

Loan No. 3554-BAN-OCR
Public-Private Infrastructure Development Facility-3

ANNUAL ENVIRONMENTAL AND SOCIAL COMPLIANCE AUDIT REPORT

22 MW Power Project at Narayanganj, Bangladesh

City Seed Crushing Industry Limited – Unit 2 (CSCIL UNIT-2)

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List of Abbreviations

ADB	Asian Development Bank
BEZA	Bangladesh Economic Zone Authority
BOD	Biological Oxygen Demand
CO	Carbon Mono-Oxide
COD	Chemical Oxygen Demand
DO	Dissolved Oxygen
DOE	Department of Environment
ECR	Environment Conservation Rules
EHS	Environment and Health Safety
EMP	Environmental Management Plan
ERP	Emergency Response Plan
ESSF	Environmental and Social Safeguards Framework
EZ	Economic Zone
FGD	Focus Group Discussion
GPS	Global Positioning System
IDCOL	Infrastructure Development Company Limited
IEE	Initial Environmental Examination
IP	Indigenous People
MW	Mega Watt
NOC	No Objection Certificate
NOx	Nitrogen Oxides
PM	Particulate Matter
PPE	Personal Protective Equipment
SO2	Sulphur Di-Oxide
SPM	Suspended Particulate Matter
SPS	Safeguards Policy Statement
TDS	Total Dissolved Solid
TSS	Total Suspended Solid
UoM	Unit of Measurement

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EXECUTIVE SUMMARY

Background

City Seed Crushing Industry Ltd. – Unit 2 (CSCIL UNIT-2) is a subsidiary of City Group and located in the City Economic Zone with an area of 77.96 acres and based in Narayanganj district, close to the eastern bank of Shitalakshya River. The project has a power plant of 22 MW capacity which is solely dedicated to the internal power demand of CSCIL UNIT-2 Plant. The coordinates of the location are 23°44'45.04" North and 90°30'55.59" East. For financial cooperation, CSCIL has approached Infrastructure Development Company Limited (IDCOL) for its power plant establishment. Considering the importance of the project, IDCOL has provided a term loan facility of BDT 135 crore 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)-3 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, CSCIL UNIT-2 project is of **Red** category. Given the environmental impacts of the CSCIL UNIT-2 project is 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, based on available information, there is no issue of involuntary resettlement. So, the project has been categorised as **C** from involuntary resettlement (IR) perspective. Furthermore, as per the Environmental and Social Safeguards Framework (ESSF), IDCOL, the proposed power plant is a **High Risk** project. Accordingly, the project has required a detail environmental impact assessment.

Water Technology BD Limited being engaged by CSCIL UNIT-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), and ADBs SPS, 2009. In addition, respective IFC EHS guidelines (general and sector specific) have also been consulted. To assess the actual implementation of environmental management plan and social safeguards, respective IDCOL official visited the project site during the operation phase of the project. Being a financial intermediary, there is requirement for IDCOL to submit an annual Environmental and Social Compliance Audit Report of eligible projects 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 2021 to December 2021*) of this Environmental and Social Compliance. He has also reviewed the available relevant documents and clearances. In addition, there was consultation with representatives of adjacent neighborhood. The audit deals with the implementation of environmental and social safeguards during the operation phase in light of ADB approved Initial Environmental Examination (IEE) report. During audit, the commitment of CSCIL UNIT-2 to comply with environmental and social safeguards have been found as responsive.

1.0 INTRODUCTION

1.1 PROJECT PROPONENT

City Seed Crushing Industry Ltd. – Unit 2 (CSCIL UNIT-2) is located at City Economic Zone, North Rupshi, Rupganj, Narayanganj. It generally produces Soya Cake, Rape seed cake and Crude edible oil and the plant has a 22 MW power generation facility adjacent to it for required electricity demand. Soybean processing plants convert soybeans into meal/hulls (79-80%), soybean oil (19-20%) and soap/ lecithin/dockage (1-2%). The entire project is completely enclosed and is owned by the City Group. The project is also under the City Economic Zone with an area of 77.96 acres. CSCIL UNIT-2 is a running project and it has continued its production since 2018. The key project information has been shown in Table 1.1.

Table 1.1: Key Project Information

Project Company	City Seed Crushing Industry Limited Unit-2
Project Location	City Economic Zone, Uttar Rupshi, Rupganj, Narayanganj
Project Area	88,000 sq. meter
Industry Type According to DoE	Red
Project Cost	\$15,00,00,000 (Fifteen Crore USD)
Production Capacity	15,00,000MT Soya Cake, Rape Seed Cake, Crude Edible Oil annual & 22 MW power generation
Power Plant Capacity & Co-Generation	5 x 4.4 MW GEJ Jenbacher Gas Engine Based Power Plant (Total: 22 MW) 5 Nos Gas Generator
Boiler Plant	3x 55 Ton/Hour with Water Tube technology
Daily Water Requirements	160 cubic meter
Source of Water	River & Deep Tube Well
Power Requirements	500 KW/H
Gas Requirements	3,00,000 cubic meter/day
Possible Amount of Wastewater	75 m3/day domestic as there is no wastewater in Production purpose

1.2 AREA AND LOCATION OF THE PROJECT

The Project is located at City Economic Zone, North Rupshi, Rupganj, Narayanganj and is easily accessible by all kinds of transports. The project site is about 1.78 km away from Rupshi Bus Stand, Narayanganj and on eastern bank of Shitalakshya River. The project location is accessible from Dhaka via Dhaka – Sylhet National Highway (N2) and through Shitalakshya river waterway. Bangladesh Edible Oil, Navana Health Care and Navana Pharmaceutical Ltd, Gazi Auto Tires Factory, Rony Knit Composite, Mir Cement etc. projects are surrounding 2 km project from the project area. The GPS coordinate of the project is 23°44'51.08" North and 90°30'54.81" East. Location map of the project has been shown in **Annex 02**.

1.3 BRIEF DESCRIPTION OF THE PROJECT

CSCIL UNIT-2 continued its operation in 2018 as a concern of renowned City Group. The project is comprised of 88,000 sq. meter of area with a production capacity of 1,50,000 MT per month. Following are the major infrastructures within the project:

- | | |
|----------------------------------|---------------------------------|
| 1. Storage Silo Group | 9. Electric substation |
| 2. Daily Silos | 10. Cooling Tower |
| 3. Preparation Building | 11. Guest House |
| 4. Extraction Plant | 12. Main Entrance |
| 5. Water degumming & Lecithin | 13. Bag Storage (Future) |
| 6. Flat Storage | 14. Water Treatment Plant (WTP) |
| 7. Packing Building | 15. Ship Discharge (E-Crane) |
| 8. Steam Building (Boiler House) | |

The Seed Crushing plant uses Soya Seed as raw material in a quantity of 15 lac MT per day. The seed is sourced from both local market and by importing. The final outputs of the factory are listed as below:

Table 1.2: Production scenario of CSCIL UNIT-2

Product Name	Amount (Annual)
Soya Cake, Rape Seed Cake, Crude Edible Oil	15,00,000 MT
Power	22 MW

In general, the whole production process is divided into several steps as follows:

- Cleaning, Drying and Preparation of the seeds/beans
- Crushing of seeds
- Degumming of crude oils having relatively high levels of phosphatides compound
- Using Solvent extraction to separate oil from seeds/beans where the principle is to employ a volatile liquid in which the oil is freely soluble
- Extracted crude oil
- Drying, cooling, storage
- Removing of solvent by distillation

Description for Power Plant

The power plant is with a 2-stage turbocharged gas engine providing significant advantages, particularly in the area of multiple engine power plants for independent power generation and combined heat and power (CHP) solutions. Compared with conventional machine room layout, BROAD packaged pump set system in cooling process reduces the rated power demand by 50~70%, and the operating electricity consumption by 70~85% (the electricity for pump set only amounts to 2~5% of the rated cooling capacity).

The captive power plant is established near Seed Crushing plant and the produced electricity from the power plant is used by the Seed Crushing plant. The generated electricity of 10-11 kV will be converted to 230 kV supply and added to existing 230kV switching station through 230 kV underground. Necessary gas supply for the Seed Crushing Plant is supplied from Economic Zone central gas distribution line. Also, necessary water for plant operation as well as firefighting emergency situation is collected from Shitalakshya River which is a vast source of surface water for all adjacent industrial projects.

A project progress matrix has been shown in Annex (**Annex 06**) which shows the activities and timelines of the pre-construction, construction and operational periods.

