants - Contractor/sub-contractors
	Other Interested Parties (External) <ul style="list-style-type: none"> - Press and media - NGOs - Businesses and business organizations - Workers' organizations - Academic institutions - National Government Ministries - Mirsharai, Sitakunda and Sonagazi Government Departments - General public, tourists, jobseekers 	<ul style="list-style-type: none"> - Project information - scope and rationale and E&S principles - Project status - Health and safety impacts - Employment opportunities - Environmental concerns - Grievance mechanism process 	<ul style="list-style-type: none"> - Public meetings, open houses, trainings/workshops - Disclosure of written information: brochures, posters, flyers, website, Information boards in BEZA - Notice board(s) at construction sites - Grievance mechanism 	<ul style="list-style-type: none"> - Quarterly meetings during construction stage - Communication through mass/social media as needed - Notice boards updated weekly - Routine interactions Brochures in local offices	<ul style="list-style-type: none"> - BEZA PRIDE team and project management team - Social Specialist - BSMSN point of Contact

Stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
	Other Interested Parties (Internal) <ul style="list-style-type: none"> - Other BSMSN staff - Supervision Consultants - Contractor, sub-contractors, service providers, suppliers and their workers 	<ul style="list-style-type: none"> - Project information: scope and rationale and E&S principles - Training on ESMF/ESMP requirements and other sub-management plans - Worker grievance mechanism 	<ul style="list-style-type: none"> - Face-to-face meetings - Trainings/workshops - Invitations to public/community meetings 	Daily, as needed	<ul style="list-style-type: none"> - BEZA PRIDE team and project management team - Social Specialist - BSMSN point of Contact
STAGE 3: OPERATION AND MAINTENANCE	Project Affected People: <ul style="list-style-type: none"> - People residing in project area - Vulnerable households 	<ul style="list-style-type: none"> - Satisfaction with engagement activities and GRM - Grievance mechanism process - Damage claim process 	<ul style="list-style-type: none"> - Outreach to individual PAPs - BEZA website - Grievance mechanism - BEZA newsletter 	<ul style="list-style-type: none"> - Outreach as needed - Meetings in affected Mirsharai, Sitakunda and Sonagazi and villages (as needed/requested) - Monthly (newsletter) 	<ul style="list-style-type: none"> - BEZA PRIDE team and project management team - Social Specialist - BSMSN point of Contact
	Other Interested Parties (External) <ul style="list-style-type: none"> - Press and media - NGOs - Businesses and business organizations - Workers' organizations - Academic institutions - Local Government Departments (Mirsharai, Sonagazi and Sitakunda) - General public, tourists 	<ul style="list-style-type: none"> - Grievance mechanism process - Issues of concern - Status and compliance reports 	<ul style="list-style-type: none"> - Grievance mechanism - BEZA website - Face-to-face meetings - Submission of reports as required 	As needed	<ul style="list-style-type: none"> - BEZA PRIDE team and project management team - Social Specialist - BSMSN point of Contact

5.4. Proposed strategy / differentiated measures to include the views of and encourage participation by vulnerable groups

5.4.1. Participation by vulnerable groups

This section describes how the views of vulnerable or disadvantaged groups will be sought during the consultation process, and which measures will be used to remove obstacles to participation specially for vulnerable or disadvantaged groups.

Table 5.3: Vulnerable Group and Proposed strategy

Component	Target Group	Strategy
Development of Mirsharai EZ-2A and 2B	Persons with disabilities, Women and unemployed people, low income houses residing in the area, people whose lands have been acquired, petty businessmen, whose livelihood has been affected and minority transgender community of the area	<ul style="list-style-type: none"> • Separate, targeted consultations for persons with disabilities. • They will get priority to get the jobs in this zone • Database development for this group • Engagement with local organizations representing the interests of persons with disabilities • Information will be translated to Bangla • Either they would be gathered at a nearby place with own transport support or the team would visit them at the households so to ensure that they are not put to discomfort • Some representative to be qualified in local dialect

5.5. Review of Comments

The comments will be gathered (written and oral comments) and reviewed, and reported back to stakeholders on the following process:

- Comments received from stakeholders orally or in the written form at the project level
- The Social Development Officer/responsible officer would summarize the comments and bring to the notice of the Project Director (PD)
- The Social Specialist on his behalf the PD would respond to the comments by oral or written means at the project level (If the comments are in the written form, then the answer will be also in the written form)
- The PD may also himself organize the meeting with respective stakeholders
- If it's not solved by PD, then it will be addressed by GM Admin & Finance of BEZA.
- Again, if it is not solved at GM level, it will come to BEZA Executive Board level.
- The Social Development Officer will share the summary of the comments to stakeholders in every level.
- A written record of all these will be kept and maintained and uploaded in the relevant website for easy access of all.

In the existing project BEZA welcomes suggestion and comments from the stakeholders e.g. the local people requested to project to dredging the Bamonsundhor and Ichakhali Khal to ensure the normal water flow from the upstream of the project. Based on suggestions from the local peoples and elected representatives, BEZA took necessary action in dredging both the Khals with the support of BWDB. Again, in BSMSN approach road project BEZA has considered the suggestion and comments of the local businessmen to avoid the local market and as per suggestions BSMSN has changed alignment of the approach road.

6. Roles, Responsibilities and Resources for Stakeholder Engagement

6.1. Resources

The management, coordination and implementation of the SEP and its integral tasks will be the responsibility of dedicated team members within BEZA PIU, its regional offices and local sub-contractors. The project will ensure necessary logistics and budget to implement the SEP as per above mentioned discussion.

The contact information of BEZA is given on the right.

Description	Contact details
Company:	Bangladesh Economic Zones Authority
To:	Manager (Admin)
Address:	111 CR Datta Road (level 12), Dhaka
E-mail:	manager.admin@beza.gov.bd
Website:	www.beza.gov.bd
Telephone:	02-9632467

Table 6.1 indicates the Tentative Budget for implementing the SEP:

Table 6.1: Tentative budget for implementation of SEP

1	Stakeholder Engagement Activities	Quantity	Unit Cost (USD)	Times/Month	Total Cost (USD)
1.1	Staff salaries (02 Social Development Officers)	2	500	60	60000
1.2	Travel expenses	2	100	60	12000
1.3	Information Desk Officer	1	300	60	18000
1.4	Stakeholder/Community/Sensitization meeting	500	50	-	25000
1.5	Meeting with Union Parisad and Upazila Administration	80	200		16000
1.6	Meeting with District Administration	20	800		16000
1.7	Communication Materials (Posters; Brochure, Flyers, Billboard uploading information in website etc.)	20	3000		60000
1.8	Training on Social and Environmental issues (Batch, per batch 20 persons)	10	2000		20000
1.9	HHs Surveys for PAPs report preparation	5	5000		25000
1.10	Engaging Service Providers (Gov. & Non-GOV)	Lump sum	8000		8000
1.11	Travel Expenses for Senior staffs of Ministry/BEZA/Others	Lump sum	5000	at least two visits a year for 5 years	25000
2	Grievance Redress Activities				0

1	Stakeholder Engagement Activities	Quantity	Unit Cost (USD)	Times/Month	Total Cost (USD)
2.1	Communication Materials	10	1000		10000
2.2	GRM Guidebook	1	5000		5000
2.3	Suggestions Box	20	100		2000
2.4	GRM MIS Database	Lump sum	5000		5000
2.5	Training on GRM Committees and Contractor staff	5	5000		25000
2.6	Honorarium for committees	Lump sum	10000		10000
2.7	Contingency (10%)				33700
Total					375,700

6.2. Management functions and responsibilities

The stakeholder engagement activities will be incorporated into the project management system with the formation of PIU where one social development specialist (National), Social Development Officer (Field level), Design and Supervision consultancy firm will assist to implement the day-to-day activities.

The roles and responsibilities of the organizations are presented below:

The Project Implementation Unit (PIU) will be responsible for the preparation and physical implementation of the project. This unit will be under the oversight of the Project Director and GM (Planning and Development) of BEZA, comprising the following staff: Project Director, GM (Planning and Development), Procurement Officer, Social Development Specialist and an Environmental Specialist.

