FP 206: Resilient Homestead and Livelihood Support to the Vulnerable Coastal People of Bangladesh (RHL) Project

Subproject Disclosure Report

(Environment and Social Safeguard) Environmental and Social Action Plan (ESAP)

Palli Karma-Sahayak Foundation (PKSF)

www.pksf.org.bd

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List of Abbreviation

GCF	Green Climate Fund
PKSF	Palli Karma-Sahayak Foundation
RHL	Resilient Homestead and Livelihood Support to the Vulnerable Coastal People of Bangladesh Project
CCAGs	Climate Change Adaptation Groups
PMU	Project Management Unit
ESMF	Environmental and Social Management Framework
ESIA	Environmental and Social Impact Assessment
FPIC	Free, Prior and Informed Consent
ESMP	Environmental and Social Management Plan
ESAP	Environmental and Social Action Plan
ESS	Environmental and Social Safeguard / Standard
SLR	Sea Level Raising
RWHS	Rain Water Harvesting System
GoB	Government of Bangladesh
NDA	National Designated Authority
PRA	Participatory of Rural Appraisal
FGD	Focus Group Discussion
KII	Key Informant Interview
IPP	Indigenous Peoples Plan
RAP	Resettlement Action Plan
SAR	Social Assessment Report
SEAH	Sexual Exploitation, Abuse and Harassment

Executive Summary

Palli Karma-Sahayak Foundation (PKSF) is implementing the "FP 206: Resilient Homestead and Livelihood Support to the Vulnerable Coastal People of Bangladesh (RHL)" project financed by the Green Climate Fund (GCF). The project aims to enhance the resilience of targeted coastal people to become resilient to climate change by adopting and practicing different adaptive activities in the project area. The project working areas have been selected based on climate change exposure, vulnerability and feasibility of the climate-resilient livelihood options, i.e., crab hatchery. Through the project, targeted people will be able to identify the impacts of climate change on their lives and livelihoods and prepare themselves for addressing those impacts through climate change adaptation groups (CCAGs). The RHL project is under ESSs Category 'B' as per GCF's ESSs, which means the project is likely to have potential environmental and social impacts. So, the PMU developed the ESMF for the sustainable adaptation measures of the project, which is aligned with GCF's Environmental and Social Safeguard (ESS) policies and the country's rules and regulations, e.g., Bangladesh Environment Conservation Act, Environment Conservation Rules, National water policy, agricultural policy, fisheries policy and others related policies along with PKSF's Gender Assessment and Project Level Action Plan. The report is focused especially on activities or subprojects 1.1.1, 2.1.1, 2.2.1, 2.2.3, and 2.2.4 because these activities are likely to have environmental and social impacts. The report followed different types of participatory to find ES impacts and mitigation. During July- September 2024, twenty-seven stakeholder consultations were conducted in the twenty upazila of seven project districts to develop the ESS subprojects or activities disclosure report of the project. According to the FAA between PKSF and GCF, the above-mentioned activities or subprojects are not included the schedule 10: exclusion list such as dams and reservoirs, land management practices, large irrigation schemes etc. Moreover, the subprojects or activities were screened against the project ESMF. The screening result reveals no strong impact on the environment or social conditions due to project activities. No such activities regarding natural habitat loss, activities among ecologically critical areas, or conservation areas have been found. On the other hand, the subprojects did not trigger ESS-5, ESS-6, ESS-7 and ESS-8. Minimal impacts were found from subprojects 1.1.1, 2.1.1, 2.2.3, and 2.2.4, which carry the characteristics of category C with low-risk factors. The subproject 2.2.1 development of crab hatcheries carries the characteristics of category B with some impacts. The report also prepared environmental and social action plan (ESAP) following consultation with communities and experts. To implement this action plan, PKSF will organize training session to build the IEs' capacity regarding environmental, social and gender issues. Moreover, IEs will disclose ES potential risks of impacts, measures and actions among communities and established GRM throughout the project. Besides, IEs will monitor the environmental and social performance of the project and shared monthly ESS monitoring report as well as progress report to PKSF quarterly. In addition, PKSF will conduct community monitoring to understand the effect and function of the interventions or mitigation measures during implementation and after end of interventions throughout the project. Environment and social action plan (ESAP) will be followed for category C subproject and ESMF (attached subproject disclosure form) for category B subproject.

Basic Information of the project

Project ID	FP206			
Project title	Resilient Homestead and Livelihood Support to the Vulnerable Coastal People of Bangladesh (RHL)			
Working Areas	Khulna, Satkhira, Bagerhat, Patuakhali, Barguna, Bhola & Cox'sBazar			
Starting Date	August 17, 2023	**Completion Date**	August 16, 2028	
Total Project Fund (USD)	GCF Grant)	42.2 million	PKSF (Co-financing)	7.7 million
Beneficiaries number	Direct	362,475	Indirect	770,050
ESS Category	B			
Accredited Entity	Palli Karma-Sahayak Foundation (PKSF)			
Country	Bangladesh			

1. Background

Bangladesh is one of the most climate-vulnerable countries in the world. Around 22% of the country's population living in 19 coastal districts is at the highest level of climate risk[1]. The frequency of climate-related disasters like cyclones and storm surges is increasing with the changing climate. Thousands of people were killed, and millions of others suffered due to the loss and damage to their houses and property by the devastating cyclone (1991), Sidr (2007), Nargis (2008), Aila (2009), Fani (2019), Bulbul (2019), Amphan (2020), Yaas (2021), Gulab (2021), Jawad (2021), Sitrang (2022), Mocha (2023), Hamoon (2023), Midhili (2023), and Remal (2024). Bangladesh's coastal zone's geographical location and low elevation make it susceptible to disasters. Furthermore, climate change has a new depressing effect on the lives and livelihoods in the region.[2]. It is predicted that a 45-cm rise in sea level may inundate 10-15 percent of the land in Bangladesh by the year 2050, resulting in over 35 million climate migrants from the coastal districts[3]. The vulnerability of coastal people is characterized in three ways: 1) poor human settlement in low-lying areas, 2) climate-sensitive livelihood, and 3) scarcity of safe drinking water. Most of the coastal population is poor, small, marginal farm families and shrimp workers. The poor coastal community builds their houses in low-lying areas subject to coastal flooding. Most houses are built with mud and *goal pata* (leaves of an indigenous coastal plant), severely affected by cyclones, storm surges, and high tides. These people have to spend a significant amount of their earnings repairing houses each year. Besides, the coastal communities primarily depend on seasonal subsistence agriculture and agricultural wage labor, which are highly climate-sensitive. Safe drinking water is highly vulnerable to rising sea levels and salinity in the country's coastal zone. Communities and local-level organizations lack an understanding of climate change's present and future impacts, which is one of the key barriers to promoting climate-resilient development in the coastal zone.

Against this backdrop, to reduce the climate-induced vulnerability of the most vulnerable coastal communities of Bangladesh and to enhance their resilience along with alternative livelihoods, the Green Climate Fund (GCF), in its 36th Board Meeting, approved "Resilient Homestead and Livelihood Support to the Vulnerable Coastal People of Bangladesh (RHL)" project to implement in the most vulnerable seven coastal districts, such as Khulna, Bagerhat, Satkhira, Barguna, Patuakhali, Bhola and Cox's Bazar, through the GCF DAE of Bangladesh, the Palli Karma-Sahayak Foundation (PKSF).

