Loan No. 3045-BAN-OCR

Public-Private Infrastructure Development Facility-2

ANNUAL ENVIRONMENTAL AND SOCIAL COMPLIANCE AUDIT REPORT

78,000 TEU Handling Capacity Container Terminal at Chittagong, Bangladesh

Ispahani Summit Alliance Terminal Limited

March, 2020

Prepared by

INFRASTRUCTURE DEVELOPMENT COMPANY LIMITED

DHAKA, BANGLADESH

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List of Abbreviations

ADB	Asian Development Bank
DOE	Department of Environment
ECR	Environment Conservation Rules
ISATL	Ispahanai Summit Alliance Terminal Limited
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
SPS	Safeguards Policy Statement

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EXECUTIVE SUMMARY

Background

Ispahani Summit Alliance Terminal Limited (ISATL) has initiated to to convert the former jute factory (Victory Jute Products Limited) into a modern Bonded Warehouse and Inland Container Depot at North Kattoli, Pahartali on the Dhaka - Chittagong Trunk Road on a 15 acres plot of land. The geographical location of the project site is 22°21'54.26"N and 91°46'31.88"E.

For financial assistance ISATL has approached Infrastructure Development Company Limited (IDCOL), along with other lenders. Considering the importance of the project, IDCOL has sourced an amount of USD 15 million 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, river terminal project has been classified as Red Category. Hence, ISATL project has fallen into the **Red** category. Given the environmental impacts of the ISATL 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. In addition, as there is no issue of involuntary resettlement or adversely affecting livelihood of any unauthorised entity, 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 ISATL seems to be a **High Risk** project requiring detail environmental impact assessment.

Bangladesh Centre for Advanced Studies (BCAS) being engaged by ISATL 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.

The project has started partial from December 2016. To assess the actual implementation of environmental management plan and social safeguards, respective IDCOL official visited the project site. According to the IEE, there is requirement of IDCOL to submit an annual Environmental and Social Compliance Audit Report of this project to ADB to share the major findings. Accordingly, this audit report has been prepared by IDCOL.

Audit overview and findings

Environmental Specialist of IDCOL along with other senior official has visited the project during the audit period (*January 2019 to December 2019*). Anyway, 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 ISATL to comply with environmental and social safeguards have been found as satisfactory.

1.0 INTRODUCTION

1.1 PROJECT PROPONENT

Ispahani Summit Alliance Terminal Limited (ISATL), a joint initiative of M.M. Ispahani Limited (40%), Summit Group (30%) and Alliance Holdings Limited (30%), has emerged to convert the former jute factory (Victory Jute Products Limited) into a modern Bonded Warehouse and Inland Container Depot at North Kattoli, Pahartali on the Dhaka - Chittagong Trunk Road (near Chittagong City Gate) and only 12km from Chittagong Port the project is ideally located to provide the planned services. After successfully completing this terminal, ISATL has started partial commercial operation from December 2016. Table 1.1 shows key project information.

Table 1.1: Key project information

Name of the Project	Ispahani Summit Alliance Terminal Limited (ISATL)
Project Location	Holding No.-185/260, Dhaka Trunk Road, North Kattali, Pahartali, Chittagong
Raw Materials	The main raw material of the project is export import oriented goods
Net Container Capacity	**3 Warehouses with a an individual capacity** (a) Bonded warehouse capacity 10,952 pallet (b) CFS-1 capacity 1000 TUES/ month (c) Import capacity 1000 TUES/ month **3. Length, wide and height of the warehouse** (a) Bonded warehouse 397'X 210' X 52' H , area- 83,000 sft (b) CFS-1 : 200' X150' X 48' H ,area- 30000X3= 90,000 sft (c) Import shd 270'X 60' X45'H area 16,200 sft
Project Cost	130 cror BDT
Total Area of Land	15.0 Acres
Total Covered Area	10.0 Acres
Total Developed Land	15.0 Acres
Fuel Requirement	Diesel
Generator	500KVA, 400KW, Diesel Engine, Ferbo, Italy.

1.2 AREA AND LOCATION OF THE PROJECT

It is already said that the ISATL is located on a 15 acres plot at North Kattoli, Pahartali. The satellite map of the project site is shown in Annex-2. The GPS coordinates of the plot is 22°21'54.26"N and 91°46'31.88"E. Dhaka Chittagong Highway N1 and settlement are located on the eastern side of the site, Sagorika BISCIC area and a container Terminal are on the southern side of the site. Ispahani High School and Settlement have been found on the northern side, whereas the presence of social forestry, settlement and pond have been observed on the western side of the site.

