



Ministry of Environment, Forestry and Climate Change  
Department of Forestry



# Strategic Environmental Assessment (SEA) of SW Region and the Sundarbans

January 2020 – June 2021

Undertaken by CEGIS and Integra Consulting

## PROSPECTUS

*(24 Feb 2020)*



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## **1. Introduction**

This prospectus is aimed to provide all stakeholders - from government, the private sector and civil society, and all interested organisations and individuals - with some basic information about the Strategic Environmental Assessment (SEA) being undertaken of the SW Region and the Sundarbans (Figure 1). It sets out the reasons for the SEA and gives a brief introduction to its role, function and benefits. The aims and scope of the SEA are set out, and the steps in the process and products are described.

## **2. Background**

Bangladesh is on a trajectory to become a developed economy by 2041. In contributing to achieving this goal, the SW region has significant prospects for development. The government is committed that such development should be sustainable and should not adversely affect the outstanding universal value of the Sundarbans.

The Sundarbans covers 10,000 km<sup>2</sup> of land and water in the Ganges delta. It contains the world's largest area of natural mangrove forests. 60 % of these forests occur in Bangladesh; the remainder in India. The area has both local and global significance due to its diversity, uniqueness, biological productivity and rich ecosystems, with a number of rare or endangered species living in the forest, including tigers, aquatic mammals, birds and reptiles. The area provides essential ecological services such as nursery grounds for many fish species, and coastal erosion protection against storms.

Parts of the Sundarbans were proposed by the Government of Bangladesh and subsequently designated by UNESCO as World Heritage Sites in 1997 (Figure 2). But, recently, concerns have been raised about the potential impacts on the Sundarbans of existing and planned developments in the SW Region. In this regard, UNESCO suggested to the Government of Bangladesh (GoB) to undertake a Strategic Environmental Assessment (SEA) to assess the impacts of development at a landscape and regional scale to help Bangladesh uphold the Outstanding Universal Value (OUV) of the Sundarbans.

In response, following an open tender process, the Department of Forestry has commissioned CEGIS and Integra Consulting to undertake the SEA over 18 months, from January 2020 to June 2021. The overall aim is to ensure the sustainable development of the SW region whilst also ensuring the conservation of the Sundarbans.

The SEA will analyse the environmental and socio-economic impacts, existing and likely, of current and future policies, plans and programmes (PPPs) for development and of mega projects in the South West Region (Figure 1). In particular, the SEA will address PPPs covering all relevant sectors including, but not limited to, the following: forestry, fisheries, transportation and communication, industry, power and energy, water resources, shipping, urbanisation and tourism.

The SEA will identify the positive and negative, direct and indirect, transboundary, cumulative, synergistic and antagonistic, impacts of development in the region and address how these are impacting on, or are likely to impact on in the case of future policies, plans and programmes, the region as a whole (and including the Sundarbans). It will also highlight the potential for enhancing positive impacts and for trade-offs. The SEA will result in a Strategic Environmental Management Plan (SEMP) for the region that sets out a framework for monitoring the implementation of policies, plans and programmes and individual mega development activities, providing a valuable tool to help transition to sustainable development in the region and to support sustainable forest management.

A key objective is to engage widely with all relevant stakeholders to ensure that key concerns about development and environmental management in SW region are able to be raised and taken into account.

