

Loan No. 3045-BAN-OCR

2nd Public-Private Infrastructure Development Facility

ANNUAL ENVIRONMENTAL AND SOCIAL COMPLIANCE AUDIT REPORT

163 MW Combined Cycle Power Project at Fenchuganj, Sylhet, Bangladesh

Kushiara Power Company Limited

February, 2021

Prepared by

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www.idcol.org

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List of Abbreviations

ADB	Asian Development Bank
BPDB	Bangladesh Power Development Board
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
KPCL	Kushiara Power Company Limited
PPE	Personal Protective Equipment
SPS	Safeguards Policy Statement

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EXECUTIVE SUMMARY

Background

Kushiara Power Company Limited (KPCL) has been awarded through a competitive bidding process to develop and operate an independent combined-cycle power plant project with capacity of 163 MW at Garulikona Village of Fenchuganj Upazila in Sylhet District. For financial assistance KPCL has approached Infrastructure Development Company Limited (IDCOL), along with other lenders. Considering the importance of the project, IDCOL has provided a term loan facility 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) 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, KPCL project has fallen into the Red category. Given the environmental impacts of the KPCL 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 was no issue of involuntary resettlement, 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 KPCL seems to be a **High Risk** project requiring detail environmental impact assessment.

EQMS Consulting Limited 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.

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 audit period (*January 2020 to December 2020*) of this Environmental and Social Compliance was influenced with the requirement of lock-down and subsequent social distancing due to COVID. Hence, there was limited scope to physically visit the project and to consult with adjacent neighborhoods, similar to the previous years. However, respective officials of Environmental and Social Safeguards Unit (Infrastructure), IDCOL have reviewed the available relevant documents and clearances. The audit deals with the implementation of environmental and social safeguards during operation phase in light of ADB approved Initial environmental Examination (IEE) report. During audit, the commitment of KPCL 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 163 MW gas-fired combined-cycle power plant at Garulikona Village of Fenchuganj Upazila in Sylhet District by Kushiara Power Company Limited (KPCL). KPCL is a special purpose vehicle of well-known entrepreneur named Max Group. The generated electricity from the project will be sold to Bangladesh Power Development Board (BPDB) under a 22-year Power Purchase Agreement. Table 1.1 shows key project information.

Table 1.1: Key project information

Project Company	Kushiara Power Company Limited
Capacity	163 MW
Fuel Type	Gas
Project Location	Garulikona Village of Fenchuganj Upazila in Sylhet District
Land Area	9.22 acres
Project Tenure	22 Years
Project Type	Independent Power Producer
Gas supplier	Jalalabad Gas Transmission and Distribution System Ltd
RMS supplier	General Electric International, INC
GenSet Supplier	General Electric International, INC
Gas Turbine Generator model	9E.03

1.2 AREA AND LOCATION OF THE PROJECT

It is already said that the project site of KPCL 163 MW Project is located at a village named Garulikona Village of Fenchuganj Upazila in Sylhet District. It is a purchased land from private landowners. The area is about 9.22 acres. The location of the proposed project site lies, geographically between 24°41'25.54"N; 91°55'7.80"E to 24°41'25.69"N; 91°55'6.72"E and 24°41'19.28"N; 91°55'6.80"E to 24°41'21.21"N; 91°55'1.39"E. The site is about 3.5 km from Sylhet-Moulavibazar Road to the west, about 28 km south-east of Sylhet and about 8 km road from Fenchuganj upazila. The Kushiara River is located just beside the project site. The project site is plain vacant land. There are two religious structures (Mosque and Graveyard) present adjacent to the project boundary. Details of areas surrounding the project site are as follows:

- North: Settlement and Agricultural Land
- South Side: Settlement and Agricultural land
- East: Approach road, Agricultural Land and Settlement
- West: Kushiara River

The schematic location of the project in respect of local context and satellite image of the project area has been presented in respect of 5 km and 10 km radius air shed are presented in Annex-2.