1.3 BRIEF DESCRIPTION OF THE PROJECT

A range of highly specialized machineries and tools are being used for the operation of ISATL. These include Reach Stackers, Forklifts, Hydraulic Hand Trolley, Chassis Trailer, Prime Mover with Chassis and other handling equipment. A list of major equipment has been provided in following Table 1.2.

Table 1.2: Key equipment/device

SN	Equipment	Capacity	Quantity
1	Load Reach Stacker	45 Ton	03
2	Empty Side Stacker		02
3	Forklift: Fuel Driven	10 Ton	02
4	Forklift: Fuel Driven	08 Ton	01
	Forklift: Fuel Driven	05 Ton	02
5	Forklift: Fuel Driven	03 Ton	03
6	Forklift: Battery Operated	03 Ton	02
7	Hydraulic Hand Trolley	03 Ton	04
8	Prime Mover with Chassis		20
9	Chassis Trailer		20

For ISATL project, following infrastructural facilities have been developed:

- Whole area of 31.12 acre land is faced with 9ft height brick wall
- A RCC bridge (18ft width) is built to make easy access of heavy truck, lorry, or Crane in the factory ground. 20 ft width road is prepared for the same purpose
- An office & a residential shed are built for employees refreshment & accommodation
- 30 feet height production shed is closed with brick & wall
- A closed carbon black storage & steel wire storage for are built here
- Washing center, prayer room are available here for all employees
- 12 feet height oil storage shed, an ETP shed, a generator shed have been separately built here.

1.4 OPERATIONAL STATUS OF THE PROJECT

The capacity of the project is 78,000 TEU. Considering the efficiency in operation, a large portion of the total capacity has been utilized.

1.5 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.

1.6 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 Resettlement Action Plan, Stakeholder Engagement Plan (as are relevant) ;

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

1.7 REPORTING PERIOD

The reporting period of this Environmental and Social Compliance Audit Report is January 2019 to December 2019.

1.8 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 ISATL. 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.

1.9 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. As no record of any indigenous habitat has been found at Pahartali, Chittagong the project has been categorised as **C** in respect of Indigenous People (IP). And in respect of involuntary settlement (IR) it is a **C** category project.

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**.

[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

ISATL has to comply with the requirement of ECR, 1997 of the DOE. In the following Table 3.1, the compliance status of ISATL, in regard of major milestones of ECR, 1997 is depicted. The renewal copy of Environmental Clearance Certificate (ECC) 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, ISATL has already appointed Mr. Abu Sayed Md. Abdullah as HSE Engineer. Mr. Abu Sayed has been found to be fairly competent to deal with relevant EHS matters.

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 ISATL has been discussed.

Table 3.2: Response of ISATL on project activities and mitigation measures during operation phase

Project Activity	Potential Impacts	Mitigation Measures	Actual Implementation	Compliance Status
Project site, Access Road & Jetty	Road and River Traffic movement	• Implementation of a safety program (signage, speed restrictions, lights on trucks, truck load restrictions etc.); • Provide training on safe driving; • Load trucks in accordance with legal requirements and cover transported materials to prevent them falling off during transit.	Adequate attention on safe traffic movement has been observed.	Fully complied
Operation of generator	Emission from the container yard construction	• Planting of indigenous trees around the Project site.	Some trees have been observed around the project site.	Fully complied
	Generation of noise from generators and associated sub-stations, which could exceed 70 dB(A) at site boundary	• Use walls, fencing, and/or greenbelt to provide partial noise barrier; • Use of ear-muffs and ear-plugs by port personnel where it is required.	The generator has been found to place in a relatively distant places having limited adverse impact.	Fully complied
Loading, storing and unloading of goods	Emission of dust and SPM	▪ Regular application of water sprinklers.	No significant dust issue has been observed.	Fully complied
Occupational Health and safety	Health hazard	• Application of proper safety gears; • Introduction of EHS document; • Regular drill and awareness session.	Satisfactory safety gears and adequate awareness has been observed.	Fully complied

