

Resilient Homestead and Livelihood Support to the Vulnerable Coastal People of Bangladesh (RHL)

Indigenous People Planning Framework (IPPF)

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This document is prepared by Palli Karma Sahayak Foundation (PKSF) for Resilient Homestead and Livelihood Support to the Vulnerable Coastal People of Bangladesh (RHL) Project, which is submitted by PKSF for funding to Green Climate Fund (GCF)



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Disclosure

In Bangladesh, there is no such term as 'indigenous' in existing laws and guidelines, but they recognize the terms 'small ethnic minority' and 'tribal' people. However, for this project, this document was prepared by the Palli Karma-Sahayak Foundation (PKSF), a Direct Access Entity (DAE) working in Bangladesh. This project is prepared to request a grant from the Green Climate Fund (GCF). It is developed based on the GCF's 'Indigenous People Policy', which captures the policy as adopted in Decision B.19/11. For any further clarifications, 'scope of application', 'definitions' and 'guiding principles' mentioned in the GCF's 'Indigenous People Policy' can be consulted.

It is to be mentioned that the term "Indigenous People" (in short IP) is interchangeable in this document with "small ethnic minority" and "tribal" people.

It is also noted that PKSF will act as 'Executing Entity (EE)' for this project. It will set up a 'Project Management Unit (PMU)' at the central level. For this, the terms 'PKSF', 'EE' and 'PMU' represent almost similar meanings.

According to population census, there are roughly 13.92 million people living in the project area. Only 26,047 of them, or an insignificant 0.19% of the overall population, are indigenous people. The indigenous people mostly are from the Rakhyain community and concentrated mainly in the Patuakhali, Barguna and Cox's Bazar districts in the project area. However, IPs will be properly taken care of in this project. A proper assessment will be done during the project implementation following this IPPF.

Disclaimer

This indigenous people planning framework is a document of PKSF. The views expressed herein do not necessarily represent those of Green Climate Fund (GCF).

List of Abbreviation

AP	Affected People
BCCSAP	Bangladesh Climate Change Strategy and Action Plan
BCS	Broad Community Support
BDT	Bangladesh Taka
BECA	Bangladesh Environmental Conservation Act
CBO	Community Based Organization
CCAGs	Climate Change Adaptation Groups
CGR	Central Grievance Redress
DAE	Direct Access Entity
DoE	Department of Environment
ECR	Environmental Conservation Rules
EDA	Enhanced Direct Access
EE	Executing Entity
ECA	Ecological Critical Area
ES	Environmental Screening'
FGD	Focus Group Discussion
GCF	Green Climate Fund
GIS	Geographical Information System
GoB	Government of Bangladesh
GR	Grievance Register
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
IE	Implementing Entities
IP	Indigenous People
IPDF	Indigenous People Development Framework
IPP	Indigenous People Plan
IPPF	Indigenous People Plan Framework
LDC	Least Developed Country
LGR	Local Grievance Redress
MD	Managing Director
MoEFCC	Ministry of Environment, Forest and Climate Change
NAP	National Adaptation Plan
NEMAP	National Environmental Management Action Plan
NGO	Non-Government Organization
NOC	No Objection Certificate
O&M	Operation & Maintenance
PKSF	Palli Karma-Sahayak Foundation
PMU	Project Management Unit
RHLP	Resilient Homestead and Livelihood Support to the Vulnerable Coastal People of Bangladesh (RHL) Project
SDGs	Sustainable Development Goals

Executive Summary

A. Introduction

1. The Resilient Homestead and Livelihood Support to the Vulnerable Coastal People of Bangladesh (RHL) project will fund community-based adaptation activities focusing on resilient settlement and climate-adaptive livelihood for the coastal vulnerable communities living in 7 coastal districts of Bangladesh. The PKSf is the Executing Entity (EE) of the project while at least 15 (fifteen) Partner Organizations (POs) of PKSf will be selected as Implementing Entities (IEs). IEs will be selected through a rigorous process and based on pre-defined criteria as stated in the funding proposal.

The primary goal of the project is to develop climate adaptive coastal community in Bangladesh through adopting resilient livelihood technologies and housing. The project will achieve the following outcomes to meet the primary goal:

- a. Decreased risk of loss of asset and life from extreme weather events.
- b. Increased Livelihood Resilience to SLR/storm surge and salinity.
- c. Improved Climate Planning and Implementation by Communities and local level institutions.

B. Rationale and Objective of IPPF

2. The improvement works for the subcomponents to be selected under different components of the project are expected to have a negligible or no impact on the indigenous people (IP) community. However, the project activities might cause different impacts on different groups of people living within the project area. The IPPF is intended to guide the selection and preparation of subcomponents under this project where impacts on IPs are identified. The framework is prepared in accordance with the GCF's Indigenous People Policy, 2018. The main objective of IPPF will be to ensure that the project activities do not adversely affect IP and that they receive culturally compatible social and economic benefits. This will require the Executing Entity (EE) and Implementing Entities (IEs) to carefully select and screen all subcomponents and their locations and sites, to determine whether IPs are present in the subcomponent area, and also to ensure their participation in the site selection and implementation processes of various interventions. The Project Management Unit (PMU) will undertake the screening of the indigenous and tribal communities with the help of community leaders and local authorities. If the results of the screening indicate the presence of IP households in the zone of influence of the proposed subcomponent, a social impact assessment will be undertaken for those areas.

C. Definition of Indigenous People

3. In Bangladesh, there is no such term as 'indigenous' in existing laws and guidelines, but they recognize the terms 'small ethnic minority' and 'tribal' people. The indigenous peoples are the social or cultural groups that are distinct (possessing in varying degrees self-identification and recognition by others; collective attachment to habitats and natural resources; separate customary cultural, economic, social, or political institutions; a distinct language) and vulnerable (historically, economically, and socially).