1.3 BRIEF DESCRIPTION OF THE PROJECT

The project has a heavy duty, single shaft 9E.03 gas turbine with 19 stage of air compressor, 14 stage of combustor that is directly coupled to a 50 Hz generator. A new and clean 9E.03 combustion turbine makes 109 at a heat rate of 10,403 kJ/kWh (LHV) under reference conditions. The gas turbine (GT) has been installed within an acoustic, ventilated enclosure with fire detection and protection system. The GT will has all associated ancillary equipment and systems required for the safe, efficient and reliable operation of the unit under simple and combined cycle modes. The specifications of gas turbine and steam turbine are available in Table 1.2 and Table 1.3.

Table 1.2: Gas turbine generator specification

Particular	Details
Combustion turbine manufacturer	GE
Model/Type	9E.03
Net Output	109 MW (Gas)
Hear Rate at 100% load	10,403 (LHV)
RPM	3,000

The Gas Turbine Generator (GTG) will be installed in a GT building. The GTG will be capable of operation with their exhaust gases passing into the associated heat recovery steam generator, or as simple open cycle turbine generator, exhausting directly to atmosphere via an exhaust gas damper and the bypass stack, located on the exhaust ducting upstream of the heat recovery boiler. All cooling requirements for the turbine shall be met using heat exchangers, fed from either the Closed-Circuit Water (CCW) system or Cooling Water System (CWS). Control of emissions of NO_x will be achieved by Dry Low NO_x (DLN) burners. The gas turbine will be equipped with dual fuel systems, capable of burning the specified fuel gas and backup fuel oil.

The heat recovery steam generator (HRSG) is a primary component in the bottoming cycle of a combined cycle power plant. It provides the thermodynamic link between the gas turbines and steam turbines. Each HRSG solution is custom engineered to meet your desired operating flexibility and performance requirements.

GE's HRSG units are cost-effectively designed for heavy cycling operations that allow owners to reduce the cost of electricity, boost performance, increase reliability, and enhance flexibility. Numerous options are available, such as supplementary firing, SCR for NO_x abatement, CO catalyst for emissions reduction, and exhaust gas bypass systems for simple cycle gas operation in a combined cycle installation.

The ST will be of proven design and directly coupled to a 50 Hz generator to produce 54 MW. The ST exhaust and condenser configuration will be in accordance to manufactures standard design. It will be sized to pass the entire quantity of steam generated by the HRSG over the full range of ambient temperature specified.

Table 1.3: Steam turbine generator specification

Particulars	Specification
Combustion turbine manufacturer	GE
Model/Type	SC2-26
Net Output	54 MW (Gas)
Steam conditions	90 bar-a/535°C

1.4 OPERATIONAL STATUS

The project has been meant for generating 163 MW electricity. But due to considering the power demand from Bangladesh Power Development Board, in most of the time of the year the project was not required to generate maximum output. But all the year, the plant was technically capable to generate 163 MW of electricity.

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) and other relevant documents.

1.6 METHODOLOGY

The audit includes the following steps:

- (i) review the environmental and social safeguards documents including environmental impact assessment report;
- (ii) 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 2020 to December 2020.

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 KPCL. 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. Accordingly, an IEE has been prepared, which is already approved by the ADB. As no record of any indigenous habitat has been found at Garulikona Village of Fenchuganj Upazila in Sylhet District the project has been categorised as C in respect of Indigenous People (IP). In addition, the project has been categorised as **C** from IR perspective.

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** 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

3.0 IMPLEMENTATION OF ENVIRONMENTAL SAFEGUARDS

3.1 COMPLIANCE WITH ENVIRONMENT CONSERVATION RULES, 1997

KPCL has to comply with the requirement of ECR, 1997 of the DOE. In the following Table 3.1, the compliance status of KPCL, 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

Currently, the EHS Department consists of total 4 members which are- 1 EHS manager (Mr. Monjur Morshed), 2 EHS officer (Mr. Md. Anwarul Islam and Mr. Md. Idris Ali) and One Medic (Mr. Nazrul Islam Chowdhury). All EHS officers and manager are post graduated with 6+ year's field experience in Health Environment & Safety Management.

b. Compliance status

In the IEE, several 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 KPCL has been discussed.