Project Activity	Potential Impacts	Mitigation Measures	Actual Implementation	Compliance Status
Fires, explosion and other accidents	Risk of human health and property damage	▪ 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.	Sufficient **active**[3] and **passive** measures have been practiced to address fire safety.	Fully complied
Domestic wastewater and sewage	BOD, fecal coliform contamination in groundwater and surface water	▪ Need to provide septic tank with soak pit for treatment of sewage.	Required infrastructures has been found to be installed. In addition, satisfactory house-keeping has been observed.	Fully complied
Wastes oil from Project	Potential soil and groundwater contamination	▪ Secure on-site storage, waste sell to the DOE authorized vendor for discharge in a safe place.	Required measures have been found to be practiced. So, there is no issue of waste oil spillage.	Fully complied

[3] Active measures include fire drill and passive measures include different types of in-house awareness session, safety manual etc.

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**
Project site at North Kattoli	Quarterly (routine) analysis	SPM, SOx, NOx
Key parameters to be monitored: (2a) Surface Water		
location	**frequency**	**parameter**
Project site at North Kattoli	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 North Kattoli	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 (four times in each year)	Limits in dBA

It is already stated that the project has become considerably operational from August, 2018, ISATL has conducted air, water and noise monitoring from August 2018 onwards.

Table 3.4: Ambient air quality at project site

Location	**29 March 2019**			**27 September 2019**		
	SPM ($\mu g/m^3$)	**PM 2.5 ($\mu g/m^3$)**	**PM 10 ($\mu g/m^3$)**	**SPM ($\mu g/m^3$)**	**PM 2.5 ($\mu g/m^3$)**	**PM 10 ($\mu g/m^3$)**
At ISATL site	137.15	14.26	50.34	184.81	64.90	98.75
Standard of DOE	200	65	150	200	365	100

Source : ISATL

Table 3.5: Ambient noise level at project site

Location	29 March 2019		27 September 2019	
	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 project	58.35	58.38	69.71	65.30
Southern side of the project boundary	56.43	56.22	67.53	64.42
Standard of DOE[4]	75	70	75	70

Source : ISATL

Table 3.6: Surface water [5]quality at project site

Parameter	29 March 2019	27 September 2019	DOE Standard
pH	7.50	7.32	6-9
Temperature	25.2^{0}C	25.1^{0}C	40^{0}C
DO	7.23 mg/l	7.95 mg/l	4.5-8 mg/l
BOD5	4.23 mg/l	4.00 mg/l	50 mg/l
COD	7.84 mg/l	11.9 mg/l	200 mg/l
TDS	246mg/l	135 mg/l	2100 mg/l
Oil and grease	6.0 mg/l	2.70 mg/l	10 mg/l

Source : ISATL

Table 3.7: Ground water quality at project site

Parameter	29 March 2019	27 September 2019	DOE Standard
pH	6.65	6.70	6-9
Temperature	25.1^{0}C	25.3^{0}C	20-30^{0}C
DO	6.91 mg/l	5.45 mg/l	6 mg/l
COD	2.94 mg/l	3.84 mg/l	4 mg/l

Source : ISATL

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

[5] Drainage outlet water

II. Result of environmental monitoring

During operation phase, the ambient air quality has been found to comply with the acceptable limit of DOE. No significant noise has been observed which is being generated from the project activities. But during the movement of marine vessels just beside the project site, the noise level seems to be high. But it is within the limit of Industrial Zone. The quality of housekeeping has been found to be as satisfactory. Different types of wastes have been found to deposit and dispose in safe manner. While reviewing the monitoring report, the surface and ground water quality have been found to be within the limit of DOE.

III. Disclosure of environmental monitoring

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

IV. Monitoring adjustment measure

As the monitoring report reveals that the noise, air and water quality of the project site are within the acceptable limit of DOE, no adjustment has been required.

3.3 COMPLIANCE WITH SAFEGUARDS POLICY STATEMENT, 2009 OF ADB

It is already said that the ISATL 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 3.8.

Table 3.8: Compliance with important EHS aspects during operation phase

ADB Requirements	Issue and Description of Observation	compliance Status
Environment Assessment requirements for various financing modalities	ISATL has been found to satisfactorily implement the EMP as has been recommended in the environmental assessment report.	Fully complied
Occupational and Community Health and safety	ISATL has ensured the satisfactory application of PPE. In this regard, they have introduced standard operational procedure (SOP).	Fully complied
	There is evidence of regular 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
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 ISATL from private land-owners through *willing seller-willing buyer* arrangement, there is no issue of resettlement. In addition, it has been reported that the project is not associated with adversely affecting the livelihood of any local household. So, the project has been categorized as **C** in respect of Involuntary Resettlement (IR) aspect.

