

Initial Environmental Examination

Document Stage: Draft
Project Number: 55201-001
October 2022

Bangladesh: Coastal Towns Climate Resilience Project – Construction of Multipurpose Cyclone Shelter in Lalmohan Pourashava

Prepared by the Local Government Engineering Department of the Government of Bangladesh
for the Asian Development Bank.

CURRENCY EQUIVALENTS

(as of 5 September 2022)

Currency Unit	=	Bangladesh Taka (BDT)
BDT1.00	=	\$0.0105
\$1.00	=	BDT 95.035

ABBREVIATIONS

ADB	–	Asian Development Bank
DOE	–	Department of Environment
EA	–	executing agency
EIA	–	environmental impact assessment
ECA	–	Environmental Conservation Act
ECR	–	Environmental Conservation Rules
ECC	–	environmental clearance certificate
EMP	–	environmental management plan
GOB	–	Government of Bangladesh
GRC	–	grievance redress committee
GRM	–	grievance redress mechanism
IEE	–	initial environmental examination
MOEFCC	–	Ministry of Environment and Forests, and Climate Change
NGO	–	nongovernment organization
O&M	–	operation and maintenance
PIU	–	project implementation unit
PMU	–	project management unit
ROW	–	right-of-way
SPS	–	safeguard policy statement
WHO	–	World Health Organization

WEIGHTS AND MEASURES

ha	–	hectare
km	–	kilometer
m	–	meter
mg/l	–	milligram per liter
MLD	–	million liters per day
mm	–	millimeter
km/h	–	kilometer per hour

NOTE

In this report, "\$" refers to United States dollars.

This draft initial environmental examination is a document of the borrower. The views expressed herein do not necessarily represent those of ADB's Board of Directors, Management, or staff, and may be preliminary in nature. Your attention is directed to the "terms of use" section on ADB's website.

In preparing any country program or strategy, financing any project, or by making any designation of or reference to a particular territory or geographic area in this document, the Asian Development Bank does not intend to make any judgments as to the legal or other status of any territory or area.

CONTENTS

	Page
Executive Summary	i
I. Introduction	1
A. Background.....	1
B. Coastal Towns Climate Resilience Sector Project.....	1
C. Purpose of the Initial Environment Examination	3
D. Methodology	3
E. Structure of IEE Report.....	4
II. Policy, Legal and Administrative Framework.....	6
A. ADB Safeguard Policy Statement 2009.....	6
B. National Environmental Legislations	10
C. International Environmental Agreements	16
III. Description of the Subproject.....	21
A. Subproject Location and Area.....	21
B. Subproject Scope and Components.....	24
C. Project Implementation Schedule.....	32
D. Resource Utilization	32
IV. Analysis of Alternatives	33
V. Description of Baseline Environment.....	34
A. Baseline Information	34
B. Project Influence Area.....	34
C. Physical Environment	34
D. Biological Environment	45
E. Socio-economic Environment	49
VI. Anticipated Environmental Impacts and Mitigation Measures	51
A. Design/Pre-Construction Phase Impacts and Mitigation Measures	51
B. Construction Phase Impacts and Mitigation Measures	55
C. Operation Phase Impacts and Mitigation Measures	64
D. Cumulative Impacts and Mitigation Measures	64
E. Unanticipated Impacts during Construction and Operation.....	65
F. Environmental Benefits and Enhancement Measures	65
VII. Information Disclosure, Consultation and Participation	66
A. Consultation and Participation	66
B. Public Consultations Conducted	66
C. Future Consultations during Detailed Design Stage	68
D. Information Disclosure	68
VIII. Grievance Redress Mechanism.....	69
IX. Environmental Management Plan.....	72
A. Institutional Arrangement	72
B. Environmental Management Plan (EMP)	78
C. Environmental Monitoring Program.....	102
D. Capacity Development Training	106
E. Environmental Management and Monitoring Plan Implementation Cost (Indicative)	107
X. Monitoring and Reporting.....	110
XI. Conclusion and recommendation	111

Appendix 1: Rapid Environmental Assessment (REA) Checklist	112
Appendix 2: Result of Integration Biodiversity Assessment Tool Screening	118
Appendix 3: Solid Waste Management Plan	131
Appendix 4: Spoil Management Plan	133
Appendix 5: Generic Traffic Management Plan (TMP)	135
Appendix 6: Bangladesh Government guideline in response to COVID-19 in worksites	140
Appendix 7: Record of Focus Group Discussion	155
Appendix 8: Sample Grievance Redress Form.....	166
Appendix 9: Sample Daily Inspection/Monitoring Checklist of Contractor	167
Appendix 10: Sample Inspection Checklist for PMU/Divisional/Regional Office /PIU.....	171
Appendix 11: Semi-annual Environmental Monitoring Report Template	174

TABLES

Table 1: District wise Pourashavas where Project (CTCRSP) will be implemented	3
Table 2: Summary Environmental Clearance Application Requirements Per Category	10
Table 3: Government of Bangladesh Classification of the Subproject	11
Table 4: Relevant Government Laws and Regulations.....	13
Table 5: International Environmental Agreements Relevant to the Subproject	16
Table 6: Applicable Ambient Air Quality Standards for Bangladesh Projects.....	17
Table 7: Ambient Noise Quality Standards.....	17
Table 8: Applicable Standards for Sound Originating from Motor Vehicles or Mechanized Vessels (Schedule 5 of ECR, 1997)	18
Table 9: Applicable Drinking Water Quality Standards for Bangladesh Projects.....	18
Table 10: Summary of Subproject Components and Description	24
Table 11: Basic Data on Proposed Cyclone Shelter.....	26
Table 12: Assessment of Environmental Impacts Based on Proposed Subproject Location.....	33
Table 13: Households and Population of Lalmohan Pourashava	49
Table 14: Summary of Public Consultation.....	67
Table 15: Environmental Management Plan.....	79
Table 16: Environmental Monitoring Program	103
Table 17: Sample Lecture and Seminar Training Program for Environmental Management....	106
Table 18: Indicative Environmental Management and Monitoring Cost	108

FIGURES

Figure 1: Government Environmental Clearance Process.....	12
Figure 2: Location and Map of Lalmohan Pourashva	22
Figure 3: Google Earth Map of Gazibari Madrasha, Lalmihon Pourashava	23
Figure 4: Vicinity Map of Gazi Bari Madrasha Cyclone Shelter Lalmohon Pourashava	23
Figure 5: Photos of the Site for the Cyclone Shelter.....	24
Figure 6: Ground Floor Plan for the Cyclone Shelter	27
Figure 7: First Floor Plan for the Cyclone Shelter.....	28
Figure 8: Second Floor Plan for the Cyclone Shelter.....	29
Figure 9: Roof Plan for the Cyclone Shelter	30
Figure 10: Land Development Plan of the Proposed Cyclone Shelter	31
Figure 11: Elevation Map Showing Subproject Location.....	35
Figure 12: Geological Formation of Barishal Region	36
Figure 13: General soil map (left) and Soil Texture Map (right) of Bangladesh.....	37
Figure 14: Earthquake and Seismic Zone Maps of Bangladesh	38
Figure 15: Koppen-Geiger Climate Classification and Location of Subproject (Red Star).....	39
Figure 16: Temperature and Precipitation Pattern in Lalmohan (Bhola)	39