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

Project Activity	Potential Impacts	Proposed mitigation measures in EMP	Actual implementation	Compliance status
Power generation	Emission from the power plant	▪ Using two types of stack: 40 m by-pass stack and 60 m main stack ; ▪ Installation of stack emission monitoring equipment for major pollutants; ▪ Planting of indigenous trees around the project site.	▪ By-pass stack with 40 m height has been installed. ▪ Main stack with 60 m height has been installed. ▪ Some indigenous trees have been planted.	Complied
	Generation of noise from generators, cooling tower, steam turbine generator, combustion in-let filter house and heat recovery steam generator	▪ Locate facility at a required distance from the nearest receptor; ▪ Use walls, fencing, and/or greenbelt to provide partial noise barrier; ▪ Provision of silencers or generators an turbines (if need arises); ▪ Use of ear-muffs and ear-plugs by plant personnel working in the generator and turbine facilities of the plant.	▪ Walls are being installed as noise barrier; ▪ Ear plugs were being used as noise barrier. ▪ To minimize noise impact on local communities, vehicles carrying construction materials have been restricted after 6 pm. ▪ KPCL is in the process to develop a green belt within project boundary. This green belt will make a safeguard for local people as noise protection.	Complied

Project Activity	Potential Impacts	Proposed mitigation measures in EMP	Actual implementation	Compliance status
	NOx generation from the engine, which can negatively affect health	- Use low-NOx burners and water injection to control NOx; - Should maintain burning temperature less than 900 °C.	- KPCL has installed low-NOx burners and water injection to control NOx; - The burning temperature is less than 900°C.	Complied
	Suspended particulate matter (SPM) and PM _{2.5} , PM ₁₀ generation from the engine, which can adversely affect health	- Use fabric bag filter to reduce particulate matter before discharging the emission; - Good combustion control, required stack height should also be maintained properly.	- Fabric bag filter has been introduced; - Good combustion and required stack height have been ensured.	Complied
	Electro-magnetic wave or electrical interference, which may result in occupational health risk.	- All equipment should be grounded earthing with mesh system; - Power plant to sub-station should be connected by HT cable; - Power plant & substation site is away from the settlement; - No house is located in the immediate vicinity of the site.	- Relevant equipment have been grounded; - Power plant to sub-station has been connected by HT cable; - Power plant & substation site are away from the settlement; - No house is located in the immediate vicinity of the site.	Complied
Heath safety during operation	Risk of human health and property damage	- All necessary safety equipment should be ready at the plant; - Regular training on safety needs to provide. - A first-aid centre with the trained personnel	- PPE were found to be adequately practiced. - KPCL has engaged a full time site medic for taking care of first aid, occupational injury and general health problems of the employees.	Complied
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;	There are various types of fire extinguishers to address different types of fire;	Complied

Project Activity	Potential Impacts	Proposed mitigation measures in EMP	Actual implementation	Compliance status
		▪ Regular inspection of lines for faults prone to accidents; ▪ Provision of fire protection equipment; ▪ Provision of lightening arrestors.	▪ Automated firefighting system has been installed; ▪ Regular fire drill has been accomplished.	
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.	▪ Septic tank with soak pit for treatment of sewage.	Complied
Chemicals and 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.	▪ Used lube oil is being sold to DOE designated vendor. ▪ KPCL has prepared a procedure for the chemical loading & unloading and spill control, and has ensured trained workers for the same. KPCL already build a chemical storage house to keep all hazardous materials.	Complied
Waste generated from different sources	Contamination of soil	▪ Store wastes in a manner that will prevent contact between incompatible wastes i.e. post compatibility checks. ▪ Take special care in the storage areas to prevent any spillage of hazardous wastes and restrict access (except for trained staff) to such areas.	▪ In line with the ESMP, regular monitoring of solid and hazardous waste disposal is being ensured by EHS personnel of the KPCL.	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, SO _x , NO _x and PM 10
Key parameters to be monitored: (2a) Surface Water		
location	frequency	parameter
Project site at Garulikona	Quarterly (routine) analysis	pH, Temperature, DO, BOD, COD, TDS, Oil and grease
Key parameters to be monitored: (2b) Ground Water		
location	frequency	parameter
Project site at Garulikona	Quarterly (routine) analysis	pH, Temperature, DO, BOD, COD, TDS, Oil and grease
Key parameters to be monitored: (3) Noise		
location	frequency	parameter
At five points around project boundary	A 24-hour observation Quarterly (routine)	Limits in dBA

