Loan No. 3045-BAN-OCR

Public-Private Infrastructure Development Facility-II

ANNUAL ENVIRONMENTAL AND SOCIAL COMPLIANCE AUDIT REPORT

55 MW Summit Narayanganj Power Unit-2 Project at Narayanagnj, Bangladesh

Summit Narayanganj Power Unit-2 Limited

February, 2019

Prepared by

INFRASTRUCTURE DEVELOPMENT COMPANY LIMITED

DHAKA, BANGLADESH

www.idcol.org

TABLE OF CONTENTS

Executive Summary…..……..……..……..6

1. Introduction……..……..……..……..7

1.1 Project proponent……..……..……..……..……..……7

1.2 Area and location of the project……..……..……..……..……..……7

1.3 Brief description of the project……..……..……..……..…..…8

1.4 Objectives of environmental and social compliance audit……..……..……..……..……9

1.5 Methodology ….……..……..……..……..……9

1.6 Reporting period……..……..……..……..……..9

1.7 Changes in project scope……..……..……..……..9

1.8 Environmental monitoring ……..……..……..……..9

2. Regulatory Requirements……..10

2.1 ECR, 1997 of Bangladesh Government……..… 10

2.2 SPS, 2009 of Asian Development Bank……..……..……..……10

2.3 ESSF of IDCOL……..……10

3. Implementation of Environmental Safeguards……11

3.1 Compliance with ECR, 1997……..……..……..……11

3.2 Compliance with EMP……..……11

3.3 Compliance with ADB requirement……..……..…16

4. Implementation of Social Safeguards……..……..…17

4.1 Impact on resettlement and livelihood ……..……17

4.2 Institutional arrangement for social safeguards ……..……..17

4.3 Grievance redress mechanism…… ……..……..17

4.4 Impact on indigenous people…….. ……..……..17

4.5 Child labour……..……..……..……17

4.6 Public consultation and disclosure of information ……..……..……19

4.7 Enhancement ……..……..……19

5. Corrective Action Plan ……..……..……..……..20

6. Conclusion……..……..……..……..…21

Annexure

Annex-1: Renewal of Environmental Clearance Certificate……...……...22

Annex-2: Location of the project site……...……23

Annex-3: Project risk rating checklist of ESSF, IDCOL……24

Annex-4: PPE arrangement……...……25

Annex-5: Fire fighting arrangement……...26

Annex-6: Application of signage……27

Annex-7: Current status of project (external view)..……...…28

Annex-8: Current status of project (internal view)……..29

Annex-9: Effluent treatment plant……..30

Annex-10: House- keeping ……31

Annex-11: Landscape……..32

Annex-12: Stakeholder consultation by IDCOL Official……...……33

List of Abbreviations

ADB	Asian Development Bank
DOE	Department of Environment
ECR	Environment Conservation Rules
EHS	Environment and Health Safety
EMP	Environmental Management Plan
ERP	Emergency Response Plan
FGD	Focus Group Discussion
IDCOL	Infrastructure Development Company Limited
IEE	Initial Environmental Examination
PPE	Personal Protective Equipment
SNPL-2	Summit Narayanganj Power Unit-2 Limited
SPS	Safeguards Policy Statement

List of Tables

Table 1.1: Key project information……...……..……..……..…..…..……...7

Table 1.2: Project site surrounding feature……..……..……..…..…..……7

Table 1.3: List of major machineries…...……..……..…..……..…..……8

Table 3.1: Compliance with ECR, 1997……..……..…… ……..……...…11

Table 3.2: Response of SNPL-2 on project activities and mitigation measures during operation…….12

Table 3.3: Monitoring parameters and frequency ……..……..……..…14

Table 3.4: Ambient air quality at project site ……..……..……14

Table 3.5: Ambient noise level at project site ……...……..……15

Table 3.6: Surface water quality at project site ……..……...……..…..…15

Table 3.7: Compliance with important EHS aspects during operation……..……..……16

EXECUTIVE SUMMARY

Background

Summit Narayanganj Power Unit -2 Limited (SNPL-2) has been awarded, through a competitive bidding process, to develop and operate an independent power plant project with capacity of 55 MW at Modonganj, Bandar of Narayanganj District. For financial assistance SNPL-2 has approached Infrastructure Development Company Limited (IDCOL), along with other lenders. Considering the importance of the project to meet the national power demand, IDCOL has provided a term loan facility of USD 15 million in favour of the project. IDCOL has sourced the required financing from the fund allocated as ordinary capital resources (OCR) for large infrastructure projects under Public-Private Infrastructure Development Facility (PPIDF)-2 of Asian Development Bank (ADB).

