

# **EGPP+ Program at Cox's Bazar**

**Under**

**Strengthening of the Ministry of Disasters Management and  
Relief Programs Administration (SMoDMRPA) Project**

**Monthly Environment and Social Monitoring Report  
DECEMBER 2022**



**Department of Disaster Management  
Ministry of Disaster Management & Relief  
Government of the People's Republic of Bangladesh**

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## 1 Project Background

1. The Department of Disaster Management (DDM), under the Ministry of Disaster Management and Relief (MODMR), implements the country's flagship public workfare program – Employment Generation Program for the Poorest (EGPP). Since FY 2014 to date, the World Bank supported Safety Net Systems for the Poorest (SNSP) Project (IDA 5281-BD & IDA 6137-BD) has co-financed small-scale community level basic infrastructure (subprojects) to create rural employment during lean periods under EGPP throughout the country. However, due sudden arrival of over 870,000 peoples into Bangladesh from Myanmar, most taking shelter in congested camps, with some living amongst host communities created immense stress on the host community livelihood especially at ultra-poor level people. Hence to cope the stress and ensure the social cohesion and keep the minimal environmental degradation in the whole Cox's Bazar. The Government of Bangladesh (GOB) has requested Additional Financing of US\$100 million to the SNSP Project on grant terms to support (1) scale-up of the EGPP in Cox's Bazar district (under a new Component 4, tentatively titled "Strengthening Host Community Resilience using EGPP+).

2. This Component is being support to finance benefits to poor households in the host community in Cox's Bazar. It is being support the EGPP by taking an approach whereby the program operates with modified procedures to provide work opportunities to eligible households for a longer term on a wider range of community schemes (referred to as "EGPP+" to distinguish this shock-responsive "window" from the regular program) to enable vulnerable groups like women, older persons and those with disabilities to also participate. Under the 2022-2023FY, since October 2022 total 527 subprojects are being implemented in 71 unions of eight Upazila under the cox's bazar district.

3. The SNSP parent project was Category B, and as the activities are remain similar, the AF category has also remain B. Considering the nature and magnitude of potential social and environmental impacts and scale of community level infrastructure development, the proposed SNSP Project Additional Financing is classified as category 'B' as per the aforementioned World Bank Operational Policy on Environmental Assessment (OP 4.01) and category 'Orange B' under the Department of Environment guidelines.

*Table 1 :Project Overview and Snapshot of Project Activates*

<b>Project Name and Title</b>	Strengthening of the Ministry of Disasters Management and Relief Programs Administration (SMoDMRPA) Project. Component: <b>Strengthening Host Community Resilience using EGPP+</b>
<b>Key subproject Activities</b>	Earthen road and embankment renovation, canal and pond re-excavation, raising the ground of school, madrasah and mosque
<b>Allocated working days for 2022-2023 FY</b>	110
<b>Environment and Social Screening Status</b>	Prior to Start the Work, ESS and community consultation have been completed.
<b>Grievance Management</b>	Functional. Grievance Register and Complaint Box Confirmed at all Upazila
<b>Environmental and Social Management Plan (ESMP)</b>	It's being implemented at field moderately.
<b>Subproject Implementation Starting Date</b>	8 <sup>th</sup> October 2022

Tentative Date of Completion	28 <sup>th</sup> January 2023
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## 2 Purpose of Report Preparation

4. This Monthly Environmental and Social Safeguards Monitoring Report (ESMR) covers the 1 December 2022 to 31 December 2022, in compliance with the Project Loan Agreement, which requires the preparation of ESMRs for submission to WB. The report presents the findings of the monitoring of environmental and social safeguards protection and supervision activities including grievance management. In particular, it determines whether or not the ESMP and environmental protection measures and mitigation recommended in the ESMP document have been implemented effectively to avoid, minimize, or mitigate environmental impacts. It also identifies activities that have not been properly implemented by the project.