Figure 17: Groundwater Zoning Map of Bangladesh	41
Figure 18: Cyclone Risk Map of Bangladesh.....	42
Figure 19: Flood Prone Areas of Bangladesh and Classifications	43
Figure 20: Areas with Riverbank Erosion in Bangladesh	44
Figure 21: Protected Areas of Bangladesh.....	48
Figure 22: Participants in Public Consultation for the Cyclone Shelter Subproject.....	67
Figure 23: Grievance Redress Process.....	71
Figure 24: Institutional Arrangement for Safeguards	72

EXECUTIVE SUMMARY

Bangladesh is one of the most vulnerable countries in the world with high exposure to a multitude of climate-related hazards. The natural hazards interact with physical and socioeconomic factors, including its low-lying delta and coastal areas, high population density, poverty levels, and lack of resilient infrastructure, resulting in high disaster risk with widespread impacts on both rural and expanding urban areas. The coastal towns are the most vulnerable to increasing climate risks.

Proposed Coastal Towns Climate Resilience Project (CTCRP). The ADB supported the Coastal Towns Climate Resilience Project (CTCRP) which will strengthen climate resilience and disaster preparedness in 22 (twenty-two) vulnerable coastal pourashavas (project towns) of Bangladesh. The towns were selected based on their vulnerability, population size, density, and level of past investments. The project takes a holistic and integrated approach to urban development and will (i) provide climate-resilient municipal infrastructure, and (ii) strengthen institutional capacity, local governance, and knowledge-based public awareness, for improved urban planning and service delivery considering climate change and disaster risks. Investments will benefit the poor and women. Municipal infrastructure will include (i) elderly (older persons), women, children, and persons with disabilities (EWCD) friendly cyclone shelters constructed with early warning system; (ii) roads including emergency access roads and roads with stormwater drainages, footpath, bridges and culverts rehabilitated, or constructed for improved connectivity, and access to emergency services in the event of disasters triggered by natural hazard, including footpath, drains bridges and culverts which are critical for accessing emergency services; (iii) climate-resilient infrastructure for improved urban flood risk management including stormwater drains, nature-based solutions, water bodies restoration, and integrated waste management (IWM) developed; (iv) gender-responsive and socially inclusive urban public spaces improved; ; and (v) slum improvement programs for basic service improvement implemented in each pourashava following poverty reduction action plan and (vi) EWCD-friendly sanitation facilities constructed for poor households. Slum improvement models currently being implemented in ADB projects, such as the Third Urban Governance and Infrastructure Improvement Project, will be replicated with necessary improvements.¹ Output 1 will also support development of EWCD-friendly socio-economic infrastructures including (i) development of gender responsive markets; (ii) bus terminals; and (iii) other priority roads, bridges, culverts, and boat landing stations.

The project will cover and prioritize the following 22 towns as beneficiaries: Bagerhat, Patuakhali, Morelganj, Mehendiganj, Paikgacha, Kolaroya, Patharghata, Goaranadi, Charfasson, Borhanuddin, Betagi, Jhalokathi, Muladi, Chalna (Dacope), Banaripara, Bedorganj, Shorupkathi, Lalmohan, Nolchity, Janjira, Kuakata and Bakerganj. The Ministry of Local Government, Rural Development and Cooperatives (MLGRDC) acting through its Local Government Engineering Department (LGED) will be the Executing Agency. Pourashavas are the implementing agencies of the project.

Subproject and Scope. Proposed Multipurpose Cyclone Shelter subproject is one of the subprojects proposed under the CTCRP. It will be used as emergency accommodation for affected communities in Lalmohan during cyclones or other extreme weather events and will also be utilized as a secondary school for most of the year. The cyclone shelter building will have three floors and a rooftop level and will occupy a footprint of about 291.86 square meters (ground floor) over a plot with total area of 10,572 m². It can accommodate 540 people on two floors. The cyclone shelter will have all essential facilities, including separate toilets for male, female, and pregnant women; care room for pregnant-women, ramp for disabled persons, water supply, power supply,

¹ ADB. 2014. [Third Urban Governance and Infrastructure Improvement Project](#). Manila.

and septic tank with sealed bottom and sides for wastewater treatment and disposal. The cyclone shelter will be in a vacant space within the Gazi Bari Madrasha complex and is well connected to the main road of Ward No. 7. This existing access road is bituminous concrete (BC) paved and the current condition is good, therefore, no road improvement work is required. There will be an access road of 6m length and 7.66m width, which will connect the cyclone shelter to the existing main road. The ground floor (plinth level) will be raised by 2.2 meters from the existing average ground level in accordance with the Climate Change adaptation measures to make the structure climate resilient. Madrasha compound is already raised by 1300 mm from existing ground level to avoid water logging and for easy access to the cyclone shelter. Raising the surrounding open area, formation level of nearby roads and plinth level of existing adjacent buildings are also considered. The details of which will be determined during the detailed design. Shallow groundwater quality in Lalmohan area is not good due to arsenic contamination, and therefore tube wells will be drilled deep until groundwater quality meets the drinking water standards. The cyclone shelter will be connected to the rural electrification network. Solar panels with a total capacity of four kilowatts will also be installed.

Categorization. The proposed subproject is classified as Environmental Category “B” as per the ADB Safeguard Policy Statement (2009) mentioned in Para 37 as no significant adverse impacts are envisioned and accordingly this Initial Environmental Examination (IEE) has been prepared. This IEE is assessing the environmental impacts and providing mitigation and monitoring measures to ensure that there are no significant impacts because of the proposed subproject implementation. The assessment was also carried out within the policy, legal, and administrative frameworks of the government relevant to sewerage and sanitation projects in the country. Per Government of Bangladesh’s Environment Conservation Act, 1995 (ECA, 1995) and Environment Conservation Rules (ECR, 1997), the cyclone shelter subproject is categorized as Orange-B, which will require a Location Clearance Certificate (LCC) and Environmental Clearance Certificate (ECC) from the Department of Environment (DOE). Project proponent needs to prepare IEE along with EMP and obtain ECC.

This IEE report aims to (i) provide facts, findings, and recommended actions from environmental assessment; (ii) present the national and local legal and institutional framework within which the environmental assessment has been carried out; (iii) provide information on existing geographic, ecological, social and temporal context including associated facilities within the project’s area of influence; (iv) assess the project’s likely positive and negative direct and indirect impacts to physical, biological, socioeconomic, and physical cultural resources in the project’s area of influence; (v) identify mitigation measures and any residual negative impacts that cannot be mitigated; (vi) describe the process undertaken during project design to engage stakeholders and the planned information disclosure measures and the process for carrying out consultation with affected people and facilitating their participation during project implementation; (vii) describe the project’s grievance redress mechanism for resolving complaints about environmental performance; (viii) present the set of mitigation measures to be undertaken to avoid, reduce, mitigate, or compensate for adverse environmental impacts; (ix) describe the monitoring measures and reporting procedures to ensure early detection of conditions that necessitate particular mitigation measures; and (x) identify who is responsible for carrying out the mitigation and monitoring measures.