**Figure 1: The SEA area of focus**

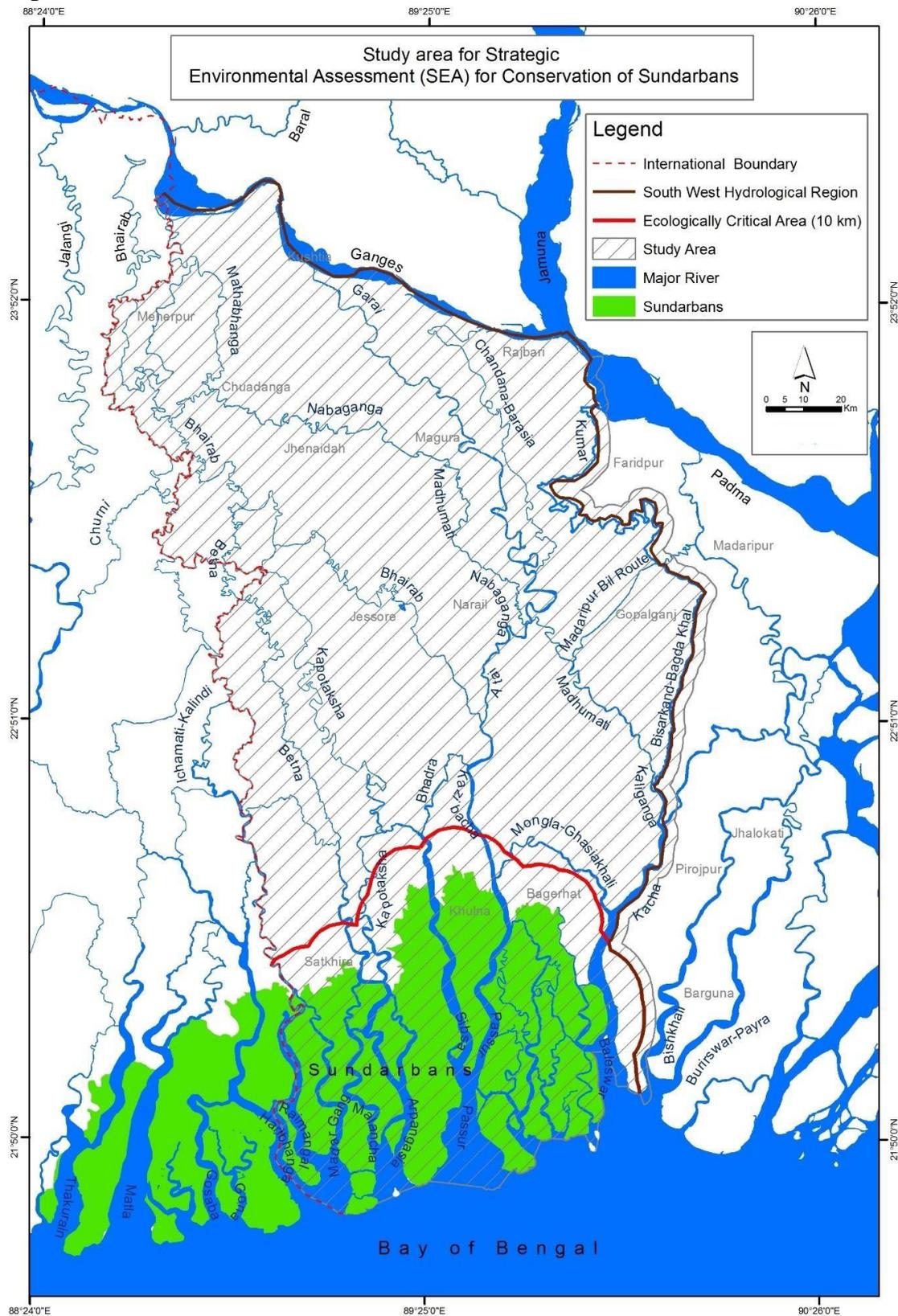
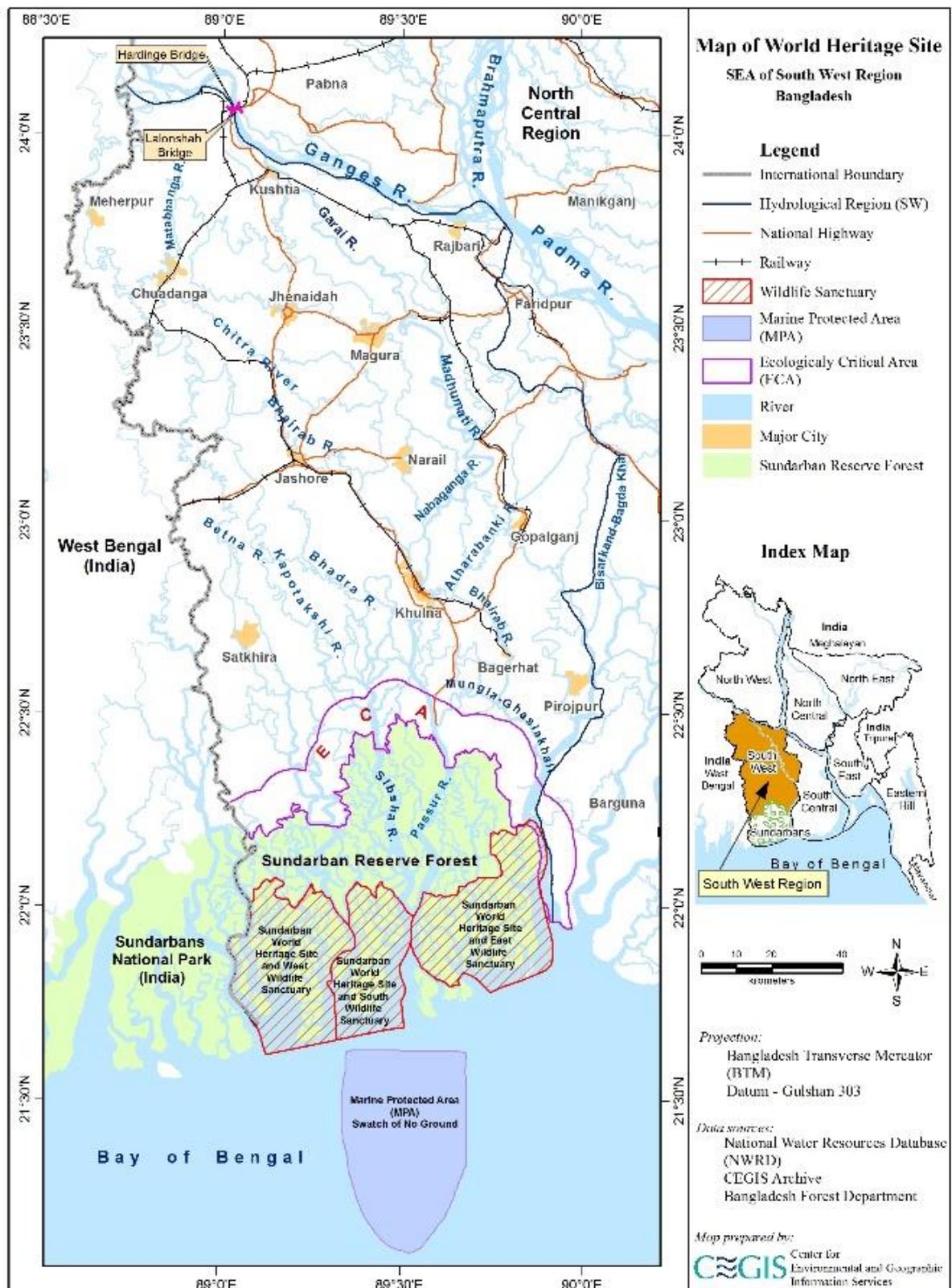