## 3 ESS and ESMP Implementation status

5. Environment and Social Screening have been performed for all subproject before starting the subproject implementation. Summary of the ESS also have been done and submitted to WB for review. Outcomes of the ESS reveal that anticipated impact is low and negligible and very much site specific which is well manageable. In fact, potential impact for the implementing subprojects are typical in nature. Therefore, no further study is needed. However, to confirm the workplace safeguard compliance at satisfactory level, a common ESMP are being practiced during the subproject implementation. For effective and convenient implementation of ESMP, Bengali format are used at field (**Annex-1**). This ESMP implementation is being monitored and supervised by the environment and social safeguard specialist in coordination with the field staff of Implementation Supporting firm (Shushilon). Majhi (beneficiaries' leader) and Shushilon field staff are responsible to reporting the violation of ESMP. If any such types of violation are reported, ESSS provide effort to resolve the issues involving the PIO and SAE. However, during this reporting period it is observed that ESMP are being implemented moderately at all subprojects. None of the serious violating of ESMP execution are recorded. Nevertheless, serious violation of the ESMP implementation, some intend was observed in few site on mismanagement of top soil at some subproject. Consequently, we sat with the concerned UP chairman and member and asked their attention on the issues and now our close monitoring has minimized the mismanagement of top soil. Based on the field observation and consultation with local community, it is reported that ESMP is being practices overall moderately in the all subproject. Some pictorial evidence of the successful implementation of the safeguard compliance at subproject site shown in *figure 1*.

Table 2 : ESMP Implementation Status

Types of Subproject	Potential Impact	Proposed Mitigation Measures	Method of Monitoring	Implemented by	Supervision and Monitoring by	Implementation Status
Earthen road renovation /Earthen embankment renovation	<ul style="list-style-type: none"> <li>• Damage of agricultural land due to excavation of fertile top soil (about 0.3m) for the road construction;</li> <li>• Erosion of lands, landslides, slips or slumps from roadbed or in borrow areas;</li> <li>• Stagnant water in left borrow pits;</li> <li>• Increased sediments into streams, ponds and rivers due to erosion from road sides during high flood.</li> <li>• Increased flooding conditions/drainage congestion at one side of the road or embankment due to improper drainage structure</li> <li>• Loss of natural vegetation during construction</li> <li>• Disturbance of culturally important sites e.g. graveyards, mosques, prayer grounds.</li> </ul>	<ul style="list-style-type: none"> <li>• Using of the top soil of the agricultural field are to be avoided and if needed then top soil shall be preserved and placed on the top layer again once the soil is taken from bottom layer;</li> <li>• If Soil is to be taken from agricultural land, soil should be taken from some parts and some part should be left and taken from later part so that the soil is balanced during re-cultivation;</li> <li>• Proper compaction of the road and embankment shoulders must be ensured;</li> <li>• If possible soil shall be collected from the nearby khals, and community ponds;</li> <li>• At the edge off the road plantation of grass and trees shall be provided to protect the erosion;</li> <li>• Cutting of trees and natural grown vegetation along the proposed road</li> </ul>	<ul style="list-style-type: none"> <li>• Visual, Consultation</li> </ul>	<p>Primarily Sub project President- UP Member and UP Chairman</p> <p>Secondarily SAE, PIO and DRRO</p>	<p>Primarily Majhi and Field Staff of Shushilon</p> <p>Secondarily Tag Officer and Consultant of SMO DMRPA Project</p>	<p>Measures are being conformed fully. However, at some place top soil management recorded partial. Vigorous monitoring going on to improve the situation of top soil management</p>