Description of the Environment. The proposed subproject site is located in Gazi Bari Madrasha compound, Lalmohan Pourashava, Lalmohan Upazila, Bhola District. The cyclone shelter is proposed on a vacant, flat space within the school complex. No vegetation except little grass and small trees of mahogany and raintree is observed within the site. The subproject site is located about 1500 meters away from Tetulia River in the east. There is no notable land-based natural

habitat within or immediate to the vicinity of the subproject site. There are two protected areas within 50 km near the subproject location. There are no wetlands, mangroves, or estuaries. Screening with the Integrated Biodiversity Assessment Tool (IBAT) confirms that there is one ecologically sensitive area key biodiversity area within the 10 km radius of the subproject location.

Assessment of Potential Environmental Impacts and Mitigation Measures. Potential negative impacts were identified especially those concerning pre-construction, construction and operation phases. Planning principles and design considerations have been reviewed and incorporated into the site planning and design process wherever possible; thus, environmental impacts as being due to the project design or location were not significant. The cyclone shelter will involve straightforward construction and is unlikely to cause significant adverse impact. Usual construction-related impacts such as noise, dust generation, silt generation, soil contamination from chemicals spills and leaks, construction waste generation, and occupational and community health and safety risks including the spread of COVID-19, among others, will be localized, temporary and avoidable with the implementation of mitigation measures in the EMP. Design measures for climate change risks such as flooding are incorporated in the EMP. Location of site within a school compound is a concern for safety, and isolating construction area, barricading, restricting access etc., will be followed to minimize the impact. Construction related vehicle movement will be restricted to non-school houses, and any heavy noisy works that may interfere with school operation will be conducted out of school hours or in holidays. These are all general impacts of construction in urban areas, and there are well-developed methods of mitigation that are suggested in the Environmental Management Plan (EMP).

Environmental Management Plan. An environmental management plan (EMP) has been developed and included as part of this IEE, which outlines the following: (i) mitigation measures for environmental impacts during implementation; and (ii) an environmental monitoring program, and the responsible entities for mitigating, monitoring, and reporting. In accordance with this EMP, the Contractor will be required to prepare a site-specific environmental management plan (SEMP). Contractor will submit its SEMP for approval to the project implementation unit (PIU) or Divisional/Regional Office. The EMP and SEMP will (i) ensure that the activities are undertaken in a responsible non-detrimental manner; (ii) provide a pro-active, feasible, and practical working tool to enable the measurement and monitoring of environmental performance on site; (iii) guide and control the implementation of findings and recommendations of the environmental assessment conducted for the subproject; (iv) detail specific actions deemed necessary to assist in mitigating the environmental impact of the subproject; and (v) ensure that safety recommendations are complied with. Copies of the EMP and SEMP shall be kept on-site during the construction phase. The Contractor will be responsible for the organization, direction, and execution of environmental management related activities during construction of the proposed subproject. The Contractor will also undertake all activities in accordance with the relevant environmental requirements, including consent documentation and other regulatory and/or statutory and contractual requirements.

Implementation Arrangement. The Ministry of Local Government, Rural Development and Cooperatives through the Local Government Engineering Department (LGED) will be the executing agency. The Pourashavas that will be the recipients of the project are the implementing agencies. LGED has established a project management unit (PMU) comprising officials including an Environmental Safeguard Officer/Focal Person who is a permanent employee of LGED. The PMU will be strengthened by a project management and supervision consultant (PMSC) team composed of external experts or consultants in environmental and social safeguards, including experts on finance, procurement, technical areas, and contract management. Divisional/Regional Office and project implementation units (PIUs) will be established at the Divisional Level and

Pourashava Levels, respectively. For the subproject, Lalmohan Pourashava will serve as the PIU. The PMU, Divisional/Regional Office for Barishal Division and PIU will have responsibility for overseeing subproject management, including overseeing EMP implementation. The PMU will also have the responsibility for obtaining environmental clearance of the subproject (or the overall CTCRP) from the Department of Environment.

The Contractor will be required to (i) obtain all other statutory clearances prior to commencement of civil works; (ii) establish an operational system for managing environmental impacts; (iii) prepare a SEMP based on the EMP of this IEE, and submit to PIU or Divisional/Regional Office for approval; (iv) carry out all of the monitoring and mitigation measures set forth in the approved SEMP; and (v) implement any corrective or preventative actions set out in safeguards monitoring reports that the PMU will prepare from time to time to monitor implementation of this IEE, EMP, and SEMP. The Contractor shall allocate a budget for compliance with these EMP measures, requirements and actions.

Grievance Redress Mechanism. The subproject will adopt the common grievance redress mechanism (GRM) of the overall CTCRP, which has been set up to register grievances of the people regarding technical, social and environmental aspects. The process will be designed to be transparent, gender responsive, culturally appropriate and commensurate to the risks and adverse impacts of the subproject, as well as readily accessible to all segments of the affected people. Affected people are to be informed about the mechanism through media and public outlets. This participatory process shall ensure that all views of the people are adequately reviewed and suitably incorporated in the design and implementation process. Procedurally, every grievance or complaint will be resolved at the first tier or Pourashava level. Any unresolved grievances at the first level will be automatically elevated to second-tier or at the Divisional/Regional Office level (or at the Division level) for resolution. Then any unresolved grievances at the second level will be automatically elevated to the third-tier or PMU level for final resolution. The GRM, notwithstanding, an aggrieved person or complainant shall have access to the country's legal system at any stage. This can run parallel to accessing the GRM and is not dependent on the negative outcome of the GRM.

Information Disclosure and Consultation. The subproject has undertaken meaningful consultations² during the project preparatory stage. During the feasibility phase, focus group discussion (FGD) and public consultations were conducted with the representatives, officials and community people for site selection and construction of cyclone shelter at the proposed location. Their views were incorporated into the IEE and in the planning and development of the subproject. The IEE and/or the executive summary translated in the local language (Bangla) understandable to affected people and other stakeholders will be made available in an accessible place (e.g. community bulletin boards, offices of PMU, Divisional/Regional Office, PIU and Contractor, including any satellite office of Contractor at the subproject site) and will be disclosed to a wider audience via the ADB and project websites. Disclosure will be made locally at prior to scheduled consultation/s in order to provide stakeholders time to read and consult with expert/s if needed. The consultation process will be continued and expanded during project implementation, including

² Per ADB SPS, meaningful consultation means a process that (i) begins early in the project preparation stage and is carried out on an ongoing basis throughout the project cycle; (ii) provides timely disclosure of relevant and adequate information that is understandable and readily accessible to affected people; (iii) is undertaken in an atmosphere free of intimidation or coercion; (iv) is gender inclusive and responsive, and tailored to the needs of disadvantaged and vulnerable groups; and (v) enables the incorporation of all relevant views of affected people and other stakeholders into decision making, such as project design, mitigation measures, the sharing of development benefits and opportunities, and implementation issues.

design period, to ensure that stakeholders are fully engaged in the project and have the opportunity to participate in its development and implementation.³

Monitoring and Reporting. PMU, with support from PMSC, will be responsible for monitoring the project implementation and compliance with EMP requirements. The Contractor will submit monthly reports to the PIU/Divisional/Regional Office with jurisdiction over the subproject. The PIU/Divisional/Regional Office will submit quarterly environmental monitoring reports to PMU. The PMU shall consolidate quarterly reports from the PIUs/Divisional/Regional Office s and prepare semi-annual environmental monitoring report (SEMRs) which shall be submitted to ADB. PMU and ADB will post the cleared SEMRs on the project website and ADB website, respectively. ADB will monitor the project on an ongoing basis until a project completion report is issued.