1.4 OPERATIONAL STATUS

The power plant has started its operation from May 2021. The project has been developed for generating 22 MW electricity. The produced electricity is being used by the CSCIL plant. The project has formulated an Environmental and Social Management Plan. Project progress status on implementation of environmental and social compliance for the reporting period is shown in Table 1.3. Additionally, environmental and social compliance work schedule (Annual Working Plan) for January to December 2022 has been attached in **Annex 19**.

Table 1.3: CSCIL Implementation of Environmental and Social Compliance 2021

Sl.	Compliance item	Progress status	Remark
1	Environmental monitoring report (quarterly/ annual)	Completed (Four quarterly Monitoring report submitted)	
2	Periodic monitoring of environmental parameter	Completed (Four quarterly Monitoring report submitted)	
3	Workshop, training program	Under Planning (A template have been prepared for annual training program)	
4	PPE distribution	Completed (PPE Distribution information has been mentioned in QMR)	

1.5 OBJECTIVES OF 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 is January 2021 to December 2021.

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 CSCIL UNIT-2. So, CSCIL has to comply with the Environmental Management Plan (EMP) of Initial Environmental Examination (IEE) during the reporting period.

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 area which is an economic zone has been categorized as **Orange-B**, but the project consists of a captive power plant with a capacity of 22 MW. So, the project turns into **Red** category 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 Rupshi, Rupganj, Narayanganj the project has been **categorized as C** in respect of Indigenous People (IP). Also, the land of the economic zone has been acquired through a “willing buyer willing seller” basis by City Economic Zone and CSCIL UNIT-2 has leased the land from the EZ authority, as no physical and economic displacement in terms of involuntary acquisition of land and involuntary restrictions on land use is triggered, the project has been identified as **C** category in respect of Involuntary Resettlement. Similarly, the absence of indigenous habitat in close proximity has resulted in **C** category from IP 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 categorized as **High-Risk** project requiring significant compliance safeguards including comprehensive environmental impact assessment and regular monitoring. The project has been categorized as **Low Risk** in consideration of social safeguards (involuntary resettlement and indigenous people).

3.0 IMPLEMENTATION OF ENVIRONMENTAL SAFEGUARDS

3.1 COMPLIANCE WITH ENVIRONMENT CONSERVATION RULES, 1997

CSCIL UNIT-2 has to comply with the requirement of ECR, 1997 of the DOE. In the following Table 3.1, the compliance status of CSCIL UNIT-2, in regard of major milestones of ECR, 1997 is depicted. The updated Environmental Clearance Certificate is provided in **Annex 01**.

Table 3.1: Compliance with the requirement of ECR, 1997

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

The project is a component of CSCIL. The produced electricity is being used for the seed crushing plant. So, the captive power plant does not have any separate regulatory certificate except ECC. The ECC has been obtained on 30 June 2021 and it is valid until 16 May 2022. Other legal requirements such as fire license has been obtained for CSCIL plant.

3.2 COMPLIANCE WITH ENVIRONMENTAL MANAGEMENT PLAN

a. Institutional arrangement

The environmental and social compliances are dealt by the respective project team. Following table shows the environmental safeguard personnel engaged in the project site during the reporting period.

Table 3.2: Environmental Safeguard Personnel Engaged in Project Site

Name	Designation	Responsibility	Mobile No.
Mr. Shabbir Ali	Group Head, HR and Admin	Responsible for HR and Administrative activities as well as occupational and environmental health safety management of City Economic Zone.	01708833533
Mr. Atiqur Rahman	Sr. Executive, Compliance	Responsible for EHS under Group Head HR and Admin	01313199379

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 3.3, suitable mitigation measures to address these impacts according to the EMP and actual responses by the project sponsor has been discussed.

Table 3.3: Project activities and mitigation Measures

Project Activity	Potential Impacts	Proposed mitigation measures in EMP	Actual implementation	Compliance status
Operation of Power Plant	Low amount of emissions of air pollutants such as sulfur dioxide, nitrogen oxides, carbon monoxide and carbon dioxide polluting ambient air quality	• The stack of the CPP shall be of enough heights. • Adequate safety Measures and green belt development	• Good combustion and required stack height have been ensured. • Some indigenous trees have been planted.	Complied
	Noise will be generated from the generator, pump, cooling tower, chiller, heat recovery site transformer as component of the power plant	• Use noise reduction canopy to keep the environment free from sound pollution • Noise barrier should also be given around the generator room • The worker inside the project area should use earmuffs during the operation of diesel generator.	• 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. • CSCIL is in the process to develop and implement a green belt program within project boundary. This green belt will make a safeguard for local people as noise protection. As the project is inside the City Economic Zone, the green belt development has been	Complied

Project Activity	Potential Impacts	Proposed mitigation measures in EMP	Actual implementation	Compliance status
			delayed for some additional construction works.	
	Surface and ground water contamination	Wastewater generated from the proposed project shall be EZ central drainage line and it goes ETP for further better treatment	- It has been conveyed that the project sponsor is attentive to address oil leakage and spillage, and has adopted for awareness raising initiative to workers. - ETP and WTP is in effect to treat the wastewater.	Complied
<i>Fires, explosion and other accidents</i>	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.	- There are various types of fire extinguishers to address different types of fire; - Automated firefighting system has been installed; - Regular fire drill has been accomplished.	Complied
<i>Waste generated from different sources</i>	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 CSCIL. - Apart from the domestic waste and paper waste, no solid or liquid waste is being generated in the project site.	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 3.4, with respective monitoring results (Table 3.7 to 3.10).

Table 3.4: Monitoring parameters and frequency of monitoring

Key parameters to be monitored: (1) Ambient Air Quality		
location	frequency	Parameter
Four corners of plant boundary and centre point of the plant	Quarterly (routine) analysis	PM ₁₀ , PM _{2.5} , CO, SPM, NO ₂ , SO ₂
Key parameters to be monitored: (2a) Surface Water		
location	frequency	parameter
Project site at North Rupshi	Quarterly (routine) analysis	pH, DO, BOD, COD, TDS
Key parameters to be monitored: (2b) Ground Water		
location	frequency	parameter
Project site at North Rupshi	Quarterly (routine) analysis	pH, TDS, As, Fe, Hardness, Total Coliform
Key parameters to be monitored: (3) Noise Level		
location	frequency	parameter
At four corners of Project boundary	Quarterly (routine)	Limits in dBA

Methodology of Air Quality Monitoring Test

The following methods were used to analyze the indoor air quality parameters and the measurement uncertainties were assigned to the respected parameters.

Table 3.5: Ambient Air Quality Testing Methods

S.L	Parameters	Methods	Measurement Uncertainties
1	CO (Carbon Monoxide)	Electrochemical	± 0.2 ppm
2	SPM (Suspended Particulate Matter)	Laser	± 0.4%
3	PM _{2.5} (Particulate Matter)	Laser	± 0.4%
4	PM ₁₀ (Particulate Matter)	Laser	± 1.1%

The geographical location and setting of the ambient air quality monitoring locations has been listed in following table.

Table 3.6: Ambient Air Quality Sampling Locations

S.L	Parameters	Geographic Location	Sampling Location
1	AQ1	23°45'4.48"N; 90°30'49.75"E	North-west corner
2	AQ2	23°44'53.83"N; 90°30'52.28"E	South-west corner
3	AQ3	23°45'5.70"N; 90°30'59.68"E	North-east corner
4	AQ4	23°44'55.34"N; 90°30'59.81"E	South-east corner

The above mentioned location for the data collection of ambient air quality monitoring test has been shown in a location map (**Annex 07**).

Table 3.7: Ambient air quality at project site

Location	20 May 2021						8 November 2021					
	SPM	PM _{2.5}	PM ₁₀	SO ₂	NO _x	CO	SPM	PM _{2.5}	PM ₁₀	SO ₂	NO _x	CO
North-West Side	112	54	92	ND	ND	0.1	145	66	135	ND	ND	0.3
North-East Side	124	68	91	ND	ND	0.2	180	67	146	ND	ND	0.4
South-West Side	135	62	102	ND	ND	0.1	189	65	148	ND	ND	0.4
South-East Side	58	18	52	ND	ND	0.1	114	52	110	ND	ND	0.0
UoM	µg/m ³	µg/m ³	µg/m ³	µg/m ³	µg/m ³	ppm	µg/m ³	µg/m ³	µg/m ³	µg/m ³	µg/m ³	ppm
National Standard	200	65	150	365	100	9	200	65	150	365	100	9

ND = Not Determined

Source: CSCIL UNIT-2, Air Quality Monitoring Report (Annex 9);

ECR 1997 (amended in 2017), Standard of DOE (Schedule - 02).