The Social Specialist who is part of the PIU be responsible to manage all social development aspects of the BEZA. The Social Specialist will oversee all planned stakeholder engagement activities and those in the process of being implemented. Responsibilities of the Social Specialist include the following:

- Develop, implement and monitor all stakeholder engagement strategies/plans for the Project/ESIA;
- Oversee all stakeholder engagement related activities for the Project;
- Manage the grievance mechanism;
- Interact with related and complementary support activities that require *ad hoc* or intensive stakeholder engagement (community development and land acquisition/resettlement planning and implementation);
- Liaise with the project directors/BEZA to ensure that stakeholder engagement requirements/protocols are understood; and
- Proactively identify stakeholders, project risks and opportunities and inform the PM / senior management to ensure that the necessary planning can be done to either mitigate risk or exploit opportunities.
- **The Social Development Officer (Field)** who is part of the PIU be responsible to manage all social development aspects of the BEZA. The Social Officer will oversee all planned stakeholder engagement activities or in process of being implemented in the field. He/she will be responsible to assist the Social Specialist (National)

Design and Supervision Consultant shall be recruited to provide institutional capacity and support to the Project Implementation Unit (PIU) with: (a) overall project management and supervision including procurement, design, and contract management; and (b) oversee the overall

implementation, monitoring, and reporting of safeguards aspects such as ESMPs, LMP, SEP and RAPs. After familiarizing themselves with the project area through reading and consultations with the BEZA Project Unit, the consultants will design appropriate questionnaires intended for data collection at project location levels. The consultations will be on-going and an integral part of the project as set out in this SEP.

In order to advance the Project, the PIU will work collaboratively with some of government departments and stakeholders such as (i) RHD, (ii) KGDCL, (iii) Power division, (iv) BEZA (Admin & Finance), (v) PGCB, (vi) CPA and relevant organization who is working in the city.

The roles and responsibilities, their interest and potential influence, and the internal coordination and communication arrangements are summarized below.

Table 6.2: Roles and responsibilities of the stakeholder

Actor/ Stakeholder	Responsibilities
PIU	<ul style="list-style-type: none"> ○ The PIU will be responsible for the preparation and physical implementation of the project. ○ Organize regular meeting with stakeholders ○ The PD would oversee the activities of the Project Social Development Specialist and monitor the ongoing activities
Project Social Development Specialist	<ul style="list-style-type: none"> ○ Quarterly reporting on SEP and the GRM to the WB. ○ Responds to stakeholder feedback ○ Keep PD posted on all matters relating SE
Social Specialist (HQ)	<ul style="list-style-type: none"> ○ Develop, implement and monitor all stakeholder engagement strategies/plans for the Project/ESIA; ○ Oversee all stakeholder engagement related activities for the Project; ○ Manage the grievance mechanism; ○ Interact with related and complementary support activities that require <i>ad hoc</i> or intensive stakeholder engagement (community development and land acquisition/resettlement planning and implementation); ○ Liaise with the project directors/BEZA to ensure that stakeholder engagement requirements/protocols are understood; and ○ Proactively identify stakeholders, project risks and opportunities and inform the PM / senior management to ensure that the necessary planning can be done to either mitigate risk or exploit opportunities.
Social Development Officer (field)	<ul style="list-style-type: none"> ○ Support to Social Specialist to develop, implement and monitor all stakeholder engagement strategies/plans for the Project/ESIA; ○ Support to Social Specialist to oversee all stakeholder engagement related activities for the Project; ○ Manage the grievance mechanism; ○ Interact with related and complementary support activities that require <i>ad hoc</i> or intensive stakeholder engagement (community development and land acquisition/resettlement planning and implementation); ○ Liaise with the PD/BEZA to ensure that stakeholder engagement requirements/protocols are understood; and implemented.

Actor/ Stakeholder	Responsibilities
Design and Supervision Consultant	<ul style="list-style-type: none"> ○ Supervision/monitoring of contractor; ○ Management of engagement activities during the construction phase; ○ Support to Social Specialist to develop, implement and monitor all stakeholder engagement strategies/plans for the Project/ESIA; ○ Support to Social Specialist to oversee all stakeholder engagement related activities for the Project.
Others government departments and stakeholders	<ul style="list-style-type: none"> ○ Supervision/monitoring of contractor ○ Management of engagement activities during the construction phase. ○ Support to Social Specialist to develop, implement and monitor all stakeholder engagement strategies/plans for the Project/ESIA; ○ Support to Social Specialist to oversee all stakeholder engagement related activities for the Project;

7. Grievance Mechanism

Considering the overall need for the total project period, BEZA will establish a GRM to address complaints and grievances throughout the lifecycle of the project. The GRM is intended to address issues and complaints in an efficient, timely, and cost-effective manner. The mechanism will, however, not bar an aggrieved person to go to the courts of law. A separate mechanism will be available for labor related issues under contractors and sub-contractors. Project-affected-people in the PRIDE project and any other stakeholder may submit comments or complaints at any time by using the project's Grievance Redress Mechanism (GRM).

Grievances in the project may range from disputes over ownership and inheritance of the acquired lands to affected persons and assets missed by the censuses; less valuation of the affected assets; delay in compensation payment; adverse effect on the squatters and their livelihood, effect on the society and the local community due to construction related activities leading to noise, light and dust pollution, conduct of the migrant workers, local workers and the contractor, GBV and spread of STD, and during the operational stage grievances of the workforce against factory management, water pollution, mismanagement in treatment of effluent discharged by the factory and the like.

The Objectives of the GRM are to:

- Provide a transparent process for timely identification and resolution of issues affecting the project and people, including issues related to the environmental impact, resettlement and compensation program.
- Strengthen accountability to the beneficiaries, including project affected people.

7.1. Grievance Mechanism Structure/Architecture

The purpose of the GRM is to **record and address any issue that may arise during the life cycle of the project period effectively and efficiently**. The GRM is designed to address concerns and complaints promptly and transparently with no impacts (cost, discrimination) for any reports made by project affected people (PAPs) and the complainants. The GRM works within existing social and resettlement management frameworks, providing an additional opportunity to resolve grievances at the local, project and BSMSN/EZ level. Necessary sign posting/bill board would be placed at the central places/places where people gather for sharing detailed information of the GRCs at every level.

The structure of Grievance Mechanism chain is as follows:

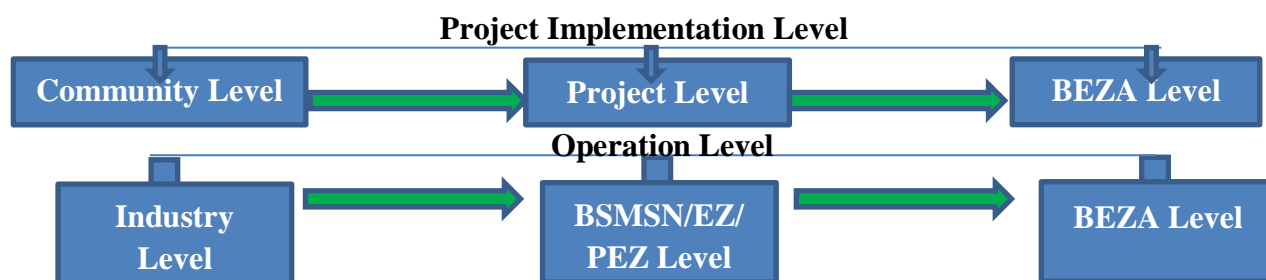


Figure 7.1: The structure of Grievance Mechanism

7.1.1. Community level

The objective of the community level GRM is to resolve issues at the first instance. However, issues that are not resolved at community level will be referred to the industry/project level GRC. The community level GRC shall carry out the following as regard to redressing grievances:

- a) Hear the grievances, and provide an early and mutually satisfactory solution to those;
- b) Immediately bring to the notice of the Project unit or Social Standards Officer/Industry Leadership any serious matter that may have arisen/complaint received;
- c) Inform the aggrieved parties about the progress of actions of their grievances and decisions.

The community level Grievance Redress Committee (GRC) shall have the following members:

- Assistant Manager-BSMSN (Convener), BEZA
- An Elected Member of the Union Parishad or Upazila Parishad
- A Female Member of the Union or Upazila Parishad
- A Representative of the PAPs in the EZ/subproject
- An Elected UP chairman
- A member of the NGO working in the locality on Social Development/Gender/GBV issues
- Social development officer (Member Secretary)

The Community level GRC shall resolve or reach a decision fifteen (15) days from the date the complaint is received. The chairperson of the GRC shall communicate the committee's decision to the aggrieved PAPs in writing and maintain a record of all decisions related to each case. In addition, local communities have existing traditional and cultural grievance redress mechanisms. It is expected that some disputes at the community level may be resolved using these mechanisms, without the involvement of the contractor(s), and or Government representatives at the local, BSMSN/EZ/ and BEZA level.