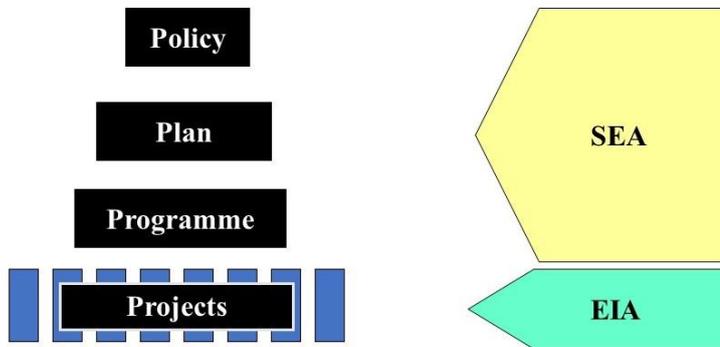
Figure 2: World Heritage Sites and Protected Areas in the SW region



### 3. What is Strategic Environmental Assessment

There is a hierarchy of levels in public decision-making comprising policies, plans, programmes and then individual projects (Figure 3).

**Figure 3: SEA, EIA and the decision-making hierarchy**



Policies shape the subsequent plans, programmes and projects that put those policies into practice. Policies are thus top of the decision-making hierarchy. Policies, plans, and programmes (PPPs) are more ‘strategic’ than projects as they determine the general direction or approach to be followed towards broad goals. SEA is applied to these more strategic levels and deals with assessing broadly-defined proposals with a wide range of options usually available for assessment. As one moves down the hierarchy from policies to projects, the nature of decision-making changes, as does the nature of environmental and socio-economic assessment needed. Table 1 indicates how SEA differs from Environmental Impact Assessment (EIA) which is used to assess the impacts of individual projects. But as Table 1 shows, it differs considerably from SEA.

**Table 1: SEA and EIA compared**

	<b>SEA</b>	<b>EIA</b>
<b>Level of application</b>	Policies, plans and programmes	Specific projects
<b>Alternatives</b>	Broad range considered (eg to PPPs, scenarios, economic growth trajectories).	Considers limited range
<b>Who does it?</b>	Commissioned by government.	Usually prepared and/or funded by project proponents.
<b>Focus</b>	Decision on policy, plan and programme implications for future lower-level decisions.	Obtaining project permission, and rarely with feedback to policy, plan or programme consideration.
<b>Process</b>	Multi-stage & iterative, with feedback loops.	Well-defined & linear, with clear beginning and end (e.g. from feasibility to project approval).
<b>Emphasis</b>	Meeting balanced environmental, social and economic objectives in policies, plans and programmes. Includes identifying macro-level development outcomes.	Mitigating impacts (environmental and social) of a specific project, but with identification of some project opportunities, off-sets, etc.
<b>Consideration of cumulative impacts</b>	Key component of assessment	Limited consideration

The experience gained from undertaking EIAs and SEAs of plans and programmes feeds into the design of policy SEAs. There is two-way flow between the four levels in Figure 2. Some major public instruments (e.g. White Papers) do not fit easily into the simplified hierarchy shown in Figure 3.

The uptake of SEA has grown since first introduced in the 1980s and it is now used in countries all over the world to support PPP preparation and implementation and over 60 countries now have formal legal and regulatory requirements for SEA. But there has been very little experience of its application in Bangladesh. So this SEA is playing a pilot role. It will help to raise awareness of the role, methods and value of the process, and hopefully will stimulate its wider uptake in the country.