According to the Environment Conservation Rules (ECR), 1997 of Bangladesh Government, industrial projects have been categorized into four classes—Green, Orange A, Orange B and Red. Considering the magnitude of environmental impacts, power plant project has been classified as Red Category. Hence, SNPL-2 project has fallen into the Red category. Given the environmental impacts of the SNPL-2 project are mostly site specific, ADB has categorized the project as **B** as per ADB guidelines. Due to the absence of any indigenous habitat in the project area, the project has been categorised as **C** from indigenous peoples (IP) perspective. But as there were no issues in relevant to involuntary resettlement or adversely affecting livelihood, the project has been categorised as **C** from involuntary resettlement (IR) perspective. In addition, IDCOL has adopted an Environmental and Social Safeguards Framework (ESSF). According to this ESSF, the proposed project of SNPL-2 seems to be a **High Risk** project requiring detail environmental impact assessment.

Bangladesh Centre for Advanced Studies (BCAS) being engaged by SNPL-2 as Environmental Consultant, has conducted the detail environmental impact assessment and prepared the Initial Environmental Examination (IEE) Report based on the guidelines of Department of Environment (DOE), Government of Bangladesh (GOB) and Asian Development Bank's (ADB's) Safeguard Policy Statement (SPS), 2009. In addition, as there was a plan to seek investment of International Finance Corporation (IFC), SNPL-2 has also complied with the respective IFC EHS guidelines (general and sector specific).

To assess the actual implementation of environmental management plan and social safeguards, respective IDCOL official visited the project site during construction and operation phases. According to the IEE, there is requirement of IDCOL to submit annual Environmental and Social Compliance Audit Report of this project to ADB. Accordingly, this audit report has been prepared by IDCOL.

Audit overview and findings

The respective IDCOL official has visited the project during the audit period (January 2018 to December 2018). He has also reviewed the available relevant documents and clearances. In addition, there was consultation with representatives of adjacent neighborhood. During audit, the commitment of SNPL-2 to comply with environmental and social safeguards have been found as satisfactory.

1.0 INTRODUCTION

1.1 PROJECT PROPONENT

The project involves development and operation of a 55 MW HFO based power plant at Modonganj, Bandar, Narayanganj by Summit Narayanganj Power Unit-2 Limited (SNPL-2). SNPL-2 is a special purpose vehicle of well-known entrepreneur named Summit Group. The generated electricity from the project will be sold to Bangladesh Power Development Board (BPDB) under a 15-year Power Purchase Agreement (PPA). Table 1.1 shows key project information.

Table 1.1: Key project information

Project Company	Summit Narayanganj Power Unit-2 Limited (SNPL-2)
Project Location	Modonganj, Bondor, Narayanganj
Plant capacity	55 MW
Raw material	HFO
Source of raw material	Import
Required quantity	111600MT/year
Water requirement	40 m^3/hr
Water source	Deep tubewell
Land Area	2.2 acres
Project Tenure	15 Years
Project Type	Independent Power Producer

1.2 AREA AND LOCATION OF THE PROJECT

It is alaready stated that the power plant is located at Modonganj, Bondor, Narayanganj in Bangladesh. The project site is of a 2.2 acres, which is purchased land of the project sponsor. The site is situated in the north-eastern side of Dhaka-Chittagong Highway and at a distance of 11 kilometer. The present location is at a distance of 1.5 kilometer from the Bondor Upazilla, Narayanganj, which is north-east to the proposed site. The place is known as Modonganj. The site is adjacent to existing pucca road of 12 feet, which connects this side of Modonganj village, Bondor Upazilla, Narayanganj. The site is also adjacent to Sitalakkhya River.

Table 1.2: Project site surrounding feature

Location	Land type	Coordinate point	Coordinate
North	Settlement and open space	NE Corner	23^0 59' 01.37" N 90^0 51' 36.47" E
South	Basundhara Cement	SW Corner	23^0 59' 09.54" N 90^0 51' 53.99" E
East	Road and market	SE Corner	23^0 59' 07.34" N 90^0 51' 60.95" E
West	Sitalakha River	NW Corner	23^0 58'97.99" N 90^0 51' 38.46" E

1.3 BRIEF DESCRIPTION OF THE PROJECT

The power plant uses HFO as fuel. The Project comprises four (4)numbers of Wartsila made of which 3 x 18V46 GD engines and 1 x 12V46 GD engine, each coupled with ABB made AMG 1121 0M (or equivalent) of 17.076 MVA (21345 KVA) Generators. Electrical power is generated from 3 engines is 64035 MW and 14230 MW from the other. The engine is the four strokes, lean burn, prechamber, spark ignited, port injected, trunk piston, turbocharged and intercooled design. The engine has a fully microprocessor based control system.