7.1.2. Project/Industry (During Operation) Level Grievance Redress Mechanism

The objective of the project/Industry level GRM is to bring the GRM closer to PAPs/workers of an industry, when operational. Issues that are not resolved at community level or industry level issues would be handled at this level. All effort shall be made to resolve issues at the first instance. The Project Director/ Social Specialist at the project level / Appropriate representative of the Industry along with HR Manager at the operational level shall carry out the following as regard to redressing grievances:

- a) Hear the grievances of the PAPs/staffs and workers, and provide an early and mutually satisfactory solution to those;
- b) Immediately bring to the notice of the Project unit or Social Standards Officer/Industry Leadership any serious matter that may have arisen/complaint received;
- c) Inform the aggrieved parties about the progress of actions of their grievances and decisions of the Project unit/Industry level.

The project level GRM shall have the following Grievance Redress Committee (GRC) members: -

- Project Director (Convener) / Director Administration of the Industry (during Operation Level)
- Assistant Manager-BSMSN
- An Elected Member of the Union Parishad or Upazila Parishad (Project Level Only)
- A Female Member of the Union or Upazila Parishad (Project Level Only)
- A Representative of the PAPs in the EZ/subproject/staff or workers representative of the Industry (operational level)

- An Area Representative of an NGO working in the area on Social Development /Gender/GBV and labor issues
- Social/ Resettlement Specialist/ HR Manager (Member Secretary)

The project level GRC shall resolve or reach a decision fifteen (15) days from the date the complaint is received. The Convener of the GRC shall communicate the committee's decision to the aggrieved PAPs in writing and maintain a record of all decisions related to each case.

7.1.3. BSMSN/EZ Level Grievance Redress Mechanism (Operational Stage)

The objective of BSMSN/EZ level GRM is to oversee the GRM of the Industries at the operational stage and assist the Industries/Entrepreneurs in addressing the grievances immediately upon receipt of a complaint. When a grievance could not be effectively addressed and mitigated at the Industry/Entrepreneur level, it would be forwarded to the BSMSN/EZ level for necessary action. All effort shall be made to resolve issues at the earliest.

The BSMSN/EZ level GRM shall have the following Grievance Redress Committee (GRC) members:

- General Manager of BSMSN/his Deputy as Convener
- Director Administration of the Industry
- Representative of the staff or workers of the Industry including a female staff/worker
- An Area Representative of an NGO working in the area particularly in the fields of Labor, Gender and GBV
- Manager Administration of BSMSN/EZ (Member Secretary)

The BSMSN/EZ level GRC shall reach a decision fifteen (15) days from the date the complaint is received. The chairperson of the GRC shall communicate the committee's decision to the aggrieved ones in writing and maintain a record of all decisions related to each case.

7.1.4. BEZA Level Grievance Redress Mechanism

A committee of knowledgeable persons, experience in the subject area, shall be constituted at the BEZA to handle complaints that have not been addressed or resolved at the Project implementation and operational level in the impact area or the project influence. The BEZA level GRM shall be comprised of the following members: -

- General Manager (Convener)
- Legal Specialist, Member
- Social Specialist, Member
- Environmental Specialist-Member
- UP Chairman (on behalf of PAPs in Project Implementation stage)/Director Administration of the during the Operational Level - Member
- Chief Law Officer of BEZA – Member
- BSMSN/EZ Manager Administration (operational level)
- Director Administration of the Industry (operational level)
- GBV Specialist of the Local NGO assigned by BEZA to manage and respond to GBV cases
- Manager Administration-BEZA - Member Secretary

The BEZA level Grievance redress committee shall do everything possible to hear and determine the issues within 15 (fifteen) days from the date the case has been transferred to it from the BSMSN/EZ GRC. To ensure impartiality and transparency, hearings on complaints will remain open to the public. The GRCs will record the details of the complaints, the reasons that led to acceptance or rejection of the particular cases, and the decision agreed with the complainants. BEZA will keep records of all

resolved and unresolved complaints and grievances and make them available for review as and when asked for by the World Bank and other interested persons/entities.

The chairperson of the GRC shall communicate the outcome to the aggrieved PAP(s)/staffs in writing. The GRC shall maintain a record of all outcomes related to each case. Should measures taken by the BEZA fail to satisfy the complainant, the aggrieved party is free to take his/her grievance to the court, and the court's decision will be final.

7.2. Grievance Mechanism Intake Channels

Information about the GRM will be publicized as part of the initial disclosure consultations in the participating Upazila, union and villages. Brochures will be distributed during consultations and public meetings, and posters will be displayed in public places such as in government offices, project offices, village notice boards, community centers, etc. Information about the GRM will also be posted online on the BEZA website (<http://www.beza.gov.bd>).

The overall process for the GRM will include six steps and described below:

- **Step 1: Uptake.** Project stakeholders will be able to provide feedback and report complaints through several channels: in person at offices (village/mahalla, Union, project, and Upazila offices) and at project sites, and by mail, telephone, and email.
- **Step 2: Sorting and processing.** Complaints and feedback will be compiled by the Assistant Manager/Social Development Officer and recorded in a register. Submissions related to the resettlement and compensation program will be referred to the planning department for processing and resolution.
- **Step 3: Acknowledgement and follow-up.** Within seven (7) days of the date a complaint is submitted, the responsible person will communicate with the complainant and provide information on the likely course of action and the anticipated timeframe for resolution of the complaint.
- **Step 4: Verification, investigation and action.** This step involves gathering information about the grievance to determine the facts surrounding the issue and verifying the complaint's validity, and then developing a proposed resolution, which could include changes of decisions concerning eligibility for compensation, additional compensation or assistance, changes in the program itself, other actions, or no actions. Depending on the nature of the complaint, the process can include site visits, document reviews, a meeting with the complainant (if known and willing to engage), and meetings with others (both those associated with the project and outside) who may have knowledge or can otherwise help resolve the issue. It is expected that many or most grievances would be resolved at this stage. All activities taken during this and the other steps will be fully documented, and any resolution logged in the register.
- **Step 5: Monitoring and evaluation.** Monitoring refers to the process of tracking grievances and assessing the progress that has been toward resolution. The Planning Department will be responsible for consolidating, monitoring, and reporting on complaints, enquiries and other feedback that have been received, resolved, or pending. This will be accomplished by maintaining the grievance register and records of all steps taken to resolve grievances or otherwise respond to feedback and questions. **Typical grievance resolution process is shown on Figure 7.1.**
- **Step 6: Providing Feedback.** This step involves informing those to submit complaints, feedback, and questions about how issues were resolved, or providing answers to questions. Whenever possible, complainants should be informed of the proposed resolution in person. If the complainant is not satisfied with the resolution, he or she will be informed of further options, which would include pursuing remedies through the

World Bank, as described below, or through avenues afforded by the Bangladesh legal system. On a monthly basis, the Planning Department will report to the Executive Chairman on grievances resolved since the previous report and on grievances that remain unresolved, with an explanation as to steps to be taken to resolve grievances that have not been resolved within 30 days.

7.3. Grievance Registry, Referral, Resolution and Appeals Process

As per existing practice BEZA would adopt the following procedures:

The GRC at the Community level will establish a simple computerized system to record the complaints; information on the complainants and perpetrators with names of the enterprises they are employed in; acceptance/rejection of the complaints by CGRC and the reasons thereof. If the decision made at this level is not acceptable to the aggrieved person, GRC will refer to the project level during implementation level/to BSMSN/EZ level during operational level. If they too fail to solve the problem, it would be referred to the BEZA Headquarters with details of the complaint and minutes of the hearings at the BSMSN/EZ level. BEZA will review the case and send its decision within fifteen days from the receipt of the complaint or earlier. However, if an aggrieved person is dissatisfied with the GRM, he/she may lodge complaint following the law of the land. An example of a grievance registration form and Grievance Mechanism for PRIDE project is given at **Annex E**.

Any GBV related complaints will be handled in a survivor-centric manner in line with the World Bank guidelines provided in the WB good practice note on gender-based violence⁴. GBV-related complaints will be dealt with strict confidentiality, based on the wishes of the GBV-survivor. Any GBV-survivor will be referred to an NGO assigned for the project by the Borrower to manage and respond to GBV cases. This NGO will support GBV survivors in accessing service providers and guiding them through options of lodging a complaint. Process of grievance resolution is presented in **Figure 7-2**.