D. Indigenous People in the Project Area

4. According to the Bangladesh Population and Housing Census 2022, there are approximately 1.65 million indigenous people living in Bangladesh, divided into 52 categories. Of these, approximately 49.98% are men and 50.02% are women. Every ethnic indigenous group in Bangladesh has its own unique tradition, culture, legacy, and sense of self. They also have a variety of ways to make a living, most of which are based on survival techniques and strategies that have been tailored to the various agro-ecological zones where they dwell. Twelve coastal districts in Bangladesh's south-west are included in the project. According to population census, there are roughly 13.92 million people living in the project area. Only 26,047 of them, or a insignificant 0.19% of the overall population, are indigenous people. The indigenous people mostly are from the Rakhayin community and concentrated mainly in the Patuakhali, Barguna and Cox's Bazar districts.

E. Project Impacts

5. Due to the small number of IPs (approximately 0.19%) that have been found in the project area, there is almost no chance that any IPs will be displaced as a result of the project. In addition, the nature of the interventions will not cause any displacement. The Rakhayan community was discovered to be interested in the idea during consultations, and they pledged that they would offer every kind of cooperation and support. They anticipate that the project will benefit them in a variety of ways to enhance their economic situation, as opposed to having negative effects.

F. Consultation, Participation & Disclosure

6. This framework seeks to ensure that IPs are informed, consulted, and mobilized to participate in the relevant subcomponents. The Executing Entity (EE) and Implementing Entities (IEs) will undertake consultation from the very beginning and will continue till end of the project. Participation of indigenous people is to be ensured in selecting, designing and implementing the subcomponents. The EE will undertake prior consultations with any likely impacted indigenous communities and those who work with and/or are knowledgeable of indigenous peoples' development issues and concerns. To facilitate effective participation, the EE will follow a timetable to consult indigenous people communities at different stages of the Project program cycle, especially during preparation of the site selection. Also, the EE will undertake a social impact assessment (SIA) to gather relevant information on demographic data; (i) social, cultural and economic situation; and (ii) social, cultural and economic impacts — positive and negative — on the indigenous communities in the relevant subcomponent area.

7. For each subcomponent, IPP will be disclosed to the affected IP community with detailed information of the subcomponent. This will be done through public consultation and made available as brochures, leaflets, or booklets, using local languages. Hard copies of the IPP in local tribal language will also be made available at: (i) Offices of the PMU; (ii) District Commissioner Office (iii) Upazila Nirbahi Office; and (iv) any other local level public offices. Electronic versions of the framework as well as the IPPs will be placed on the official website of the PMU after approval and endorsement of the IPPF and each IPP by the PMU and GCF. If the project undertakes any intervention within the area of any indigenous community, the project will involve their representative bodies and organizations (e.g. councils of elders, village councils, or

chieftains) and, where appropriate, other community members, including indigenous women and youth for carrying out meaningful consultations. PKSf, as AE, will ensure that the proposed interventions are consistent with applicable law and obligations of the country, particularly with regard to a transparent and inclusive free, prior and informed consent during project and programme design, implementation, and expected outcomes related to the risks and impacts affecting the communities of indigenous peoples. The project will document the engagement of the indigenous communities (if any) in the project implementation process.

G. Institutional Arrangements and GRM

8. The Project Management Unit (PMU), will have a combination of PKSf and IE's staff including a designated safeguard officer from the PMU, who will be responsible for addressing IP concerns and ensuring their participation through preparation and implementation of an IPP.

9. The EA will establish a mechanism to receive and facilitate resolution of affected IP's concerns, complaints, and grievances about the project's safeguards performance at each subcomponent having IP impacts, with assistance from IEs. Under the Grievance Redress Mechanism (GRM), a Grievance Redress Committee (GRC) will be formed with involvement of IP representative and local stakeholders. The GRCs are to be formed and activated during the IPP implementation process to allow IPs sufficient time to lodge complaints and safeguard their recognized interests. Assistance to IP will be given to document and record the complaint, and if necessary, provide advocate services to address the GRC. Any complaints of ownership or other suits are to be resolved by the judicial system. The PMU will make the public aware of the GRM through public awareness campaigns.

H. Budget

10. There should be adequate budgetary provisions to implement any IPP where necessary for the subcomponent development. The budget for the implementation of the IPP will mainly include costs for skills development and self-employment training of the IPs, consultation/meetings, information dissemination, IPP implementation and monitoring, and GRM. Once the subcomponent has been appraised and finalized in the context of the IPPF, the required budget is to be allocated by the EE for proper implementation of the IPP. In this project, there are some budget allocations for safeguard issues, which could be utilized for the activities related to IPP.

I. Monitoring

11. The EE with assistance from the IEs will be responsible for implementation, monitoring and evaluation of the IPP. The IEs will collect baseline data including qualitative information and analyze the same to assess the impacts of the project on indigenous people. The EE will develop a management information system (MIS) and reporting system. PKSf through the PMU will take the overall responsibility for implementation, monitoring and evaluation of each IPP. The EE will collect required data/information and regularly analyze project outputs and impacts considering impact on IPs, and annually report the results to GCF with Annual Performance Report (APR).