The generated electricity is being transmitted through the nearby Dhaka Power Distribution Company (DPDC) sub-station. The interconnection line has been handed over to DPDC after commissioning and subsequently, DPDC operates and maintains the equipment of the bay. SNPL-2 has installed, operates and maintains separate 230 kV synchronizing breaker at the high voltage side of the step-up transformer and also construct the connecting lines for connection as mentioned above. The 600 meter underground interconnection transmission line has been taken from the pant to DPDC substation along the road for which permission from the City Corporation was obtained by SNPL-2.

Table 1.3: List of major machineries

Component	Manufacturer/ Country	Model / type
Reciprocating Engine	WARTSILA / FINLAND	14G46
Generator	ABB / GERMANY (or equivalent)	AMG 1121 M
Control system	WARTSILA / FINLAND	WOIS

1.4 OBJECTIVES OF THE ENVIRONMENTAL AND SOCIAL COMPLIANCE AUDIT

The audit has been conducted with the aim to assess the project's compliance with-

(i) Environment Conservation Rules (ECR)1997 of GOB;

(ii) Environmental and social safeguards according to the Environmental and Social Safeguards Framework (ESSF) of IDCOL;

(iii) Environmental and social safeguards according the Safeguards Policy Statement (SPS), 2009 and other relevant standards and guidelines of the ADB;

(iv) Proposed mitigation measures and monitoring procedures according to the environmental management plan (EMP), resettlement action plan (RAP) as are applicable.

1.5 METHODOLOGY

The audit includes the following steps:

(i) visit the project site and consult with stakeholders especially local people;

(ii) review the environmental and social safeguards documents including environmental impact assessment report, EMP and and so on (as are relevant) ;

(iii) assess actual implementation of the guidelines/action plan of the safeguard related documents.

1.6 REPORTING PERIOD

The reporting period of this Environmental and Social Compliance Audit Report is January 2018 to December 2018.

1.7 CHANGES IN PROJECT SCOPE

There is no change in the technology and operational process as have been declared by the respective government and accepted by SNPL-2. So, it can be said that the Environmental Management Plan (EMP) of ADB approved Initial Environmental Examination (IEE) is fully applicable during the reporting period as well.

1.8 ENVIRONMENTAL MONITORING

The parameter, frequency and methodology of environmental monitoring are in accordance with EMP of ADB approved IEE, as has been detailed in chapter 3 of this audit report.

2.0 REGULATORY REQUIREMENTS

2.1 ENVIRONMENT CONSERVATION RULES, 1997 OF BANGLADESH

The project has to comply with the Environment Conservation Rules (ECR), 1997. According to the categorization of ECR, 1997, the project has been categorised as **Red**[1] meaning that it has significant adverse environmental impacts, which are to be mitigated with proper mitigation measures.

2.2 ENVIRONMENTAL AND SOCIAL COMPLIANCE RELATED STANDARDS AND GUIDELINES OF ASIAN DEVELOPMENT BANK

The project has to be complied with Safeguards Policy Statement (SPS), 2009 of ADB in regard of environmental and social (E&S) compliances. Considering the adversity of environmental impacts, it has been categorized as **B** from environmental safeguard point of view. Accordingly an IEE has been prepared, which is already approved by the ADB. As no record of any indigenous habitat has been found at Modonganj, Narayanaganj, the project has been categorised as **C** in respect of Indigenous People (IP).And as there is neither any issue of involuntary resettlement nor adversely affecting livelihood of any community or person, the project has been categorised as **C** in repest of Involuntary Resettlement (IR) issue.

2.3 ENVIRONMENTAL AND SOCIAL SAFEGUARDS FRAMEWORK OF IDCOL

IDCOL has adopted an Environmental and Social Safeguards Framework (ESSF) in 2011, which is to be complied with all infrastructure projects as are to be funded IDCOL. According to the environmental categorization of ESSF, the project has been categorised as **High Risk**[2] project requiring significant compliance safeguards including comprehensive environmental impact assessment and regular monitoring. In consideration of social categorization, the project has been categorised as **Low Risk** in consideration of social safeguards as there is neither issue of indigenous people nor involuntary resettlement..

[1] Schedule-1 of ECR (project no. 6 of Red category), 1997

[2] The project risk screening checklist of ESSF, IDCOL is provided in Annex-3

3.0 IMPLEMENTATION OF ENVIRONMENTAL SAFEGUARDS

3.1 COMPLIANCE WITH ENVIRONMENT CONSERVATION RULES, 1997

SNPL-2 has to comply with the requirement of ECR, 1997 of the DOE. In the following Table 3.1, the compliance status of REPL, in regard of major milestones of ECR, 1997 is depicted. The renewal copy of Environmental Clearance Certificate is provided in Annex-1.