⁴ The World Bank (2018): Good Practice Note Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works.
<http://documents.worldbank.org/curated/en/399881538336159607/Environment-and-Social-Framework-ESF-Good-Practice-Note-on-Gender-based-Violence-English.pdf>

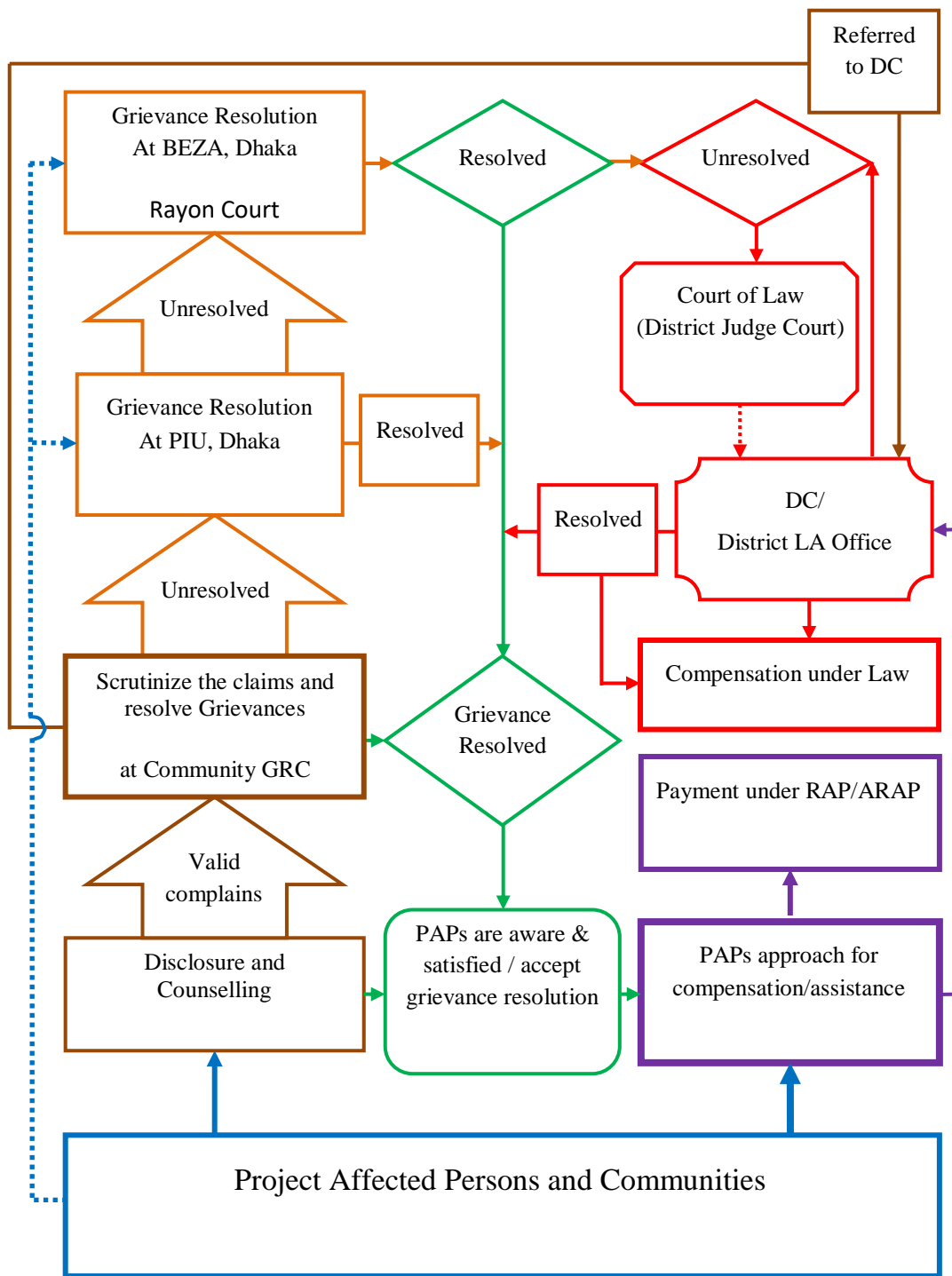


Figure 7-2: Grievance Resolution Process

7.4. GRM Monitoring and Reporting

Day-to-day implementation of the GRM and reporting to the World Bank will be the responsibility of the Project Director of PRIDE project. To ensure management oversight of grievance handling, the Internal team will be responsible for monitoring the overall process, including verification that agreed resolutions are actually implemented.

Any GBV related complaints will be handled in a survivor-centric manner in line with the World Bank guidelines provided in the WB good practice note on gender-based violence⁵. GBV-related complaints will be dealt with strict confidentiality, based on the wishes of the GBV-survivor. Any GBV-survivor will be referred to an NGO assigned for the project by BSMSN/BEZA to manage and respond to GBV cases. This NGO will support GBV survivors in accessing service providers and guiding them through options of lodging a complaint. For further details, please refer to the GBV action plan at <https://www.worldbank.org/en/news/press-release/2017/11/08/new-action-plan-addresses-gender-based-violence-in-world-bank-operations>

7.5. GRM contact information - BEZA

Information on the project and future stakeholder engagement programs will be available on the project’s website and will be posted on information boards in the project office, villages, Union Parishad office, Upazila Office crossed by the line. Information can also be obtained from BEZA offices in Mirsharai and Dhaka.

The point of contact regarding the stakeholder engagement program at BEZA is given below:

Description	Contact details
Company:	Bangladesh Economic Zones Authority
To:	Project Director
Address:	111 CR Datta Road (level 12), Dhaka
E-mail:	mahmud.faruk@gmail.com , social.stcb@beza.gov.bd
Website:	www.beza.gov.bd
Telephone:	02-9632459

⁵ The World Bank (2018): Good Practice Note Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works. <http://documents.worldbank.org/curated/en/399881538336159607/Environment-and-Social-Framework-ESF-Good-Practice-Note-on-Gender-based-Violence-English.pdf>

8. Monitoring and Reporting

8.1. Involvement of stakeholders in monitoring activities

The SEP will be periodically revised and updated by the Social Specialists as necessary in the course of PRIDE project implementations in order to ensure that the information presented herein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to the project related activities and to its schedule will be duly reflected in the SEP. This way there would also be room to include a freshly identified stakeholder group who might have been missed/were absent during the initial SEP preparation. BEZA engaged **Institute of Water Modelling (IWM)** to review the SEP developed by its specialists. IWM notified that the SEP was in a good standard and recommended that the BEZA should consider this as a living document and update it from time to time as necessary.

8.2. Reporting back to stakeholder groups

Monthly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the senior management of the project(s). The monthly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner.

As mentioned before, the intensity of interaction and stakeholder engagements would vary depending on various Stage of the project and Grievance Mechanism of the SEP. However, on receipt of any grievance, necessary timeframe would be strictly followed to communicate solution reached/if referred to hierarchy/is in the Court of Law awaiting final decision to the local community and the interested groups verbally/through meetings/interactions/local elected leadership/local administration/BEZA's own means etc. NGOs operating in the locality could also be used to communicate the message. The PRIDE website would be regularly updated covering all aspects of the project including progress, outcome of various meetings, and the Grievance related issues. Close and intense monitoring by PD with the assistance of Social Development Officer (field), and PIU in the project area would also work as an effective means of disseminating related information to the PAPs.

Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in two possible ways:

- Publication of a standalone annual report on project's interaction with the stakeholders.
- A number of Key Performance Indicators (KPIs) will also be monitored by the project on a regular basis, including the following parameters:
 - Number of public hearings, consultation meetings and other public discussions/forums conducted within a reporting period (e.g. monthly, quarterly, or annually);
 - Frequency of public engagement activities;
 - Geographical coverage of public engagement activities – number of locations and settlements covered by the consultation process, including the settlements in remote areas within the Project Area of Influence (PAI);
 - Number of public grievances received within a reporting period (e.g. monthly, quarterly, or annually) and number of those resolved within the prescribed timeline;

- Type of public grievances received;
- Number of press materials published/broadcasted in the local, regional, and national media;
- Amount of Project's charitable investments in the local communities in the Project Area of Influence.

All the consultations so far held in the project area included women and the VG. Observations/suggestions of the elderly and the disabled were also taken by visiting them in situ. The outcomes of the consultation were given due importance and following discussion, certain project related planning and execution modalities were modified/changed.

8.3. Reporting to the World Bank

The project director with the support of social and environment specialist will share the progress and results of the stakeholder engagement activities to the World Bank quarterly and annually where Stakeholder related activities will be described broadly. These reports will also include detailed reports on the GRM effectiveness, including a list of grievances received, addressed and the pending ones.

References

- (a) Environmental and Social Framework (2018), The World Bank.
- (b) The South Asia Template for Stakeholder Engagement Plan
- (c) Abbreviated Resettlement Action Plan for Mongla and Mirsharai EZ
- (d) Stakeholder Engagement Plan, Off-Grid Solutions (last-mile connections) in Khatlon Region, Tajikistan
- (e) SIA of Mirsharai EZ- 2, BEZA
- (f) Resettlement Action Plan for BSMSN Approach road
- (g) Stakeholder Engagement Plan, for network reinforcement and access project
- (h) Md.Abdul Quader Khan, Social Speciliest , BEZA, Social Impact and Analysis Good
- (i) Practice Note: Third-Party Monitoring report of Environment & Social Framework for IPF Operations

Annexes:

Annex A: Project Components and Sub-components

The PRIDE project covers four components. The first three components would be implemented by BEZA. The activities build on the experience from, and work done to date, under the IDA-funded Bangladesh Private Sector Development Support Project-PSDSP (P120843) and the joint WB-IFC Bangladesh Investment Climate Fund 2. The project is designed as an investment project financing operation with disbursement-linked indicators (DLIs) to strengthen focus on achieving important institutional and regulatory reforms. For BEZA, the project is designed to help reduce the risk of operations and significantly scale up its activities to deliver on commitments to private and public partners.