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[1] Islam, S. A., and Rahman, M. M. (2015). Coastal afforestation in Bangladesh to combat climate change-induced hazards.
[2]http://www.journalbinet.com/uploads/2/1/0/0/21005390/coastal_afforestation_in_bangladesh_to_combat_climate_change_induced_hazards.pdf
[3]National Adaptation Programme of Action (NAPA), 2009. The Ministry of Environment and Forests, Government of Bangladesh, Dhaka

The project's primary goal is to develop climate-adaptive coastal communities in Bangladesh through adapting climate-resilient housing and livelihood technologies. The project will also enhance the capacity of communities and organizations to address climate change impacts in their localities. The adaptation practices proposed under the RHL project are climate-resilient homesteads (not only the houses but also the homestead, sanitation, and safe drinking water), saline-resilient livelihood practices including integrated fruit-fish-fibre (crab farming) farming, slatted houses for goats or sheep rearing, saline-tolerant vegetable cultivation, and storm-resilient tree plantations. These interventions will create multiple adaptation benefits under different results areas of the GCF for the target communities. According to the approved project proposal, the total number of direct beneficiaries will be 375,975, and the absolute number of direct beneficiaries is 362,475 (deducting the overlapping beneficiaries).

The project became effective on 17 August 2023, and PKSF received the first disbursement on 26 September 2023. According to the FAA clause 10 `In relation to each Category B Sub-Project (pursuant to the Environmental and Social Risk Categories, and for this covenant, "Sub-Project" shall mean activities generally grouped for execution in close geographic proximity), disclose the Environmental and Social Impact Assessment (ESIA) (including a Conflict Sensitivity Assessment) and ESMP and, any other associated information including those relevant to Indigenous peoples required to be disclosed pursuant to the Information Disclosure Policy and the Revised Environmental and Social Policy (each, the "Sub-Project Disclosure Package"). The Accredited Entity shall, for at least thirty (30) calendar days before it approves of the relevant Category B Sub-Project, disclose the Sub-Project Disclosure Package in English and local language (if not English) on its website and in locations convenient to the affected peoples, and submit the Sub-Project Disclosure Package to the Fund for subsequent distribution to the GCF Board and the Fund's active observers and publishing in the GCF website.

The RHL project is under Environment and Social Safeguard Category ‘B’ as per GCF’s Environmental and Social Safeguard Standards, which means the project is likely to have minimal environmental and social impacts. This report has been prepared to realize the abovementioned conditions.

1.1. Purpose of the Project

To respond to above-mentioned climate change challenges, the primary goal of the project is to develop climate-adaptive coastal communities in Bangladesh through the adoption of climate-resilient housing and livelihood technologies. The project will also enhance the capacity of communities and organizations to address climate change impacts in their localities.
The specific objectives are:

1. To develop climate-resilient homesteads for vulnerable communities in the southwest coastal zone of Bangladesh;
2. To develop climate-adaptive livelihoods for vulnerable coastal communities; and

3. To enhance the capacity of vulnerable communities and institutions so that they are able to plan and implement adaptation interventions.

2. Design and building of homesteads

2.1. Basic Information of the subproject

Name of the Subproject	Design and building of homesteads
Location of the Subproject	Khulna, Satkhira, Bagerhat, Patuakhali, Barguna, Bhola & Cox'sBazar districts of Bangladesh.
Name of the Activity	Activity 1.1.1 Design and building of homesteads
Activity Numbers	3000

2.2. Description of the Subproject of RHL Project

According to the FAA Clause 10.2. (i) "Pursuant to the Environmental and Social Risk Categories, and for this covenant, "Sub-Project" shall mean activities generally grouped for execution in close geographic proximity." The project will select 13,500 (3000HH) beneficiaries based on the selection criteria stated in Para 126 of FAA for constructing 3,000 climate-proof houses. The IE will carry out consultation meetings in the areas chosen to select the beneficiaries. They will prepare a draft list of beneficiaries and submit it to PKSF for approval. The PMU representatives from PKSF will visit to verify the beneficiary list and provide approval for the final beneficiaries. The local community will undertake all construction activities following the PKSF model. Project contribution (grant) and beneficiary contribution will be ensured for implementing the above construction activities. The beneficiary will purchase all construction materials from the local market and manage the construction workers. Project engineers and technical staff will also provide necessary supervision support. Implementing Entities (IEs) will supervise the construction work to ensure the quality of construction, the health and safety of the workers, and the transparency of the work. Some interventions will be conducted under the activity 1.1.1. The descriptions about interventions are given below.

Homestead area raising

Low-lying poor communities in coastal areas, whose houses are often inundated, are at the highest risk. In order to mitigate this risk and enable the concerned communities to adapt to these natural disasters, initiatives have been taken to raise habitats in these areas under the RHL project. Homestead area will be selected for raising the sum of all rooms by at least twice. The proper slope will be maintained during implementation. In raising the homestead, steps or grooves shall be placed 25.4 cm after every 0.61 meters height and 12.70 cm after every 0.3 meters height for the house plinth. Durbaghas (grass) should be planted around the slope after raising the settlement. Earth will be used for raising homestead areas. Trees will be planted on raised homestead area under the *Activity 1.1.2 Homestead tree planting*. Moreover, if available spaces are found in the homestead area project will support vegetable cultivation under the *Activity 2.1.3: Introduce the cultivation of saline tolerant vegetables within homestead areas.*

Latrine Construction

Every year natural disasters destroy sanitary latrines in coastal areas. As a result, people are forced to use open latrines after disasters which plays a leading role in environmental pollution as well as diseases outbreak. Therefore, with the aim of ensuring the good health of the poor people and improving the quality of life in adaptation to climate change, PKSF has undertaken the construction of sanitary latrines in coastal areas under RHL project. The substructure will be constructed by readymade RCC pillar, environment friendly bricks or blocks and cement concrete. Corrugated color CI sheet, wooden / MS /GI frame will be used to construct super structure of latrine. The latrine will be offset single or double pit latrines. Offset pit latrine means the pit and structure will be separated. RCC rings will be used to construct pit. The homestead area will be raised by soil or sand. Two types of techniques will be used for the construction of pit latrines. Firstly, the latrine site will be raised up to the formation ground label (FGL) of the homestead using sand. The foundation of the latrines will be constructed at the FGL along with digging a 1.5 m pit at the existing ground level (EGL). Secondly, the substructure will be constructed at the existing ground level as per the design, and it will be extended up to the FGL. Where neither technique is applicable, the homestead area will be raised to the flood level and kept for one rainy season for settlement. Later, the infrastructure construction work will be started there.

Twin pit latrines are scalable, implementable, and cost-effective. The latrines are comprised of two pits, each measuring about 1.5 m deep and about 76.2 cm in diameter, and the distance between the two pits being a minimum 1 meter.

When twin pit toilets are used, fecal matter will be allowed to pass and settle in one pit only. When that pit is filled in a certain period, the channel to the first pit is closed and the second will be opened for the fecal matter to pass. After a specific period, the content of the first pit will be converted into manure, which can be removed and used for plants. The same procedure is followed when the second pit gets filled.

Rainwater Harvesting System

Due to climate change, salinity in the coastal areas of Bangladesh is increasing day by day. People have to collect drinking water from far away or buy it. The average annual rainfall of coastal areas of Bangladesh varies by region but is generally between 1500 to 5000 mm (150 - 500 cm). The RHL project will construct a house of about 20 square meters where the roof size will be about 22 square meters. Stakeholders can add more catchment areas if they want. Some information is presented through the following equation.

Footprint of property (m2) x Drainage coefficient x filter efficiency x average annual rainfall (mm) x 0.05 = recommended tank size. (Where area = 22 sqm; drainage coefficient = 0.8; filter efficiency = 0.95; average annual rainfall = 3200 mm).
The equation shows that 53504 liters of water will be available in a year, as well as the recommended tank size will be around 2700 liters. As a result, the project recommended the capacity of storage to be about 3000 liters.

When collecting rainwater, significant safety precautions will be required, such as installing gratings at each drainpipe's mouth to catch floating objects, debris, and leaves. The storage tank should be cleaned and flushed of all sediments and debris toward the conclusion of the dry season, right before the first expected rain.
Therefore, the work of setting up RWHS in the covered areas has been undertaken to deal with the drinking water crisis. RWHS will be installed at the household level. The plastic tank will be used as the storage. No straw or asbestos roofing shall be used as the catchment area. The basement area shall be constructed with blocks or machine-made bricks for holding tanks. The purification system will be added to the inlet of the tank.