Table 3.1: Compliance with the requirement of ECR, 1997

Basic Requirement	Compliance Status
Award Site Clearance Certificate	Fully complied
Award EIA approval	Fully complied
Award Environmental Clearance Certificate	Fully complied
Renewal of Environmental Clearance Certificate	Fully complied

3.2 COMPLIANCE WITH ENVIRONMENTAL MANAGEMENT PLAN

a. Institutional arrangement

To ensure satisfactory EHS compliance, SNPL-2 has already appointed Mr. Md. Abu Sufian as Assistant Deputy Manager (HSE). He is cooperated by Mr. Hafiz Al Atick, who is serving as Assistant General Manager.

b. Compliance status

In the IEE, a number of activities having potential adverse environment impacts and occupational health safety aspects during operation phase have been identified. In the following Table 3.2, suitable mitigation measures to address these impacts according to the EMP and actual responses by SNPL-2 has been discussed.

Table 3.2: Response of SNPL-2 on project activities and mitigation measures during operation phase

Project Activity	Potential Impacts	Mitigation Measures	Actual Implementation	Compliance status
Air emission, noise generation	Emission from the power plant	▪ Install stack emission monitoring equipment for major pollutants; ▪ Plant indigenous trees around the Project site	Trees have been planted and quarterly air quality is monitored	Fully complied
	Generation of noise from generators and associated sub-stations , which could exceed 70 dB(A) at site boundary	▪ Locate facility 70–100 m from nearest receptor; ▪ Use walls, fencing, and/or greenbelt to provide partial noise barrier; ▪ Provision of critical silencers or generators (if need arises); ▪ Use of ear-muffs and ear-plugs by plant personnel working in the generator and turbine facilities of the plant.	Through using new generators and ensuring proper application of walls, fencing and green belt, noise level is within the acceptable limit.	Fully complied
	Suspended particulate matter (SPM) and $PM_{2.5}$, PM_{10}, NOx, CO, VOC generation from the engine, which can adversely affect health	▪ Good combustion control, required stack height should also be maintained properly .	45m high stack has been introduced, which has sufficiently addressed the air emission including SPM and others.	Fully complied
Occupational Health and safety	Solid wastes	▪ Apply the waste hierarchy and reduce, reuse or recycle wastes wherever possible; ▪ Segregate wastes by types and provide appropriate waste containers for the storage of all waste streams.	Proper waste management has been observed, which includes segregation of wastes at source.	Fully complied
	Hazardous Materials Management	▪ Refueling, washing and maintenance of plant and vehicles will be prohibited in the vicinity of water bodies; ▪ Spill kits will be available to contain any accidental release of hazardous materials; ▪ All hazardous materials will be provided with secondary containment.	Spill kits were found to wash with due attention.	Fully complied
	Application of PPE	▪ Ensure satisfactory PPE for workers, officials and visitors	There are satisfactory use of PPE	Fully complied

Project Activity	Potential Impacts	Mitigation Measures	Actual Implementation	Compliance status
Disaster Management, Fires, explosion and other accidents	Emergency Response (i.e. Fire, Earthquake, Flood etc.)	▪ Use of personal protective equipment during operation and maintenance; ▪ Prepare and implement safety and emergency manual; ▪ Regular inspection of lines for faults prone to accidents; ▪ Provision of fire protection equipment; ▪ Provision of Lightening arrestors.	There are application of different types of fire extinguishers, fire hydrant and regular training arrangement	Fully complied
Domestic wastewater, sewage and sanitary waste	BOD, fecal coliform contamination in groundwater and surface water	▪ Need to provide septic tank with soak pit for treatment of sewage; ▪ Provision of an appropriate number of toilets and hand-washing points; ▪ Provision of on-site treatment of sanitary wastes; ▪ Training on sanitation practices.	There is adequate number of toilets with septic tank facility.	Fully complied
Wastes oil from Plant *(scrap metal, waste, lube oils, spill oil etc)*	Potential soil and groundwater contamination	▪ Secure on-site storage, waste sell to the DOE authorized vendor for discharge in a safe place.	The waste lube oil and spill oil are sold to DOE authorized vendor.	Fully complied
Public Relations & Stakeholder Engagement	Emergence of grievance	▪ Conduct proactive public relations (PR) exercises consisting of news/information dissemination to increase understanding of the project.	SNPL-2 communicates with society	Fully complied

c. Environmental monitoring

I. Technical approach of environmental monitoring

In the EMP of the IEE, environmental monitoring has been required during operation phase. The air, water and noise quality monitoring schedule are depicted in Table 3.3.