Component 1: Creating an Enabling Environment for Private Investment, Sustainability and Job Creation (US\$100m)

The first component will inform and implement institutional, regulatory and administrative reforms; strengthen BEZA's core competence in technical functions that would allow it to be an effective partner to leading private investors; and embed resilience and sustainability concepts into its development of infrastructure and associated services. It covers a significant budget for activities that disburse against the execution of eligible expenditures and verification of the achievement of DLIs. The link between some of the disbursement against the achievement of certain outputs and outcomes will emphasize and incentivize the quality of core results that are paramount to reduce certain risks associated with BEZA's activities and at the same time allow it to scale up and accelerate its development activities.

Sub-component 1.1: Promoting good governance and administrative efficiency (US\$15m + DLIs)

This sub-component would promote good governance and administrative efficiency by rendering BEZA a more effective autonomous authority. It will help BEZA to crowd in and realize the most attractive proposals in its US\$18 billion, and growing, investment pipeline. It will also help ensure that these investments are properly implemented and generate strong public benefits by reducing the risk of negative social and environmental externalities, and fiscal exposure of the treasury. It will allow BEZA to build on its achievements over the last five years and strengthen the authority and its operations to deliver on its commitment to public and private partners. Key priorities are to separate the regulator role and developer role; create special operations units within core functions; update operational procedures to reduce the risk for land speculation; introduce stronger incentives for productive private participation; and integrate green economic zone concepts of resilience and sustainability in the management and financing mechanisms of all infrastructure, utilities and associated services. The DLIs will be linked to a selection of the core outputs and outcomes as follows:

- a) Review and revision of BEZA's mission and vision statements;
- b) Design and implementation of a comprehensive human resources policy;
- c) The establishment, recruitment, training and equipment of special operations units—some of which may become centers of excellence—within BEZA around:
 - Site selection, feasibility evaluation and master planning,
 - Investment facilitation and promotion,
 - Social and environmental management,
 - PPPs and transaction support,
 - Green economic zone development - sustainable and resilient infrastructure, including post-disaster recovery strategies;
- d) Development and expansion of BEZA's nascent one stop shop services center to introduce streamlined administrative services;

- e) Establishment of formal coordinating mechanisms to allow BEZA to play a more effective role vis-à-vis other public entities and private partners, including at the division level;
- f) Develop and implement clear rules when economic zones may have public ownership/participation;
- g) Clearly separate the regulatory and developer roles;
- h) Establishment of special purpose entities when economic zones have public participation to improve governance and promote inclusive development; and
- i) Development of a practical framework and guidelines for green and resilient economic zones at the national level and application at the local level for all economic zones supported under the project.

Sub-component 1.2: Promoting public private participation (US\$15m + DLIs)

The project would finance technical assistance and training to support the PPP Special Operations Unit develop a PPP program, including the delivery of specific PPP transactions, with the aim of attracting internationally reputed developers and operators of economic zones and associated services. The project will provide support for legal, regulatory and institutional reforms. It will develop procedures and guidelines for identifying, selecting, preparing, structuring, negotiating, implementing and monitoring PPP transactions. It will provide resources to BEZA for inter-agency coordination with entities such as the PPP Authority, the Chittagong Port Authority, etc., when collaboration is required. It will build the capacity of a core team of 3-4 staff plus embedded consultants and experts who will be responsible for managing the PPP preparation, tendering and transaction implementation process. Structured training programs will cover PPP concepts and best practices, including on transaction structuring, risk allocation, procurement best practices, assessing value for money, PPP standard contractual provisions, contract negotiation, etc. The DLIs will be linked to the compliance with the due diligence process of openness and competition and then support expenditures under the GoB's counterpart investments.

The project would also provide technical assistance to prepare and implement a few concrete PPP transactions. It will finance capital contributions when needed to make transactions financially viable, especially where green, resilient and smart investments need to be commercially viable. The preliminary pipeline of potential transactions includes:

- a) **PPP for Green Zone Master Developer (200 ha, in two phases):** feasibility study, transaction advisory services, capital contribution for land elevation, and possibly partial capital contribution for key green infrastructure. The latter may include one or more services/activities such as desalination, rain water capture, water resource management, solid waste management, waste pyrolysis/energy, solar energy production, sewage management, waste water treatment, flood management, etc. The selection will depend of findings of feasibility studies and market response.
- b) **PPP for Sea Port, Port Facilities and Land Reclamation:** feasibility study, transaction advisory services, support to help mobilize public financing for port superstructure, capital investment from other financing sources for port superstructure, etc. Total funding would likely amount to approximately US\$1bn. BEZA has received credible but unsolicited proposals and the project will integrate them in an open and competitive selection process.
- c) **PPP for Desalination and Wastewater Treatment:** feasibility study, transaction advisory services and capital investment to buy down the cost of green, best practice solutions. Other green zone activities such as solar power, rain water capture and flood management will be considered at the pre-appraisal stage.

Component 2: Supporting phased development of the BSMSN Green Economic Zone (US\$300m)

The second component would support the phased development of the BSMSN Green Economic Zone along the Dhaka-Chittagong corridor, following the formal adoption of the Master Plan for the greater industrial city of BSMSN. This is a unique opportunity to properly plan and establish a new economic agglomeration with an ideal institutional setup, inclusive leadership, joint facilities to tackle negative externalities associated with industrial production, promote private participation in the development of the site, and integrate resilience and sustainability concepts into the design and operation of new infrastructure and services. BEZA has an investment pipeline covering 1,610 ha for 58 investment projects—some of which have already been allocated land. The investors originate mainly from Europe, Asia and the Pacific and include many Bangladeshi textiles and garments producers, and various producers of food and beverage, chemical engineering, footwear and pharma. The 58 investment projects are estimated to be worth US\$12.3bn and could employ more than 150,000 workers if realized.

This component would catalyze the development of a state-of-the-art green economic zone and set an example for sustainable, resilient and environmentally sound industrial development in Bangladesh. While BSMSN could ultimately cover approximately 40,000 ha by 2040, the project would focus on three plots of land: BSMSN-2A (380 ha), 2B (182 ha) and 200 ha of GoB land that have not yet been allocated and which would go through a rigorous concession process to attract a developer and operator (i.e. an International Master Developer, IMD) that has a proven international track record to bring in leading participants in global supply chains. The land development for 2A and 2B is in progress and will be ready before the effectiveness of the project. As the first areas in BSMSN that will host large-scale production it is critical for BEZA to use 2A and 2B to set expectations of quality and managerial standards at a high level for subsequent phases of development. It is also essential to get 2A and 2B right to ensure synergies with expected developments of residential areas and a commercial center in the greater BSMSN region. This entails shared environmental and social infrastructure such as water, waste water, solid waste and social facilities. GoB support to crowd in investments by private developers and operators is partly motivated by the public good that shared facilities must bring to workers and new residents in the area.

Sub-component 2.1: Developing environmentally sustainable and resilient infrastructure (US\$230m)

This sub-component would finance works, goods and technical assistance to apply and implement the new International Framework for Eco-Industrial Parks in BSMSN 2A-2B and in the BSMSN-IMD area. The approach will eventually be scaled up at a national level under a parallel technical assistance. The Master Plan for BSMSN and associated demand analysis show strong demand mainly from labor-intensive light industries. A preliminary analysis of the measures required to incorporate resilience and sustainability as a core strategy in the development of BSMSN 2A-2B are presented in Table 1 and in Annex B. These investments would significantly reduce negative externalities from industrial production by helping to optimize the use and cost of utilities and resources (e.g. water, drainage, electricity, gas) and reduce the environmental footprint and operational risks. The investments would enhance the attractiveness of BSMSN 2A-2B to tenants since they render supply chains more effective and cater also to more demanding international multinationals and buyers. The investments would also generate positive externalities to households in surrounding residential areas because the expected demand for clean water, renewable energy and waste management services for civilian needs will be incorporated in the design and phased development of services that primarily serve industrial demand.