		<p>and embankment must be avoided;</p> <ul style="list-style-type: none"> <li>• Water should be sprinkled while working near the mosque and madrasah so that the dust does not spoil the sanctity.</li> </ul>				
<p>re-excavation of irrigation canals and drains/ re-excavation of public ponds or fish firms/excavation or re-excavation of small water reservoirs / and cleaning ponds and bushes</p>	<ul style="list-style-type: none"> <li>• Increase in soil erosion</li> <li>• Soil water logging due to improper proper design of canals or ponds</li> <li>• Clogging of canals from weeds</li> <li>• Inefficient water flows due to siltation during high flood</li> <li>• Disturbance to flow regimes if proper drainage measures not provided</li> <li>• Disturbance of natural habitats</li> <li>• Risk of waterborne diseases from artificial water flows</li> </ul>	<ul style="list-style-type: none"> <li>• Excavation of the khals should be followed the engineering practice with the close observation of technical personnel;</li> <li>• Avoid removing the work site tress or vegetation;</li> <li>• Ensuring the proper disposal of weed after clearing the unwanted weeds at khals;</li> <li>• Canal should be dug in section to avoid disturbance to the natural habitat and movement of aquatic animal;</li> <li>• Ensuring proper slope while digging canal to reduce the soil erosion;</li> <li>• Ensure PPEs such as gumboot, mask etc.,</li> <li>• Waste to be generated from cleaning ponds and drains, need to dispose in designated place in trance cutting with soil cover.</li> </ul>	<p>Visual, Consultation</p>	<p>Primarily Sub project President- UP Member and UP Chairman</p> <p>Secondarily SAE, PIO and DRRO</p>	<p>Primarily Majhi and Field Staff of Shushilon</p> <p>Secondarily Tag Officer and Consultant of SMoDMRPA Project</p>	<p>Measures are being conformed fully.</p>

<p>land-fill for community institutions like school, mosque, pagoda, temple, graveyard, prayer ground (eidgah) etc ,</p>	<ul style="list-style-type: none"> <li>• Erosion of lands, landslides, slips or slumps in borrow areas,</li> <li>• Loss of fertile soil,</li> <li>• Loss of natural vegetation,</li> <li>• Risk for generation of dust if sandy soil is used,</li> <li>• Vulnerable (causes cracking, rutting) to weather conditions for improper selection of soil and compaction</li> </ul>	<ul style="list-style-type: none"> <li>• Ensuring proper compaction after raising the community institution ground;</li> <li>• Emphasis should be given to collection of soil from the nearby canal and pond,</li> <li>• Spraying the water during the compaction of ground to reduce the dust nuisance;</li> <li>• Avoiding the destruction of natural vegetation if possible;</li> <li>• Select loamy soil to reduce creaking,</li> </ul>	<p>Visual, Consultation</p>	<p>Primarily Sub project President- UP Member and UP Chairman</p> <p>Secondarily SAE, PIO and DRRO</p>	<p>Primarily Majhi and Field Staff of Shushilon</p> <p>Secondarily Tag Officer and Consultant of SMO DMRPA Project</p>	<p>Measures are being conformed fully.</p>
	<p>Beneficiary's occupational health and safety</p>	<ul style="list-style-type: none"> <li>• Ensure arrangement of sanitation facilities for the beneficiaries at any place near the project,</li> <li>• Ensure drinking water during working hour at site,</li> <li>• Ensure provision of breastfeeding in a house near the project for beneficiaries who need such support;</li> <li>• If someone is inured due to an accident at work place, he should be taken to nearest hospital immediately</li> </ul>	<p>Visual, Consultation</p>	<p>Primarily Sub project President- UP Member and UP Chairman</p> <p>Secondarily SAE, PIO and DRRO</p>	<p>Primarily Majhi and Field Staff of Shushilon</p> <p>Secondarily Tag Officer and Consultant of SMO DMRPA Project</p>	<p>Measures are being conformed partly.</p>