4.2 INSTITUTIONAL ARRANGEMENT ON SOCIAL SAFEGUARD

Institutional arrangement

According to ISATL, the EHS team is also assigned to ensure the social safeguards. As like as environmental safeguard, Mr. Abu Sayeed Md. Abdullah is also in charge of social safeguard. While audit by IDCOL official, the local people informed that Mr. Sayed regularly communicates with them.

Grievance Redress Mechanism

For ensuring proper redressal of grievances, ISATL has adopted a Grievance Log Book. While reviewing the Grievance Log Book and consultation with local people, no significant grievance has been observed.

4.3 IMPACT ON INDIGENOUS PEOPLE

Based on the primary observation during site visit and information of secondary sources, no habitat of any indigenous community has been reported at Pahartoli. So, the project has been categorized as **C** for Indigenous Peoples (IP) safeguards concluding that there is no issue about adversely affecting IP.

ISATL 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.

4.4 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‟.

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.

ISATL has been found to be careful about the child labour issue. So, 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. Photograph of consultation has been provided in Annex-9. 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 social support of ISATL

II. Response from ISATL

Based on the findings of consultation, there was no issue to respond by ISATL.

III. Disclosure

ISATL is in principal agreed to share the information in relevant to environmental and social safeguards to relevant stakeholders.

4.7 ENHANCEMENT

ISATL acknowledges the importance of satisfactory relationship to adjacent communities. Accordingly, it has extended various types of cooperation including monetary support to adjacent communities. ISATL has improved the local drainage and access roads which have been very useful for the local people especially to address the risk of water logging during rainy season.

5.0 CORRECTIVE ACTION PLAN

ISATL 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. Hence, it is concluded that ISATL does not require any corrective action plan.

6.0 CONCLUSION

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

Annex 1: Renewal of Environmental Clearance Certificate

গণপ্রজাতন্ত্রী বাংলাদেশ সরকার
পরিবেশ অধিদপ্তর
চট্টগ্রাম মহানগর কার্যালয়
পরিবেশ ভবন, জাকির হোসেন রোড
ফয়েজ লেক এলাকা,খুলশী, চট্টগ্রাম -৪২০২
www.doe.gov.bd

ছাড়পত্র নবায়ন

ছাড়পত্র নং: ১৮-১২৪৬৫

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

প্রতিষ্ঠান/প্রকল্পের নাম	:	Ispahani Summit Alliance Terminals Limited
উদ্যোক্তার নাম	:	Syed Yasser Haider Rizvi
সনাক্তকরণ নং	:	৪৪০১৫
প্রতিষ্ঠান/প্রকল্পের কার্যক্রম	:	Container Terminal
প্রতিষ্ঠান/প্রকল্পের শ্রেণী	:	Orange-B
প্রতিষ্ঠান/প্রকল্পের ঠিকানা	:	Holding No. 185/260, Dhaka Trunk Road, North Kattali, Pahartali, Chittagong.
প্রদানের তারিখ	:	18/10/2018
মেয়াদ উত্তীর্ণের তারিখ	:	23/11/2019