I. Project Background

1. Palli Karma Sahayak Foundation (PKSF) prepared a project titled 'Resilient Homestead and Livelihood Support to the Vulnerable Coastal People of Bangladesh (RHL) Project', which is submitted by PKSf for funding to Green Climate Fund (GCF). The RHL project will fund community-based adaptation activities focusing on resilient settlement and climate-adaptive livelihood for the coastal vulnerable community of Bangladesh. The PKSf is the Executing Entity (EE) of the project while at least 15 (fifteen) Partner Organizations (POs) of PKSf will be selected as Implementing Entity (IE). IEs will be selected through a rigorous process and based on pre-defined criteria as stated in the funding proposal. It will be implemented in seven coastal districts of Bangladesh: Borguna, Bhola, Potuakhali, Cox's Bazar, Bagerhat, Khulna and Satkhira.

2. The primary goal of the project is to develop climate adaptive coastal community in Bangladesh through adopting resilient livelihood technologies and housing. The project will achieve the following outcomes to meet the primary goal, i.e., a) decreased risk of loss of asset and life from extreme weather events; b) livelihood Resilience to SLR/storm surge and salinity and c) communities and local level institutions have greater capacity and knowledge base for climate planning and implementation.

3. *Component/Outcome 1: Decreased risk of loss of asset and life from extreme weather events:* Studies found that more than three-fourth of the households in coastal areas are vulnerable to intensive precipitation, cyclone and storm surge and coastal flooding due to perishable materials. For sustaining the livelihood, the proposed project will provide support to construct climate resilient housing. The concept of climate resilient housing under the project includes raising homesteads plinth above flood or tidal surge level, constructing and/or reconstructing houses with concrete pillars that are resilient to climate change and associated shocks (i.e., cyclone, storm surge, tidal surge, coastal flooding etc.), construction of climate resilient sanitary latrines, rainwater harvesting system, homestead gardening system, and tree plantation around the homestead area. Resilient housing is very important for building resilience of the affected community; because they have to spend much of their income in repairing their houses each year during post-monsoon period.

4. *Component/Outcome 2: Livelihood Resilience to SLR/storm surge and salinity:* A large portion of the coastal population is highly exposed to climate change impacts due to increased sea level rise, salinity in water and soil, intensity of cyclones and coastal flooding. These pose a significant threat to agriculture, brackish aquaculture, and open water fishing. A recent study by UNDP shows that 16 and 35 percent of the people living in Khulna and Satkhira are extremely poor, whereas the national average is 12.9 percent. Gender inequality is prevalent in these districts through various societal and cultural norms that shape women's day-to-day activities as well as their capacity to adapt to climate change. For example, women have less decision-making power within the household and the workplace and are expected to manage the household and care for the family. Compounding these factors, climate change aggravates the burden of unpaid care work, creating a cycle that undermines their climate change resilient livelihoods.

5. The proposed project will implement goat and sheep rearing in slatted houses; a fruit-fish-fibre model including crab hatchery and farming; homestead vegetable cultivation livelihood options; and fruit trees and mangrove plantation. The elements that are crucial to the success of the proposed interventions have been identified as: a) capacity building of participants, particularly women; b) adequate and suitable access to resources for the participants and value chain actors; c) collaboration between government and local government institutions; d) private sector engagement; and improved climate change adaptation knowledge, attitudes, and practices. The

project will provide technological support and capacity training to the selected beneficiaries in promoting saline-resilient technologies and practices, particularly in the agriculture sector. The project will provide technical support to the selected households and encourage them to cultivate vegetables at their own cost.

6. *Component/Outcome 3: Improved climate planning and implementation by communities and local level institutions:* Addressing climate change impacts at the community level requires specialized institutions. Local government institutions in Bangladesh mainly deal with regular development activities. Besides, there are experienced NGOs that have strong and long-term relationships with local communities due to credit programs. These organizations would play a crucial role in promoting climate change adaptation activities at the community level. The proposed project will select at least 15 NGOs as Implementing Entities in the proposed working areas and enhance their capacity through training and practicing adaptation activities. This will significantly contribute to achieving the objectives of the project. The local government departments and institutions will play a role in the decision-making process at the community level through participation in meetings and workshops during implementation. The Union Parishad (UP) chairman will be the focal person of the local GRM process.

7. PKSF always works with poor and vulnerable people in a group-based approach. For climate change adaptation projects, these groups are termed "Climate Change Adaptation Groups (CCAGs)." The group will consist of one representative from each chosen HH. About twenty-five (+/-) participants together will form a group. The objective of forming this group is to deliver the support services in groups in order to minimize the delivery cost as well as to ensure the participation and collective decisions of the affected community in implementing the proposed interventions. Because they will discuss climate change at regular intervals, typically fortnightly or monthly in groups, it will aid in the transfer of knowledge on climate change issues throughout society. Thus, they will be able to internalize the impacts of climate change on their lives and livelihoods. The groups will receive training on climate change issues and how to deal with these problems. They will be able to identify climate change problems in their lives and livelihoods and prepare plans accordingly to reduce the impacts of climate change. They will also look after community infrastructure beyond the project period. Besides, the group approach reduces the management cost of the project.

8. The project proposes a number of physical adaptation activities, for example, a) construct climate-adaptive homes for coastal residents; b) plant trees in coastal residents' homesteads and farm areas; c) build slatted houses for goat or sheep rearing; d) grow saline-tolerant vegetables in homestead areas; e) construct crab hatcheries and produce crablets; f) provide crab nurseries with technical and financial assistance; and g) provide technical and financial support to crab farmers.

II. Rationale of the IPPF

9. The activities under this project might cause different impacts on different groups of people living within the project area. The objective of this document is to provide a policy framework for preparation of Indigenous Peoples Plans (IPP) for the relevant subcomponents where negative impacts on the indigenous or ethnic minority people will be found. There are both Bengalis and small numbers of ethnic minority or indigenous people or tribes found living in the project area. Although the project is a sovereign loan, it is sector-like, with only 3 sample projects having been identified at this stage. As a result, as per GCF's Indigenous People Policy 2018, preparation of an Indigenous Peoples Planning Framework (IPPF) is necessary for the RHL Project. There is

significant diversity among the indigenous people; their patterns of livelihoods are based on traditional use of resources and their socio-economic and cultural patterns are distinct from the mainstream Bengali peoples, though their presence in the project areas is insignificant, i.e., 0.19%.