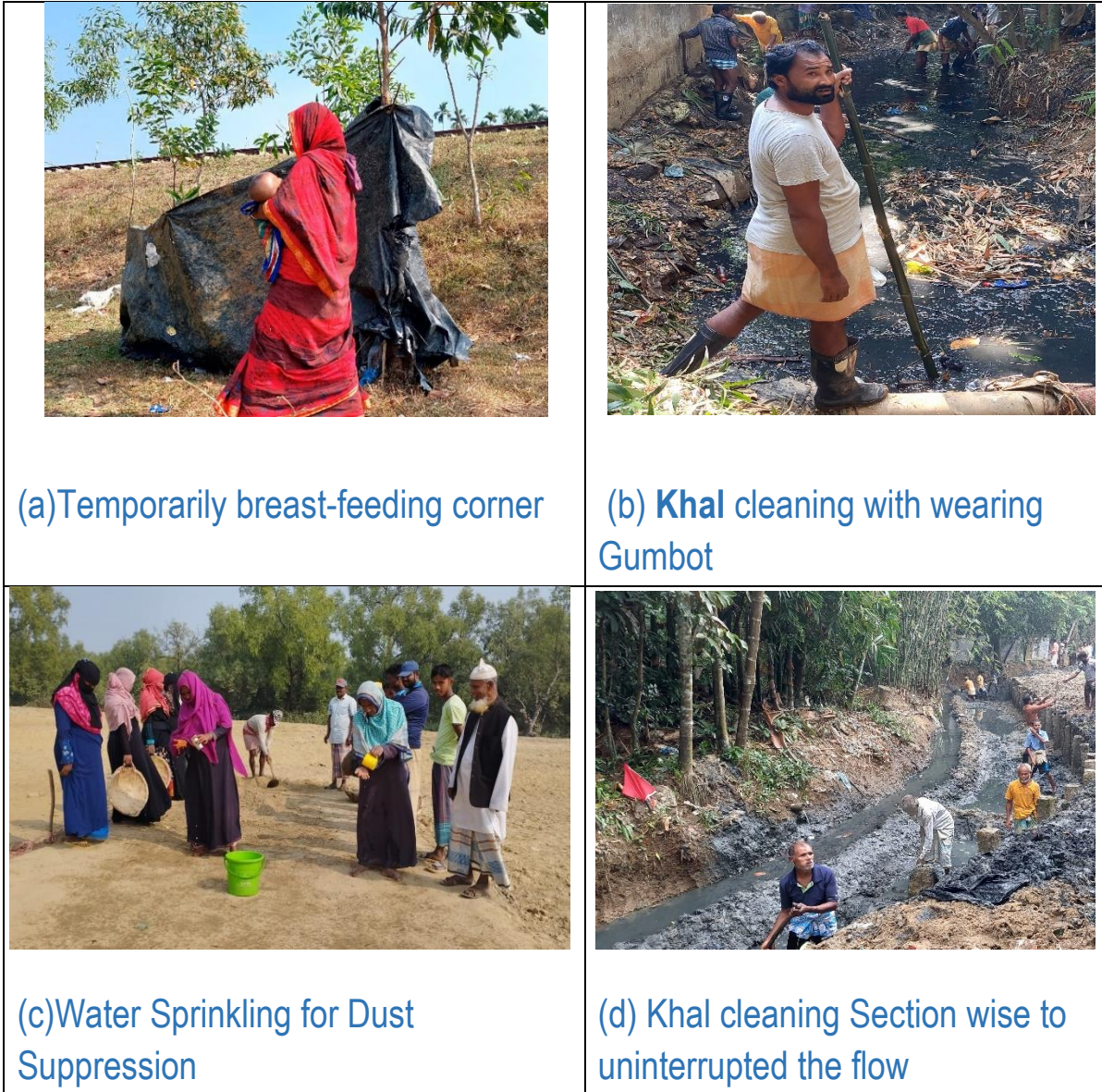


Figure 1 Practicing the Safeguard compliance at subproject implementation

#### 4 Impact of Land Acquisition

6. There is no impact for land acquisition for the subproject which are being implemented under the SMO DMRPA Project. Because during subproject selection, land acquisition and displacement were avoided by introducing alternative design options or changing the location/alignment of the subproject with the consultation of local people and key stakeholders.

#### 5 Impact on Ethnic Communities

7. According to the subprojects screening conducted for the ongoing schemes under the SMO DMRPA project, there will have no adverse impact on the ethnic community. Rather than adverse impact to ethnic



community, they will get social and economic benefit because at some subproject of Ramu, Chokoria and Ukhiya Upazila, a considerable amount of Bon Proja, Bomo, Rakhain (Chakma) community are involved as project beneficiaries.

## 6 Grievance Management Issues

8. A well-defined grievance redress mechanism (GRM), as defined in the implementation guidelines of EGPP, is already established to resolve grievances and complaints in a timely and satisfactory manner for existing EGPP which is being followed for SModMRPA Project.