Conclusion and Recommendations. The subproject will result in significant socio-economic benefits because of improved infrastructure and facilities for emergency response during calamities in Lalmohan Pourashava. The subproject is unlikely to cause significant adverse impacts to environment and people, and potential negative environmental impacts associated with construction can be mitigated to standard levels without difficulty through proper engineering practice, and the incorporation or application of recommended mitigation measures and procedures in the EMP and SEMP. Consequently, the potential adverse impacts that are associated with the operation phase (i.e., the period when the cyclone shelter is used for multiple purposes) can be mitigated upfront through incorporation of environmental requirements in the detailed engineering design, including climate change adaptation measures.

This IEE has been prepared in accordance with ADB SPS's requirements for projects classified as Category B for the environment. No further special study or detailed environmental assessment needs to be undertaken to comply with ADB SPS. However, per Environmental Conservation Rules of Bangladesh (ECR, 1997), the project is categorized as "Orange-B" category and requires Environmental Clearance Certificate (ECC) from Department of Environment (DOE). This must be obtained prior to award of civil works contracts.

This IEE has been prepared based on preliminary designs of the subproject. If the design is revised or modified, the PMU, with support from PMSC, shall update this draft IEE based on final detailed design and submit to ADB for review and disclosure. No work can commence until the final IEE is approved by ADB and provided to the Contractor, and the SEMP is approved by the PIU or Divisional/Regional Office.

³ Per ADB SPS, 2009, prior to disclosure on ADB website, ADB reviews the "borrower's/client's social and environmental assessment and plans to ensure that safeguard measures are in place to avoid, wherever possible, and minimize, mitigate, and compensate for adverse social and environmental impacts in compliance with ADB's safeguard policy principles and Safeguard Requirements 1-4."

I. INTRODUCTION

A. Background

1. The ADB supported the Coastal Towns Climate Resilience Project (CTCRP) which will strengthen climate resilience and disaster preparedness in 22 (twenty-two) vulnerable coastal pourashavas (project towns) of Bangladesh. The towns were selected based on their vulnerability, population size, density, and level of past investments. The project takes a holistic and integrated approach to urban development and will (i) provide climate-resilient municipal infrastructure, and (ii) strengthen institutional capacity, local governance, and knowledge-based public awareness, for improved urban planning and service delivery considering climate change and disaster risks. Investments will benefit the poor and women. Municipal infrastructure will include (i) elderly (older persons), women, children, and persons with disabilities (EWCD) friendly cyclone shelters constructed with early warning system; (ii) roads including emergency access roads and roads with stormwater drainages, footpath, bridges and culverts rehabilitated, or constructed for improved connectivity, and access to emergency services in the event of disasters triggered by natural hazard, including footpath, drains bridges and culverts which are critical for accessing emergency services; (iii) climate-resilient infrastructure for improved urban flood risk management including stormwater drains, nature-based solutions, water bodies restoration, and integrated waste management (IWM) developed; (iv) gender-responsive and socially inclusive urban public spaces improved; and (v) slum improvement programs for basic service improvement implemented in each pourashava following poverty reduction action plan and (vi) EWCD-friendly sanitation facilities constructed for poor households. Slum improvement models currently being implemented in ADB projects, such as the Third Urban Governance and Infrastructure Improvement Project, will be replicated with necessary improvements.⁴ The Ministry of Local Government, Rural Development and Cooperatives (MLGRDC) acting through its Local Government Engineering Department (LGED) will be the Executing Agency. Pourashavas are the implementing agencies of the project.

2. Coastal towns are particularly at risk from the impacts of climate change due to high levels of poverty and limited capacity of pourashavas (urban local governments) to invest in resilience. The pourashavas lack resilient infrastructure, clubbed with haphazard urbanization, lack of stormwater drains, poor solid waste management system further worsens the condition of these towns. Most of the coastal towns are situated on the riverbanks of low-lying tidal zones at an average elevation of 1.0–1.5 meters (m) from the sea level⁵ and coastal flooding is a key hazard faced by these towns. Inadequate basic municipal infrastructure to respond to increasing climate risk threatens both quality of life and the economic growth of coastal towns. This calls for an integrated approach for coastal town development that promotes risk-informed planning and investment for building resilience.

B. Coastal Towns Climate Resilience Sector Project

3. The project will be aligned with the following impacts: higher and sustainable growth trajectories achieved in the face of the various weather-related natural hazards and risks, and improved livability of coastal towns.⁶ The outcome of the project will be climate and disaster

⁴ ADB. 2014. [*Third Urban Governance and Infrastructure Improvement Project*](#). Manila.

⁵ Sowmen Rahman and Mohammed Ataur Rahman. Climate Extremes and Challenges to Infrastructure Development in Coastal Cities in Bangladesh. Volume 7, March 2015, Pages 96–108

⁶ Government of Bangladesh, General Economics Division, Bangladesh Planning Commission Ministry of Planning. 2020. Making Vision 2041 a Reality – Perspective Plan of Bangladesh, 2021–2041. Dhaka.

resilience of coastal towns strengthened including benefiting the poor and women. The project directly supports achieving project outcomes through three outputs.

4. **Output 1: Municipal infrastructure for resilience improved.** Municipal infrastructure will include (i) 25 elderly, women, children, and persons with disability friendly cyclone shelters with early warning system; (ii) 247.7 kms roads with drainage, bridges, and culverts rehabilitated or constructed for improved connectivity and access to emergency services in the event of disasters caused by natural hazards including access to cyclone shelter; (iii) climate-resilient infrastructure including 201.0 stormwater drainages, at least 3 nature-based solutions, water bodies restoration, and 4 integrated waste management (IWM) developed rehabilitated or constructed for improved urban flood risk management including; (iv) gender-responsive and socially inclusive urban public spaces improved; (v) slum improvement program implemented; and (vi) EWCD-friendly sanitation facilities constructed for poor households. Output 1 will also support development of EWCD-friendly socio-economic infrastructures including (i) local markets; (ii) bus terminals; and (iii) other priority roads, bridges, culverts, and boat landing stations.