Methodology of Water Quality Monitoring Test

Samples were taken from selected water bodies and groundwater sources representing different parts of the designated study area. The surface water sampling was based on the identification of major surface water bodies such as the Shitalakshya River adjacent to the site (**Annex 7**). The ground water samples were collected from deep tube wells. Two surface water and two ground water samples were collected.

The samples were analyzed for parameters covering bacteriological and physio-chemical characteristics which include certain heavy metals and trace elements. Water samples were collected as grab water sampling procedure in a standard sampling bottle and 500 ml sterilized clean PET bottle for complete physio-chemical and bacteriological tests respectively. The samples were analyzed as per standard procedures/method given in standard Method for examination of water and wastewater Edition 23, published by APHA as well as using on site field test kit.

Detail of the sampling location for surface and ground water sample is provided in following table (Table 3.8).

Table 3.8: Surface and Ground Water Sampling Locations

Sampling Location	Sampling Water	Sampling Code	Geographic Locations	Source Type
North Point of the project	Surface water	SW1	23°44'46.01"N 90°30'51.84"E	Shitalakshya River
West side of the project	Surface water	SW2	23°44'41.91"N 90°30'52.08"E	Shitalakshya River
East side of the project	Ground water	GW1	23°44'45.39"N 90°30'58.87"E	Deep Tube well
West side of the project	Ground water	GW2	23°44'42.38"N 90°30'59.74"E	Deep Tube well

Details of the analysis method and protocol are presented in following table (Table 3.9).

Table 3.9: Methods for Surface and Ground Water Analysis

S.N.	Parameter	Unit	Test Name
1	Temperature	°C	Digital thermometer
2	TDS	mg/l	Digital TDS meter
3	EC	µmhos/cm	Digital EC meter
4	DO	mg/l	Digital DO meter
5	pH		Digital pH meter
6	Salinity	ppt	Digital Salinity meter
7	Fecal Coliform	mg/l	Lab Analysis
8	Iron (Fe)	mg/l	3113.B

The surface and ground water quality test result has been provided in table 3.10 and 3.11 respectively.

Table 3.10: Surface water quality at project site

Parameter	20 May 2021		8 November 2021		DOE Standard
	SW1	SW2	SW1	SW2	
Temp.	28	27	28	27	40
pH	8.0	8.2	8.0	8.2	6.0-9.0
BOD	8	10	12	8	50
COD	23	17	28	24	200
DO	6.8	6.9	7.2	6.5	4.5-8.0
TDS	550	540	1120	640	2100

Source: CSCIL UNIT-2, Surface Water Quality Monitoring Report (Annex 9);
ECR 1997(amended in 2017), Standard of DOE (Schedule - 03).

Table 3.11: Ground water quality at project site

Parameter	UoM	20 May 2021		8 November 2021		DOE Standard
		GW1	GW2	GW1	GW2	
Temp.	°C	28.0	27.8	27.4	27.3	20-30
pH		7.3	7.2	7.3	7.2	6.5-8.5
Total Coliform	mg/l	0	0	0	0	0
Hardness	mg/l	165	160	220	230	200-500
TDS	ppm	435	440	510	500	≤1000
Iron (Fe)	mg/l	0.1	0.1	0.1	0.2	0.3-1.0
Arsenic (As)	mg/l	-	-	-	-	0.05

Source: CSCIL UNIT-2, Ground Water Quality Monitoring Report (Annex 9);
ECR 1997(amended in 2017), Standard of DOE (Schedule - 03).

Methodology of Noise Quality Monitoring Test

Noise levels were recorded at four locations in the project area during the sampling time (**Annex 07**). Noise levels were recorded in the form of sound pressure levels with the help of a digital sound level meter. The sound level is recorded in form of A-weighted equivalent continuous sound pressure level (Leq) values with the use of A-weighting filters in the noise measuring instrument.

Table 3.12: Sampling Location of Noise Level Analysis

S.N.	Station Code	Geographic Location	Sampling Location
1	NQ-1	23°44'45.26"N 90°30'52.70"E	North-west side of the project
2	NQ-2	23°44'45.87"N 90°30'58.07"E	North-east side of the project
3	NQ-3	23°44'42.13"N 90°30'58.87"E	South-west side of the project
4	NQ-4	23°44'41.91"N 90°30'52.73"E	South-east side of the project

Table 3.13: Ambient noise level at project site

Sample Location	20 May 2021		8 November 2021	
	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)
NQ-1	62	49	66	51
NQ-2	63	53	70	50
NQ-3	66	54	67	52
NQ-4	52	48	60	40
DoE Standard	75	70	75	70

Source: CSCIL UNIT-2, Noise Quality Monitoring Report (Annex 9);
ECR 1997(amended in 2017), Standard of DOE (Schedule - 04).

II. Result of environmental monitoring

The ambient air and noise qualities have been found to comply with the acceptable limit of DOE. In addition, 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, CSCIL has kept the copy of 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 measures have been recommended.

3.3 COMPLIANCE WITH SAFEGUARDS POLICY STATEMENT, 2009 OF ADB

It is already said that the CSCIL UNIT-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 3.14.

Table 3.14: 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>	Water Technology BD Limited has conducted the environmental impact assessment	Complied
<i>Occupational and Community Health and safety</i>	CSCIL UNIT-2 has ensured the satisfactory application of PPE.	Complied
	There is satisfactory evidence of fire drill. During the reporting period, limited number of training and workshop were arranged by the project proponent maintaining COVID-19 health protocol.	Complied
<i>Biodiversity conservation and sustainable natural resource management</i>	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.	Complied
<i>Pollution prevention and abatement</i>	CSCIL UNIT-2 conducts the air, water and noise monitoring on a regular basis.	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 AND LIVELIHOOD

As the project site is a purchased land of City Economic Zone through willing seller-willing buyer arrangement and leased by CSCIL UNIT-2, there is no issue of resettlement. In addition, as the project site was not being used for any income generating activities before acquiring for economic zone establishment, so the project is not associated with any adverse impact on the livelihood of any local household.

4.2 INSTITUTIONAL ARRANGEMENT FOR SOCIAL SAFEGUARDS

Institutional arrangement

The social compliances are dealt by the respective project team. The current organogram of the CSCIL project team has been attached in annex **(Annex 13)**.

Grievance Redress Mechanism

The project site is a purchased land having no involuntary resettlement issue. In addition, there is no habitat of indigenous community in the project area. According to the local community members, CSCIL UNIT-2 focuses on deploying workers coming from local community and they are satisfactorily paid. In addition, CSCIL UNIT-2 is supportive to the local community. So, no grievance was flagged.

4.3 IMPACT ON INDIGENOUS PEOPLE

Based on the primary observation during site visit and secondary sources, no habitat of any indigenous community has been reported at the surrounding areas of the project site. 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.

CSCIL UNIT-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.

4.4 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 labor issues:

- 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.

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

4.5 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 during the reporting period.

The major findings of public consultation are as follows:

- Local people are happy for establishment of the economic zone as the locality gets increased opportunity of income through house rent to the increased inflow of workers.
- Local people do not have specific concern about project-personnel or project activity.
- They are pleased with the measures of CSCIL UNIT-2 to mitigate noise issue.
- Some of the local residents are pleased to get employment opportunities in the project
- They are happy with the social support of CSCIL UNIT-2.

II. Response from CSCIL

CSCIL UNIT-2 officials have confirmed that they are careful about the convenience of local people.

III. Disclosure

CSCIL UNIT-2 has confirmed that they are agreed to share environment and social safeguards related information to the relevant stakeholders, if they are asked.

4.6 ENHANCEMENT

CSCIL UNIT-2 acknowledges the importance of satisfactory relationship to adjacent communities. Accordingly, it has extended various types of cooperation to the community, which is expected to be continued.

4.7 OHS MEASURES TAKEN BY THE PROJECT PROPONENT

OHS Statistics

The City Seed Crushing Unit-2 Captive Power Plant began operations in January 2021 as the construction work was finished at the end of 2020. The project proponent maintains rigorous procedures and keep arrangements for occupational hazards, accidents, incidents. During the reporting period, there was no accident at the power plant. However, CSCIL maintain the accident register in accordance with ISO 14001 I OHSAS 18001 standards. CSCIL also keeps a separate PPE register, the template of which is listed here.