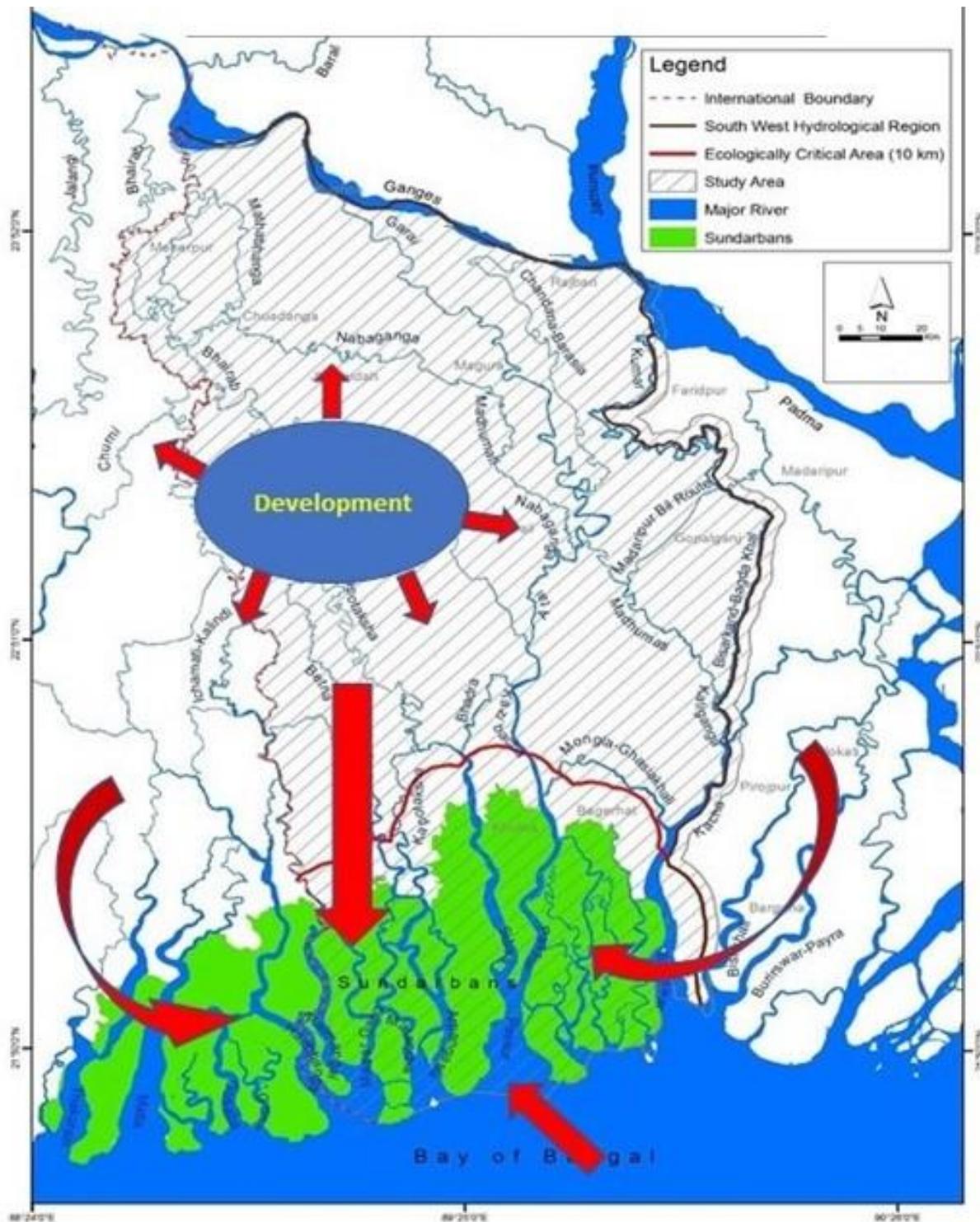
In a nutshell, SEA involves analytical and participatory approaches for the environmental evaluation of proposed policies, plans and programmes, and for evaluating the inter linkages with economic and social considerations. It is a planning tool that aims to improve strategic decision-making. It complements planning by (a) generating information on environmental and socio-economic issues, (b) providing a platform for stakeholder dialogue on these issues with well-structured debate involving government, the private sector and civil society, and (c) offering a mechanism to take the results of the assessment and debate into account in institutions and governance.

SEA uses a variety of tools in a flexible and adaptive way, rather than a single, fixed, prescriptive approach as is usually the case with EIA. SEA can complement and strengthen EIA at the project level by: (a) identifying prior information needs and potential impacts, providing the context and parameters for subsequent EIAs of projects designed to implement a policy, plan or programme; and (b) making EIA and the project review process more streamlined and efficient by addressing many issues at a more strategic level - including concerns that may relate to project justification so that EIAs can be more effective by being designed to focus on local and site- or project-specific concerns.

#### **4. What kinds of impact will the SEA look at**

The SEA will look at all the developments (projects, infrastructure, etc) likely to arise over the next 20 years in the SW Region as a result of implementing current and proposed policies, plans and programmes across all relevant sectors (eg particularly forestry, fisheries, agriculture, water, power and energy, tourism, urbanization, industry, transportation/communication and shipping, and others). The environmental and socio-economic impacts of developments under these sectors will be assessed including those which are positive/negative, direct/indirect, domestic/transboundary, cumulative, and synergistic/antagonistic. Impacts arising across the SW region will be assessed as well as those that impact upon the outstanding universal value (OUV) of the Sundarbans, including those that are transboundary in nature (ie arising across regional boundaries within Bangladesh and across international boundaries) – as illustrated in Figure 4.

Figure 4: Schematic flow of impacts of development affecting the SW region



## 5. Some key issues

An initial analysis by the SEA team has identified a range of key environmental and socio-economic issues that the SEA will need to address (Table 2). This analysis will be deepened and verified, and issues prioritised, following the scoping phases when a range of multi-stakeholder workshops and consultations will be organised at national, regional and local levels.