5. **Output 2: Resilient livelihood improved.** Output 2 includes: (i) climate vulnerable households covered in the graduation program in six project towns; (ii) women, including person with disabilities, reported increased skills for resilient livelihood; and (iii) inventory of productive assets of vulnerable households documented and insured. The Graduation Approach and Program will be adopted to ensure livelihood resilience.⁷

6. **Output 3: Institutional capacity, governance, and climate-awareness strengthened.** Output 3 includes: (i) risk-informed urban development plans and poverty reduction action plans of project towns submitted to pourashavas council; (ii) staff of LGED and pourashavas including 90% eligible women staff reported increased knowledge on climate and disaster risk assessment to inform the urban development plans and to enforce development control regulations linked with natural hazards; (iii) knowledge and capacity of LGED and pourashavas' staff including 90% of women staff on nature-based solutions and green solution application developed;⁸ (iv) disaster management committee on disaster preparedness measures, cyclone shelter management committees, and standing committees on women and children affairs, poverty reduction and slum improvement in project pourashavas operationalized for improving municipal governance and sustainable service delivery;⁹ (v) revenues enhancement plan adopted by each project *pourashava* to improve municipal finance systems; (vi) computerized tax records and billing systems made functional; (vii) annual gender responsive operation and maintenance (O&M) plans approved and at least 75% of the required annual budget is allocated and spent; and (viii) gender responsive urban space guidelines developed. Output 3 supports to enhance public awareness, behavior change, and community mobilization in light of emergencies such as coronavirus disease (COVID-19) and cyclone Amphan in 2020. It will also support training and capacity

⁷ The graduation program originated in Bangladesh and has since been adopted in several countries as a holistic, time-bound interventions to lift households from poverty through: (i) social assistance to support immediate needs; (ii) livelihood promotion; (iii) financial inclusion; and (iv) social empowerment.

⁸ Nature-based solutions promote actions to protect, sustainably manage and restore natural and modified ecosystems in ways that address societal challenges effectively and adaptively, to provide both human well-being and biodiversity benefits. (Source: IUCN (2020). Guidance for using the IUCN Global Standard for Nature-based Solutions. A user-friendly framework for the verification, design and scaling up of Nature-based Solutions. First edition. Gland, Switzerland: IUCN).

⁹ A risk-informed performance-based budget allocation strategy will be adopted to promote governance-led infrastructure improvement to ensure sustainable urban services. The *pourashava* will need to fulfil a set of performance criteria to receive fund for infrastructure improvement. Performance criteria is elaborated in project administration manual (footnote 27).

building of LGED and Pourashavas to institutionalize information technology-based remote monitoring through strengthening LGED's geographic information systems section, monitoring and evaluation unit, and project management unit.

7. The proposed CTCRP is to be implemented in 22 pourashavas (local governments). District wise location of the CTCRP towns is summarized in **Table 1**.

Table 1: District wise Pourashavas where Project (CTCRSP) will be implemented

District	Town (Pourashava)	District	Town (Pourashava)
Barishal	Bakerganj	Bhola	Charfasson
	Mehendiganj		Lalmohan
	Banaripara		Borhanuddin
	Muladi	Jhalokathi	Jhalokathi
	Gouranadi		Nalchity
Bagerhat	Bagerhat	Satkhira	Kalaroa
	Morelganj	Khulna	Paikgacha
Patuakhali	Patuakhali		Chalna (Dacope)
	Kuakata	Pirojpur	Swarupkathi
Shariatpur	Janjira	Barguna	Patharghata
	Bhedarganj		Betagi

C. Purpose of the Initial Environment Examination

8. The objective of the IEE is to provide guidance to LGED, its consultants and contractors on how to design and construct the subproject in an environmentally responsible manner, ensuring that all negative effects are prevented or mitigated, and positive impacts are enhanced.

D. Methodology

9. This IEE report was prepared following the requirements of the ADB SPS, 2009. Site visits, stakeholder consultations, and primary and secondary data collection were conducted to assess the existing environmental conditions of the project site and the potential environmental impacts that may occur during project implementation. Baseline environmental monitoring for air quality, noise level, surface water quality and groundwater quality will be conducted before the start of construction activities. The Integrated Biodiversity Assessment Tool (IBAT) was used to screen potential risks on the protected areas or critical habitat that may exist around the project sites.

10. During the feasibility phase, focus group discussion (FGD) and public consultations were conducted with the representatives, officials and community people for site selection and construction of cyclone shelter at the proposed location. Their views were incorporated into the IEE and in the planning and development of the subproject.

11. The following summarizes the activities conducted in relation to the preparation of this IEE report:

- (i) Review of project- and subproject-related documents and literature;
- (ii) Site visits to the subproject site to review the existing environmental conditions and develop baseline information for the subproject area;
- (iii) Consultation with executing and implementing agencies to discuss subproject components, benefits, and impacts;

- (iv) Analysis of typical environmental impacts of subproject components and identification of suitable measures to mitigate potential impacts; and
- (v) Review and develop institutional arrangements and capacity building needs for implementation of environmental management and monitoring.

E. Structure of IEE Report

12. The report has been structured in compliance with ADB SPS, 2009.

- (i) **Executive Summary.** This chapter describes concisely the critical facts, significant findings, and recommended actions.
- (ii) **Introduction.** Presents a brief overview of the assignment along with its background, objectives, scope of work and methodology etc.
- (iii) **Policy, Legal, and Administrative Framework.** This chapter discusses the national and local legal and institutional framework within which the environmental assessment is carried out. It also identifies project-relevant international environmental agreements to which the country is a party.
- (iv) **Description of the Project.** This chapter describes the proposed project; its major components; and its geographic, ecological, social, and temporal context, including any associated facility required by and for the project.
- (v) **Analysis of Alternative.** Analyzes the environmental situation "With and Without project".
- (vi) **Description of the Environment.** This chapter describes relevant physical, biological, and socioeconomic conditions within the study area. It also looks at current and proposed development activities within the project's area of influence, including those not directly connected to the project. It indicates the accuracy, reliability, and sources of the data.
- (vii) **Anticipated Environmental Impacts and Mitigation Measures.** This chapter predicts and assesses the project's likely positive and negative direct and indirect impacts to physical, biological, socioeconomic (including occupational health and safety, community health and safety, vulnerable groups and gender issues, and impacts on livelihoods through environmental media, and physical cultural resources in the project's area of influence, in quantitative terms to the extent possible; identifies mitigation measures and any residual negative impacts that cannot be mitigated; explores opportunities for enhancement; identifies and estimates the extent and quality of available data, key data gaps, and uncertainties associated with predictions and specifies topics that do not require further attention; and examines global, transboundary, and cumulative impacts as appropriate.
- (viii) **Information Disclosure, Consultation, and Participation.** This chapter (i) describes the process undertaken during project design and preparation for engaging stakeholders, including information disclosure and consultation with affected people and other stakeholders; (ii) summarizes comments and concerns received from affected people and other stakeholders and how these comments have been addressed in project design and mitigation measures, with special attention paid to the needs and concerns of vulnerable groups, including women, the poor, and Indigenous Peoples; and (iii) describes the planned information disclosure measures (including the type of information to be disseminated and the method of dissemination) and the process for carrying out consultation with affected people and facilitating their participation during project implementation.

- (ix) **Grievance Redress Mechanism.** This chapter describes the grievance redress framework (both informal and formal channels), setting out the time frame and mechanisms for resolving complaints about environmental performance.
- (x) **Environmental Management Plan.** This chapter deals with the set of mitigation and management measures to be taken during project implementation to avoid, reduce, mitigate, or compensate for adverse environmental impacts (in that order of priority). It may include multiple management plans and actions (mitigation, monitoring and performance indicators).
- (xi) **Monitoring and Reporting.** Outlines the environmental monitoring program and reporting system including the cost of implementing the EMP.
- (xii) **Conclusion and Recommendations.** Presents the conclusion and recommendations of the IEE study.