Table 3.3: Monitoring parameters and frequency of monitoring during operation phase

Key parameters to be monitored: (1) Ambient Air Quality		
location	**frequency**	**parameter**
At Project site, residential /institutional /commercial areas within 500m outside from plant boundary.	Quarterly (routine) analysis	SPM, SOx, NOx
Key parameters to be monitored: (2a) Surface Water		
location	**frequency**	**parameter**
Project site at Modonganj	Bi-annual basis in each year (pre-monsoon and post-monsoon)	pH, Temperature, DO, BOD, COD, TDS, Oil and grease
Key parameters to be monitored: (2b) Ground Water		
location	**frequency**	**parameter**
Project site at Modonganj	Bi-annual basis in every year (pre-monsoon and post-monsoon)	pH, Temperature, DO, BOD, COD, TDS, Oil and grease
Key parameters to be monitored: (3) Noise		
location	**frequency**	**parameter**
At four corners of Project boundary	Quarterly (routine) analysis	Limits in dBA

Table 3.4: Ambient air quality at project site

Location	**14 March 2018**			**21 October 2018**		
	SPM ($\mu g/m^3$)	**SOx ($\mu g/m^3$)**	**NOx ($\mu g/m^3$)**	**SPM ($\mu g/m^3$)**	**SOx ($\mu g/m^3$)**	**NOx ($\mu g/m^3$)**
At project site	157	33	45	188	37	42
Standard of DOE	200	365	100	200	365	100

Source : SNPL-2

Table 3.5: Ambient noise level at project site

Location	15 March 2018		26 December 2018	
	Day (6.00 am to 9.00 pm)	Night (9.00 pm to 6.00 am)	Day (6.00 am to 9.00 pm)	Night (9.00 pm to 6.00 am)
Northern side of the plant	55	45	57	45
Southern side of the plant	60	46	69	64
Easrtern side of the plant	54	43	56	42
Western side of the plant	56	46	57	48
Standard of DOE[3]	75	70	75	70

Source : SNPL-2

Table 3.6: Surface water quality at project site

Parameter	3 March 2018	15 November 2018	DOE Standard
pH	7.34	7.34	6-9
Temperature	29^0C	25^0C	40^0C
BOD	20 mg/l	8.8 mg/l	50 mg/l
COD	45 mg/l	12.1 mg/l	200 mg/l
Oil and grease	1.0 mg/l	1.5 mg/l	10 mg/l

Source : SNPL-2

II. Result of environmental monitoring

During operation phase, the ambient air quality has been found to comply with the acceptable limit of DOE. The surface and ground water quality have been found to be within the limit of DOE. In addition, the noise level has also been found to be within the acceptable limit.

III. Disclosure of environmental monitoring

As disclosure of environmental monitoring, SNPL-2 has kept the copy monitoring result available at project site.

IV. Monitoring adjustment measure

As the result of air, water and noise level monitoring have been found to be within the acceptable limit, application of any adjaustyment/mitigation measure has been required.

[3] The project area has been considered as Industrial Zone based on landuse

3.3 COMPLIANCE WITH SAFEGUARDS POLICY STATEMENT, 2009 OF ADB

It is already said that the SNPL-2 project has to comply with the requirement of SPS, 2009 of ADB. Accordingly, the compliance of this project in regard of major EHS related requirement are mentioned in Table 3.7.

Table 3.7: Compliance with important EHS aspects during operation phase

ADB Requirements	Issue and Description of Observation	compliance Status
Environment Assessment requirements for various financing modalities	SNPL-2 has adopted an EHS Implementation Guidelines, which could be enhanced by incorporating the IFC EHS Guidelines (general and project specific) in a more structured manner.	Fully complied
Occupational and Community Health and safety	SNPL-2 has ensured the satisfactory application of PPE.	Fully complied
	There is satisfactory evidence of fire drill.	Fully complied
Biodiversity conservation and sustainable natural resource management	The activities in relevant to operation phase seems to be inadequate to adversely affect the biodiversity and natural resource management in the project area to a greater extent. But due to the long term operation of the project, there could be limited/minimal impact to the local biodiversity.	Fully complied
Pollution prevention and abatement	SNPL-2 has conducted air, water and noise quality monitoring.	Fully complied
	Spillage management process has been found as satisfactory.	Fully complied
Physical Cultural resources	Due to the unavailability of physical cultural resources within the range of close distance, the issue of adversely affecting the physical cultural property seems not to be relevant with the project.	Fully complied

4.0 IMPLEMENTATION OF SOCIAL SAFEGUARDS

4.1 IMPACT ON RESETTLEMENT OF THE PROJECT AFFECTED PEOPLE AND LIVELIHOOD

As the project site is a purchased land of SNPL-2 from private land-owners through willing seller-willing buyer arrangement, there is no issue of resettlement. There was no physical displacement or loss of structure of any project affected people due to the land purchase. So, the project has been categorized as **C** from Involuntary Resettlement (IR) perspective.