Housing

The core structure will be made of bricks and concrete. The house will be rectangular, and the shorter edge will face the direction of the wind, which will reduce overall wind exposure. Secondly, the side of the roof with the greater slope will face the wind, and the roof will not extend beyond the wall, which will allow the wind to pass over the roof without affecting the core structure. Moreover, the roof will only be attached to the core structure and will not be supported by any walls, so even if the roof is affected, the walls will remain safe. Furthermore, there would be some gaps between the wall surface and the roof, so when the wind hits the roof, the thrust would be reduced.

Description of materials of housing

a) For reinforced concrete (RCC) building/housing: The whole frame structure (footing, column, grade beam, slab, and lintel) will be established.
b) If the building will be built by RCC, the exterior and interior walls will be made of brick masonry and finished off with cement plaster.
c) For semi-pucca buildings: The foundation and all walls will be constructed with the help of brick masonry. The roof will be made of CGI sheet roofing with wooden or MS angle trusses. Finally, all civil works will be finished off with cement plaster.

d) CGI House: Strong RCC pillars having the capacity to withstand wind velocity at high speeds will be used in CGI (Corrugated Galvanized Iron) houses. The plinth will be made of brick masonry, and PCC (Plain Cement Concrete) casting will be done on floor and walls. The roofing will be made of CGI sheet. The CGI roofing will be above wooden or MS angle trusses. In this type of house, all sorts of strengthening techniques will be taken into consideration, like horizontal and diagonal stiffeners on all walls.
During the construction phase, local builders will receive on-the-job training on resilient housing standards, designs, and materials. Through this capacity building, local skills will be ensured, while standards will be updated to meet the demand for new builds.

2.3. Environmental and Social screening of the subproject

The 'environmental screening' is a mandatory requirement for the design of a project or sub-project. The purpose of the environmental screening is to get relevant concerns addressed early on before further decision and/or design of a sub-project and to ensure that actions to mitigate environmental impacts or enhance environmental opportunities are budgeted for. It is the first step in understanding the possible environmental impacts and identifying the environmental categorization of the project or sub-project. Participation and consultation with local communities are important in determining the potential effects of the project interventions. Considering this, around twenty-seven consultation meetings were conducted during July-September 2024. The conducted consultation meeting is illustrated in the Annex I. The PKSF has screened the project in consultation with experts and communities. The report using annex III to find risk factor. The screening results of the subprojects are presented below:

Environmental and Social Screening Checklist

Issues	Trigger		Risk	Remarks
	Yes	No		
ESS-1 Assessment and Management of ES Risks and Impacts	√		Low	The subproject has small scale construction activities like resilient homestead (plinth raising, latrine, RWHS). So, there is potential for topsoil loss, drainage congestion, loss of grass and herbaceous vegetation, Dust and Noise pollution may be arisen during construction phase.
ESS-2 Labor and Working Conditions	√		Low	The subproject has minor construction. As a result, the workers' risk of injury is quite low. Additionally, there is a very slim probability of engaging in forced labor or child labor.
ESS-3 Resource Efficiency and Pollution Prevention and Management	√		Low	There is limited possibility of air and water pollution during construction work and material transportation.
ESS-4 Community Health and Safety	√		Low	The activities may involve labor for women in construction. So, they may be affected by other

Issues	Trigger		Risk	Remarks
				local people or co-workers on the way to the workplace or vis-à-vis. There is potential for female workers to pay lower wages than male workers.
ESS-5 Land Acquisition Restrictions on Land Use and Involuntary Resettlement		√		No public land or disputed land will be used for implementing the activity.
ESS-6 Biodiversity Conservation		√		Some grasses, herbs, and earthworms may be damaged while collecting soil for homestead raising. However, as the project is not in a protected or internationally recognized ecological area, there is no chance for the program to be located in modified, natural and/or critical habitats or in protected or internationally recognized ecology.
ESS-7 Indigenous Peoples	Not Relevant to the project			
ESS-8 Cultural Heritage	Not Relevant to the project			

The above screening, it is found that the activity has some impacts that will require some mitigation measures. To minimize the effects, the following Environmental and Social Action Plan is developed in consultation experts and communities.

2.4 Environmental and Social Action Plan of the subproject of RHL project

Name of Subproject	Interventions	Potential Impacts	Mitigation Measures
Activity 1.1.1 Design and Building of Homesteads	Homestead area raising	Top soil loss	Dry pond, Fish firm, borrow pit will be used for collecting soil; No agricultural or productive land will be used for collecting soil.
		Cutting trees; Loss of grass and herbaceous vegetation	No trees will be cut for implementing the activity; Tree plantation will be ensured after the homestead area is raised.
	Latrine construction	Water pollution	A minimum 10-meter distance will be maintained between the latrine pit and nearby water sources. No waste materials will be dumped into water bodies. A one-meter distance will be maintained between the groundwater table and the bottom of the latrine pit. Connection with water bodies from the latrine pit is prohibited. A hand wash device will be installed adjacent to the latrine.
	RWHS installation	Drinking water contamination	Straw or asbestos roof will not be used as catchment area; will not collect the first 10 minutes of rainwater; Filtration system will be added inlet of

			collector.
	Housing	Drainage congestion	Construction material is totally prohibited from being stored on or beside roads and drains
		Dust and noise pollution	Spraying water on the construction site will be ensured to control dust; Using good machinery and finishing work in the daytime; Mechanical lubrication will be used to reduce noise from machines.
	Occupation health and safety		Ensuring first aid box and PPE for workers; community's people will be involved in implementing the activity; Child labors should be avoided.
	Gender inequality and risk of sexual exploitation, abuse and harassment.		Awareness session will be conducted; Establish grievance redress mechanism at community level
			Involve community people as a worker; Ensure equal wages for male and female workers

Based on the screening results, it has been identified that the subproject carries the category 'C' with some environmental and social impacts on the project area. The screening found dust and noise, loss of vegetation, construction waste and occupational health and safety issues as major ES impacts. ESS disclosure report has also mentioned ESAP to mitigate the impacts. Regular monitoring, compliance checks, and continuous improvement in safety and environmental management practices will be ensured for mitigating the impacts.

3. Construction of slatted house for Goat / Sheep rearing

3.1 Subproject Information

Name of the Sub-project	Construction of Slatted Houses for Goat / Sheep Rearing
Location of the Sub-project	Khulna, Satkhira, Bagerhat, Patuakhali, Barguna, Bhola & Cox'sBazar
Name of the Activity	Activity 2.1.1 Construction of slatted houses for goat or sheep rearing
Number of Activity	20,000

3.2 Description of the Subproject of RHL Project

According to the FAA Clause 10.2. (i) "Pursuant to the Environmental and Social Risk Categories, and for this covenant, "Sub-Project" shall mean activities generally grouped for execution in close geographic proximity." The project will support 20,000 HHs through sheep/goat rearing in slatted houses. The IEs' staff will be responsible for selecting the beneficiaries based on the selection criteria described in Paragraph 121 (Those who do not have financial capacity to purchase livestock and have capacity to rear livestock; and women-headed households and households with disadvantaged members will be given priority; poor and ultra-poor households (as defined in the Household Income and Expenditure Survey (HIES 2016) of the Bangladesh Bureau of Statistics (BBS-2017)); and have access to homestead land).They will carry out consultation meetings in the selected areas to select the beneficiaries. They will prepare a draft list of beneficiaries and submit it to PKSF for approval. The PMU representatives from PKSF will visit to verify the beneficiary list and provide approval for the final beneficiaries. The slatted houses will be constructed on raised areas at a height above flood level. The proposed project will provide financial and technological support for improved goat and sheep management as an alternative livelihood for vulnerable farmers who do not have a sustainable year-round income. The CCAG members will arrange for the builders to construct the slatted houses. Once the houses are completed, PMU staff will visit them for quality assurance. Then the payment will be made on a muster roll basis. This activity will be carried out mainly by the female member of the selected household. This will empower them by contributing to family income and reducing their vulnerability to climate change.