10. One of the objectives of the GCF's Indigenous People Policy is to protect the indigenous people's rights in terms of identity, means of livelihoods, heritage, tradition, culture, dignity, conventional rights, and sustainability of indigenous community. Moreover, GCF supports the introduction of any development project that helps not only to protect the distinct identity of indigenous community but also ensures participation of the community members where possible or their representatives in all project activities. It is expected that there will be involvement of indigenous community members/their representatives before starting any specific activities, especially during the preparation, design and implementation phases of the project. The GCF is also concerned about the balanced participation of women members of indigenous community in development of the project, including special gender focused activities.

11. The project aims to improve lives and livelihoods of the coastal people and to build resilient communities. Therefore, Indigenous People (IPs) should benefit from the project. Initial consultations with the IPs found that there should be no negative impacts. This IPPF serves to reinforce the project participatory process to ensure that IPs in the project area are effectively involved and able to get project benefits. However, provision has been made to carefully assess any adverse impacts that the members of indigenous community (if any) suffer due to the implementation of the project. Therefore, the RHL project will operate in the context of an Indigenous Peoples' Planning Framework and will support IPs to benefit from the project services.

III. Objective of the IPPF

12. The IPPF seeks to ensure that indigenous or tribal communities are informed, consulted, and mobilized to participate in relevant subcomponents preparation. The IPPF is intended to guide selection and preparation of subcomponents under this project, where impacts on indigenous people are identified to ensure better distribution of the Project benefits and promote development of the indigenous people in the Project areas. The framework is prepared in accordance with the GCF's Indigenous People Policy, 2018.

13. The main objective of IPPF will be to ensure that the project activities in general, and the physical works in particular, do not adversely affect indigenous people, and that they receive culturally compatible social and economic benefits. This will require the EE and IEs to carefully select and screen all subcomponents and their locations and sites, to determine whether indigenous people are present in the subcomponent area, and also to ensure their participation in the selection and implementation processes of various activities. In this connection, proper consultation with the indigenous people is essential to assess their needs and concerns considering the following guidelines: (i) the planning and design of homestead development for the proposed sub-component should be in such a manner to avoid or minimize adverse impacts on indigenous people, to the extent feasible. (ii) where adverse impacts on indigenous people are unavoidable, socially and culturally appropriate measures are to be adopted and implemented to mitigate them. (iii) wherever feasible, adopt special measures in addition to those for impact mitigation to reinforce and promote any available opportunities for socioeconomic development of indigenous communities.

14. Since the majority of the indigenous people of the project area belong to the poorest groups of the community, and are socially separate from the main population (with different religious practices, social networks and interactions), the project objective is to ensure the active participation of indigenous people and their receiving of tangible benefit from the project. In the event that any subcomponents are found to have any IP impacts, this IPPF will guide the screening and preparation of the necessary IPP which aim to address any relevant development issues.

15. Screening Criteria: The PMU will visit all indigenous people's or tribal settlements near the selected subcomponent areas which may be affected and influenced by the subcomponent components. Public meetings will be arranged in selected communities by the EE and IEs with the indigenous/ tribal communities and their leaders to provide them information about the subcomponent and take their views on the subcomponent. During this visit, the safeguard officer of the PMO will undertake screening of the indigenous or tribal communities with the help of the community leaders and local authorities. The screening will cover the following aspects: (i) name(s) of indigenous/ tribal community group(s) in the area; (ii) total number of tribal community groups in the area; (iii) percentage of indigenous/ community population to that of total area/locality population (iv) number and percentage of indigenous/ community households along the zone of influence of the proposed subcomponent. (v) any land acquisition required from any IP community for the subcomponent? (vi) if so, any alternatives to avoid land acquisition? (vii) If no, will this subcomponent be excluded? (viii) Will an IPP be required if a subcomponent passes through any IP community? (ix) If no, why? If the results of the screening indicate the presence of indigenous/tribal community households in the zone of influence of the proposed subcomponent, a social impact assessment will be undertaken for those areas.

IV. Defining Indigenous People

16. No single definition can capture the diversity of the indigenous people, as they are found in varied and changing contexts. Even in Bangladesh, there is no such a term 'indigenous' in existing laws and guidelines, but they recognize the terms 'small ethnic minority' and 'tribal' people. The GCF defines indigenous people are the social or cultural groups who are distinct (possessing in varying degrees self-identification and recognition by others; collective attachment to habitats and natural resources; separate customary cultural, economic, social or political institutions; distinct language) and vulnerable (historically, economically, socially). As such, the EE should use the development partners' guidelines to identify indigenous people in particular geographic areas by examining the following characteristics. (i) self-identification as members of a distinct indigenous cultural group and recognition of this identity by others; (ii) collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories; (iii) customary cultural, economic, social, or political institutions that are separate from those of the dominant society and culture; and (iv) an indigenous language, often different from the official language of the country or region. Essentially indigenous people have a social and cultural identity distinct from the mainstream society that makes them vulnerable to being overlooked in development processes.