II. POLICY, LEGAL AND ADMINISTRATIVE FRAMEWORK

13. Alongside the ADB Safeguard Policy Statement (SPS, 2009), each component of the project must comply with the relevant legal and policy framework of Government of Bangladesh, such as the Environment Conservation Act 1995 (ECA, 1995) with amendments in 2000, 2002 and 2010, and the Environment Conservation Rules 1997 (ECR, 1997), which are the primary environmental law and rules of the country.

A. ADB Safeguard Policy Statement 2009

14. ADB SPS provides guidance on the environment category of projects based on the degree of anticipated environmental impacts. The objectives are to ensure the environmental soundness and sustainability of projects, and to support the integration of environmental considerations into the project decision-making process.

15. ADB environmental safeguards are triggered if a project is likely to have potential environmental risks and impacts. The initial process of categorization involves filling out a sector-specific rapid environmental assessment (REA) checklist. A project is classified based on the most environmentally sensitive component, and assigned with one of the four environmental categories (A, B, C, or FI) defined in the SPS. These categories are as follows:

- (i) **Category A:** Project that is likely to have significant adverse environmental impacts which are irreversible, diverse, or unprecedented. These impacts may affect an area larger than the sites or facilities subject to physical works. An environmental impact assessment (EIA), including an environmental management plan (EMP), is required.
- (ii) **Category B:** Project with potential adverse environmental impacts that are less adverse than those of category A projects. These impacts are site-specific, few if any of them are irreversible, and in most cases mitigation measures can be designed more readily than for category A projects. An initial environmental examination (IEE), including an EMP, is required.
- (iii) **Category C:** Project that is likely to have minimal or no adverse environmental impacts. An EIA or IEE is not required, although environmental implications need to be reviewed.
- (iv) **Category FI:** Project is classified as category FI if it involves the investment of ADB funds to, or through, a financial intermediary.

16. **Screening and Categorization.** Subprojects are to be screened for their expected environmental impacts and are assigned to a specific category. Categorization is to be based on the most environmentally sensitive component. However, for subproject(s) with component(s) that can trigger Category A or with potentially significant adverse impacts that are diverse, irreversible, or unprecedented, project management unit (PMU) shall examine alternatives to the subproject's location, design, technology, and components that would avoid, and, if avoidance is not possible, minimize adverse environmental impacts and risks, and to meet Category B categorization. The rationale for selecting the subproject location, design, technology, and components will be properly documented, including cost-benefit analysis, taking environmental costs and benefits of the various alternatives considered into account. The "no action" alternative will be also considered.

17. Initial screening using ADB REA checklist was conducted for the cyclone shelter and access road, and results of the rapid assessment show that the project is unlikely to cause any significant adverse impacts, and therefore classified under Category B per ADB SPS. See

Appendix 1 for the filled REA Checklist. Thus, this IEE report has been prepared following ADB SPS requirements for project with Category B classification.

18. Environmental Assessment. Environmental assessment shall include a description of environmental and social baseline to provide an understanding of current conditions forming the benchmark against which subproject impacts are assessed. Environmental impacts and risks will be analyzed for all relevant stages of the project cycle, including design and planning stage, construction, operations, decommissioning, and post-closure activities such as rehabilitation or restoration. This IEE may be used as a model document for other future cyclone shelter subprojects.

19. Environmental Planning and Management. The PMU shall prepare an environmental management plan (EMP) to be included in the IEE report. The EMP shall describe and address the potential impacts and risks identified by the environmental assessment. The level of detail and complexity of the EMP and the priority of the identified measures and actions will be commensurate with the subproject's impact and risks. The EMP shall include the proposed mitigation measures, environmental monitoring and reporting requirements, emergency response procedures, related institutional or organizational arrangements, capacity development and training measures, implementation schedule, cost estimates, and performance indicators.

20. Public Disclosure. The PMU shall submit the following to ADB for review and disclosure on ADB website upon receipt of acceptable reports and endorsement from the PMU, so affected people, other stakeholders, and the public can provide meaningful inputs into the subproject design and implementation:¹⁰

- (i) final IEE upon receipt;
- (ii) a new or updated IEE and corrective action plan prepared during subproject implementation, if any, upon receipt; and
- (iii) environmental monitoring reports submitted during subproject implementation upon receipt.

21. Consultation and Participation. The PMU and PIU shall carry out meaningful consultation¹¹ with affected people and other concerned stakeholders, including civil society, and facilitate their informed participation. The consultation process and its results are to be documented and reflected in the environmental assessment report.

22. Grievance Redress Mechanism. The PMU shall establish a mechanism to receive and facilitate resolution of affected peoples' concerns, complaints, and grievances about the subproject's environmental performance. The grievance mechanism shall be scaled to the risks

¹⁰ Per ADB SPS, 2009, prior to disclosure on ADB website, ADB reviews the "borrower's/client's social and environmental assessment and plans to ensure that safeguard measures are in place to avoid, wherever possible, and minimize, mitigate, and compensate for adverse social and environmental impacts in compliance with ADB's safeguard policy principles and Safeguard Requirements 1-4." Upon its receipt of acceptable safeguard documents and endorsement by PMU, ADB discloses the same on ADB website.

¹¹ Per ADB SPS, 2009, meaningful consultation means a process that (i) begins early in the project preparation stage and is carried out on an ongoing basis throughout the project cycle; (ii) provides timely disclosure of relevant and adequate information that is understandable and readily accessible to affected people; (iii) is undertaken in an atmosphere free of intimidation or coercion; (iv) is gender inclusive and responsive, and tailored to the needs of disadvantaged and vulnerable groups; and (v) enables the incorporation of all relevant views of affected people and other stakeholders into decision making, such as project design, mitigation measures, the sharing of development benefits and opportunities, and implementation issues.

and adverse impacts of the subproject. As of the ADB loan processing for the project, a grievance redress mechanism (GRM) has been established and discussed in detail in Chapter VI below.

23. **Monitoring and Reporting.** The PMU shall monitor, measure and document the progress of implementation of the EMP. If necessary, PMU will identify the necessary corrective actions, and reflect them in a corrective action plan. PMU will prepare and submit to ADB semi-annual environmental monitoring reports that describe progress with implementation of the EMP and compliance issues and corrective actions, if any. For subprojects likely to have significant adverse environmental impacts during operation, reporting will continue until project completion.

24. **Unanticipated Environmental Impacts.** Where unanticipated environmental impacts become apparent during subproject implementation, PMU shall update the environmental assessment and EMP or prepare a new environmental assessment and EMP to assess the potential impacts, evaluate the alternatives, and outline mitigation measures and resources to address those impacts.