Table 4.1: PPE Register

Client:	Project: City Seed Crushing Unit-2 Captive Power	Date:	
Site Address: North Rupshi, Rupganj, Narayanganj			
Name of recipient	Date of Issue/replacement	Item Supplied	Signature of recipient
Project Operator	28.10.2021	Ear Plug, Gloves, mask	
Project Operator	15.11.2021	Safety boot and helmet	
Project Maintenance Team	02.11.2021	Ear Plug, Gloves, Helmet, mask, safety shoes	
Project Operator	10.12.2021	Safety goggles and mask	

COVID – 19 related Arrangements

CSCIL has been maintaining COVID-19 protocol in its premise when required. The project proponent follows the GoB regulations on COVID – 19 pandemic management and ensures necessary health safety arrangements and guidelines.

Factory Arrangement:

- Establishing hand wash stations at the main gate with adequate number of liquid soaps;
- Ensuring hand wash/sanitization for all the visitors and employees while entering into the factory;
- Ensuring at least two meters' distance from one tap to another;
- Always keeping hand washing stations clean;
- Checking workers and any visitor's temperature by using infrared thermometer/thermal scanning/ necessary health check-up of every employee

General Guidelines for all workers:

- Wearing cloth face coverings at all times when around coworkers or the general public.
- Frequently washing hands with soap and water for at least 20 seconds.
- Avoid touching eyes, nose, or mouth with unwashed hands.
- Practice good respiratory etiquette, including covering coughs and sneezes or coughing/sneezing into the elbow or upper sleeve.
- Avoid close contact (within 6 feet for a total of 15 minutes or more over a 24-hour period) with people who are visibly sick and practice physical distancing with coworkers and the public.
- Stay home if sick.

5.0 CORRECTIVE ACTION PLAN

The project sponsor has been responsive to maintain the required mitigation measures to address the potential environmental impacts. From social safeguard perspective, it has been reported 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 CSCIL UNIT-2 has been found to be mostly 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

পরিবেশগত ছাড়পত্র নবায়ন

ছাড়পত্র নং: ২১-৬০৫৭১

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

প্রতিষ্ঠান/প্রকল্পের নাম :	সিটি সিড ক্রাসিং ইন্ডাস্ট্রিজ লিঃ
উদ্যোক্তার নাম :	ফজলুর রহমান
সনাক্তকরণ নং :	২৪০০৭
প্রতিষ্ঠান/প্রকল্পের কার্যক্রম :	ক্রুড সয়াবিন তেল প্রস্তুত
প্রতিষ্ঠান/প্রকল্পের শ্রেণী :	Orange-B
প্রতিষ্ঠান/প্রকল্পের ঠিকানা :	উত্তর রূপসী, রূপগঞ্জ, নারায়ণগঞ্জ।
প্রদানের তারিখ :	৩০ জুন ২০২১ খ্রিঃ
মেয়াদ উত্তীর্ণের তারিখ :	১৬ মে ২০২২ খ্রিঃ

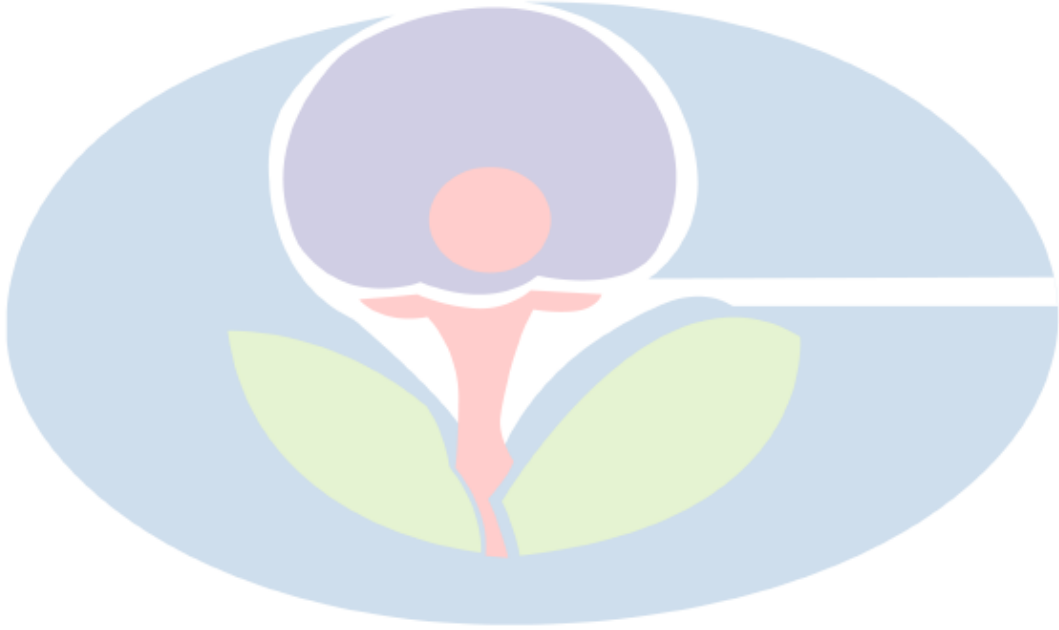


এ ছাড়পত্র সশর্তে প্রদত্ত এবং পৃথকভাবে সংযুক্ত শর্তাবলী যথাযথভাবে প্রতিপালন করতে হবে,
অন্যথায় ছাড়পত্র বাতিল/স্বত্বপূরণ আদায়সহ যে কোন আইনগত ব্যবস্থা গ্রহণ করা হবে।

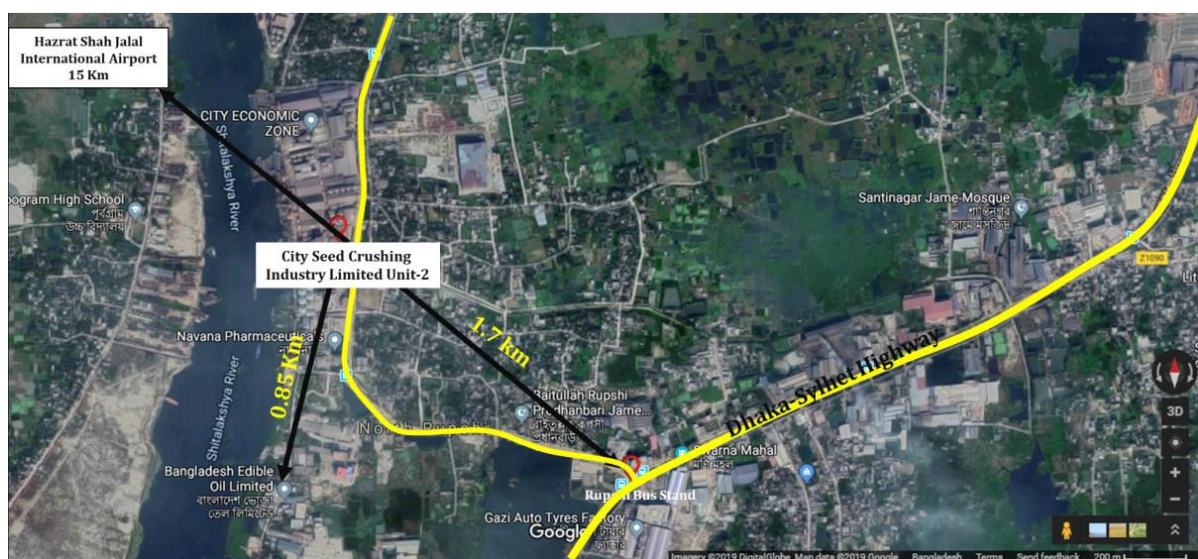
বিঃদ্রঃ এটি একটি সিস্টেম জেনারেটেড ছাড়পত্র এবং এতে কোনোরূপ স্বাক্ষরের প্রয়োজন নেই।

পরিবেশগত ছাড়পত্র নবায়ন এর জন্য প্রযোজ্য শর্তাবলী:

১. উভয় রূপসী, রূপগঞ্জ, শারায়ণগঞ্জ-এ অবস্থিত কমলা-খ শ্রেণির সিটি সীড অসিং ইভাঃ লিঃ নামক মৃত সয়াবিন তেল প্রস্তুত কার্যক্রম পরিচালনাকারী কারখানার অধুকূলে ১৭/০৫/২০১৫ খ্রিঃ তারিখে ২২.০২.৬৭০০.১৪০.৭১.৩৪৩.১৫-১৬৩ সংখ্যক স্মারকে জারীকৃত পরিবেশগত ছাড়পত্রের সকল শর্তাবলী অপরিবর্তিত রেখে আপনাদি ১৬/০৫/২০২২ খ্রিঃ তারিখ পর্যন্ত মেয়াদের জন্য নবায়ন করা হলো।