Slatted house will be constructed with local available materials like wood or bamboo, and the roof will be made with rust-protected corrugated iron sheets, which are resilient to storms and associated surges. Iron-made angles will be used to align the roof with the walls. Thus, the slatted houses will be resilient to climate change. The selected households will get financial support from PKSF under the *Activity 2.1.2: Provide financial support for goat/sheep rearing*

3.3 Environmental and Social Screening of the subproject

The 'environmental screening' is a mandatory requirement for the design of a project or sub-project. The purpose of the environmental screening is to get relevant concerns addressed early on before further decision and/or design of a sub-project and to ensure that actions to mitigate environmental impacts or enhance environmental opportunities are budgeted for. It is the first step in understanding the possible environmental impacts and identifying the environmental categorization of the project or sub-project. Participation and consultation with local communities are important in determining the potential effects of the project interventions. Considering this, around twenty-seven consultation meetings were conducted during July-September 2024. The conducted consultation meeting is illustrated in the following Annex I. The PKSF has screened the project in consultation with experts and communities. The report using Annex III to find risk factor. The screening results of the subprojects are presented below:

Environmental and Social Screening Checklist of the subproject

Issues	Trigger		Risk	Remarks
	Yes	No		
ESS-1 Assessment and Management of ES Risks and Impacts	√		Low	The sub-project will provide support to households for goat or sheep rearing. So, it may cause bad smell / odor.
ESS-2 Labor and Working Conditions	√		Low	Builders are required to construct slatted house. As a result, the workers' risk of injury is quite low. There are some internal risks to engage child labour in goat/sheep rearing activity. This may be occurred by the family members.
ESS-3 Resource Efficiency and Pollution Prevention and Management	√		Low	It has potential impact on surface water body by mixing of urine and feces of goat and sheep.
ESS-4 Community Health and Safety	√		Low	Odor problems may be acute for neighboring households due to lack of cleanliness of slatted house.
ESS-5 Land Acquisition Restrictions on Land Use and Involuntary Resettlement		√		No public land or disputed land will be used for implementing the activity.
ESS-6 Biodiversity Conservation		√		The project is not in a protected or internationally recognized ecological area, there is no chance for the program to be located in modified, natural and/or critical habitats or in protected or internationally recognized ecology.
ESS-7 Indigenous Peoples	Not Relevant to the project			
ESS-8 Cultural Heritage	Not Relevant to the project			

The above screening, it is found that the activity has some impacts that will require some mitigation measures. To minimize the effects, the following Environmental and Social Action Plan is developed in consultation experts and communities.

3.4 Environmental and Social Action Plan of the subproject of RHL project

Name of Activity	Potential Impacts	Mitigation Measures
Activity 2.1.1 Construction of Slatted Houses for Goat / Sheep Rearing	Odor	Litter box and litter will be cleaned thoroughly regularly; Manure will be used to produce organic fertilizer; Polythene sheets will be provided under the slatted house so that the urine and faces can be easily removed.
	Water pollution	Safe distance will be maintained from kitchen and surface water bodies;
	Gender inequality and risk of sexual exploitation, abuse and harassment.	Awareness session will be conducted; Establish grievance redress mechanism at community level
		Involve community people as a worker; Ensure equal wages for male and female workers
	Occupation health and safety	First aid box will be ensured in working place; Litter box and litter will be cleaned thoroughly regularly; Keep separate if animals are sick from others goat or sheep herd.

Based on the screening results, it has been identified that the subproject carries the category 'C' with minimal impacts. The screening found the risk of water pollution, spreads of odor and occupational health and safety issues as ES impacts. ESS disclosure report has also mentioned the mitigation measures for mitigating the impacts. This will possible to mitigate at source level. Regular monitoring, compliance checks, and continuous improvement in safety and environmental management practices will be ensured for mitigating the impacts.

4. Development of Crab Hatcheries

4.1. Subproject Information

Name of the Sub-project	Development of Crab Hatcheries
Location of the Sub-project	Khulna, Satkhira, Bagerhat, Patuakhali, Barguna, Bhola & Cox'sBazar
Name of the Activity	Activity 2.2.1 Development of Crab Hatcheries
Number of Activity	50

4.2 Description of the Subproject of RHL project

According to the FAA Clause 10.2. (i) "Pursuant to the Environmental and Social Risk Categories, and for this covenant, "Sub-Project" shall mean activities generally grouped for execution in close geographic proximity." The project will develop 50 small enterprises of micro-crab hatcheries based on the selection criteria stated in Para 123 of FAA. The IEs will carry out consultation meetings in the areas chosen to select the beneficiaries. They will prepare a draft list of beneficiaries and submit it to PKSF for approval. The PMU representatives from PKSF will visit to verify the beneficiary list and provide approval for the final beneficiaries. The structure of hatcheries will be made of machine-made cement-sand bricks or blocks, concrete and corrugated sheet. A crab hatchery at the entrepreneur level has an estimated production capacity 100,000 juvenile crabs per cycle, will have 6-8 larvae rearing tanks, 2-4 treatment tanks, 2 filter tanks, 2 sea water treatment tanks, and 1 overhead tank. The filter tank should be set up in a way that its bottom is at least 1 foot higher than the larvae rearing tank. It will ensure a smooth flow of water from the filter tank to the larvae rearing and treatment tanks. The larvae rearing tanks, treatment tanks, and adult female rearing space will be located in one section of the brick house and maintained at an optimum temperature through passive control. Water collected from the deep sea should be stored in a reserve tank. Sea water will be treated with chlorine, and then, after dechlorination, it will be filtered by the filter tank. The filtered water will be transferred to the larvae rearing tank for Zoea rearing (day one larvae). Hatchery owners will begin their operations with wild gravid female crabs. Collectors catch wild gravid female crabs from natural sources, especially the deep sea. Typically, collectors collect large numbers of juvenile crabs or crablets from mangroves or estuaries. As a result, this poses a major threat to natural resources or biodiversity. The project will collect small quantities of female crabs from the deep sea, from which millions of crablets will be produced. After hatching, they will rear the zoea for up to 25-30 days in the hatchery, following the technical protocol to transform zoeas into juvenile crabs. By this time, each juvenile crab will have gained 0.1gm in weight. At this stage, they will sell the juvenile crabs to nurseries. The hatchery owners may also nurse the juvenile crabs up to their adolescent stage. The PKSF will provide technical support and loans to construct and develop the hatchery as an initial operational cost under *Activity 2.2.2: Financial support for producing crablets.*

Description of materials

a) For reinforced concrete (RCC) building/housing: The whole frame structure (footing, column, grade beam, slab, and lintel) will be established.
b) If the building will be built by RCC, the exterior and interior walls will be made of brick masonry and finished off with cement plaster.

c) For semi-pucca buildings: The foundation and all walls will be constructed with the help of brick masonry. The roof will be made of CGI sheet roofing with wooden or MS angle trusses. Finally, all civil works will be finished off with cement plaster.