9. In the process of GRM, at Upazila level, a complaint receive box has been installed for the EGPP+ and grievance register (**Annex 2**) is maintained for both the verbal and written complaint. However, in this monitoring period 12 verbal complaints have been received at different unions of Pekua, Teknaf and Ramu Upazila. Recorded complaint was for delay payment of wages. After receiving the complaint, UNO contacted the PD and requested to confirm the payment as soon as possible. In the meanwhile, PIO and consultants with the assistance of UNO tried to explain the reason for the delay in complainant which was for developing the MIS. All cases complainant was found satisfied after counseling.

## 7 Public Consultation with Stakeholders

10. Public consultation has been carried out for each subproject before the starting of the work involving the project beneficiaries, local elite and respective UP member. In fact, this consultation is a continuous process and it's being carried out with beneficiaries and the local community by the consultants informally while they visit the site. Main focus of the consultation is trying to know the perception of beneficiaries and community people on the current safeguards issues/management if any. None of the negative perceptions recorded at any chance.



(a)



(b)

*Figure 2 Informal Public Consultation at Subproject Sites in (a) Tekanf and (b) Kutubdia*

## 8 Conclusion and Recommendation

11. In EGPP+, concerned PIO, SAE and Shushilon field officers have got training in environmental screening format (SSES) and monitoring of typical ESMP during construction. From the field visits it is experienced that more capacity building program should be undertaken for the DDM field officials so that the quality environmental and monitoring screening data are received. It is hoped that the situation will improve soon and quality data will be received from Upazila in time.

12. It has been observed that through intensive supervision miss management of op soil and dust pollution can be reduced significantly. During field visits it was evident that some road improvement site sites are not being managed properly in the case of top soil management.