Annex 2: Satellite image of project location



Annex 3: Application of Safety Signage



Photograph: Safety Signage on the site

Annex 4: Arrangements of PPE



Photograph: Ear Bud

Annex 5: Arrangement of Fire Safety Equipment



Photograph: Fire Extinguisher



Photograph: Hose pipe



Photograph: Firefighting Van for City Economic Zone

Annex 6: Project Progress Matrix

SN	Phase	Activities	Jan- June,19	July- Dec,19	Jan- June,20	July- Dec,20	Jan- June,21	July- Dec,21
1	Pre- Construction	Land Lease/purchase						
2		Land Development						
3		Design & Drawing						
4		Machineries purchase						
5	Construction	Foundation work						
6		1st floor development						
7		2nd floor development						
8		Top floor development						
9		Machineries installation						
10		Fabrication work						
11	Operation	Full phase operation						

Annex 7: Sampling Map Showing the Monitoring Locations in the Project Site

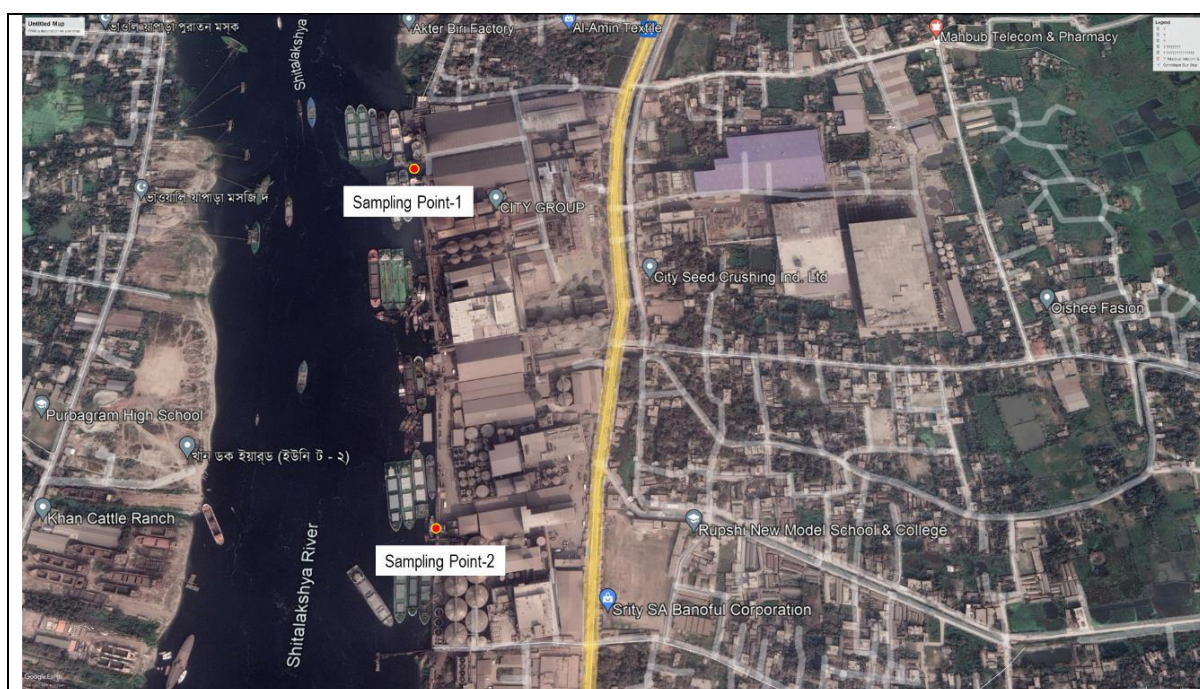


Figure 1: Sampling point of Surface Water Quality

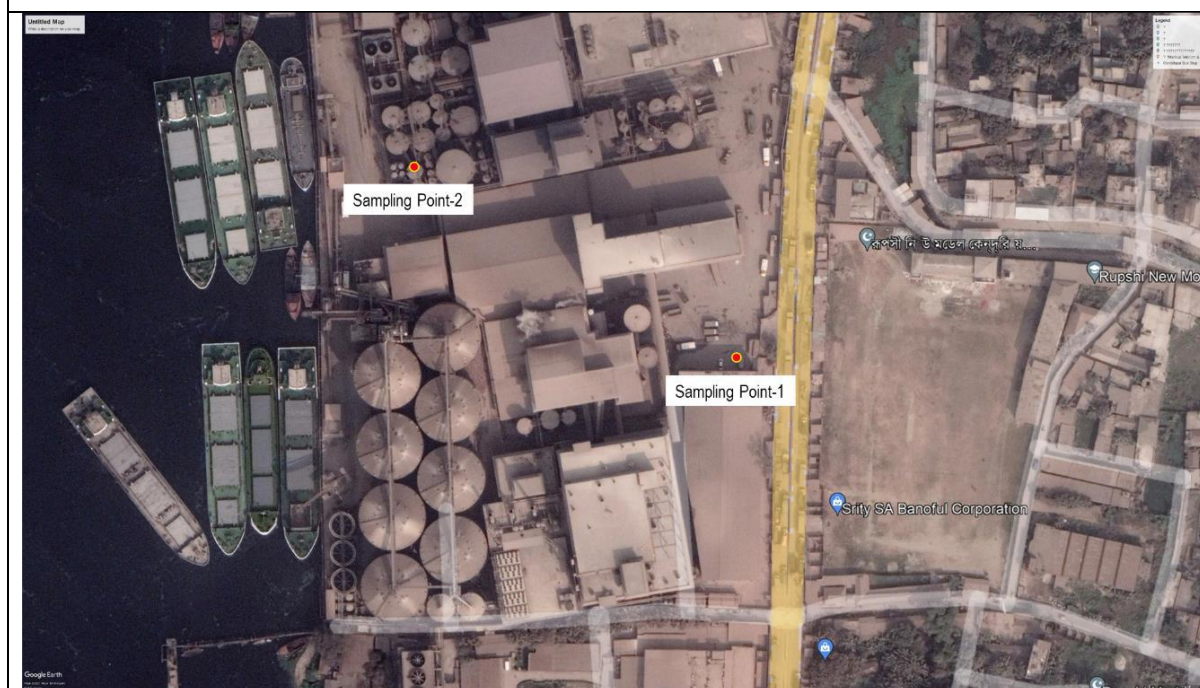


Figure 2: Sampling point of Ground Water Quality

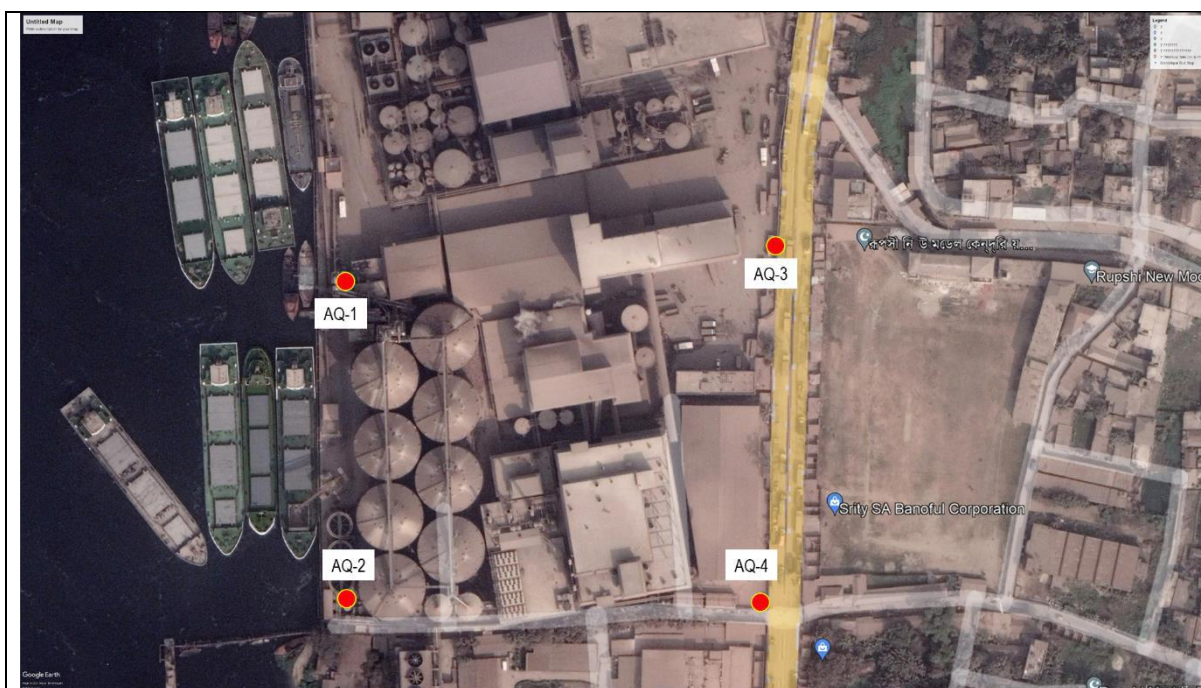


Figure 3: Sampling point of Ambient Air Quality at the project site

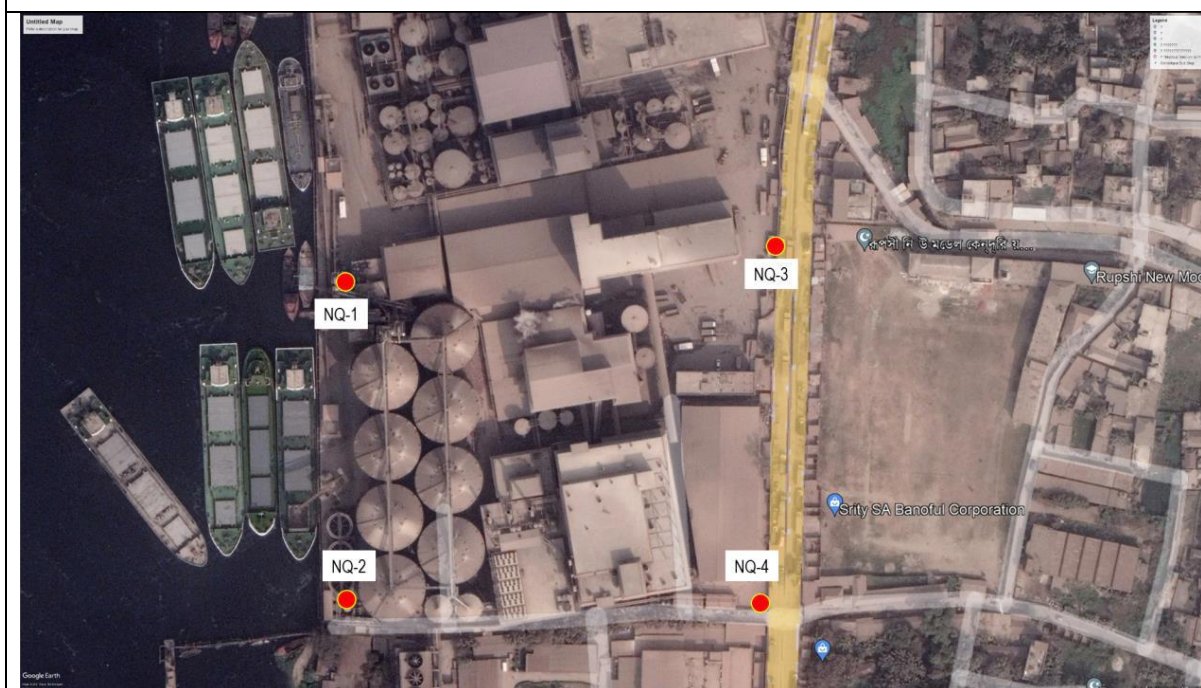


Figure 4: Sampling point of Noise Quality at the project site.