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

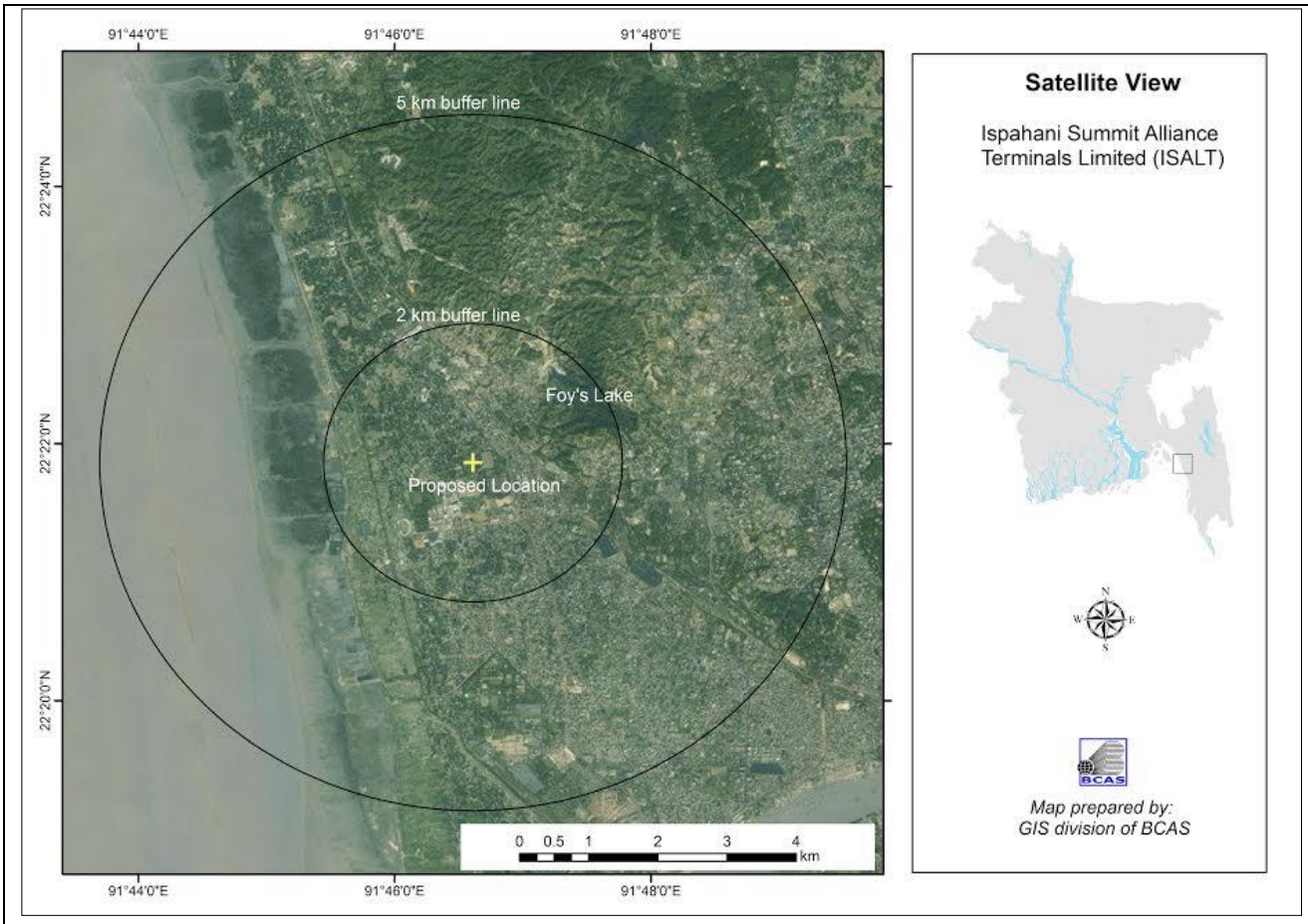


Figure: Satellite image of the proposed Project with 2 km and 5 km radious air shed

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: Application of dustbin

Photograph: Training session on EHS

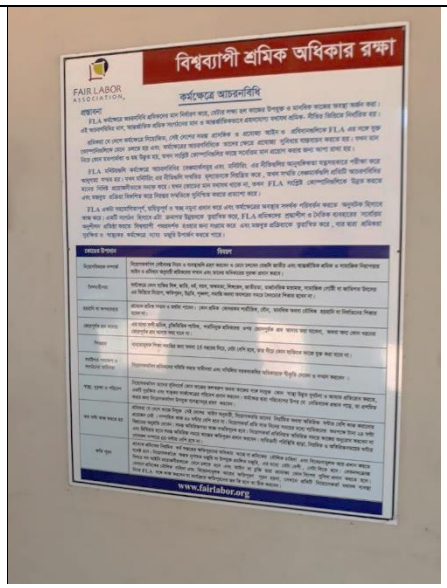
Annex 5: Fire-fighting arrangement

Photograph: Fire-fighting arrangement

Annex 6: Fire-drill

Photographs: Brief orientation before fire drill	

Annex 7: Application of signage



Photographs: Safety signage and instruction in different sections of the project

Annex 8: Current status of project

Photograph: Proper stacking of cargos

Photograph: Vehicles are being loaded

Photograph: Systematic array of vehicles and cargos

Annex 9: Stakeholder consultation by IDCOL official

Photograph: Consultation with local respondents by IDCOL official