4.2 INSTITUTIONAL ARRANGEMENT ON SOCIAL SAFEGUARD

In addition of environmental safeguards, Mr. Abu Sufian is also in charge of complying social safeguards. He is supervised by Mr. Hafiz Al Atick who is serving as Plant Manager.

4.3 GRIEVANCE REDRESS MECHANISM

To redress the grievances, SNPL-2 has introduced Grievance Log Book. The Grievance Log Book is accessible for any internal or external stakeholder, who wants to place grievances in writing. But in case of confidentiality, there is an arrangement of Grievance Box, where anyone can place complain in a secret manner. SNPL-2 is committed to resolve any grievance within 15 days of receiving the grievance. Based on the discussion with SNPL-2 officials and adjacent community members, it has been concluded that during operation phase there no grievance has been emerged during audit period (January 2018 to December 2018).

4.4 IMPACT ON INDIGENOUS PEOPLE

Based on the primary observation during site visit and secondary sources including BBS[4] Census 2011, no habitat of any indigenous community has been reported at Garpara. So, the project has been categorized as **C** for Indigenous Peoples (IP) safeguards concluding that there is no issue about adversely affecting IP neither in construction phase nor in operation phase.

SNPL-2 has conveyed that they are gender and caste neutral. So, any qualified person coming from the indigenous community will be equally treated during the recruitment process, and will be given the same benefits as like as other personnel.

4.5 CHILD LABOUR

The Bangladesh Labour Act 2006 (Act XLII of 2006) also defines the “child” and the “adolescent” on the basis of age. As per section 2(8) of the Act, a person who has attained the age of 14 but below the age of 18 is considered to be an **adolescent** and as per section 2(63), a person not attaining the age of 14 is defined as a “child".

[4] BBS stands for Bangladesh Bureau of Statistics

According to The National Child Labour Elimination Policy 2010, following rights are to be complied with, in regard of addressing child labour Issue

- Employing children according to the age determined by the Acts and not to employ children below 14 years as a regular employee;
- Ensuring the children at domestic work not to perform any hazardous work and providing them with proper food and accommodation, education, recreation since they work full time; and
- Refraining child workers from physical, mental, sexual persecution and abuse.

SNPL-2 has been found to be careful about the child labour issue. So, neither in construction phase nor in operation phase, no child has been found to be engaged in the project activities.

4.6 PUBLIC CONSULTATION AND DISCLOSURE OF INFORMATION

I. Public Consultation and major findings

As part of environmental and social compliance, the respective official of IDCOL consulted with local respondents for a number of occasions during the reporting period. Some photographs of consultation have been provided in Annex-13.

The major findings of public consultation are as follows:

- local people do not have specific concern about project-personnel or project activity.
- they are pleased with the measures of SNPL-2 to mitigate noise issue

II. Response from SNPL-2

In response, the SNPL-2 official has ensured that they are considering the noise issue with due importance.

III. Disclosure

SNPL-2 may think for more structured approach to disclose the grievance redress aspects, results of environmental monitoring and any other issue (as seems relevant during operation phase).

4.7 ENHANCEMENT

SNPL-2 acknowledges the importance of satisfactory relationship to adjacent communities. Accordingly, it has extended various types of cooperation such as:

- monetary support to adjacent religious and academic institutions
- funding support for medical-treatment

5.0 CORRECTIVE ACTION PLAN

SNPL-2 has been found to properly comply with the EMP. They have been found to maintain the required mitigation measures to address the potential impacts including noise and air pollution. From social safeguard perspective, it has been found that there is no significant grievance neither from any internal stakeholder nor from any external stakeholder. In addition, SNPL-2 has been found to extend various types of social welfare services to the communities.

6.0 CONCLUSION

Based on the findings of environmental and social compliance audit, it can be concluded that SNPL-2 has been found to satisfactorily complying with environmental and social safeguards.

Annex 1: Renewal of Environmental Clearance Certificate

গণপ্রজাতন্ত্রী বাংলাদেশ সরকার
পরিবেশ অধিদপ্তর
নারায়ণগঞ্জ জেলা কার্যালয়
মা আমেনা স্বপ্ন টাওয়ার (চতুর্থ তলা), পূর্ব লামাপাড়া , ফতুল্লা, নারায়ণগঞ্জ
www.doe.gov.bd