Annex 8: Photographs during Air, Noise and Water Quality Sampling



Figure 1: Photographs during surface water sample collection



Figure 2: Photographs during ground water sample collection



Figure 3: Photographs during air quality monitoring

Annex 9: Laboratory Test Reports For Ambient Air Quality, Noise Level and Water Quality Monitoring

See the attached file

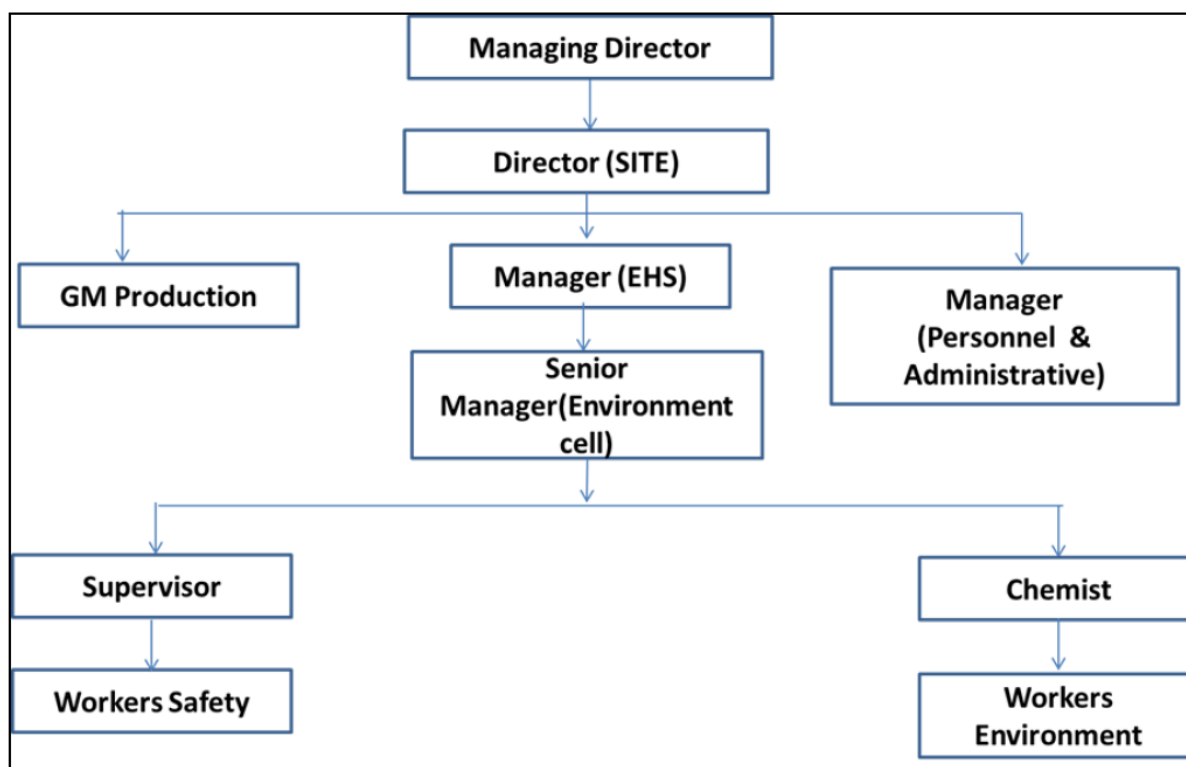
Annex 10: Sample Grievance Redress Form used in the Project Site

Reference No.:		Date:	
Full Name:			
Father's Name:			
Mother's Name:			
Address			
Phone No.			
Date, time & Venue of GRC meeting			
Description of Incitement or Grievance			
Date of incident			
What is you like to see happen to resolve the problem			
Signature of Complaint/ Thump impression of Complaints		Signature of person filling the form (CSCIL Representative)	

Annex 11: Accident/Incident Register used in the Project Site

Incident/Accidental Register Environment Health & Safety [ISO 14001 OHSAS 18001]													
Format NO:													
No	Date & Time	Location /Department	Supervisor	Reported by	Description	Types of Incidents (Environmental, Health & Safety, assets Damage, Production Loss)	Estimate Cost	Estimate Lost Hours	Corrective Actions	Responsible person	target date	completion date	Sign by M.R EHS Dept.