4.3. Environmental and Social Screening of the subproject

The 'environmental screening' is a mandatory requirement for the design of a project or sub-project. The purpose of the environmental screening is to get relevant concerns addressed early on before further decision and/or design of a sub-project and to ensure that actions to mitigate environmental impacts or enhance environmental opportunities are budgeted for. It is the first step in understanding the possible environmental impacts and identifying the environmental categorization of the project or sub-project. Participation and consultation with local communities are important in determining the potential effects of the project interventions. Considering this, around twenty-seven consultation meetings were conducted during July-September 2024. The conducted consultation meeting is illustrated in the following Annex I. The PKSF has screened the project in consultation with experts and communities. The report using Annex III to find risk factor. The screening results of the subprojects are presented below:

Environmental and Social Screening Checklist

Issues	Trigger		Risk	Remarks
	Yes	No		
ESS-1 Assessment and Management of ES Risks and Impacts	√		Low	The sub-project has small scale construction activities for developing hatcheries. So, there is potential of drainage congestion, dust and noise pollution may be arise during construction phase.
ESS-2 Labor and Working Conditions	√		Low	The subproject has minor construction activities. As a result, the workers' risk of injury is quite low. Additionally, there is a very slim probability of engaging in forced labor or child labor.
ESS-3 Resource Efficiency and Pollution Prevention and Management	√		Medium	The subproject will promote crab hatchery Hence, it has potential to increase soil and water salinity around the hatchery. As a result, saline contaminated area will be used for the activity.
ESS-4 Community Health and Safety	√		Low	The activities may involve labor for women in construction. So, they may be affected by other local people or co-workers on the way to the workplace or vis-à-vis. There is potential for

Issues	Trigger		Risk	Remarks
				female workers to pay lower wages than male workers.
ESS-5 Land Acquisition Restrictions on Land Use and Involuntary Resettlement		√		No public land or disputed land will be used for implementing the activity.
ESS-6 Biodiversity Conservation		√		Collectors catch wild gravid female crabs from natural sources, especially the deep sea. Typically, collectors collect large numbers of juvenile crabs or crablets from mangroves or estuaries. As a result, this poses a major threat to natural resources or biodiversity. The project will collect small quantities of female crabs from the deep sea, from which millions of crablets will be produced. The crab hatchery will reduce the capture of wild crabs and thus increase crab stock in nature, which is the most significant impact of the project interventions on biodiversity. However, as the project is not in a protected or internationally recognized ecological area, there is no chance for the program to be located in modified, natural and/or critical habitats or in protected or internationally recognized ecology.
ESS-7 Indigenous Peoples	Not Relevant to the project			
ESS-8 Cultural Heritage	Not Relevant to the project			

4.4 Environmental and Social Action Plan of the subproject of RHL project

Name of Activity	Potential Impacts	Mitigation Measures
Activity 2.2.1 Development of Crab Hatcheries	Loss of productive land due to establishment of hatcheries	Saline contaminated pond, barren & fallow land will be used for hatchery establishment and to collect soil; No agricultural/ productive land will be used.
	Water salinity	Crab hatchery's brackish water will not be discharge in open space or surface water bodies; 3R modelling (Reduce, Recycle and Reuse) will be used; To be ensured chlorination as well as filtration facilities; Desalination plant will be installed if requires;
	Soil salinity	Several chambers placed inside of house will be used for O&M of hatchery; PVC pipe will be used as media for collecting saline water from sea to hatchery; Use of duck weed for removing soil salinity; Flushing soil with pre-monsoon rainwater.
	Air pollution	Compressed natural gas driven vehicle will be used during transportation of materials; Electricity will be used as power supply for hatchery; Diesel driven device will not be used for operating hatchery.
	Hatchery waste	Hatchery waste especially crablets will be decomposed by buried in the soil.
	Drainage congestion	Construction material is totally prohibited from being stored on or beside roads and drains
	Dust and noise pollution	Readymade construction material will be arranged; Spraying water on the construction site will be ensured to control dust; Maximize mechanical lubrication to reduce noise from machines; Using good machinery and finishing work in the daytime.
	Gender inequality and risk of sexual exploitation, abuse and harassment.	Awareness session will be conducted; Establish grievance redress mechanism at community level
		Involve community people as a worker; Ensure equal wages for male and female workers
	Occupation health and safety	Ensuring first aid box and PPE for workers; community's people will be involved in implementing the activity; Child labors will be avoided.

The above screening of the subproject found that the project will have some impacts that will require some mitigation measures. The subproject will construct crab hatcheries that will require water treatments facilities like chlorination. The hatchery will use saline water in operational phase. As a result, O&M of hatchery will be limited in the house and around 25 ppt saline water will be collected from deep sea via pipe. So, there is less possibility to increase water and soil salinity in surrounding area. It also be noted that chloride allowable limit 150-600 mg/l in Bangladesh. In addition, no brackish water will be discharged in surrounding. This water will be reused after chlorination and filtration. Other hand, the labor may require to wear personal protective equipment including masks, hand-gloves, helmet etc. For reducing dust, the construction activities will require water-spray etc. The cumulative impact of the subproject would be moderate. In this consideration, the project is categorized as B.

5. Technical and financial support to crab nursers

5.1. Subproject Information

Name of the Sub-project	Technical and Financial Support to Crab Nursers
Location of the Sub-project	Khulna, Satkhira, Bagerhat, Patuakhali, Barguna, Bhola & Cox'sBazar
Name of the Activity	Activity 2.2.3 Technical & Financial Support for Crab Nursers
Number of Activity	500

5.2 Description of the Subproject of RHL project

According to the FAA Clause 10.2. (i) "Pursuant to the Environmental and Social Risk Categories, and for this covenant, "Sub-Project" shall mean activities generally grouped for execution in close geographic proximity." The activity of the project will engage a secondary group between hatchery owners and crab farmers. The project termed this group as "crab nursers". Crab collectors (50 per cent of them women) will be engaged in juvenile crab rearing. The IEs' staff will select the nurseries based on the selection criteria stated in Paragraph 125. The IEs staff will carry out consultation meetings in the selected areas to select the beneficiaries. They will prepare a draft list of beneficiaries and submit it to PKSF for approval. The PMU representatives from PKSF will visit to verify the beneficiary list and provide approval for the final beneficiaries. Some of them may also be involved in crab fattening, which is the third part of the production chain. The crab nursers will be provided with the necessary training along with financial support for transporting and nursing juvenile crabs. Considering five juvenile crabs per square meter, estimated a nurser will rear 2,000 juvenile crabs. For pond preparation, lime will be used to balance ammonia and pH. Then, the pond is fenced with a meshed net and dykes covered with Tripoli (a type of mat). They will buy juvenile crabs from the hatchery and rear them for one and a half to two months. At this stage, the juvenile crabs will be 40-50 gm in weight and able to grow in a pond. The nursers will sell the juvenile crabs to the crab nursers and fatteners.

5.3. Environmental and Social Screening of the subproject

The 'environmental screening' is a mandatory requirement for the design of a project or sub-project. The purpose of the environmental screening is to get relevant concerns addressed early on before further decision and/or design of a sub-project and to ensure that actions to mitigate environmental impacts or enhance environmental opportunities are budgeted for. It is the first step in understanding the possible environmental impacts and identifying the environmental categorization of the project or sub-project. Participation and consultation with local communities are important in determining the potential effects of the project interventions. Considering this, around twenty-seven consultation meetings were conducted during July-September 2024. The conducted consultation meeting is illustrated in the following Annex I. The PKSF has screened the project in consultation with experts and communities. The report using Annex III to find risk factor. The screening results of the subprojects are presented below:

Environmental and Social Screening Checklist

Issues	Trigger		Risk	Remarks
	Yes	No		
ESS-1 Assessment and Management of ES Risks and Impacts	√		Low	The sub-project will provide support to crab nursers for rearing juvenile crab. Pond bank repairing may be required as well as lime will be used to balance ammonia and pH in the phase of pond preparation.
ESS-2 Labor and Working Conditions	√		Low	The subproject may be required to raise the bank of pond and fencing. As a result, the workers' risk of injury is limited. But there are some internal risks to engage child labour in project interventions particularly crab farming. This may be occurred by the family members.
ESS-3 Resource Efficiency and Pollution Prevention and Management	√		Low	The subproject will promote juvenile crab nursing. Hence, it has potential to increase soil and water salinity around the pond. As a result, existing saline contaminated area will be used as well as who involved are crab firming since before the project will select them for the activity.
ESS-4 Community Health and Safety	√		Low	Household members will engage in the pond preparation activities like pond bank raising, fencing etc. for crab culture. Sometimes community-based worker may be required. In the case, there is potential for female workers to pay lower wages than male workers. Collecting deep sea water is the sole essential transport needed to run a crab culture. However, because deep-sea water has already been accumulating from shrimp hatcheries, the contamination won't get worse. Moreover, there is a very slim probability to impact on community health during using lime and organic fertilizer.
ESS-5 Land Acquisition Restrictions on Land Use and Involuntary Resettlement		√		No public land or disputed land will be used for implementing the activity.
ESS-6 Biodiversity Conservation		√		The crab nursers will reduce the capture of wild crabs and thus increase crab stock in nature, which is the most significant beneficial impact of the project interventions on biodiversity. However, as the project is not in a protected or internationally recognized ecological area, there is no chance for the program to be located in modified, natural and/or critical habitats or in protected or internationally recognized ecology.
ESS-7 Indigenous Peoples	Not Relevant to the project			
ESS-8 Cultural Heritage	Not Relevant to the project			

The above screening, it is found that the activity has minimal impacts that will require some mitigation measures. To minimize the effects, the following Environmental and Social Action Plan is developed in consultation experts and communities.

5.4 Environmental and Social Action Plan of the subproject of RHL project

Name of Activity	Potential Impacts	Mitigation Measures
Activity 2.2.3 Technical and Financial Support for Crab Nursers	Loss of productive land	Existing saline contaminated pond or gher will be used; Pond, fish firm, canal, barren & fallow land will be used to collect soil; No agricultural/ productive land will be used.
	Water salinity	Existing saline contaminated pond or gher will be used only; Fresh water will be introduced into the pond or farm at regular intervals.
	Soil salinity	Only saline contaminated pond will be used; Household's duck weed for removing soil salinity; Will be used organic matter and manure; Inlet and outlet drainage system will be used for better flushing; Trees will be planted on the bank of pond or farm.
	Gender inequality and risk of sexual exploitation, abuse and harassment.	Awareness session will be conducted; Establish grievance redress mechanism at community level
		Involve community people as a worker; Ensure equal wages for male and female workers
	Occupation health and safety	Fences and nets will be used during pond preparation; Crab waste especially dead crab will be buried in the soil.

Based on the screening results, it has been identified that the subproject carries the category 'C' with minimal impacts. The screening found water and soil salinity, loss of productive land and occupational health and safety issues. The saline contamination in water and soil won't get worse because deep-sea water or saline water has already been accumulating from shrimp hatcheries. Besides the subproject / activity will be conducted only existing saline contaminated areas. ESS disclosure report has also mentioned ESAP to mitigate the impacts. Regular monitoring, compliance checks, and continuous improvement in safety and environmental management practices will be ensured for mitigating the impacts.

6. Technical and financial support for crab farmers

6.1 Subproject Information

Name of the Sub-project	Technical and Financial Support for Crab Farmers
Location of the Sub-project	Khulna, Satkhira, Bagerhat, Patuakhali, Barguna, Bhola & Cox'sBazar
Name of the Activity	Activity 2.2.4 Technical & Financial Support for Crab Farmers
Number of Activity	20,000

6.2 Description of the Subproject of RHL project

According to the FAA Clause 10.2. (i) "Pursuant to the Environmental and Social Risk Categories, and for this covenant, "Sub-Project" shall mean activities generally grouped for execution in close geographic proximity." The project will select tertiary level crab farmers (50per cent women) to produce export-quality crab both hard shell and soft shell. The IEs staff will carry out consultation meetings in the selected areas to select the beneficiaries. They will prepare a draft list of beneficiaries and submit it to PKSF for approval based on the selection criteria stated in paragraph 125. The PMU representatives from PKSF will visit to verify the beneficiary list and provide approval for the final beneficiaries. They will be provided with the necessary training and financial support. They will buy juvenile crabs from the nurseries and rear them for 30 to 40 days before marketing them. The project will promote fruit-fish-fiber (3-F model) integrated crab farming and tree plantations in and around the crab-pond or gher. Each crab farmer will plant at least 20 mangrove tree saplings in the crab-pond or gher as well as fruit trees around the ponds. The trees will provide timber, fuel, and fruit, in addition to the crabs that will grow in the pond, leading to increased additional income for the crab farmers.

6.3. Environmental and Social Screening of the subproject

The 'environmental screening' is a mandatory requirement for the design of a project or sub-project. The purpose of the environmental screening is to get relevant concerns addressed early on before further decision and/or design of a sub-project and to ensure that actions to mitigate environmental impacts or enhance environmental opportunities are budgeted for. It is the first step in understanding the possible environmental impacts and identifying the environmental categorization of the project or sub-project. Participation and consultation with local communities are important in determining the potential effects of the project interventions. Considering this, around twenty-seven consultation meetings were conducted during July-September 2024. The conducted consultation meeting is illustrated in the following Annex I. The PKSF has screened the project in consultation with experts and communities. The report using Annex III to find risk factor. The screening results of the subprojects are presented below

Environmental and Social Screening Checklist

Issues	Trigger		Risk	Remarks
	Yes	No		
ESS-1 Assessment and Management of ES Risks and Impacts	√		Low	The sub-project will provide support to crab farmers for crab rearing. Pond bank repairing may be required as well as lime will be used to balance ammonia and pH in the phase of pond preparation.
ESS-2 Labor and Working Conditions	√		Low	The subproject may be required to raise the bank of pond and fencing. As a result, the workers' risk of injury is limited. But there are some internal risks to engage child labour in project interventions particularly crab farming.This may be occurred by the family members.
ESS-3 Resource Efficiency and Pollution Prevention and Management	√		Low	The subproject will promote crab firming. Hence, it has potential to increase soil and water salinity around the pond. As a result, existing saline contaminated area will be used as well as who involved are crab firming since before the project will select them for the activity.
ESS-4 Community Health and Safety	√		Low	Household members will engage in the pond preparation activities like pond bank raising, fencing etc. for rearing crab. Sometimes community-based worker may be required. In the case, there is potential for female workers to pay lower wages than male workers. Collecting deep sea water is the sole essential transport needed to run a crab culture. However, because deep-sea water has already been accumulating from shrimp hatcheries, the contamination won't get worse. Moreover, there is a very slim probability to impact on community health during using lime and organic fertilizer.
ESS-5 Land Acquisition Restrictions on Land Use and Involuntary Resettlement		√		No public land or disputed land will be used for implementing the activity.
ESS-6 Biodiversity Conservation		√		The project is not in a protected or internationally recognized ecological area, there is no chance for the program to be located in modified, natural and/or critical habitats or in

Issues	Trigger		Risk	Remarks
				protected or internationally recognized ecology.
ESS-7 Indigenous Peoples	Not Relevant to the project			
ESS-8 Cultural Heritage	Not Relevant to the project			

The above screening, it is found that the activity has some impacts that will require some mitigation measures. To minimize the effects, the following Environmental and Social Action Plan is developed in consultation experts and communities.

6.4. Environmental and Social Action Plan of the subproject of RHL project

Name of Activity	Potential Impacts	Mitigation Measures
Activity 2.2.4 Technical and Financial Support for Crab Farmers	Loss of productive land	Existing saline contaminated pond or gher will be used; Pond, fish firm, canal, barren & fallow land will be used to collect soil; No agricultural/ productive land will be used.
	Water salinity	Existing saline contaminated pond or gher will be used only; Fresh water will be introduced into the pond or farm at regular intervals.
	Soil salinity	Only saline contaminated pond will be used; Household's duck weed for removing soil salinity; Will be used organic matter and manure; Inlet and outlet drainage system will be used for better flushing; Trees will be planted on the bank of pond or farm.
	Gender inequality and risk of sexual exploitation, abuse and harassment.	Awareness session will be conducted; Establish grievance redress mechanism at community level
		Involve community people as a worker; Ensure equal wages for male and female workers
	Occupation health and safety	Fences and nets will be used during pond preparation; Crab waste especially dead crab will be buried in the soil.