25. **Pollution Prevention and Control Technologies.** During the design, construction, and operation of the subproject the PMU and PIU shall apply pollution prevention and control technologies and practices consistent with international good practice, as reflected in internationally recognized standards such as the World Bank Group's Environmental, Health and Safety Guidelines. These standards contain performance levels and measures that are normally acceptable and applicable to subprojects. When the government regulations differ from these levels and measures, the subproject shall achieve whichever is more stringent. If less stringent levels or measures are appropriate in view of specific subproject circumstances, LGED through PMU will provide full and detailed justification for any proposed alternatives that are consistent with the requirements presented in ADB SPS.

26. **Occupational Health and Safety.** The PMU¹² shall ensure that workers¹³ are provided with a safe and healthy working environment, considering risks inherent to the sector and specific classes of hazards in the subproject work areas, including physical, chemical, biological, and radiological hazards. PMU shall ensure to take steps to prevent accidents, injury, and disease arising from, associated with, or occurring during the course of work by (i) identifying and minimizing, so far as reasonably practicable, the causes of potential hazards to workers; (ii) providing preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances; (iii) providing appropriate equipment to minimize risks and requiring and enforcing its use; (iv) training workers and providing them with appropriate incentives to use and comply with health and safety procedures and protective equipment; (v) documenting and reporting occupational accidents, diseases, and incidents; and (vi) having emergency prevention, preparedness, and response arrangements in place.

27. **Community Health and Safety.** The PMU shall ensure to identify and assess the risks to, and potential impacts on, the safety of affected communities during the design, construction, operation, and decommissioning of the project, and will establish preventive measures and plans to address them in a manner commensurate with the identified risks and impacts.

¹² In case where responsibility is delegated to subproject contractors during construction phase, PMU shall ensure that the responsibilities on occupational health and safety as described herein are included in the contract documents.

¹³ Including nonemployee workers engaged by LGED through contractors or other intermediaries to work on project sites or perform work directly related to the project's core functions.

28. PMU shall ensure to apply preventive and protective measures for both occupational and community health and safety consistent with international good practice, as reflected in internationally recognized standards such as the World Bank Group's Environmental, Health and Safety Guidelines.¹⁴ PMU shall also adhere to necessary protocols in response to emerging infectious diseases such as the corona virus disease (COVID-19) consistent with the guidelines of relevant government healthcare agencies and the World Health Organization.

29. **Physical Cultural Resources.** The PMU is responsible for siting and designing the subproject to avoid significant damage to physical cultural resources. Such resources likely to be affected by the subproject will be identified, and qualified and experienced experts will assess the subproject's potential impacts on these resources using field-based surveys as an integral part of the environmental assessment process. When the proposed location of a subproject component is in areas where physical cultural resources are expected to be found as determined during the environmental assessment process, chance finds procedures shall be included in the EMP.

30. **Environmental Audit.** When the subproject involves existing activities or facilities, PMU is responsible to ensure that relevant external experts will perform environmental audits to determine the existence of any areas where the subproject may cause or is causing environmental risks or impacts. If the subproject does not foresee any new major expansion, the audit constitutes the environmental assessment for the subproject.

31. **Bidding and Contract Documents.** IEE, which contains the EMP, shall be included in bidding and contract documents and verified by PIU. The PMU and PIU shall also ensure that bidding and contract documents include specific provisions requiring contractors to (i) comply with all other conditions required by ADB,¹⁵ and (ii) to submit to PIU, for review and approval, a site-specific environmental management plan (SEMP), including (i) proposed sites/locations for construction work camps, storage areas, hauling roads, lay down areas, disposal areas for solid and hazardous wastes; (ii) specific mitigation measures following the approved EMP; (iii) monitoring program as per SEMP; and (iv) budget for SEMP implementation, among others as may be required. No work can commence prior to approval of SEMP. A copy of the EMP and/or approved SEMP will be always kept on site during the construction period. Non-compliance with, or any deviation from, the conditions set out in the EMP and/or SEMP constitutes a failure in compliance and shall require corrective actions.

32. **Conditions for Award of Contract and Commencement of Work.** PMU shall not award any works contract under the subproject until (i) relevant provisions from the EMP are incorporated into the works contract; (ii) this IEE is updated to reflect subproject's detailed design and PMU has obtained ADB's clearance of such updated IEE; and (iii) DOE-approved IEE (i.e., IEE in compliance with ECR, 1997) and other necessary permits from relevant government agencies have been obtained. For "design, build, and operate" type contracts, PMU shall ensure no works for a subproject which involves environmental impacts shall commence until (i) relevant provisions from the EMP are incorporated into the works contract; and (ii) this IEE is updated to reflect subproject's detailed design and PMU has obtained ADB's clearance for such updated IEE.

¹⁴ World Bank Group, 2007. *Environmental, Health, and Safety General Guidelines*. Washington, DC.

¹⁵ Contractors to comply with (i) all applicable labor laws and core labor standards on (a) prohibition of child labor as defined in national legislation for construction and maintenance activities; (b) equal pay for equal work of equal value regardless of gender, ethnicity, or caste; and (c) elimination of forced labor; and with (ii) the requirement to disseminate information on sexually transmitted diseases, including HIV/AIDS, to employees and local communities surrounding the project sites.

B. National Environmental Legislations

33. **Environmental Conservation Act (ECA), 1995.** Provides for the conservation of environment, improvement of environmental standards and control and mitigation of environmental pollution. In line with these provisions of the Act, the Environmental Conservation Rules, 1997 have been framed. This act provides for (i) remedial measures for injury to ecosystem; (ii) provides for any affected person due to environmental pollution to apply to Department of Environment (DOE) for remediation of the damage; (iii) discharge of excessive environmental pollutants; (iv) inspection of any activity for testing any equipment or plant for compliance to the environment act, including power to take samples for compliance; (v) power to make rules and standards with reference to environment; and (vi) penalty for non-conformance to environment act under the various sections.

34. **Environmental Conservation Rules (ECR), 1997.** The Rules outline the processes and requirements of environmental clearances for specific type of projects indicated therein and stipulates that “no industrial unit or project shall be established or undertaken without obtaining, in the manner prescribed by rules, an ECC from the Director General” of the DOE. Schedule 1 of the Rules classifies industrial units and projects into four categories according to their site and impact on the environment, namely (i) green, (ii) orange-A, (iii) orange-B, and (iv) red. The rules specify the procedures for issuing ECC for the various categories of projects. **Table 2** summarizes the requirements for environmental clearance application for each category.