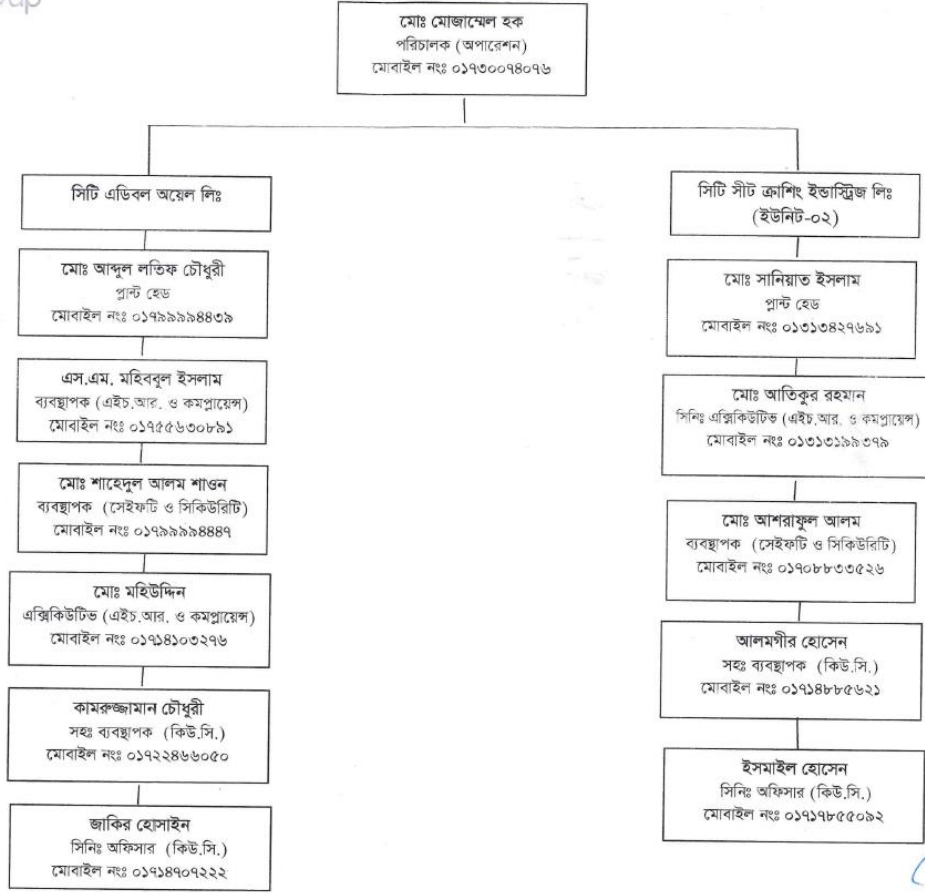
Annex 12: Organizational Structure for Environmental Compliance Monitoring



Annex 13: Current EHS Organogram of CSCIL Unit-02



ই. ইএচ. এস. টিম



Signature
Md. Zakir Hossain
GM (Admin) Project

Annex 14: Public Consultation with Local Residents during Annual Visit



Photograph: Public Consultation on City Economic Zone Limited

Annex 15: Participants List of Fire Drills

CITY SEED CRUSHING INDUSTRIES LTD. (Unit-02)
Rupshi, Rupgonj, Narayanganj.

SOP No. : CSCIU-2-HRA-15
Format No : CSCIU-2-F&S-12

বিষয়ঃ মৌলিক অগ্নিনির্বাপন বিষয়ক সতেজকরণ প্রশিক্ষণ।
তারিখঃ ০৪/১২/২০২১ ইং

অংশ গ্রহণকারীদের নামীয় তালিকা

ক্রমিক নং	নাম	কার্ড নং	পদবী	সেকশন	স্বাক্ষর
০১	শ্রীমান হারি	৫৪৩৭	মহঃ প্রবন্ধক	ইলেকট্রিক্যাল	
০২	হারুন আল মেল	৫০০২	ডুঃ ইঞ্জিনিয়ার	১১	
০৩	(মঃ) মিরাজ হোসেন	৫৫৫১	অফিসার	ইকসাম	
০৪	(মঃ) বাবু প্রদীপ	৭০৭২	ইঞ্জিনিয়ার	ইকসাম	
০৫	(মঃ) অমিত (হোসেন)	৭৫২৫	১১	ইকসাম	
০৬	(মঃ) সাহাবু (হোসেন)		ডুঃ ইঞ্জিনিয়ার	ইকসাম	
০৭	(মঃ) জুয়েল	৫৩৭৬	ইঞ্জিনিয়ার	ইকসাম	
০৮	(মঃ) হোসেন হোসেন	৭০৫৪	ইঞ্জিনিয়ার	১১	
০৯	(মঃ) হাজরা	৭০৫৮	ইঞ্জিনিয়ার	১১	
১০	জাহাঙ্গীর		ইঞ্জিনিয়ার	ইলেকট্রিক্যাল	
১১	শ্রীমান হারুন মল্লিক	৫৫২৫	মিঃ (মিঃ)	ইকসাম	
১২	ইদ্রিস (হোসেন)	৫৮৫৮	অফিসার	ইকসাম	
১৩	(মঃ) মিরাজ আলী	৭১৩০	ইঞ্জিনিয়ার	ইকসাম	
১৪	(মঃ) হারুন	৫৫৭৮	ইঞ্জিনিয়ার	ইলেকট্রিক্যাল	
১৫					
১৬					
১৭					
১৮					
১৯					
২০					

Md. Ashraful Alam
Manager (Safety & Security)
Rupshi Complex-1, City Group

Please see the attached file for fire drill records and photographs of the fire drills.

Annex 16: Participants List of EHS Workshops/Trainings

CITY SEED CRUSHING INDUSTRIES LTD. (Unit-02)
Rupshi, Rupgonj, Narayanganj.

Format No : CSCIL-HRA-18

অংশ গ্রহনকারীদের নামীয় তালিকা

বিষয়ঃ ওরিয়েন্টেশন বিষয়ক প্রশিক্ষণ।

তারিখঃ ১৮/১২/২০২১ইং

ক্র. নং	নাম	আইডি নং	পদবী	সেকশন	স্বাক্ষর
০১	মোঃ অনিক হাসান	০৭৫২৮	ট্রেইনি অপাঃ	উৎপাদন	অনিক
০২	মোঃ রাসেল খান	০৭৫২৯	অপারেটর	ব্যাগিং	Rasel
০৩	মোঃ রাজিব	০৭০৩২	অপারেটর	ব্যাগিং	Rajib
০৪	মোঃ বাবু প্রধান	০৭০৭২	ট্রেইনি অপাঃ	উৎপাদন	বাবু
০৫	মোঃ রাজিব আহমেদ	০৭০৩১	অপারেটর	উৎপাদন	Rajib
০৬	মোঃ সজল মিয়া	০৭০৩৫	ট্রেইনি অপাঃ	উৎপাদন	Sajal
০৭	মোঃ তুষার মিয়া	০৭০৬৮	ট্রেইনি অপাঃ	উৎপাদন	Tushar
০৮					
০৯					
১০					

(Signature)

তারিখ : ২৫/১২/২০২১ ইং

প্রশিক্ষণে অংশগ্রহণকারীদের নামীয় তালিকা

বিষয়ঃ “ Discrimination ” গত আচারন সমন্বিত প্রশিক্ষণ কর্মশাল

ক্র.নং	নাম	কার্ড নং	সেকশন	পদবী	স্বাক্ষর
১.	মোঃ রাজিব	০৭০৩২	অপারেটর	ব্যাগিং	রাজিব
২.	মোঃ কানন তালুকদার	০৫৯৬৮	সিনিয়র অপাঃ	উৎপাদন	কানন
৩.	মোঃ রাজিব আহমেদ	০৭০৩১	অপারেটর	উৎপাদন	রাজিব
৪.	মোঃ সজল মিয়া	০৭০৩৫	ট্রেইনি অপাঃ	উৎপাদন	Sajal
৫.	মোঃ তুষার মিয়া	০৭০৬৮	ট্রেইনি অপাঃ	উৎপাদন	Tushar
৬.	মোঃ বাবু প্রধান	০৭০৭২	ট্রেইনি অপাঃ	উৎপাদন	বাবু
৭.	মোঃ অনিক হাসান	০৭৫২৮	ট্রেইনি অপাঃ	উৎপাদন	অনিক
৮.	মোঃ আমিনুল ইসলাম	০৪৮২১	অপারেটর	সাইলো	আমিনুল
৯.	মোঃ এরশাদ আলী	০৫৩২৪	অপারেটর	সাইলো	এরশাদ
১০.	মোঃ আব্দুল হাই	০৫৩২৫	অপারেটর	সাইলো	হাই
১১.					
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১৪.					