**Table 2: Initial list of key environmental and socio-economic issues**

*Note: This table is provisional and illustrative only. The scoping phase of the SEA will identify and analyse the key issues in detail, including through consultations and stakeholder meetings, and efforts will be made to verify assumptions and facts. Issues and impacts in the Sundarbans will often be different to those affecting the region inland.*

<b>Environmental Issues</b>	<b>Comment / examples of potential impacts</b>
<p><b><i>Pollution and waste (solid and liquid):</i></b></p> <ul style="list-style-type: none"> <li>• Surface waters. Brackish and sea water</li> <li>• Groundwater</li> <li>• Air</li> <li>• Oil</li> <li>• Waste disposal</li> <li>• Plastics</li> </ul>	<p>Pollution &amp; waste management is a major concern for the ecological integrity of the SW region of Bangladesh and the Sundarbans due to different developmental initiatives.</p>
<p><b><i>Water flow dynamics in rivers</i></b></p>	<p>Change of water flow in rivers of SW region may change the region's economic sustainability/integrity as well as livelihood patterns and crop production</p>
<p><b><i>Sedimentation and siltation</i></b> (fluvial and tidal)</p> <ul style="list-style-type: none"> <li>• Dredging and disposal</li> </ul>	<p>Sedimentation and siltation management is a challenge to maintain river flows. Disposed dredged materials can affect the regeneration of trees &amp; survival of existing forests as well as benthic aquatic biodiversity.</p>
<p><b><i>Salinity:</i></b></p> <ul style="list-style-type: none"> <li>• Groundwater</li> <li>• Soil</li> </ul>	<p>Due to reduced flow of upstream fresh water and channel siltation, and resultant sea water intrusion/inundation, soil and groundwater salinity has increased and soil productivity has decreased as well as livelihood diversity</p>
<p><b><i>Noise</i></b> - particularly due to shipping in Sundarbans</p>	<p>Noise from the regular movement of ships (notably along Pashur river) and associated with Rampal power station can disrupt wildlife movement, cause localisation of populations and result in inbreeding.</p>
<p><b><i>Habitat fragmentation</i></b></p>	<p>Increased movement of ships in the international routes through the Sundarbans may be causing fragmentation, inhibiting wildlife movement, undermining biodiversity conservation and reducing ecosystem productivity.</p>
<p><b><i>Loss of biodiversity</i></b></p>	<p>Some environmental as well as regional &amp; local activities may affect biodiversity (particularly in the Sundarbans), with loss of keystone species and their prey base due to poaching and habitat degradation as a result of climate change &amp; anthropogenic activities</p>
<p><b><i>Invasive alien species</i></b></p>	<p>Invasive alien species are a problem in the Sundarbans and ecologically critical areas. They are the major threat to ecosystem productivity as well as regeneration of desired species - an important concern for natural resource managers.</p>
<p><b><i>River bank erosion</i></b> – due to port expansion and boats</p>	<p>River bank erosion is a particular concern in the Sundarbans due to bow-waves from the increased numbers of fast-moving ships (including to Rampal power station); and due to river bed siltation, formation of new islands and changed river courses, as well as increasing sea water inflow in SW region.</p>
<p><b><i>Climate change</i></b></p> <ul style="list-style-type: none"> <li>• Sea level rise</li> <li>• Salt water intrusion</li> <li>• Erratic rainfall &amp; distribution</li> </ul>	<ul style="list-style-type: none"> <li>• Sea level rise is a global threat that will impact on the region.</li> <li>• Many factors have reduced river flow in the region, decreasing flushing time, with increased periods of saltwater exposure.</li> <li>• Shifting of monsoon with erratic rainfall has impacted on the cropping season and pattern</li> </ul>