Table 1 presents a gap analysis for BSMSN 2A-2B that applies the criteria defined in the International Framework for Eco-Industrial Parks. The preliminary list of interventions has been

classified by sustainability or resilience depending of the type of service. Services under the sustainability category optimize the use of resources (water, waste, energy), including through effective and innovative recycling solutions that can be profitable. These solutions are already established in many countries, but most have yet to be introduced or implemented in Bangladesh. Services under the resilience classification minimize the loss of services after natural disasters and under changing climate conditions before, during and after natural disasters and extreme weather events. The preliminary investment assessment indicates that some of the services can be provided through private participation. Activities under sub-component 1.2 will help inform the process of selecting appropriate developer and operator modes. The pre-appraisal of the project will evaluate and prioritize these infrastructure investments.

There will be a mix of public and private participation. Some of the investments will be partially financed by the government to make green solutions viable. The financing strategy of the interventions for BSMSN 2A-2B will be based on a cascade approach to classify and prioritize the investments that can be performed considering various private and public sources. Infrastructure classified as resilience services and primary infrastructure such as roads and bridges or connecting pipelines for utilities and general services (see sub-component 2.2) will be financed through public investment, including with funds released from DLIs under Component 1. The PPP options will be explored during project pre-appraisal, including with the IFC, and will concern: (a) serving BSMSN-2A and BSMSN-2B with desalination and wastewater treatment, renewable energy sources (floating solar, rooftop solar), and solid waste management; and (b) social services and logistics for the greater BSMSN Green Industrial City, such as a new seaport, a hospital, an international school, etc. Some of these sub-projects will be completed within the timeframe of this project while other sub-projects will be planned, prepared and possibly transferred to a second phase of the project, or spun off and incorporated in other government projects.

Table 1: Indicative list and preliminary investment assessment for BSMSN 2A and 2B

Type of Intervention	Potential intervention	Area (ha)	Equity (30%) IRR	Investment assessment
Sustainability	Waste water plant (CETP)	7.2	9%	US\$110m
Sustainability	Desalination plant	4	9%	US\$100m
Resilience	Underground electric line (15km)	4.5	n.a.	US\$10m
Resilience	Innovative draining system	102	n.a.	US\$100m
Sustainability	Floating solar	35	19%	US\$67m
Sustainability	High temperature pyrolysis plant (associated to SWM)	0.6	19%	US\$27m
Total				US\$ 404m

Sub-component 2.2: Last mile infrastructure to implement the Master Plan for BSMSN (US\$70m)

Besides the infrastructure under sub-component 2.1, the project will also finance last mile infrastructure to connect BSMSN-2A, BSMSN-2B and BSMSN-IMD to local roads and grids, and in some cases factory units within these sites. The investments will follow the priorities identified in the Master Plan for BSMSN. The sub-projects have been identified and their details are available in this plan, which follow international best practice standards.

Component 3: Creating a dynamic private market for serviced industrial land (US\$75m)

The third component would help create a dynamic private market for serviced industrial land that serves external investors unaffiliated with the developer or operator. Eleven private economic zones have been licensed in the last three years but a minority of these eleven PEZs have so far attracted investors that are unaffiliated to the licensed operator. Two of the PEZs have in the last 18 months attracted credible foreign investors. A preliminary assessment of the nascent PEZ market suggests three forms of interventions that would be included to help accelerate the development of this market.

- a) Review and revision of the regulations and procedures around the licensing of PEZs. Technical assistance to strengthen the capacity to monitor and enforce the regulations. The current rules stipulate that at least 50 percent of the space in a PEZ must be rented out to unaffiliated investors and the effectiveness and outcomes to date of these rules will be evaluated;
- b) Technical assistance to help identify, evaluate, design and integrate resilience and sustainability in the infrastructure investments and services provided by PEZ operators. The qualifying criteria will be strict to benefit PEZ operators that are leasing out the great majority of its space to unaffiliated tenants (i.e. complying with the revised regulations). The selection criteria for sub-projects will be based on professional assessments about the economic rate of return and the internal rates of return. A PEZ operator that brings in a reputable anchor investor in a new industry gives rise to positive externalities that can be substantial and produce transformational impact, which warrants public support; and

Grant mechanism program to support new tenants in PEZs that (i) are unaffiliated to the operator and (ii) enter a sector or market where Bangladesh has little or no presence (market seeking investors that promote economic diversification) or (iii) enter the market to produce in Bangladesh for foreign markets (efficiency seeking investors that contribute to exports). The grant program will be tailored to help raise labor productivity by incentivizing firm investment in skills formation by accredited institutions. The matching grant program will operate on a reimbursable basis and only for legitimate expenses for those who successfully complete the training and obtain certified credentials. Depending on demand there could also be a window to incentivize investments that implement the new International Framework for Eco-Industrial Parks

Development challenges

- Coordination failures
- Institutional capacity to deliver across numerous technical functions
- High transaction costs for investors
- Risk for fiscal leakage and land speculation
- Negative externalities
- Underdeveloped market for infrastructure financing

- Coordination failures (national+ local authorities, agencies, social services)
- Missing public goods (lack of potable water, waste collection and treatment)
- Negative externalities (industrial pollution control)
- Fragility associated with climate change and natural disasters

- Missing markets (nascent market for serviced industrial land)
- Missing public goods (lack of potable water, waste collection and treatment)
- Negative externalities (industrial pollution control)

Project interventions

Intermediate Outcomes

PDO Outcomes

Component 1. Creating an enabling environment for private investment and job creation (US\$100m) – with DUs

1. Strengthen BEZA's institutional systems, structures and HR policy	Creating a conducive investment climate for EZ developers, operators and tenants	Private greenfield investment in the development of serviced industrial land
2. Separate regulator & developer functions	Improving planning, coordination and capacity to crowd in private participation	Private greenfield investment by tenants/manufacturers
3. Improve resource allocation through national master planning and phased development strategy	Reducing public financial exposure and promoting efficient allocation of land	Jobs created in EZs
4. Regulatory reform to combat potential speculation and fiscal leakages	Attracting foreign developers and operators to enter market for serviced industrial land	Reduction in negative E&S externalities
5. Streamline administrative procedures (OSS) and introduce job-incentives for investors	Expansion of services offered to investors under the OSS	
6. Build PPP center-of-excellence unit		
7. Build green zone-infrastructure resilience center-of-excellence unit		

Component 2. Supporting phased development of the BSMNSN Green Economic Zone (US\$300m)

1. Establish SPV for BSMNSN development	Establishing autonomous and inclusive BSMNSN Development Entity	Number of firms with access to shared green services/facilities
2. Some combination of public design and build and PPP delivery of shared facilities for: (a) last mile and internal connectivity, (b) water (supply, IWWM, recycling), (c) SWM, (d) renewable energy in blocks 2A-2B, (e) state-of-the-art international master developer(s), (f) seaport;	Delivering shared infrastructure services and facilities	Jobs created in BSMNSN
3. TA for high level planning and coordination around the commercial center, residential areas, hospital and social services	Green Zone compliance and classification	Number of workers and family members benefiting from improved basic services
	Number of PPP transactions	Reduction in negative E&S externalities
	Number of tenants/manufacturers	

Component 3. Creating a dynamic private market for serviced industrial land (US\$75mn)

1. TA Facility for identifying and promoting sustainability measures in and around PEZs	Co-investment mobilized for sustainability measures	Private greenfield investment by tenants/manufacturers
2. Financing Facility for sustainability investments in and around PEZs	Improving market demand-driven development of human capital	Number of firms with access to shared green services/facilities
3. Skills Formation Facility for workers of external tenants/manufacturers	Number of PEZs that comply with new regulations on minimum share of non-affiliated occupation	Jobs created in PEZs
		Reduction in negative E&S externalities

PDO: to promote private investment and job creation in economic zones... [...] in an environmentally sustainable manner