[Signature]

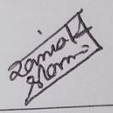
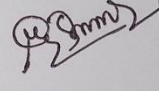
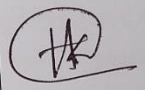
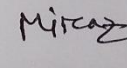
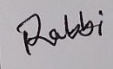
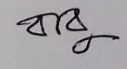
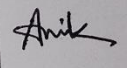
সিটি সীট ক্রাসিং ইন্ডাস্ট্রিজ লিঃ (ইউনিট-০২)

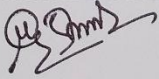
উত্তর রূপসী, রূপগঞ্জ, নারায়ণগঞ্জ।
সেইফটি কমিটি - ২০২১ ইং

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Issue No. : 03

শ্রমিক প্রতিনিধি ও মালিক পক্ষের মনোনীত প্রতিনিধিদের সমন্বয়ে সেইফটি কমিটি এর সাধারণ সভা

তারিখঃ ০৭/০৮/২০২১ইং

ক্র.নং	নাম	পদবী	কার্ড নং	বিভাগ/সেকশন	কমিটির পদবী	স্বাক্ষর	মন্তব্য
১	মোঃ সানিয়াত ইসলাম	উপ-মহাব্যবস্থাপক		উৎপাদন	সভাপতি		
২	মোঃ মহিউদ্দিন	এক্সিকিউটিভ		মানবসম্পদ ও কমপ্লায়েন্স	সদস্য সচিব		
৩	মোঃ শাহেদুল আলম শাওন	ব্যবস্থাপক		সেইফটি ও নিরাপত্তা	সদস্য		
৪	মোঃ হুমায়ুন কবির	সহঃ ব্যবস্থাপক		ইলেকট্রিক্যাল	সদস্য		
৫	মোঃ মিরাজ তালুকদার	অপারেটর	৫৫৬৯	উৎপাদন	সহঃ সভাপতি		
৬	মোঃ মনির হোসেন রাব্বি	সিনিয়র অপারেটর	৫৯৬৯	উৎপাদন	সদস্য		
৭	মোঃ বাবু প্রধান	ট্রেইনি অপারেটর	৭০৭২	উৎপাদন	সদস্য		
৮	মোঃ অনিক হোসেন	ট্রেইনি অপারেটর	৭৫২৮	উৎপাদন	সদস্য		



মোঃ মহিউদ্দিন
সদস্যসচিব-সেইফটি কমিটি
সিটি সীট ক্রাসিং ইন্ডাস্ট্রিজ লিঃ (ইউনিট-০২)

তারিখ : ২৬/১২/২০২১ ইং

প্রশিক্ষণে অংশগ্রহণকারীদের নামীয় তালিকা

বিষয়ঃ “Grievance Process & Handling Procedure সমন্বিত প্রশিক্ষণ কর্মশালা”

ক্র.নং	নাম	কার্ড নং	সেকশন	পদবী	স্বাক্ষর
১.	মোঃ রাজিব	০৭০৩২	অপারেটর	ব্যাগিং	রাজিব
২.	মোঃ কানন তালুকদার	০৫৯৬৮	সিনিয়র অপাঃ	উৎপাদন	কানন
৩.	মোঃ রাজিব আহমেদ	০৭০৩১	অপারেটর	উৎপাদন	রাজিব
৪.	মোঃ সজল মিয়া	০৭০৩৫	ট্রেইনি অপাঃ	উৎপাদন	সজল
৫.	মোঃ তুষার মিয়া	০৭০৬৮	ট্রেইনি অপাঃ	উৎপাদন	তুষার
৬.	মোঃ বাবু প্রধান	০৭০৭২	ট্রেইনি অপাঃ	উৎপাদন	বাবু
৭.	মোঃ অনিক হাসান	০৭৫২৮	ট্রেইনি অপাঃ	উৎপাদন	অনিক
৮.	মোঃ আমিনুল ইসলাম	০৪৮২১	অপারেটর	সাইলো	আমিনুল
৯.	মোঃ এরশাদ আলী	০৫৩২৪	অপারেটর	সাইলো	এরশাদ
১০.	মোঃ আব্দুল হাই	০৫৩২৫	অপারেটর	সাইলো	আব্দুল হাই
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Annex 17: Status of Preparation and Submission of OHS Plan

S.N	OHS Management Plan	Responsibility	Current Status
01	Personal Protective Equipment such as safety shoes, safety gloves, helmet, goggles, earmuffs etc. Using personal protection and safety equipment as required by the employer.	EHS officer	Complied
02	Reporting any injury or illness immediately to the supervisor or manager	EHS officer	Complied
03	Safe work procedures	EHS officer	Complied
04	Training and education	EHS officer	A training program for capacity building program of CSCCPP personnel and contractors will be arranged in next quarter upon availability of require manpower. There is environmental meeting performed in every month and discussed the overall performance of the environmental issues of power plant.
05	Medical and first aid	EHS officer	Complied
06	Hazard identification, assessment, and control	EHS officer	Will be complied after some time.

Annex 18: Status of Preparation and Submission of Site Specific EMP (SEMP)

Aspect	Activity	Mitigation Measures	Responsible for		Location	Current Progress Status
			Implementation	Monitor		
Pre-Construction/Construction Phase						
Soil Quality	Site clearing and preparation, laying of gas pipeline, use of heavy loaders	• Establish project boundaries before sand fill; • Demarcation of routes for the movement of heavy vehicles; • Remove and place the soil when it is dry and not when it is wet; • Restrict the height of topsoil piles to minimize erosion and compaction	Contractor	On site project management team of project developer	Within the demarcated project site boundary	Complied
Visual Amenity	Visual impacts from construction activities such as materials lay down, infrastructure development, etc.	√ The contractor shall ensure general cleanliness and good housekeeping practice at the project site at all times.	All Contractors on site	Site EHS Manager / EHS Team	Within the demarcated project site boundary	Complied
Water Resources	As the amount of water requirement is too little, the impact on water resources is not that significant.	√ Water conservation practice shall be done by recycling of treated water √ The Effluent water will be completely recycled in Plant to reduce the fresh water demand √ All reasonable measures will be taken to prevent the waste water produced in construction	All Contractors on site	Site EHS Manager / EHS Team	Within the 2 points, River site of the project area.	Complied
Air Quality	√ Dust generation due to construction activities. √ Transportation of raw materials and products.	√ Sprinkling of water which lead to dust suppression √ Unnecessary handling of dusty materials will be avoided √ Setting an appropriate site speed limit to reduce dust	All Contractors on site	Site EHS Manager / EHS Team	Within the demarcated project site boundary	Complied

Aspect	Activity	Mitigation Measures	Responsible for		Location	Current Progress Status
			Implementation	Monitor		
		generation from vehicles travelling over unmade surfaces.				
Soil	Soil disturbance due to accidental spillage	✓ A spill prevention and response plan shall be prepared by the contractor in order to control any inadvertent leakage or spillage. ✓ Any spilled chemical shall be immediately collected and disposed of in accordance with Spill Prevention and Response Plan and MSDS. ✓ Contractor shall ensure that a spill kit and adequate PPE is available at the site for emergency cleanup activities in case of chemical/oil spillage.	All Contractors on site	Site EHS Manager / EHS Team	Within the demarcated project site boundary	Complied
Noise Quality	Increased noise levels during construction & machinery	✓ The contractor shall use heavy equipment, machinery, and fuels in compliance with national regulations. ✓ The contractor shall perform regular maintenance on all equipment, vehicle and machinery to prevent noise emissions. ✓ Tree planting around the power plant area that will also act as noise attenuation measure for the power plant ✓ Workers should be supplied with ear plugs	All Contractors on site	Site EHS Manager / EHS Team	Within the demarcated project site boundary	Complied
Waste	Improper management	✓ The contractor shall provide a	All Contractors	Site EHS	Within the	

Aspect	Activity	Mitigation Measures	Responsible for		Location	Current Progress Status
			Implementation	Monitor		
Generation	and handling of hazardous and non-hazardous waste during construction.	separate storage area for hazardous materials. The hazardous materials/products must be labeled with proper identification of its hazardous properties. √ Chemical waste shall be stored in accordance with the provisions of Material Safety Data Sheets (MSDS). The contractor shall keep MSDS onsite. √ The contractor shall establish regular intervals for waste collection and disposal as per contractor's waste management procedures.	on site	Manager / EHS Team	demarcated project site boundary	Complied
Health and Safety risks	√ Exposure to health events during construction activities such as manual handling, temporary or permanent hearing loss and heat stress.	√ All construction equipment used for the execution of the project works shall be fit for purpose and carry valid inspection certificates and insurance requirements. √ Set up a system to alert workers on site. This may be temporary or permanent mains operated fire alarm. √ Fire extinguishers should be located at identified fire points around the site.	All Contractors on site	Site EHS Manager / EHS Team	Within the demarcated project site boundary	Complied

Annex 19: Annual Working Plan (January 2022 to December 2022)

SN	Activities	Jan	Feb	Mar	April	May	June	July	Aug	Sep	Oct	Nov	Dec
1	Safety and Operational drill												
2	EHS Training												
3	Ambient Air Quality Measures												
4	Ambient Noise Quality Measures												
5	Surface Water Quality Measures												
6	Ground Water Quality Measures												
7	Stack Emission Check												
8	PPE Distribution												