<ul style="list-style-type: none"> <li>• Increased average temperatures</li> <li>• Cyclones &amp; storm surges</li> <li>• Greenhouse gas emissions</li> </ul>	<ul style="list-style-type: none"> <li>• There is no evidence of significant increased temperatures yet, but climate models predict a significant increase in the future.</li> <li>• Cyclones making landfall impact on livelihoods (killing people and causing damage). Cyclone frequency has decreased but may rise in the future.</li> <li>• Rapid industrialisation and urbanisation is likely to lead to increased greenhouse gas emissions. Expansion of flood-irrigated paddy rice has increased methane emissions.</li> </ul>
<p><b>Exceptional floods</b> (with potentially damaging water levels):</p> <ul style="list-style-type: none"> <li>• Freshwater floods (due to rain) upstream</li> <li>• Tidal</li> <li>• Poor drainage infrastructure</li> </ul>	<p>Freshwater flooding may occur due to: heavy rain in the upstream/catchment areas of SW region, lack of drainage infrastructure and high tidal flow.</p>
<p><b>Industrialisation:</b></p> <ul style="list-style-type: none"> <li>• Power generation – oil, gas, coal</li> <li>• Pipelines</li> <li>• Petroleum</li> <li>• Cement</li> <li>• Special economic zones</li> </ul>	<p>Industrialization of the inland parts of SW region can create air &amp; water pollution as well as other potential impacts on biodiversity &amp; livelihoods of the region.</p>
<p><b>Urbanisation</b></p>	<p>Rapid urbanization in the 14 districts of SW region as well as in the environmentally critical area around The Sundarbans can affect the extent of air &amp; water pollution and agricultural productivity etc.</p>
<p><b>Land use changes</b></p>	<p>Land use changes north of The Sundarbans are arising due to population &amp; economic growth of SW region, e.g. shrimp cultivation, infrastructures &amp; urbanization, etc. Impacts of this include loss of biodiversity, reduced soil productivity and loss of livelihood opportunities</p>
<p><b>Sensitive areas</b> (eg baors, protected areas)</p>	<ul style="list-style-type: none"> <li>• Failure of parts of the polder system has created permanent water-logged areas around Jessore, Khulna and Satkhira;</li> <li>• Peat soil in areas around Gopalganj and Khulnal are used as fuel resulting in increased carbon emissions, air pollution (smoke) and land subsidence.</li> <li>• Protected areas of SW region are facing habitat degradation &amp; biodiversity loss.</li> </ul>
<p><b>Socio-economic issue</b></p>	<p><b>Comment</b></p>
<p><b>Livelihoods:</b></p> <ul style="list-style-type: none"> <li>• Conflicts between economic sectors</li> <li>• Access to resources (eg in Sundarbans)</li> <li>• Salinity</li> </ul>	<ul style="list-style-type: none"> <li>• Salinity intrusion causes conflicts, eg: shrimp cultivators vs crop producers; powerful/rich land controller's vs the powerless, smallholder and marginalized people, etc.</li> <li>• Access by forest-dependent people to forest resources (and thus their livelihood options) is frequently limited by official institutional controls and where resources are controlled by rich/powerful groups.</li> <li>• Causes health problems (eg skin conditions), reduces drinking water quality – impairing people's ability to work, and affects crop production, etc.</li> </ul>
<p><b>Out-migration</b></p>	<p>Both involuntary and economic out-migration (mainly poor people) is common in SW region, especially from coastal areas. Much is driven by disasters, indebtedness, dispossession/land grabbing, lack of livelihood options, etc. Poor people move to unhealthy urban slums and become further marginalised in an unfamiliar and uneven</p>

	job market. Some educated people move to urban areas /overseas for employment. Migrant remittances can supplement family incomes, especially helpful after disasters.
<p><b>Health &amp; sanitation:</b></p> <ul style="list-style-type: none"> <li>• Water-borne, respiratory &amp; salinity-related diseases</li> <li>• Diet</li> <li>• Inadequate health facilities and access</li> <li>• Arsenic contamination (of drinking water &amp; irrigated rice)</li> </ul>	<ul style="list-style-type: none"> <li>• Local people, especially children and elderly people, are particularly susceptible to water-borne, respiratory and salinity-related skin diseases</li> <li>• Poor diet causes malnutrition.</li> <li>• Health service providers are based in city/urban and peri-urban areas. They are not easily accessible by people and/or emergency patients living in remote areas, due to poor communication networks</li> <li>• Lack of public toilets in urban and semi urban areas. As a result, local people, especially women face problems during public gatherings and at local markets.</li> <li>• This is a serious issue in parts of the Ganges River floodplain and the northern part of the tidal floodplain.</li> </ul>
<b>Gender-related issues</b>	Women face socio-political exclusion in decision-making processes - both in the home and society. They also bear a heavy burden for collecting potable water, fuelwood (from the Sundarbans and adjacent areas), etc. Women often encounter security problem while travelling alone to/from remote areas.
<p><b>Education:</b></p> <ul style="list-style-type: none"> <li>• Low environmental awareness</li> <li>• High male dropout</li> </ul>	<ul style="list-style-type: none"> <li>• Males from poor households need to support family income, resulting in high drop out and/or lower attendance at school.</li> <li>• Poor communication network in the rural area often discourages school attendance.</li> </ul>
<b>Loss of traditional knowledge</b>	Technological advancement & other development activities may be causing loss of traditional knowledge.
<b>Loss of cultural heritage</b>	Lack of proper maintenance & negligence due to low revenue return, inadequate budget allocation, etc.
<b>Security – kidnapping of fishermen</b>	Kidnapping of forest produce extractors for ransom is an important issue for the management of the Sundarbans
<b>Seasonal tourism</b>	Uncontrolled tourism causes loss of biodiversity, disruptive noise and water pollution etc.
<p><b>Illegal activities:</b></p> <ul style="list-style-type: none"> <li>• Poaching and hunting</li> <li>• Logging</li> <li>• Poison fishing</li> <li>• Illegal tree cutting</li> <li>• Trafficking of wildlife products</li> <li>• Corruption</li> </ul>	These issue are of major concern in the Surdarbans, causing loss of habitat and biodiversity (terrestrial & aquatic) & economic loss for communities.
<b>Institutional issues</b>	Lack of manpower, capacity development & logistics are major institutional issues – impeding environmental management (In general) and overall management of the Sundarbans.