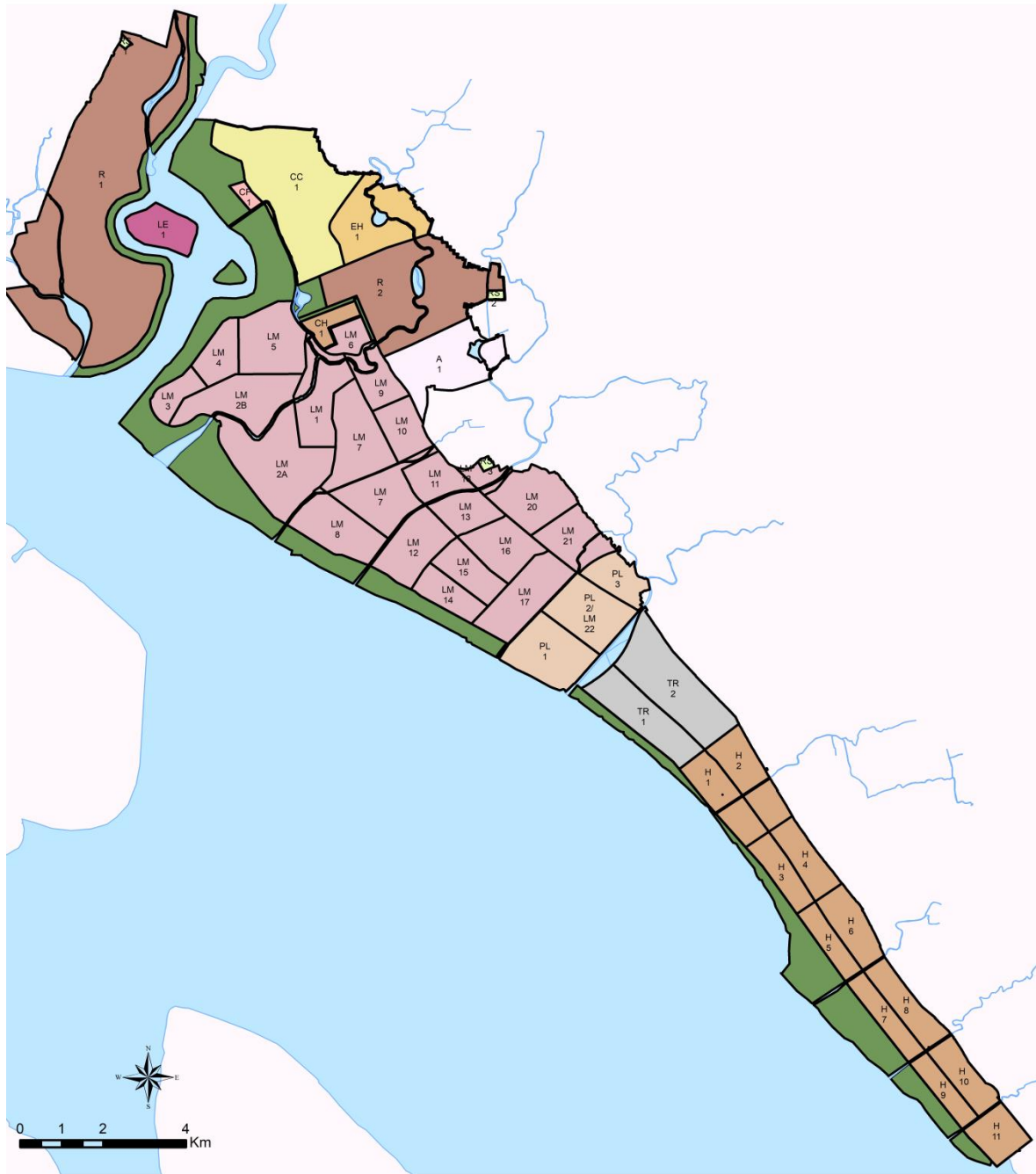
Increased FDI and private domestic investment

Increased resilience of infrastructure and improved social services

More and better jobs

Economic diversification and transformation

Annex B: The Tentative Master Plan Map of BSMSN



Annex C: Previous Consultations and Engagement with Project Stakeholders

Place	Date	Participants	Key points raised
Ward no.6 & 10 Ichakhali Union	23 May'16	38 Local community	<ul style="list-style-type: none"> • People have raised concerns about their lack of technical skills in accessing jobs in the EZ and requested BEZA to provide technical training to them to take up such new kind of jobs. • There was a request from the people to give preference to them in the semi-skilled/unskilled work. • In order to boost the local economy, it was suggested by the people to use the goods and services from/within the Upazila area in the establishment of EZ.
Tea-shop near Forest Office, Mirsharai	25 May'16	24 PAPs	<ul style="list-style-type: none"> • The affected community has raised concern over the compensation to be paid to them. • Suggestions came from the community as well as the affected people that widening of the road should be done on the western side so as to reduce the number of affected households.
Cyclone Shelter on the eastern side of the road near Hindupara (Char Sarat/East Ichakhali/Ichakhali-6)	25 May'16	31 PAPs/Local community	<ul style="list-style-type: none"> • In case the people are resettled, they prefer to stay within the Char Sarat village area. • An alternate route for the approach road to the EZ from the Dhaka-Chittagong Highway was suggested. It would pass near the Muhuri project site at Joralganj, and would be ~15km long. • People whose lands and houses are getting affected should be provided with employment opportunities.
On the existing un-metaled approach road, ~2km from Chicken Poultry end (Char Sarat/East Ichakhali/Ichakhali-6)	25 May'16	20 PAPs/Local community	<ul style="list-style-type: none"> • Widening of the road is preferred on the western side of the existing approach road
Near the house of Mr. Rezaul Karim, near Chicken Poultry (Nayapara/South Moghadia/S)	25 May'16	21 PAPs/Local community	<ul style="list-style-type: none"> • Road widening on the western side is preferred, as it reduce government's compensation requirements as well. • To further reduce the number of people to be displaced on the western side of the road, the new road can be routed straight from the Poultry farm and join the nearest elbow.

Place	Date	Participants	Key points raised
haherkhali)			
Grocery shop at Hindupara (Char Sarat/East Ichakhali/Ic hhakhali-6)	25 May'16	20 PAPs/Local community	<ul style="list-style-type: none"> • Although development is welcome, the road widening on the western side of the existing road is preferred. • There shouldn't be any delay in compensation for their lost assets. • Adequate livelihood support and income restoration to the affected persons. Expeditious payment of the compensation (before the beginning of the pre-construction activities).
Tea-shop beside the existing un-metaled approach road, ~3km from Chicken Poultry end (Char Sarat/East Ichakhali/Ic hhakhali-6)	25 May'16	20 PAPs/Local community	<ul style="list-style-type: none"> • Adequate relocation for affected families who are losing residential structures.
Mirsharai	3 Jul'15	3 BRAC (International NGO working at Sonagazi, Mirsharai & Sitakunda)	<ul style="list-style-type: none"> • EZ will raise the standard of living, thereby increasing the earning capability of locals, which, in turn, will enhance the investment opportunity for Grameen Bank • The establishment of EZ will help land value to appreciate. • Environment-polluting industries should NOT be encouraged within the EZ. • Local people should be given preference during recruitment in EZs; selection should be solely based on merit / capability.
Mirsharai	22.06.2016	3 ASA (National NGO working at Sonagazi, Mirsharai & Sitakunda)	<ul style="list-style-type: none"> • Owing to inflow of people from outside, Asa will have a higher base of potential customers for providing financial help. • Land value is expected to increase. • If needed, trainings can be provided by Asa in the future.
Mirsharai		4 Buro (National NGO working at Sonagazi, Mirsharai & Sitakunda)	<ul style="list-style-type: none"> • Increased employment will help in fastening the financing process and broadening the customer base. • Since financing is provided to low as well as medium-income people, new employees can move into higher-capability customer band, thereby increasing the loan sanction amount.
Mirsharai	24.05.2016	PMK (Palli Mangal Karmasuchi) (National NGO working at Sonagazi, Mirsharai &	<ul style="list-style-type: none"> • Establishment of the EZ will increase the customer base for the NGO. • Healthcare program is planned for providing awareness to pregnant women and preventing child marriage.

Place	Date	Participants	Key points raised
		Sitakunda)	
Ward.6, Char Sarat Village	28.05.2 016	10 Women	<ul style="list-style-type: none"> • Women believe that they can access employment opportunities in the EZ even if the gender inequality is deep rooted in the area; • EZ will be able to provide stable employment opportunities throughout the year for people dependent on seasonal income opportunities. • Extend the employment opportunity to the women in the area especially in the construction works (unskilled), cleaning, etc.
Naya Para Village	28.05.2 016	30 Participants Economic zone, Peripheral bund/road	<ul style="list-style-type: none"> • No problem is being faced by people due to construction of EZ-I and single lane access road on CDSP/BWDB bund • It is nearby village with 700 HH & 100% Muslim population. Major occupation of people is agriculture/aquaculture, small business and jobs like drivers etc. Av. Income per family is 5000-6000 TK/month. Most of the HHs rear poultry and cattle. • No factory emitting bad odor should come up in the EZ area like CB factory (poultry farm & feed factory) • Local people should be provided employment in the industries in upcoming EZ preferably • Skill enhancement training should be given to villagers by industries so that they can work in those industries • People expect agro based industries to come up in region which will help them selling their products easily. Also they expect upcoming industries will train them to enhance their productivity by using HYV seeds and modern equipment's • Only non-polluting industries should come up in this region and measures should be taken by industries to control the pollution levels
Charsharad h Village	03.07.2 016	Local community	<ul style="list-style-type: none"> • No problem is being faced by people due to construction of EZ-I and single lane access road on CDSP/BWDB bund • It is nearest village with 1400 HH & app 45% families are Muslims and rest are Hindu families. 1-2 Buddhist families also resides in this village. Major occupation of people is agriculture/aquaculture, small business and jobs like drivers etc. Av. Income per family is 5000-6000 TK/month. Most of the HHs rear poultry and cattle. Agriculture is rain fed and heavy crop losses occur due to heavy rains and delays in rains • People are educated. Most of the people obtain basic education minimum but high level of unemployment is in the area • People are aware about the project and expect good employment generation from the EZ • They emphasized that polluting industries should not be set up in the EZ zone • Pollution should be managed by upcoming industries so that no health hazards should be generated for local people • Employment should be given to women also as they are educated and interested in working
Discussion	16	20 local	<ul style="list-style-type: none"> • Fishermen catch 8-10 kg of fish per day by fishing and earn