Based on the screening results, it has been identified that the subproject carries the category 'C' with minimal impacts. The screening found water and soil salinity, loss of productive land and occupational health and safety issues. The saline contamination in water and soil won't get worse because deep-sea water or saline water has already been accumulating from shrimp hatcheries. Besides the subproject / activity will be conducted only existing saline contaminated areas. ESS disclosure report has also mentioned ESAP to mitigate the impacts. Regular monitoring, compliance checks, and continuous improvement in safety and environmental management practices will be ensured for mitigating the impacts.

7. Summary of Stakeholder Consultation

National level inception workshop was held on January 29, 2024, where National Designated Authority (NDA) representatives, representatives of relevant government ministries and departments including but not limited to the Ministry of Environment, Forests and Climate Change (MoEFCCC), National Housing Authority (NHA), Housing and Building Research Institutes (HBRI), Department of Fisheries (DoF), Water Resource Planning Organization (WARPO), Water Development Board (WDB), Department of Public Health and Engineering (DPHE), Bangladesh Fisheries Research Institute (BFRI), Department of Environment (DoE), Bangladesh Climate Change Trust (BCCT), Universities, NGOs and civil societies were participated. Moreover, PMU conducted about 13 upazila or district-based workshops during May- July 2024 **(details in Annex II)**. In addition, six batches of foundation training were held with IE's staff from 18 May to 11 June 2024at Jashore and Cox'sBazar. After that IEs conducted around 3057 participatory rural appraisals (PRAs) for collecting information along with to find ES impacts and mitigation measures using the prescribed form **(Annex IV**). Communities, civil societies like teachers, religious leaders, women representatives, and union parishad members participated in the PRAs. Moreover, IEs performed household surveys and group formation. On the other hand, PMU visited the project area around 27 times during July – September 2024. At the time, PMU conducted consultation meetings with communities, representatives of NGOs and relevant government institutions. **Annex I** show the details of the stakeholder consultation meeting. The main purposes of the consultation meeting are given below-

Types of stakeholders	Participatory Method	Purpose
Local Government Institutions	KII	Sharing project updated information; Discussing about project activities and finding impacts and mitigation measures.
Communities, civil society, women representatives and union parishad members	Communities Consultation	To increase knowledge about project activities and to understand the community's views on the beneficial and adverse effects of the project.
NGO's Representatives	KII	To understand what challenged they had faced and how they overcome; Discussing about project activities and finding impacts and mitigation measures.

Some impacts were determined from the above meeting. All the participants in the meeting opined that the negative aspects of implementing these activities are negligible compared to the beneficial ones. Also, they mentioned that it is possible to mitigate all potential impacts pre construction and construction phases. These consultation meeting has played a vital role for preparing environmental and social action plan.

8. Grievance Redress Mechanism

Grievance Redress Mechanism (GRM) is established at the central (PKSF) and sub-project level to deal with any complaints/grievances about environmental issues. At the sub-project level, the Union Parishad (U/P) Chairman or his/her nominated representative from the U/P will be the Local Grievance Redress (LGR) focal Point. At the PKSF central level, the Deputy Project Coordinator (ESS) is the Central Grievance Redress (CGR) focal Point. All mechanisms accessible to the local community will be used to receive complaints. The unsatisfied community members or anyone can submit their complaints in writing in the complaint boxes, which are hanging in an accessible location in the project office, make a written or verbal complaint directly to the focal person, or present their complaints through phone calls/texts or emails (gcfrhl@gmail.com). All types of complaints will be recorded in a register. For keeping confidentiality, the aggrieved persons or entities will submit the complaints/grievances in sealed envelopes to the selected partner's office duly entered in the Grievance Register (GR). They will collect a receipt with an entry reference to the GR. Partners will not open the envelopes but inform the LGR focal point about receipt of complaints and schedule hearings as per his/her advice. In open meetings, the selected/implementing partner will facilitate the LGR focal Point to hear and discuss the complaints and resolve them in view of the applicable guidelines of the ESMF. The aggrieved person, if female, will be assisted by a female U/P member in the hearing and, if from a tribal community, by a tribal representative. LGR focal Point, with the help of IE, will ensure that a copy of the complaint is sent by postal mail, fax, or other means to the Project Coordinator at the PKSF headquarters.

The IEs will forward the unresolved cases with all proceedings to the CGR focal Point within seven days of the decision by the LGR focal Point. Unresolved cases forwarded by IEs will be registered in the office of the CGR focal Point and disposed of within 15 days. If any decision made by CGR focal Point is unacceptable to the aggrieved persons, he/she will forward the complaints with all proceedings to the PKSF Managing Director (MD) through the Project Coordinator. The MD will review and resolve the cases, which will be finalized for PKSF. The MD may seek advice from the PKSF Chairman for any critical issues at his discretion. A decision agreed by the complainants at any level of hearing will be binding on the concerned IEs and PKSF. The GRM will, however, not pre-empt an aggrieved person's right to seek redress in the courts of law.

The aggrieved persons or entities will have the option to lodge the complaints directly to the CGR focal Point if they are against the IE, to the PKSF MD if they are against the PKSF project management or directly to the Management Committee at GCF Secretariat if there is any issue related to PKSF itself. The institutional arrangement of the Grievance Redress Mechanism is illustrated in the following figure:

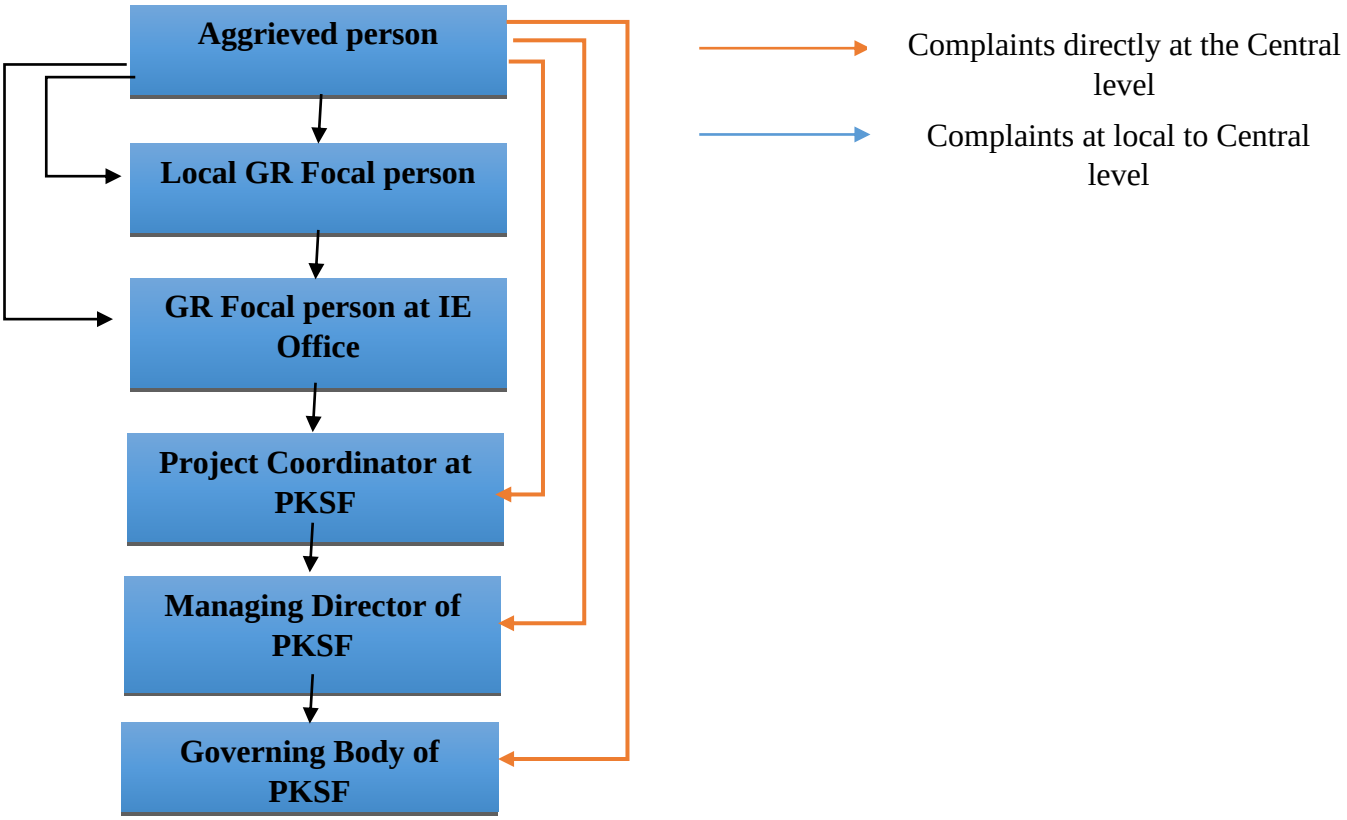

Figure 01: Grievance Redress Mechanism

PKSF and IEs will keep records of all resolved and unresolved complaints and grievances and make them available for review -- as and when asked for by the development partners and others interested in climate change issues. The provision of GRM and the process will be well disclosed to the community and the likely affected persons before implementation of sub-projects. The disclosure will be done by the IEs and ensured by PKSF DPC (ESS).

GRM focal person at PKSF level:
Dr. AKM Nuruzzaman,
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9. Conclusion

Based on the screening results, it has been shown that the subprojects 1.1.1, 2.1.1, 2.2.3, and 2.2.4 are categorized as 'C', i.e., they have no or minimal adverse environmental and social impact on the project area. In addition, subproject 2.2.1 is categorized as 'B', i.e., it has some potential impacts. These impacts will be mitigated through mitigation measures following environmental and social management framework.

Annex I: Stakeholder consultation meeting

Sl.	Meeting date	Venue	District	Stakeholder
1	25-29 June, 2024	Dacope	Khulna	Communities, civil societies like teachers, religious leader, women representatives and members of union parishad, non-government representatives, and relevant government institutions.
2		Koyra	Khulna	
3		Morolganj	Bagerhat	
4		Mongla	Bagerhat	
5		Asasuni	Satkhira	
6	3-11 July, 2024	Rangabali	Patuakhali	
7		Pathorghata	Barguna	
8		Kalapara	Patuakhali	
9		Chokoria, Cox'sBazar sadar,	Cox'sBazar	
10	15-24 July, 2024	Barguna Sadar	Barguna	
11		Bhola Sadar, Borhanuddin, Char	Bhola	
12	2-6 September, 2024	Rangabali, Kalapara	Patuakhali	
13		Barguna sadar, Pathorghata	Barguna	
14		Mongla, Morolganj	Bagerhat	
15		Dacope	Khulna	
16	13-19September, 2024	Cox'sBazar Sadar, Kutubdia,	Cox'sBazar	
17		Symnagor, Assasuni	Satkhira	
18		Koyra	Khulna	

Annex II: Summary of Inception workshops

Sl.	Date of Inception Workshop	Venue	District	Stakeholders
1	18 April 2024	Symnagor	Satkhira	Representatives of government and non-government offices, staff of IE, and members of civil societies.
		Assasuni		
2	8 May 2024	Bhola Sadar	Bhola	
		Borhanuddin		
		Char Fassion		
		Monpura		
3	13 May 2024	Kalapara	Patuakhali	
4	14 May 2024	Chokoria	Cox'sBazar	
5	15 May 2024	Dacope	Khulna	
6		Cox'sBazar Sadar, Teknaf	Cox'sBazar	
7	16 May 2024	Ramu	Cox'sBazar	
8	29 May 2024	Moheshkhali	Cox'sBazar	
9	27 June 2024	Mongla	Bagerhat	
		Morolganj		
10	30 June 2024	Koyra	Khulna	
11	4 July 2024	Pathorghata	Barguna	
12	16 July 2024	Barguna Sadar	Barguna	
13	30 July 2024	Rangabali	Patuakhali	

Annex III: Environment and Social Risk Factor of the project

Name of IE……Location…….Date……..

Exclusion criteria	YES	NO	Remark
Will the activities involve associated facilities and require further due diligence on such facilities?			
Will the activities involve transboundary impacts, including those that would require further due diligence and notification to downstream riparian states?			
Will the activities adversely affect working conditions and the health and safety of workers or potentially employ vulnerable categories of workers, including women and child labor?			
Will the activities potentially generate hazardous waste and pollutants, including pesticides, and contaminate lands that would require further studies on management, minimization control and compliance with the country and applicable international environmental quality standards?			
Will the activities involve the construction, maintenance, and rehabilitation of critical infrastructure (like dams, water impoundments, and coastal and river bank infrastructure) that would require further technical assessment and safety studies?			
Will the proposed activities potentially involve resettlement and dispossession, land acquisition, and economic displacement of persons and communities?			
Will the activities be located in protected areas and areas of ecological significance, including critical habitats, key biodiversity areas and internationally recognized conservation sites?			
Will the activities affect Indigenous peoples that would require further due diligence, free, prior and informed consent (FPIC) and documentation of development plans?			
Will the activities be located in areas that are considered to have archaeological (prehistoric), paleontological, historical, cultural, artistic, and religious values or contains features considered as critical cultural heritage?			
Will the activities affect human rights that would require further due diligence?			
Will the activities have the potential to occur in SEAH, which requires studies and due diligence?			
Will the activities have the potential to promote gender inequality?			

Annex IV: Specific Environmental and Social Impacts

Name of IE:……....

Date of Screening: …….

Name of the Union: …….

Name of Upazila: …….

Name of the District: ……

Sl.	General Intervention Issues	Yes	No	N/A	Comments
	1. Issues related to environment and pollution				
1.1	Will the activity contribute to water pollution?				
1.2	Will the activity contribute to air pollution?				
1.3	Is the activity related to soil degradation and soil pollution?				
1.4	Will the activity cause of noise pollution?				
1.5	Does the activity cause hazardous waste?				
1.6	Is the activity related to greenhouse gas emission?				
	2. Issues related to labour and working conditions				
2.1	Are the activity expected to have impacts on the working conditions, particularly non-discrimination, equal opportunity, child labour, and forced labour?				
2.2	Will the activity pose occupational health and safety risks to workers?				
	3. Issues related to Resource and Energy				
3.1	Are the activity expected to utilize natural resources including water and energy?				
	4. Issues related to community health, safety and security				
4.1	Will the activities potentially generate risks and impacts to the health and safety of the affected communities?				
4.2	Will there be risks to workers and affected communities due to safety measures and potential conflicts at the project site?				
4.3	Will the activities increase the risk of sexual exploitation, abuse and harassment?				
	5. Issues related to land and indigenous people				
5.1	Will the activity change the land use pattern?				
5.2	Are the activities likely to have direct impacts on indigenous peoples?				
	6. Issues related to biodiversity				
6.1	Are the activities likely introducing invasive alien species of flora and fauna affecting the biodiversity of the area?				

Sl.	General Intervention Issues	Yes	No	N/A	Comments
6.2	Will the activity to contribute for deforestation, tree cutting or land clearing issues.				
6.3	Will the activities have potential impacts on ecosystem or be dependent on ecosystem services including production of living natural resources?				
	7. Issues related to heritage site				
7.1	Will the activity have any potential impact on cultural heritage sites and properties?				

Annex V: Photo Gallery

Fig: Area based inception Workshop

Fig: Foundation Training on project implementation and climate change

Fig: Participatory Rural appraisal

Fig: Community consultation with women group