V. Indigenous People Plan (IPP)

17. If there are any indigenous people affected (adversely or positively), due to implementation of any subcomponent, the EE will prepare and implement an IPP for the concerned subcomponents following the principles, guidelines and procedure outlined below. To avoid or minimize adverse impacts, and at the same time, ensure culturally appropriate benefits, the EE will select, design and implement the physical works in adherence to the following principles: (i) fully include indigenous people communities in general, and their organizations, in the process leading to identification, planning and implementation of expansion/improvements works and locations and alignments/sites of subcomponents; (ii) carefully screen, together with indigenous people, the physical works to be undertaken in the subcomponents to gain a preliminary understanding of the nature and magnitude of potential impacts, and explore alternatives to avoid or minimize any adverse impacts; (iii) where alternatives are not feasible and adverse impacts are unavoidable, immediately make an assessment of the key impact issues jointly with indigenous people and others knowledgeable of indigenous people cultures and concerns; (iv) undertake the tasks necessary to prepare the IPP with the most appropriate measures to mitigate the adverse impacts and, if opportunities are there, development measures for the general IP communities; and (v) assess the need for Broad Community Support (BCS) on any particular subcomponent, and if necessary obtain BCS.

VI. Indigenous People in Bangladesh

18. According to the Bangladesh Population and Housing Census 2022 about 1.65 million indigenous people, in 52 groups, live in Bangladesh of which about 49.98 per cent are males and 50.02 per cent are females. Among the total population the majority are concentrated in the hill districts of Rangamati (372864), Khagrachori (349378) and Bandarban (197975). However, a number of IPs also live in the districts of northern Bangladesh including greater Rajshahi, Greater Bogra, Greater Rangpur, Greater Dinajpur, Greater Barishal, Greater Mymensingh, Greater Sylhet and Greater Khulna. These IP-contrate districts are not in the project area. However, approximately 0.19 percent of the total population under the project districts are tribal or ethnic minority people. Each and every ethnic indigenous community in Bangladesh has its own distinct tradition, culture, heritage and identity. Moreover, they have diverse means of livelihoods, linked primarily to survival mechanisms and strategies adapted to the various agroecological zones where they live. The indigenous people of northern and southern Bangladesh have been facing a number of challenges in maintaining their means of livelihoods.

VII. Indigenous People in the Project Area

19. The project covers seven coastal districts of Bangladesh. As per 'Bangladesh Population and Housing Census 2022', total population of the project area comprising seven districts mentioned in Table 1 is about 13.92 million. Out of the total population of the project districts, only 26,047 are indigenous people comprising an insignificant portion (0.19%) of the total population. In the project areas, the small ethnic or tribal population mostly are from the Rakhya community and concentrated mainly in the Cox's Bazar and Barguna districts. An overview of the district-wise small ethnic or tribal population share in the project area is shown in the Table 1 below.

Table 1: Small Ethnic People in the Project Districts

Population of Small Ethnic Community in the Project Area				
Sl. No	District Name	District Population	Small Ethnic Population	Percentage of Small Ethnic Population
1	Borguna	1010530	1131	0.11
2	Bhola	1932514	773	0.04
3	Potua khali	1727254	1111	0.06
4	Cox's Bazar	2823265	14861	0.53
5	Bagerhat	1613079	1046	0.06
6	Khulna	2613385	3260	0.12
7	Satkhira	2196581	3865	0.18
Total		13916608	26047	0.19

Source: Bangladesh Bureau of Statistics 2023: *Bangladesh Population and Housing Census 2022*, Dhaka, Bangladesh

20. The project has yet to identify all small ethnic or tribal beneficiaries - this will be done during the inception phase of the project. However, at this stage of project preparation, the PKSF's safeguard team has conducted some initial consultations with small ethnic groups in the project area during field visits from 3–18 January 2023. The consultations were conducted among the members of small ethnic group (Rakhyain) community at Kalapara of Patuakhali district and Rakhyain Para of Cox's Bazar district. The consultations included both female and male members from Rakhyain community. The participants were from different segments, such as community leaders, shopkeepers, different professionals, women and youth groups. The objectives of the consultation meetings were to assess and quantify the number of IPs in the project area, their existing socioeconomic condition and livelihood aspects, social linkages, relationship with the mainstream populations, participation in social activities, likely impacts of development activities, views and opinions, etc. It was learnt from those consultation meetings that IPs are located in different upazilas (subdistricts) of the project area and that they expect to benefit from the project addressing their expectations and needs. The participants also shared their opinions regarding the potential impacts and expected benefits from the proposed RHLP from the perspective of their means of livelihood. The following sections describe the main findings of the consultations.

21. The participants in the discussions narrated that this Rakhyain community settled in Cox's Bazar, Patuakhali and Barguna districts in the seventeenth century migrating from Myanmar due racial discrimination and social unrest. As reported by the participants, the main occupation of this tribe is handloom weaving. However, due to increased price of thread, their handloom business has decreased. In Patuakhali areas, during the cyclones in the years 1965, 1970, 1991, 1997 and then Sidr (2007) and Aila (2009) they have been subjected to tremendous miseries in life. Female members of the community are mostly engaged in handlooms weaving, and also in agriculture. They work more actively than their male partners. The other significant occupations of the IPs are business and service. In Cox's Bazar areas, they are heavily involved in trading focusing on tourist.

22. The Rakhyain Community remains always in motion to migrate elsewhere. This is because of minority feelings, searching for better livelihoods, insecurity and damaging cyclones almost every year. They usually are living peacefully and are not facing any problems from local people or Government to any large extent. They are availing equal educational and other social facilities similar to mainstream Bengalis. They also are equally benefited from different development by the government and nongovernment organizations (NGOs) and have legal rights to land and properties. The literacy rate among the IPs is about 95% and a significant number of them are highly educated. Some of them have had the opportunity to join in the civil service, defence services of the government of Bangladesh and other government and NGOs offices. Local leaders are also actively participating in different local government activities, politics, development works. It is understood from the discussions that this might be able to support to improve the lives and livelihoods of Rakhyain community.