Annex 1: Environment and Social Management Plan (ESMP) in Bengali

পরিবেশ ও সামাজিক ব্যবস্থাপনা পরিকল্পনা				
উপ প্রকল্পের ধরন	সম্ভব্য পরিবেশগত ও সামাজিক প্রভাব	প্রশমন ব্যবস্থা	বাস্তবায়নের দায়িত্ব	তত্ত্বাবধান ও পর্যবেক্ষণের দায়িত্ব
গ্রামীণ রাস্তা নির্মাণ ও রক্ষণাবেক্ষণ (প্রধানত মাটির রাস্তা) ও নদীর বাঁধ নির্মাণ ও রক্ষণাবেক্ষণ।	<ul style="list-style-type: none"> <li>রাস্তা নির্মাণের জন্য উর্বর উপরের মাটি (প্রায় 0.3 মিটার) খননের কারণে কৃষি জমির ক্ষতিজমির ক্ষয়,</li> <li>ভূমিধস, রাস্তার বেড থেকে বা ধার করা এলাকায় স্লিপ</li> <li>রাস্তার পাশে গর্তে (borrow pit) পানি জমে থাকা।</li> <li>উচ্চ বন্যার সময় রাস্তার পাশ থেকে ভাঙনের কারণে স্রোত, পুকুর এবং নদীতে পলি জমে</li> <li>অনুপযুক্ত নিষ্কাশন কাঠামোর কারণে রাস্তার একপাশে বা বাঁধে বন্যা পরিস্থিতি/নিকালী যানজট বৃদ্ধি</li> <li>বন্যপ্রাণীর ব্যাঘাত (বিশেষ করে পাখি)</li> <li>নির্মাণের সময় প্রাকৃতিক গাছপালা নিধন</li> <li>সাংস্কৃতিকভাবে গুরুত্বপূর্ণ সাইটের ব্যাঘাত যেমন কবরস্থান, মসজিদ, নামাজের জায়গা।</li> </ul>	<ul style="list-style-type: none"> <li>কৃষিক্ষেত্রের উপরের মাটির ব্যবহার এড়াতে হবে এবং যদি প্রয়োজন হয় তবে উপরের মাটি সংরক্ষণ করতে হবে এবং মাটি নীচের স্তরে নেওয়ার পরে আবার উপরের স্তরে স্থাপন করতে হবে;</li> <li>যদি কৃষি জমি থেকে মাটি নিতে হয় তবে কিছু অংশ থেকে মাটি নিতে হবে এবং কিছু অংশ ছেড়ে দিয়ে পরবর্তী অংশ থেকে মাটি নিতে হবে যাতে পুনরায় চাষের সময় উর্বর মাটির ভারসাম্য থাকে,</li> <li>সম্ভব হলে আশেপাশের খাল এবং পুকুর থেকে মাটি সংগ্রহ করতে হবে,</li> <li>রাস্তা এবং বাঁধের কাঁধের যথাযথ সংযোজন নিশ্চিত করতে হবে,</li> <li>রাস্তার ধারে ঘাস এবং গাছ লাগানোর ব্যবস্থা করতে হবে ভাঙন থেকে রক্ষা করার জন্য,</li> <li>প্রস্তাবিত রাস্তা ও বাঁধের পাশে গাছ কাটা এবং প্রাকৃতিকভাবে জন্মানো গাছপালা এড়িয়ে চলতে হবে,</li> <li>মসজিদ-মাদ্রাসা মত পবিত্র স্থানে মাটির কাজ করার সময় যাতে ধূলাবালি থেকে পবিত্রতা নষ্ট না হয় সে ক্ষেত্রে প্রয়োজন পানি ছিটিয়ে কাজ করতে হবে</li> </ul>	<p>প্রাথমিকভাবে প্রকল্পের সভাপতি ও ইউপি চেয়ারম্যান</p> <p>দ্বিতীয়ত SAE, PIO এবং DRRO</p>	<p>প্রাথমিকভাবে মাঝি ও শুশীলনের মাঠ কর্মকর্তা</p> <p>দ্বিতীয়ত ট্যাগ অফিসার, কনসালট্যান্ট, এস.এমও.ডি.এম.আর.পি.এ . প্রকল্প</p>
সেচ খাল এবং ড্রেনখনন বা পুনঃখনন/পাবলিক পুকুর বা মাছের ফার্ম	<ul style="list-style-type: none"> <li>মাটির ক্ষয় বৃদ্ধি</li> <li>খাল বা পুকুরের অনুপযুক্ত সঠিক নকশার কারণে মাটিতে জলাবদ্ধতা</li> <li>আগাছা থেকে খাল জমাট বাঁধা</li> </ul>	<ul style="list-style-type: none"> <li>কারিগরি কর্মীদের নিবিড় পর্যবেক্ষণে খালগুলির খনন প্রকৌশল অনুশীলন অনুসরণ করা উচিত,</li> </ul>	<p>প্রাথমিকভাবে প্রকল্পের সভাপতি ও ইউপি চেয়ারম্যান</p>	<p>প্রাথমিকভাবে মাঝি ও শুশীলনের মাঠ কর্মকর্তা</p> <p>দ্বিতীয়ত</p>