ছাড়পত্র নবায়ন

ছাড়পত্র নং: ১৮-০২৩৯০

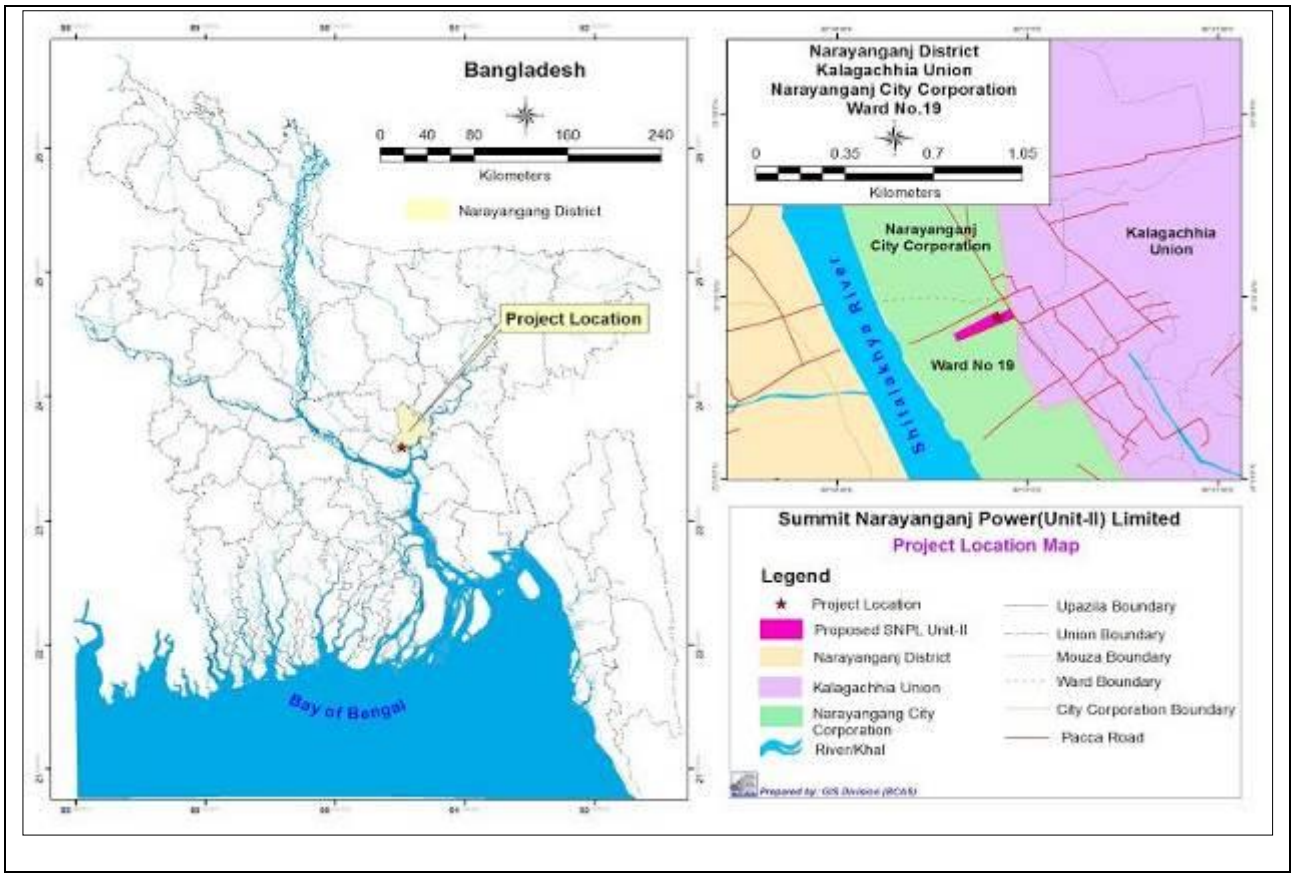
পরিবেশগত ব্যবস্থাপনা নিশ্চিতকরণ সাপেক্ষে সংযুক্ত শর্তে নিম্নবর্ণিত প্রতিষ্ঠান/প্রকল্পের অনুকূলে ছাড়পত্র নবায়ন প্রদান করা হলো :

প্রতিষ্ঠান/প্রকল্পের নাম	:	Summit Narayanganj Power Unit-II Limited
উদ্যোক্তার নাম	:	Lt. Gen. M A Wadud
সনাক্তকরণ নং	:	৪৯৭৫০
প্রতিষ্ঠান/প্রকল্পের কার্যক্রম	:	Power plant
প্রতিষ্ঠান/প্রকল্পের শ্রেণী	:	Red
প্রতিষ্ঠান/প্রকল্পের ঠিকানা	:	Summit Centre 18, Kawran Bazar C/A Dhaka-1215 Phone-9137485-6,Bandar,Narayanganj
প্রদানের তারিখ	:	১১ মার্চ ২০১৮
মেয়াদ উত্তীর্ণের তারিখ	:	১৩ মার্চ ২০১৯