VIII. Social Impact Assessment

23. This framework seeks to ensure that IPs are informed, consulted, and mobilized to participate in the relevant subcomponents. Their participation will provide benefits with more certainty and better protect them from any potential adverse impacts of the subcomponent. The main features of any IPP will be a preliminary screening process, a social impact assessment to determine the degree and nature of impact of each subcomponent, and an action plan developed, if needed. Meaningful consultations with and participation of IP communities, their leaders, and local government representatives will be an integral part of an IPP. The EE will undertake a social impact assessment (SIA). The SIA will gather relevant information on demographic data; (i) social, cultural and economic situation; and (ii) social, cultural and economic impacts — positive and negative — on the indigenous communities in the project area.

24. The PKSf as an EE with the help of the IEs will conduct the SIA covering relevant socioeconomic indicators to assess IP's socioeconomic status, including any potential impact due to the project. The socio-economic survey is to be conducted after finalization of design and project area for any subcomponents where there is presence of IPs, preferably at the inception stage of project implementation. The socioeconomic survey will supplement additional information for the SIA and its results will be also used as a benchmark for monitoring the socio-economic status of the IPs. The survey will focus on severely affected IP households and affected households if any. The survey will also collect gender-disaggregated data to address gender issues for analysis of social structures and income resources of the IP population. The data shall be analyzed to review the social impact of each subcomponent on the impacted IPs and communities. The analysis shall provide the socio-economic profile of the affected community, disaggregated by gender, income, education and other socio-economic parameters. The impacts including both positive and negative shall be assessed with the possible enhancement of positive impacts.

25. The above information is to be gathered from separate group meetings within the indigenous community, including tribal leaders; group of tribal men and women, especially those who live in the zone of influence of the proposed subcomponent. Discussions will focus on the positive and negative impacts of the subcomponent as well as recommendations on the design of the subcomponent. The IEs will be responsible for analyzing the SIA and, based on it, developing an action plan with the indigenous/tribal community leaders. If the SIA indicates that the potential impact of the proposed subcomponent will be significantly adverse and will be threatening of the cultural practices and IP's sources of livelihood, or that the indigenous people community rejects the subcomponent works then the Project Management Unit (PMU) will consider other design options to minimize such adverse impacts. If indigenous people communities support the subcomponent an IPP will be formulated.

IX. Strategy for Participation and Consultation with IPs

26. Participation of indigenous people in selection, design and implementation of the subcomponents will largely determine the extent to which the IPP objectives would be achieved. Where adverse impacts are likely, the EE will undertake prior and informed consultations with the likely affected indigenous communities and those who work with and/or are knowledgeable of indigenous people's development issues and concerns. To facilitate effective participation, EE will follow a timetable to consult indigenous people communities at different stages of the Project program cycle, especially during preparation of the activities. The primary objectives would be to examine the following. (i) to seek their inputs/feedback to avoid or minimize the potential adverse impacts associated with the required works; (ii) identify culturally appropriate impact mitigation measures; and (iii) assess and adopt economic opportunities which the EE could promote to complement the measures required to mitigate the adverse impacts.

27. Consultations will be carried out broadly in two stages. First, prior to final selection of any subcomponent located in an area inhabited by indigenous people, the EE will consult the indigenous people communities about the need for, and the probable positive and negative impacts associated with the expansion/renovation works. Second, prior to detailed impact assessment, ascertain how the indigenous people communities in general perceive the need for undertaking physical works for the subcomponent and gather any inputs/feedback they might offer for better outcomes, which would eventually be addressed in IPDPs and design of the physical works. The EE will facilitate widespread participation of indigenous people communities with adequate gender and generational representation; customary or traditional IP organizations; community elders/leaders; IEs, and civil society organizations like NGOs and community-based organizations (CBOs); and groups knowledgeable of indigenous people development issues and concerns; provide them with all relevant information about the subcomponent, including that on potential adverse impacts, organize and conduct the consultations in manners to ensure free expression of their views and preferences; and document details of all consultation meetings, with IP perceptions of the proposed works and the associated impacts, especially the adverse ones; any inputs/feedbacks offered by indigenous people; and an account of the conditions agreed with indigenous people.

28. The EE will assess the detailed impacts at household and community levels, with a particular focus on the adverse impacts perceived by indigenous people and the probable (and feasible) mitigation and community development measures. To ensure continuing informed participation and more focused discussions, the EE will provide indigenous people with the impact details of the proposed activities. Consultations will cover topics/areas concerning cultural and socioeconomic characteristics, as well as those indigenous people consider important. Consultations will continue throughout the preparation and implementation period, with increasing focus on the households which might be directly affected. Consultation stages, probable participants, methods, and expected outcomes are suggested in the Indigenous people consultation matrix below in Table 2.