Table 3.4: Ambient air quality at project site

Location	28 June 2020			26 December 2020		
	SPM (µg/m ³)	SO ₂ (µg/m ³)	NO _x (µg/m ³)	SPM (µg/m ³)	SO ₂ (µg/m ³)	NO _x (µg/m ³)
Adjacent to the project site (North Side of the Project)	102.59	39.62	14.71	28.72	0.35	22.96
In front of Adarsha Gram Primary School	103.89	55.06	11.02	196.42	0.37	17.81
In front of Abdul's House	43.16	13.75	20.23	178.86	4.61	27.27
In front of Abdus Samad's house	123.35	31.04	9.58	101.4	6.21	16.27
DOE Standards	200	365	100	200	365	100

Source : KPCL

Table 3.5: Ambient noise level at project site

Location	28 June 2020		26 December 2020	
	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)
Adjacent to the project site	61.48	59.25	56.53	57.16
Project Area	57.93	56.15	54.03	54.64
Project Area	65.92	65.38	68.82	69.01
In front of project mosque	59.66	58.40	58.64	53.62
Project Area	63.66	45.40	66.08	55.14
Standard of DOE ²	75	70	75	70

Source : KPCL

² The project area has been considered as Industrial Zone based on landuse

Table 3.6: Surface water (Kushiara River) quality at project site

Parameters	29 June 2020	28 December 2020	DoE standard
pH	7.14	7.10	6.5-8.5
Temperature	26.4° C	21.3° C	-
DO	5.7 mg/l	5.9 mg/l	5 or more
BOD	1.1 mg/l	0.1 mg/l	6 or less
COD	30 mg/l	31 mg/l	-
TDS	30 mg/l	55 mg/l	-
Oil and Grease	<2	< 2	-

Source : KPCL

II. Result of environmental monitoring

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

III. Disclosure of environmental monitoring

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

IV. Monitoring adjustment measure

As the air, water and noise monitoring result have been found to be within the limit, no adjustment measure has been recommended.

3.3 COMPLIANCE WITH SAFEGUARDS POLICY STATEMENT, 2009 OF ADB

It is already said that the KPCL 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
<i>Environment Assessment requirements for various financing modalities</i>	KPCL has conducted detail environmental impact assessment by EQMS Consulting Limited which has been approved by ADB. And while visit KPCL has been found to implement the EMP (as has been mentioned in this assessment report) to a satisfactory level.	Complied
<i>Occupational and Community Health and safety</i>	KPCL has ensured the satisfactory application of PPE.	Complied
<i>Biodiversity conservation and sustainable natural resource management</i>	KPCL is developing green belt within the project boundary and landscaping Inside KPCL plant for biodiversity conservation	Complied
<i>Pollution prevention and abatement</i>	KPCL has been found to conduct air, water and noise monitoring on a regular basis. And the monitoring result has been found to be within the acceptable limit. So, it can be said that there is sufficient preventive measures against the potential pollution	Complied
<i>Physical Cultural resources</i>	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.	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 KPCL from private landowners 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. As the evidence of any involuntary resettlement has not been documented, the project has been categorized as **C** from Involuntary Resettlement (IR) perspective.

4.2 INSTITUTIONAL ARRANGEMENT ON SOCIAL SAFEGUARD

There were two-tier arrangements to deal the stakeholder including resettlement and other social aspects. During operation phase, Mr. Monjur Morshed, EHS Manager, has been extended the responsibility of confirming required social safeguard. Mr. Monjur Morshed is supported by two EHS Officers: Mr. Md. Anwarul Islam and Mr. Md. Idris Ali.