এ ছাড়পত্র সনদের সাথে পৃথকভাবে সংযুক্ত প্রদত্ত শর্তাবলী যথাযথভাবে প্রতিপালন করতে হবে, অন্যথায় ছাড়পত্র বাতিল/ক্ষতিপূরণ আদায়সহ যে কোন আইনানুগ ব্যবস্থা গ্রহণ করা হবে।

বিঃদ্রঃ এটি একটি সিস্টেম জেনারেটেড ছাড়পত্র এবং এতে কোনোরূপ স্বাক্ষরের প্রয়োজন নেই।

Annex 2: Location of the project site



Annex 3: Project risk screening checklist of ESSF, IDCOL

Sl. no	Environmental and social risks rating criteria	Response		Remarks
		Yes	No	
01	For new projects, does the project have any pending compliance such as Location and Environmental Clearance based on its category (Red, Orange-A, Orange-B and Green), from the DOE?			
02	Is the project located in the immediate vicinity (likely to adverse impact) of environmentally critical areas (national wetlands, wildlife habitats, important bird areas, and protected areas)			
03	Does the project construction and/or operation lead to environmental impacts that are diverse, irreversible and/or unprecedented in nature?			
04	Does the project require involuntary resettlement that results in loss of land or livelihoods or physically displaces more than 200 persons?			
05	Is the project site on or in immediate vicinity of socially vulnerable or Indigenous People IP) owned or occupied land and has the potential to cause an adverse impact on their culture and identity?			
06	Is the project vulnerable to climate change related impacts?			
07	Does the Borrower have a documented Policy on E&S Performance?			
08	Does the Borrower have dedicated human resources to address E&S performance?			
09	Has the Borrower established and implemented Environmental, Health & Safety Management Systems and Social Accountability Systems for the Project SPV or in the parent company?			

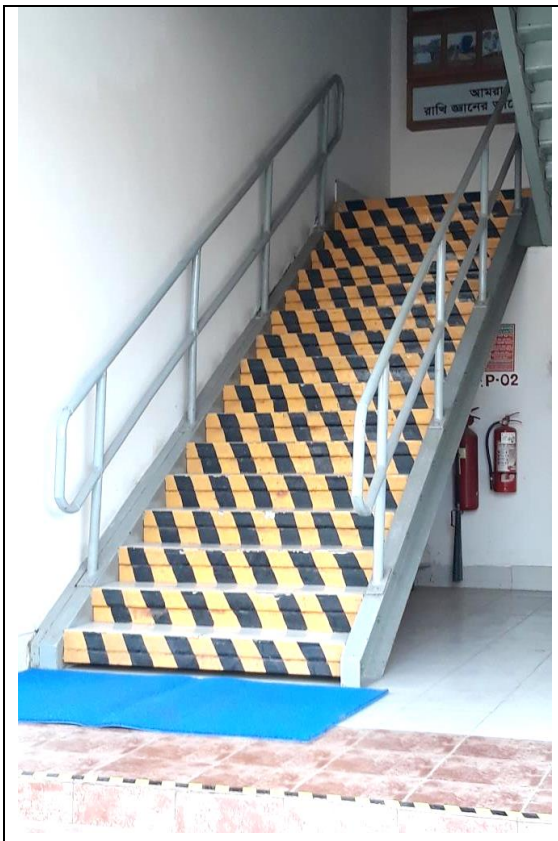
Annex 4: PPE arrangement

Photograph: PPE arrangement

Annex 5: Fire-fighting arrangement

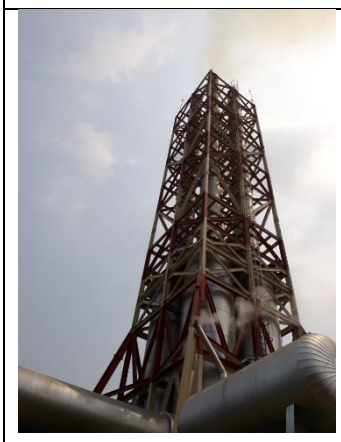
Photograph: Fire-fighting arrangement

Annex 6: Application of signage



Photograph: Arrangement of signage for occupational safety

Annex 7: Current status of project (external view)



Photographs: Transformer and some important installations

Annex 8: Current status of project (internal view)

Photographs: Control room, generators and other installation

Annex 9: Effluent Treatment Plant

Photographs: Major sections of ETP

Annex 10: Housekeeping

Photographs: Status of internal housekeeping

Photographs: Status of external housekeeping

Annex 11: Landscape

Photographs: Signpost lanscapes

Annex 12: Stakeholder consultation by IDCOL official

Photographs: Consultation with local respondents by IDCOL official