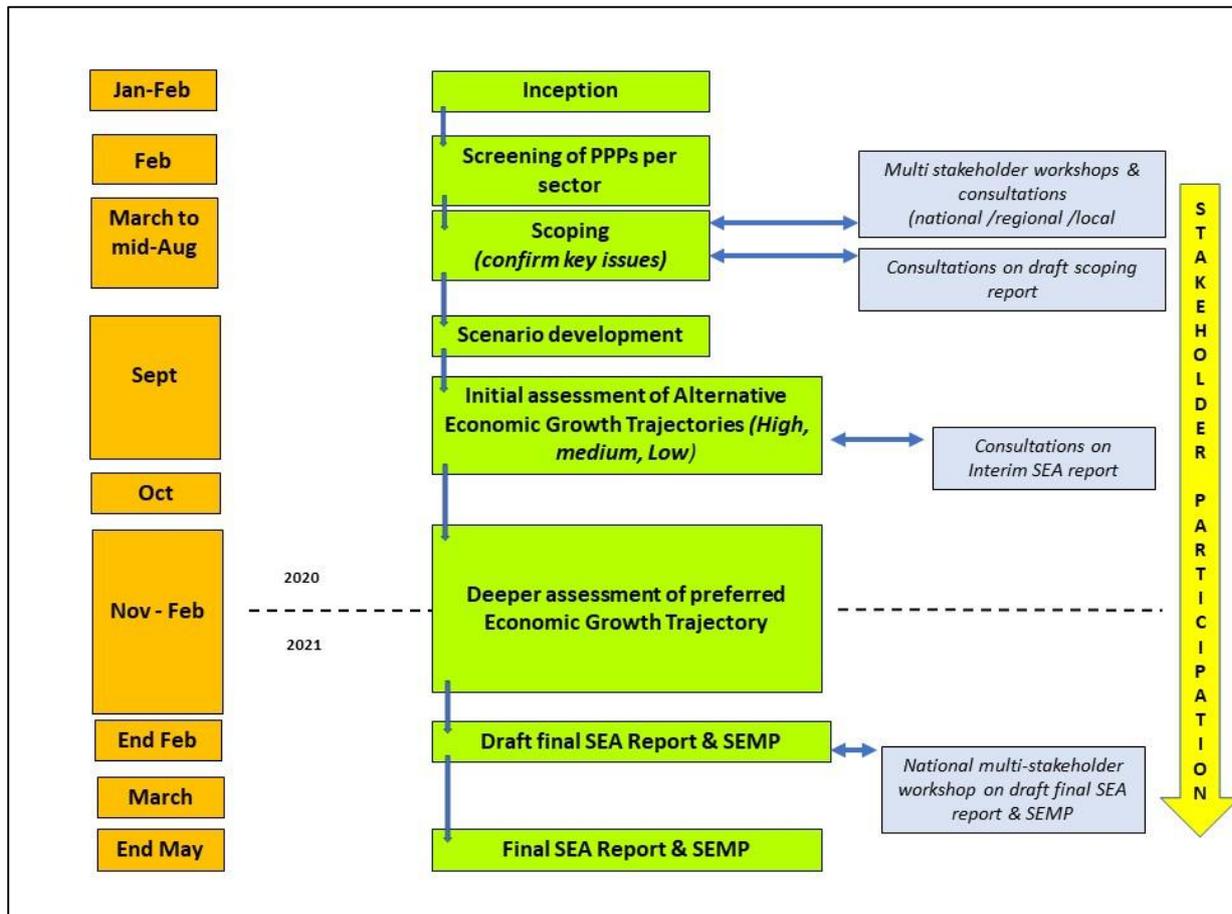
## 6. Steps in the SEA process

The SEA will follow international principles for good practice in SEA as contained in the SEA Guidance of the Development Assistance Committee of the Organisation for Economic Cooperation and Development. It will also be undertaken in accordance with the eight UNESCO World Heritage Impact Assessment Principles. In these regards, the SEA will be conducted through the a sequence of phases as shown in Table 3. And summarised in Figure 5.

**Table 3. Schedule for SEA process**

<b>Phase</b>	<b>Description</b>	<b>Date</b>
1	<b><i>Inception</i></b>	January-February 2020
2	<b><i>Screening</i></b> Identify those policies, plans & programmes likely to have significant environmental and socio-economic impacts to be included in the SEA	Mid-February to mid-March 2020
3	<b><i>Scoping</i></b> a. Gather baseline information/data b. Prepare baseline environmental and socio-economic profile (current status of key themes/factors, trends, etc). c. Stakeholder analysis and start stakeholder engagement (consultations at national, regional and local levels. d. Review policies, plans & programmes & identify environmental/social objectives. e. Draft scoping report f. Public comment on draft scoping report g. Final scoping report	March to mid-August 2020  By end July 2020) By end July 2020). By mid-August 2020
4	<b><i>Main assessment</i></b>  a. Development of future scenarios – to inform assessment process b. Initial assessment impacts of alternatives (eg high, medium & low economic growth trajectories) c. Interim SEA report d. Circulate interim SEA report for open comment e. Deeper assessment (of impacts) of preferred alternative	Mid-August 2020 to mid-February 2021  September 2020  Mid-August to October 2020  By end September 2020 Comments by end October November 2020 to mid-February 2021
5	<b><i>Draft SEA report and draft SEMP</i></b>	By end February 2021
6.	<b><i>Review</i></b> – of draft SEA and SEMP a. National multi-stakeholder review workshop	Mid-March 2021
7.	<b><i>Finalisation of SEA Report and SEMP</i></b>	By end May 2021
8.	<b><i>Monitoring and evaluation of PPPs</i></b>	Ongoing