Place	Date	Participants	Key points raised
with local fishermen near Bamon Sundar Canal	Apr'16	fishermen	<p>2500-3000 Tk per week.</p> <ul style="list-style-type: none"> • They insisted that jobs should be given to locals during both construction and operation phase preferably as there is large scale unemployment • Nearby CP factory causes lot of odor and skin diseases and same should not happen in the EZ zone • Fish based industries should be promoted • No problem is being faced by people due to construction of EZ-I and single lane access road on CDSP/BWDB bund
Ward.6, Char Sarat Village (Women Group)	16 Apr'16	40 Women	<ul style="list-style-type: none"> • Women believe that they can access employment opportunities in the EZ even if the gender inequality is deep rooted in the area; • EZ will be able to provide stable employment opportunities throughout the year for communities dependent on seasonal income opportunities. • Extend the employment opportunity to the women in the area especially in the construction works (unskilled), cleaning etc.
Ward no.6 & 10 Ichhakali Union	16 Apr'16	21 Local community	<ul style="list-style-type: none"> • Majority of the people are currently engaged in agriculture and aquaculture and does not have technical skills to undertake jobs in the EZ • In case necessary training is provided for jobs, the local people are also willing to take up such new kind of jobs • The local people should be given preference for allocation of jobs. • Involving local people who are living near the approach road in the construction works. (Especially construction workers and unskilled labors). • The local communities wanted that opportunities be given to the local workforce during the construction phase. • Use of goods and services from/within the Upazila area to develop the approach road
Consultation with NGOs and CSO at Mirsharai	25 May'i6	15 NGOs and CSO representative	<ul style="list-style-type: none"> • EZ will raise standard of living, thereby increasing the earning capability of locals, which, in turn, will enhance the investment opportunity for Grameen Bank • The establishment of EZ will help land value to appreciate • Environment-polluting industries should be encouraged within the EZ • Local people should be given preference during recruitment in EZs; selection should be solely based on merit / capability
Tea-shop near Forest Office, Mirsharai	25 May'i6	03 Tea shop owner	<ul style="list-style-type: none"> • Although construction of a wide road will be beneficial for the area, but many landowners would be displaced landless if the road is widened on the eastern side of the existing unmetaled road • The local people unanimously supported the construction of the road if it is done on the western side, since the land on the western side is government land. • Who will compensate for the difference in Mouza rate and market price of the land
Upazila	13	75 persons	<ul style="list-style-type: none"> • BEZA may construct the port within Sitakunda part

Place	Date	Participants	Key points raised
Administration Sitakunda	January '18	including BEZA, government representative, local elite, Vulnerable People, UP Chairman, women	<ul style="list-style-type: none"> because the depth of sea is higher than Mirsharai RHD may support to local community to construct a road from Baro-Darogarhat to EZ BEZA needs to start the skills development training to ensure the jobs for influence area of zone
Upazila Administration Mirsharai	07 March '18	200 persons including Member of Parliament, Executive Chairman of BEZA, government representative, local elite, freedom fighters, UP Chairman, contractors	<ul style="list-style-type: none"> RHD will complete the construction road within December 2019 To avoid the traffic management of Borotakia Bazar the RHD will open the bypass BEZA needs to start the skills development training to ensure the jobs in EZs BEZA may work for plantation program As a part of development of mega project, department of education will enhance the capacity of neighbor schools and colleges capacity. Department of fire services will construct a fire station within the zone
Project site office Mirsharai	25 September '18	50 squatters besides the approach road	<ul style="list-style-type: none"> Resettle besides the existing area Ensure the livelihood of the affected People have raised concerns about their lack of technical skills in accessing jobs in the EZ and requested BEZA to provide technical training to them to take up such new kind of jobs. There was a request from the people to give preference to them in the semi-skilled/unskilled work.
Icchakhali UP	10 January '19	200 persons including BEZA, government representative, local elite, UP Chairman, women and youth	<ul style="list-style-type: none"> BEZA may help to ripen the old embankment for smooth communication. Local UP chairman will prepare a list of youth who are interested to receive the skills training based on their choice BEZA may support to construct a mosque besides the zone BWDB/BEZA will ensure the green buffer besides the embankment to protect from natural climates.
Upazila Administration Sonagazi, Feni	07 March '19	48 government representative/PAPs/ local elite/ UP chairman and member	<ul style="list-style-type: none"> Adequate livelihood support and income restoration to the affected persons. BEZA will give priority to get the job affected HHs The approach road from the Muhuri project to Sonagazi needs to widen. BEZA will support to local community to avoid the river erosion of the Feni river
Project site office Mirsharai	10 June '19	28 government representative contractors	<ul style="list-style-type: none"> The contractors should employ the labor from the affected community. The construction of approach road should be in right time.

Place	Date	Participants	Key points raised
Char Chandina Sonagazi	30 June'19	07 Local Elites, Farmer group	<ul style="list-style-type: none"> • The contractors will use the water to control the durst. • Employment should be given to the PAPs from the earliest stage of site development so that they don't get economically deprived/jobless • They are expecting that, as a foremost need for EZ development, the connectivity and mode of transport will be improved. The social infrastructure like schools, colleges, medical facilities will gradually be developed in the area. • They fear that the people in this region will not get job in EZ as they are neither technically skilled nor literate. The project authority should undertake skill development program in neighboring areas. This will ascertain that the priority will be given to the locals for various employment opportunities during development and operation stage of EZ.
Char Khondoker Sonagazi	01 July'19	18 07 Local Elites, Farmer group	<ul style="list-style-type: none"> • The stakeholders welcomed the project. They believe it will bring various economic opportunities to them. • The local elites were concerned about the development of Economic Zone. Some cases, small scale local fishermen using the branches of Boro Feni River following within the proposed EZ boundary. They will be affected on their livelihood. • To restore the livelihood BEZA may support them to replace the jobs.
Meeting with associated government organization	October 10, 2019	18 government representatives	<ul style="list-style-type: none"> • The RHD would complete the construction of road by December 2019 • KGDCL would distribute the gas to unit investors by November 2019 • BWDB would complete the construction of sluice gate by December 2019

Annex D: Sample Grievance Form

Grievance Form : Bangladesh Economic Zones Authority			
Grievance reference number (to be completed by Project):			
Contact details (may be submitted anonymously)	Name (s):		
	Address:		
	Telephone:		
	Email:		
How would you prefer to be contacted (check one)	By mail/post: <input type="checkbox"/>	By phone: <input type="checkbox"/>	By email <input type="checkbox"/>
Preferred language	<input type="checkbox"/> Bangla	<input type="checkbox"/> English	
Provide details of your grievance. Please describe the problem, who it happened to, when and where it happened, how many times, etc. Describe in as much detail as possible.			
What is your suggested resolution for the grievance, if you have one? Is there something you would like BEZA or another party/person to do to solve the problem?			
How have you submitted this form to the project?	Website <input type="checkbox"/>	Email <input type="checkbox"/>	By hand <input type="checkbox"/>
	In person <input type="checkbox"/>	By telephone <input type="checkbox"/>	Other (specify) <input type="checkbox"/>
Who filled out this form (If not the person named above)?	Name and contact details:		
Signature			
Name of BEZA official assigned responsibility			
Resolved or referred to GRC1?	<input type="checkbox"/> Resolved	<input type="checkbox"/> Referred	If referred, date:
Resolved referred to GRC2?	<input type="checkbox"/> Resolved	<input type="checkbox"/> Referred	If referred, date:
Completion			
Final resolution (briefly describe)			
	Short description	Accepted ? (Y/N)	Acknowledgement signature
1 st proposed solution			
2 nd proposed solution			
3 rd proposed solution			

Annex E: Grievance Mechanism for PRIDE Project