<p>পুনঃখনন/ছোট জলাশয় খনন বা পুনঃখনন এবং/পুকুর এবং ঝোপ পরিষ্কার করা</p>	<ul style="list-style-type: none"> <li>• সঠিক নিষ্কাশন ব্যবস্থা না দেওয়া হলে প্রবাহ ব্যবস্থায় ব্যাঘাত ঘটে</li> <li>• দূষিত পানির প্রবাহ থেকে জলবাহিত রোগের ঝুঁকি</li> <li>• জলজ প্রানিকুলের প্রাকৃতিক বাসস্থানের ব্যাঘাত</li> </ul>	<ul style="list-style-type: none"> <li>• মাটির ক্ষয় কমানোর জন্য খল পুনরায় খনন করার সময় সঠিক ঢাল নিশ্চিত করা,</li> <li>• কর্মস্থলের গাছপালা অপসারণ এড়িয়ে চলুন;</li> <li>• খালগুলিতে অব্যঞ্জিত আগাছা পরিষ্কার করার পরে আগাছার সঠিক নিষ্পত্তি নিশ্চিত করা,</li> <li>• জলজ প্রাণীর প্রাকৃতিক আবাসস্থলের ও চলাচলের ব্যাঘাত এড়াতে ভাগে ভাগে খাল খনন করতে হবে,</li> <li>• ব্যক্তিগত সুরক্ষামূলক সরঞ্জাম যেমন গাম্বুট, মাস্ক, হ্যান্ড গ্লাভস নিশ্চিত করা,</li> <li>• মজা পুকুর ও ড্রেন পরিষ্কার থেকে প্রাপ্ত বর্জ্য কোন একটি নির্দিষ্ট জায়গায় গর্ত করে মাটিচাপা দেওয়া,</li> </ul>	<p>দ্বিতীয়ত SAE, PIO এবং DRRO</p>	<p>ট্যাগ অফিসার, কনসালট্যান্ট, এস.এমও.ডি.এম.আর.পি.এ . প্রকল্প</p>
<p>স্কুল, মসজিদ, প্যাগোডা, মন্দির, কবরস্থান, নামাজের মাঠ (ঈদগাহ) ইত্যাদির মতো কমিউনিটি প্রতিষ্ঠানের জন্য জমি ভরাট</p>	<ul style="list-style-type: none"> <li>• ধূলিকণা তৈরির ঝুঁকি</li> <li>• কৃষি জমির উর্বর উপরের মাটি ক্ষতিজমির ক্ষয়,</li> <li>• প্রাকৃতিক গাছপালা ক্ষতি</li> </ul>	<ul style="list-style-type: none"> <li>• সম্ভব হলে আশেপাশের খাল এবং পুকুর থেকে মাটি সংগ্রহ করতে হবে,</li> <li>• যদি কৃষি জমি থেকে মাটি নিতে হয় তবে কিছু অংশ থেকে মাটি নিতে হবে এবং কিছু অংশ ছেড়ে দিয়ে পরবর্তী অংশ থেকে মাটি নিতে হবে যাতে পুনরায় চাষের সময় উর্বর মাটির ভারসাম্য থাকে,</li> <li>• ধূলাবালি এড়ানোর জন্য পানি ছিটানোর ব্যবস্থা করতে হবে নিয়মিত</li> </ul>	<p>প্রাথমিকভাবে প্রকল্পের সভাপতি ও ইউপি চেয়ারম্যান দ্বিতীয়ত SAE, PIO এবং DRRO</p>	<p>প্রাথমিকভাবে মাঝি ও শুশীলনের মাঠ কর্মকর্তা দ্বিতীয়ত ট্যাগ অফিসার, কনসালট্যান্ট, এস.এমও.ডি.এম.আর.পি.এ . প্রকল্প</p>

	<ul style="list-style-type: none"> <li>উপকারভোগীদের পেশাগত স্বাস্থ্য এবং নিরাপত্তা</li> </ul>	<ul style="list-style-type: none"> <li>প্রকল্পের সভাপতি এবং মাঝি নিজ উদ্যোগে প্রকল্পের নিকটবর্তী কোন স্থানে উপকারভোগীদের জন্য স্যানিটেশন ব্যবস্থা করবে,</li> <li>মাঝি কাজ চলাকালীন সময় উপকারভোগীদের জন্য খাবার পানির ব্যবস্থা করবে</li> </ul>	প্রাথমিকভাবে প্রকল্পের সভাপতি ও ইউপি চেয়ারম্যান  দ্বিতীয়ত SAE, PIO এবং DRRO	প্রাথমিকভাবে মাঝি ও শুশীলনের মাঠ কর্মকর্তা দ্বিতীয়ত ট্যাগ অফিসার, কনসালট্যান্ট, এস.এমও.ডি.এম.আর.পি.এ . প্রকল্প
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**Annex 2 Compliant Record Register Template**

SL. NO	Details of Compliant Receiving			Complainant's Name	Details Address	Type of Complaint	Relevant WPIC's Name	Adopted Steps	Date of Settlement /Solve	Remark
	Date	Complaint Number	Type of Complaint							
1	10/12/2022	01	Verbal/ Written	A.....	Vill: Ward: Union: BNF ID: Cell No:	Delay of wage payment	Name Ward Union	Quick pay roll is prepared. In addition, PIO and UNO talked with Complainant's About reason of being delay.		