Figure 5: Steps in the SEA process



## 7. Stakeholder engagement and communication

A major internationally accepted principle of good practice in SEA is that there should be effective participation of all relevant stakeholder throughout all key steps of the process. To this end, during the inception phase, stakeholder analysis will be undertaken to identify all key stakeholders from government, the private sector, civil society, NGOs/civil society organisations and others – at national, regional and local levels, and those concerned with transboundary issues



Smallholder farmer meeting

A stakeholder strategy will be developed for engagement and communicate with stakeholders. It is planned to organise multi-stakeholder workshops at national and regional levels at key stages of the SEA process. During scoping, semi-structured interviews will be carried out with key informants and random informal interviews will be undertaken in the field, Consultative workshops will be organised in all districts and in selected upazilas. Focus sessions will be arranged for particular occupational groups (eg fisherfolk, farmers, urban dwellers, marginalised groups). Special meetings will be arranged for women, where appropriate.

The SEA will be conducted in an open and transparent way with information about the process and emerging results (including draft and final reports) provided on a website. Newsletters (including in local language) will be produced and information circulated through the media (newspapers and radio).

The final reports will be issued in both English and local language.

## 8. The SEA team members

The team conducting the SEA comprises a mix of international and national experts (Table 4).

**Table 4: SEA team members**

Name	Role / expertise	Organisation
Mr Zaheer Iqbal	SEA Project Director	Bangladesh Forest Department
Prof (Dr) Barry Dalal-Clayton	Team Leader / Environment / SEA	Integra / EDS International
Zahir Uddin Ahmed	Deputy Team Leader / EIA / Natural Resource Management	CEGIS
Dr Jean-Roger Mercier	Environmental assessment	Integra
Dr Vladislav Bizek	Environmental modelling	Integra
Dr Mohammad Zashim Uddin	Botanist	CEGIS / University of Dhaka
Dr Mahmood Hossain	Mangrove ecologist	CEGIS / Khulna University
Mohammad Abdur Rashid	Agronomist	CEGIS
Mushfiq Ahmed	Wildlife / Project leader	CEGIS
Dr Manimul Haque Sarker	River morphology	CEGIS
Apurba Kumar Sarker	Economist	CEGIS
Dr Dilruba Ahmed	Sociologist / Anthropologist	CEGIS
Mohammed Mukteruzzaman	Fisheries	CEGUS
H M Nurul Islam	Water quality / pollution	CEGIS
Dr Md Shibly Sadik	Noise pollution	CEGIS
Md Tariqul Islam	Forest management	CEGIS / consultant
Moinul Hossain	Transport	CEGIS / Islamic University of Technology
Md Ali Kabir Haider	Tourism	CEGIS
Dr Chowdhury Saleh Ahmed	Policy & institutions	CEGIS
Jalal Ahmed Choudhury	Power & energy	CEGIS
Md Shahidul Islam	Land use	CEGIS
Buiya Md Tarmin Al Hossain	Hydrodynamic modelling / hydrology	CEGIS
Capt Md Sayedul Hoque Khan	Water navigation	CEGIS / consultant
Kazi Kamrul Hassan	Environment	CEGIS
Kushal Roy	Climate change	CEGIS / consultant
Dr Kazi M Noor Newaz	Biodiversity	CEGIS
Pronab Kumar Halder	Air pollution	CEGIS
Abdul Hamid Farhar Sikdar	Soil salinity	CEGIS

Sudipta Kumar Hore	River morphology	CEGIS
Sarazina Mumu	Urbanisation / land use change	CEGIS
Md Saidur Rahman	Land use change / habitat degradation & loss	CEGIS
Tanvir Ahmed	Flooding – effects on livelihoods & property	CEGIS
Gazi Md Riasat Amin	Flooding - effects on livelihoods & property	CEGIS
Md Monowar-ul Haq	Climate change & drainage	CEGIS
Md Shifuddin Mahmud	Livelihoods, out-migration, education, loss of traditional knowledge	CEGIS
Motaleb Hossain Sarker	Health & sanitation	CEGIS
Rakshanda Mabin	Tourism	CEGIS
Mir Sajjad Hossain	Transboundary issues (water pollution, tiger migration), Ganga water flow & extraction, air pollution, pirating	CEGIS
Md Amanat Ullah	Ecology of sensitive areas (baors and inundated areas)	CEGIS

## 7. Contact the SEA Team

The SEA team is keen to hear from anyone with information, views and suggestion about:

- Key issues in the SW region that the SEA should address (environmental, social, economic, other), particularly those that affect the Sundarbans.
- Major current and planned developments and large (mega) projects in SW region.
- Key plans for SW region.
- Major past studies that provide useful information for the SEA.
- Available information and data; and who can provide it.
- Your interest to engage further in the SEA.

If you wish to contact the team, please get in touch with:

### ***Md. Zaheer Iqbal***

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