From corporate level, Mr. Md. Abu Bakar Siddique, General Manager, (Operation and Maintenance), KPCL is responsible to provide required cooperation to ensure social safeguards.

4.3 GRIEVANCE REDRESS MECHANISM

One Grievance Box is placed at the main gate for receiving grievances from staff as well as local people. Apart from that, the EHS personnel move with grievance register books to every site of the plant every day to note down grievances from the workers. KPCL management representative also remains present in the grievance redress meetings and when needed as stipulated in the Grievance Redress Mechanism.

Mr. Md. Abu Bakar Siddique, General Manager, (Operation and Maintenance), KPCL leads the grievance redress process at corporate level during operation phase. At plant level, Mr. Monjur Morshed, EHS Manager, heads the grievance redress process. Based on the discussion with KPCL officials and adjacent community members, it has been concluded that during operation phase there is no unmanaged grievance case during audit period (January 2020 to December 2020).

4.4 IMPACT ON INDIGENOUS PEOPLE

Based on the primary observation during site visit and secondary sources including BBS³ Census 2011, no habitat of any indigenous community has been reported at Garulikona. 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. KPCL 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.

³BBS stands for Bangladesh Bureau of Statistics

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”.

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.

KPCL 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

In 2020, due to COVID, it was not possible to conduct public consultation by IDCOL officials. However, public consultation in 2019 audit period has been reflected in the following sections to depict the social responsiveness of KPCL.

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.

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 KPCL to mitigate noise issue.
- they are happy with the social support of KPCL.

II. Response from KPCL

KPCL officials have confirmed that they are careful about the convenience of local people.

III. Disclosure

KPCL has confirmed that they are agreed to share environment and social safeguards related information to the relevant stakeholders, if they are asked.

4.7 ENHANCEMENT

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

- KPCL management constructed a Mosque at Moinpur Adarshgram. The mosque was declared open for all as of dated 26th July 2019.
- According to DoE regulatory requirement KPCL formed a Tree plantation plan 2019. The company as per the plan already planted different types of tree within the 40% plant open premises.
- During this period KPCL management arranged external training on Basic First aid where 4 local employees out of 15 participants participated.

5.0 CORRECTIVE ACTION PLAN

KPCL has been found to 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 informed that there is no significant grievance neither from any internal stakeholder nor from any external stakeholder.

6.0 CONCLUSION

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

Annex 1: Renewal of Environmental Clearance Certificate



গণপ্রজাতন্ত্রী বাংলাদেশ সরকার
পরিবেশ অধিদপ্তর,
সিনেট বিভাগীয় কার্যালয়,
কমিশনার কার্যালয় ভবন(৫ম তলা)
আনমপুর,সিনেট.
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পরিবেশগত ছাড়পত্র নবায়ন

ছাড়পত্র নং: ২০-৪৮৩৭৪

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

প্রতিষ্ঠান/প্রকল্পের নাম	: kushiara power company Ltd
উদ্যোক্তার নাম	: Ghulam Mohammed
সনাক্তকরণ নং	: ৭৯১৩১
প্রতিষ্ঠান/প্রকল্পের কার্যক্রম	: Power plant
প্রতিষ্ঠান/প্রকল্পের শ্রেণী	: Red
প্রতিষ্ঠান/প্রকল্পের ঠিকানা	: Moinpur,Fenchugonj, Sylhet,Fenchugonj ,Sylhet
প্রদানের তারিখ	: 05/11/2020
মেয়াদ উত্তীর্ণের তারিখ	: 20/06/2021