Table 2: Indigenous People Consultation Matrix

Consultation Stages	Consultation Participants	Consultation Participants	Consultation Method	Expected Outcome
	Project Authority	IP Community		
Reconnaissance and ground verification of existing and location/sites for sub components	PKSF, Local government, IEs, NGOs and others working with IP issues	IP Communities, including organizations, community leaders and elders	Open meetings and discussions, visit of proposed sub project sites, IP settlements and surroundings.	First-hand assessment of IPs' perception of potential social benefits and risks, and prospect of achieving broad base support for the proposed activities.
Screening of the proposed sub projects	PKSF, Local government, IEs, NGOs / CBOs and others working with IP issues	IP Communities, including likely affected IPs, IP organizations, community leaders/elders, key informants	Open meetings, focus group discussions, spot interviews, etc.	Identification of major impact issues, feedback from IP communities and would-be affected persons for the proposed activities
In-depth study of risks and benefits taking into consideration, inter alia the conditions that led to community consensus	PKSF, project consultants, IEs, NGOs / CBOs, other knowledgeable persons	Would-be affected IPs, IP organizations, community leaders/elders, key informants	Formal/informal interviews; focus group discussions; hotspot discussion on specific impacts, alternatives, and mitigation; etc	More concrete view of impact issues & risks, and feedback on possible alternatives and mitigation and development measures
Social impact assessment (SIA)	PKSF, and project consultants	Adversely affected individual IPs/households	Structured survey questionnaires covering quantitative and qualitative information	Inputs for IPDP, and identification of issues that could be incorporated into the design of the activities
Preparation of interventions and IPDP	PKSF, project consultants and other stakeholders	IP organizations, community leaders/elders, adversely affected IPs	Group consultations, hot spot discussions, etc.	Preparation of IPDP, and incorporation of SIA inputs into engineering design to avoid or minimize adverse impacts, and IP development programs
Implementation	PKSF, consultants, IEs and other stakeholders	Individual IPs, IP organizations, community leaders/elders and other stakeholders	Implementation monitoring committees (formal or informal)	Quick resolution of issues, effective implementation of IPP
Monitoring & Evaluation	PKSF, consultants, IEs and CCAGs	IP organizations or groups and individuals	Formal participation in review and monitoring	Identification and resolution of implementation issues, effectiveness of IPP

29. A number of strategies should also be included in the project to support the participation of the IPs. For example, the project needs to (i) accommodate the most vulnerable and destitute members of indigenous community, especially those who have been living in the project area; (ii) encourage members of IPs to be get involved in various development planning; implementation, operation and maintenance (O&M) activities in the project through arranging related training; (iii) Assist members of IPs to develop their capacity and capability to enable them to participate in CCAGs; (iv) explore avenues for creating employment opportunities for indigenous people, particularly women, for example in tree plantation and house constructions; (v) ensure adequate resources and technical support for the implementation of the action plan for indigenous people; and (vi) develop culturally appropriate communication methods (verbal and non-verbal, in local language) at all stages for ensuring meaningful consultation; (vii) provision an effective mechanism for monitoring implementation of the IPPF and any IPDPs; (viii) develop an accountability mechanism to ensure the planned benefits of the project are received by indigenous people; and (ix) Involve suitably experienced IEs to address the IPs vulnerability through developing and implementing action plans.

X. Disclosure of IPPF and IPP

30. Information will be disseminated to IPs at various stages. The PMO along with local revenue officials/officials from the local administration offices will also conduct meetings with IPs in addition to the public notification to ensure that the information is given to all IPs. For the benefit of the community in general and IPs in particular, a summary of this IPPF and each IPP will be made available in local IP language(s) during public meetings at the community level, and be disclosed in public places prior to project appraisal. This will enable stakeholders to provide inputs to the process, prior to award of any contract. Each subcomponent IPP will be disclosed to the affected IP community with detailed information as outlined in Annex-1. This will be done through public consultation and made available as brochures, leaflets, or booklets, using local languages. Hard copies of the IPP in local tribal language will also be made available at: (i) Offices of the PMU; (ii) District Commissioner Office; (iii) Upazila Nirbahi Office; and (iv) any other local level public offices.

XI. Institutional Arrangement for Preparation and Implementation of IPP

31. The PMU, which will have a combination of PKSf as a DAE and consultant staff including a safeguard officer, who will be responsible for addressing IP concerns and ensuring their participation through preparation and implementation of an IPP. Capacity building training on IPP will be arranged for the PMU staff who will then deliver the training to the IE staff at the onset of the project. Once any subcomponent is identified with IP impacts, necessary surveys and investigations shall be conducted to clearly define IP's impacts and prepare the IPP. One senior staff will act as IP Focal Point in the PMU and will closely support the IEs for proper implementation of IPP. Additional resources may be assigned for IPPs based on specific requirements.

XII. Institutional Arrangement for Preparation and Implementation of IPP

32. The EE will establish a mechanism to receive and facilitate resolution of affected IPs' concerns, complaints, and grievances about the project's safeguards performance for each subcomponent having IP impacts, with assistance from a suitably qualified and experienced IEs. The grievance mechanism will be scaled to the risks and adverse impacts of the project. It will address IPs concerns and complaints promptly, using an understandable and transparent process that is gender responsive, culturally appropriate, and readily accessible to IPs at no cost. The mechanism developed shall not impede access to the existing judicial or administrative remedies.

33. Under the Grievance Redress Mechanism (GRM), a Grievance Redress Committee (GRC) will be formed with involvement of IP representatives & local stakeholders. The IPs will be appropriately informed about the GRC mechanism by the IEs. This GRC will help the IPs to save time and money instead of proceeding for legal process which may be a lengthy procedure. To ensure that the GRM will be able to redress grievances within a short time at nominal cost, the Grievance Redress Committee members will comprise of IE's staff at the field level, IP's representatives and public representatives. The EE shall ensure that the GRC is working impartially through monitoring GRC activities on a regular basis.

34. GRCs will be established for each subcomponent or group of subcomponents with IP impacts, to ensure IP's participation in the implementation process. Through public consultations, the IPs will be informed that they have a right to grievance redress from the PKSf. The IPs can also call upon the support of the IEs engaged to implement the IPDP to assist them in presenting their grievances or queries to the GRC. Other than disputes relating to ownership right and award of compensation by the Deputy Commissioner under the court of law, grievances are to be redressed within three-week time from the date of lodging the complaints.