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

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

Annex 2: Location of the project site

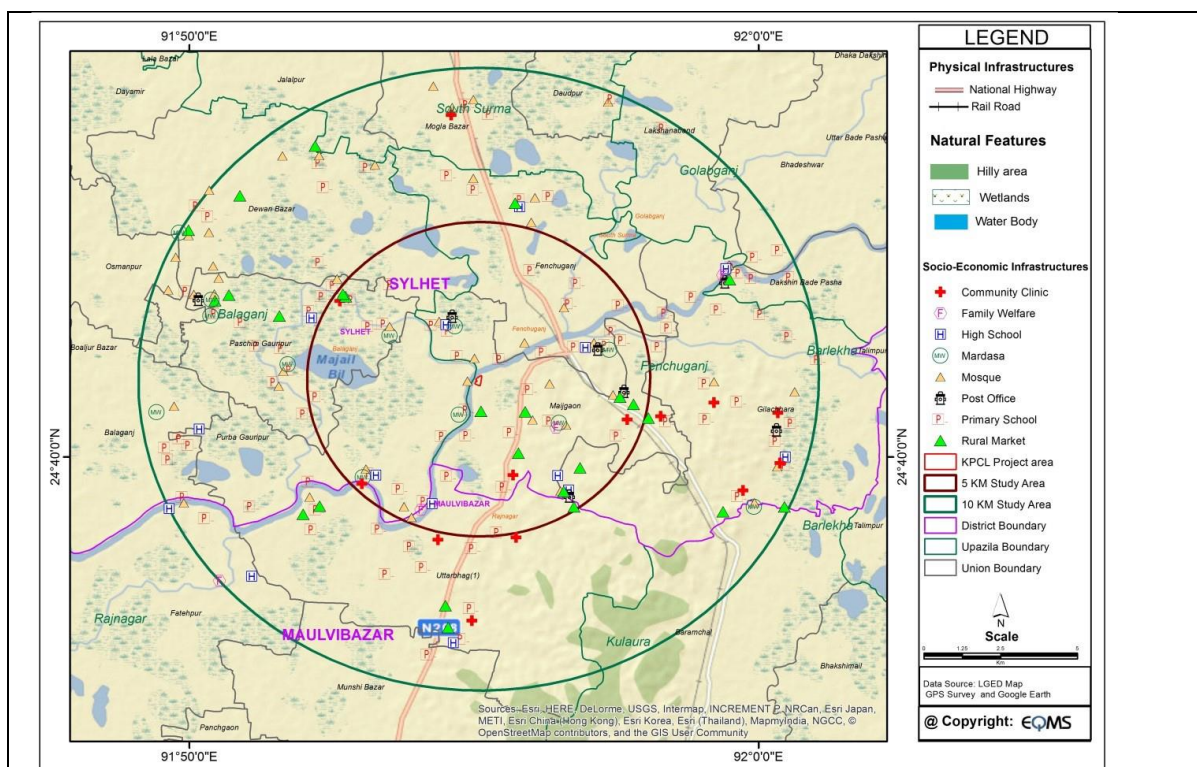


Figure: Baseline map of the in respect of 5 km and 10 km radius airshed



Figure: Satellite image of the proposed Project (500 m radius)

Annex 3: PPE arrangement



Photograph: Safety dress arrangement

Annex 4: Fire-fighting arrangement

	
Photograph: Internal fire-fighting arrangement	
	
Photograph: Fire detection system	Photograph: Three pumps for fire fighting

Annex 5: Fire-fighting team



Photograph: Dedicated fire-fighting team

Annex 6: Mock fire drill



Photograph: Mock drill and first aid care with focus to fire hazard

Annex 7: Application of signage

	
Photograph: Application of mask	Photograph: General safety instruction
	
Photograph: Awareness on speed limit	Photograph: Muster point

Annex 8: Current status of project (external view)



Photograph: An external view of the power plant



Photograph: Administrative office of the power plant



Photograph: Dormitory building

Annex 9: House-keeping



Photographs: Housekeeping drill



Photographs: Waste specific dustbin



Photographs: Waste Management



Photographs: Waste Management

Annex 10: Arrangement of noise mitigation facility



Photograph: Acoustic box surrounding exhaust fan of engines



Photographs: Acoustic doors

Annex 11: Grievance Redress Mechanism