35. The PMU will make the public aware of the GRM through public awareness campaigns. Grievances can be filed in writing using the Complaint Register and Complaint Forms or by phone with any member of the GRC. The contact phone number of the respective GRC member (s) will serve as a hotline for complaints and will be publicized through the media and placed on notice boards outside their offices and at the project sites. The GRM documents to be made available to the public in an accessible version preferably translated to local or tribal language and will include information on the GRM and will be widely disseminated throughout each project area.

XIII. Cost Estimate and Financing

36. There should be adequate budgetary provisions in the RHLP to implement any IPP where necessary for the subcomponent development. Firstly, any subcomponent found with IP impacts will require to be appraised and will identify and assess those impacts to incorporate in the IPP. During preparation of any IPP a detailed cost estimate will be prepared for mitigation of different impacts on the IPs. The budget for the implementation of an IPP will mainly include cost for skills development and self-employment training of the IPs, consultations or meetings, information dissemination, GRM, etc. Once the subcomponent has been appraised and finalized in the context of the IPPF, the required budget is to be allocated by the EE for proper implementation of the IPP.

XIV. Monitoring and Evaluation

37. The EE with assistance from the IEs will be responsible for implementation, monitoring and evaluation of the IP's plan within the purview of the IPPF. The IEs will collect Baseline Data including qualitative information and analyze the same to assess the impacts of the project on indigenous people. The IEs will develop a management information system (MIS) and Reporting System. PKSF through the PMU will take the overall responsibility for implementation, monitoring and evaluation of each IPP.

38. The major objectives of monitoring are to: (i) ensure that the standards of living of IPs are restored or improved; (ii) ascertain whether activities are progressing as per schedule and the specified timelines are being met; (iii) assess if compensation, rehabilitation measures are sufficient; (iv) identify problems or potential issues; and (v) identify methods to rapidly mitigate any problems. The above information will be collected by EE through its PMU and respective IE, which is responsible for monitoring the day-to-day resettlement activities of the subcomponent through reviewing socioeconomic information for all IPs; consulting and informal interviews with IPs; conducting in-depth case studies; undertaking sample survey of IPs; interviewing key informant; and organizing public meetings at the local level.

Annex 1: Outline of an Indigenous People Plan

1. This outline is part of the Safeguard Requirements. An Indigenous Peoples Plan (IPP) is required for all projects or subcomponents with impacts on Indigenous People. Its level of detail and comprehensiveness is to be commensurate with the significance of potential impacts on indigenous people. The substantive aspects of this outline will guide the preparation of IPPs, although not necessarily in the order shown.

A. Executive Summary of the Indigenous Peoples Plan

2. This section concisely describes the critical facts, significant findings, and recommended actions.

B. Description of the Project

3. This section provides a general description of the project; discusses project components and activities that may bring impacts on indigenous people; and identify project area.

C. Social Impact Assessment

4. This section (i) reviews the legal and institutional framework applicable to indigenous people in the project context; (ii) provides baseline information on the demographic, social, cultural, and political characteristics of the affected indigenous peoples communities; the land and territories that they have traditionally owned or customarily used or occupied; and the natural resources on which they depend; (iii) Identifies key project stakeholders and elaborate a culturally appropriate and gender-sensitive process for meaningful consultation with Indigenous People at each stage of project preparation and implementation, taking the review and baseline information into account; (iv) assesses, based on meaningful consultation with the affected indigenous people's communities, the potential adverse and positive effects of the project. Critical to the determination of potential adverse impacts is a gender-sensitive analysis of the relative vulnerability of, and risks to, the affected indigenous people's communities given their particular circumstances and close ties to land and natural resources, as well as their lack of access to opportunities relative to those available to other social groups in the communities, regions, or national societies in which they live; (v) Includes a gender-sensitive assessment of the affected Indigenous Peoples' perceptions about the project and its impact on their social, economic, and cultural status; and (vi) identifies and recommends, based on meaningful consultation with the affected indigenous peoples communities, the measures necessary to avoid adverse effects or, if such measures are not possible, identifies measures to minimize, mitigate, and/or compensate for such effects and to ensure that the indigenous people receive culturally appropriate benefits under the project.

D. Information Disclosure, Consultation and Participation

5. This section (i) describes the information disclosure, consultation and participation process with the affected indigenous peoples communities that was carried out during project preparation; (ii) Summarizes their comments on the results of the social impact assessment and identifies concerns raised during consultation and how these have been addressed in project design; (iii) documents the process and outcome of consultations with affected indigenous people's communities and any agreement resulting from such consultations for the project activities and safeguard measures addressing the impacts of such activities in the case of project activities requiring broad community support; (iv) describes consultation and participation mechanisms to be used during implementation to ensure indigenous people's participation during implementation; and (v) confirms disclosure of the draft and final IPP to the affected indigenous people communities.

E. Beneficial Measures

6. This section specifies the measures to ensure that the indigenous people receive social and economic benefits that are culturally appropriate, and gender responsive.

F. Mitigation Measures

7. This section specifies the measures to avoid adverse impacts on indigenous people; and where the avoidance is impossible, specifies the measures to minimize, mitigate and compensate for identified unavoidable adverse impacts for each affected indigenous people groups.

G. Capacity Building

8. This section provides measures to strengthen the social, legal, and technical capabilities of (a) government institutions to address indigenous people's issues in the project area; and (b) indigenous people's organizations in the project area to enable them to represent the affected indigenous peoples more effectively.

H. Grievance Redress Mechanism

9. This section describes the procedures to redress grievances by affected indigenous people's communities. It also explains how the procedures are accessible to indigenous people and culturally appropriate and gender sensitive.

I. Monitoring, Reporting and Evaluation

10. This section describes the mechanisms and benchmarks appropriate to the project for monitoring, and evaluating the implementation of the IPP. It also specifies arrangements for participation of affected indigenous people in the preparation and validation of monitoring, and evaluation reports.