Table 2: Summary Environmental Clearance Application Requirements Per Category

Category	Requirements
Green	(i) Completed Application for Environmental Clearance Certificate (ECC); (ii) Payment of the appropriate fee based on Schedule 3 of Environmental Conservation Rules (ECR), 1997; (iii) General information about the project; (iv) Exact description of the raw materials to be used and the product to be manufactured (where relevant); and (v) No objection certificate from the local authority.
Orange-A	(i) Completed Application for ECC; (ii) Payment of the appropriate fee based on Schedule 3 of ECR, 1997; (iii) General information about the project; (iv) Exact description of the raw materials to be used and the product to be manufactured (where relevant); (v) No objection certificate from the local authority; (vi) Prior issued location clearance certificate (LCC) from Department of Environment (DOE); (vii) Process flow diagram; (viii) Layout plan (showing location of effluent treatment plant (ETP)); (ix) Effluent discharge arrangement; and (x) Outlines of the plan for relocation and rehabilitation (if applicable).
Orange-B	(i) Completed Application for ECC; (ii) Payment of the appropriate fee based on Schedule 3 of ECR, 1997; (iii) Report on the feasibility of the project (if still being proposed); (iv) Report on the initial environmental examination (IEE) of the project, including process flow diagram, layout plan (showing ETP), design of ETP of the project (if still being proposed); (v) Report on the environmental management plan (EMP); (vi) No objection certificate from the local authority; (vii) Prior issued LCC from DOE;

Category	Requirements
	(viii) Emergency plan relating to adverse environmental impact and plan for mitigation of the effect of pollution; (ix) Outline of the relocation and rehabilitation plan (where applicable); and (x) Other necessary information as may be required.
Red	(i) Completed Application for ECC; (ii) Payment of the appropriate fee based on Schedule 3 of ECR, 1997; (iii) Report on the feasibility of the project (if still being proposed); (iv) Report on the IEE of the project and the terms of reference (TOR) for environmental impact assessment of the project; or environmental impact assessment (EIA) report on the basis of the TOR previously approved by DOE, including process flow diagram, layout plan (showing ETP), design of ETP of the project (if still being proposed); (v) Report on the EMP; (vi) No objection certificate from the local authority; (vii) Prior issued LCC from DOE; (viii) Emergency plan relating to adverse environmental impact and plan for mitigation of the effect of pollution; (ix) Outline of the relocation and rehabilitation plan (where applicable); and (x) Other necessary information as may be required.

^a A Guide to Environmental Clearance Procedure, DOE, Bangladesh Ministry of Environment and Forests, August 2010.

35. Schedule 1 of ECR, 1997 provides the classification for industrial projects and types of development that are common in Bangladesh. **Table 3** indicates the subproject's category and its likely classifications based on this schedule.

Table 3: Government of Bangladesh Classification of the Subproject

No.	Subproject	Component	Equivalent in Schedule I of Environmental Conservation Rules	Department of Environment Classification ^a
1.	Cyclone Shelter	Cyclone Shelter	Hotel, multi-storied commercial and apartment building.	Orange – B

^a The equivalent in the schedule is too broad. The Orange – B classification is adopted based on all similar infrastructure projects of ADB and other multilateral lenders in Bangladesh.

36. Based on the ECR 1997, the subproject is required to secure an ECC.

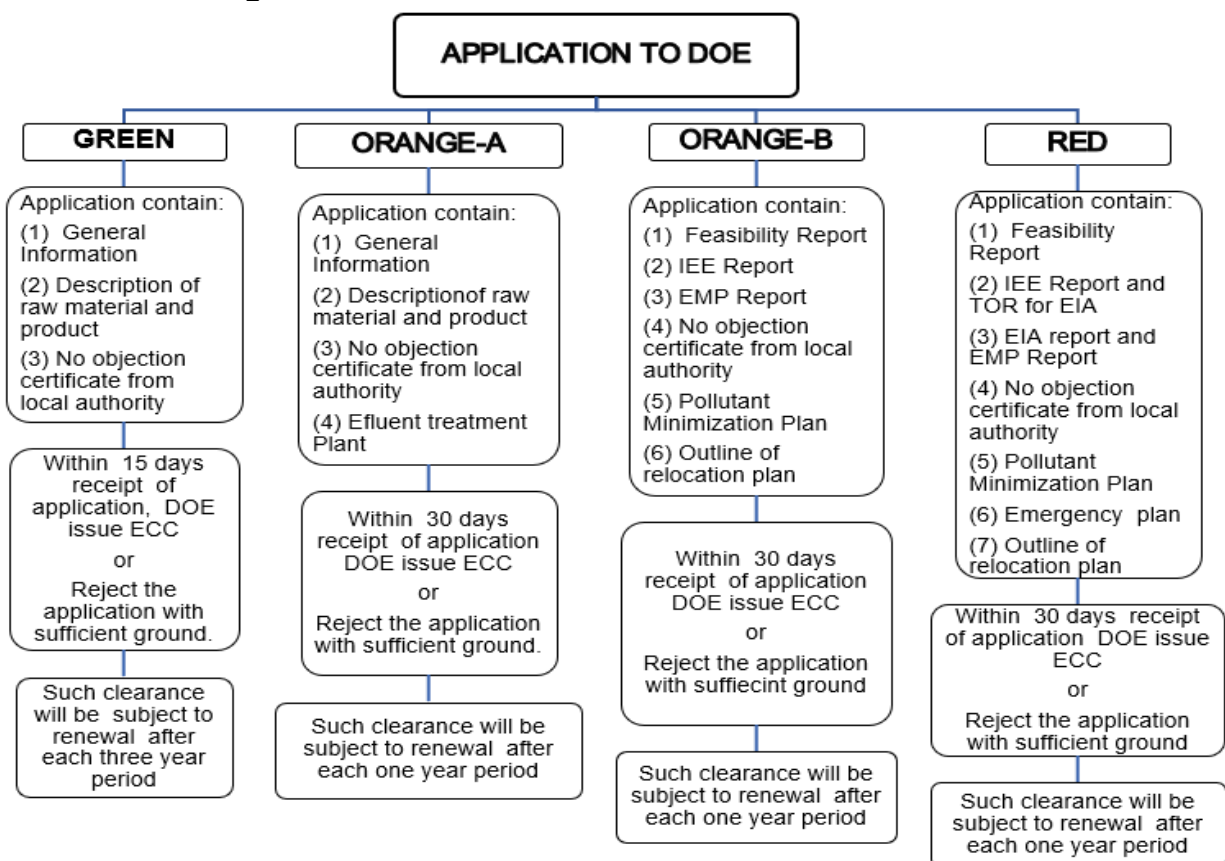
37. **Application for Environmental Clearance.** The application and requirement for issuance of ECC are described in the ECR, 1997 and summarized in Table 2. This involves the completion and submission of an application using a form available from the DOE website,¹⁶ which is revised from time to time. The accomplished application form is submitted to DOE together with requirements as enumerated in Table 2. The proponent is also required to pay equivalent application fee prescribed in Schedule 13 of ECR, 1997.

38. The ECC is issued within 30 days from receipt of the application by DOE. Such ECC is required to be renewed every year from the date of its effectivity. For the project, PMU is responsible for application for ECC. Each subproject will obtain its corresponding ECC depending on the requirements per ECR 1997, and approval should be obtained before contract award.

¹⁶ Government of Bangladesh. [Department of Environment](#).

39. **Figure 1** shows the summary of review process and timelines set under ECR, 1997, leading to the issuance of environmental clearance certificate (ECC) by DOE.

Figure 1: Government Environmental Clearance Process



DOE = Department of Environment, ECC = environmental clearance certificate, EIA = environmental impact assessment, EMP = environmental management plan, IEE = initial environmental examination, TOR = terms of reference.

40. **Other relevant government laws and regulations.** The implementation of subprojects proposed under the project will be governed by government environmental acts, rules, policies, and regulations. **Table 4** summarizes the applicable national and local laws, regulations, and standards for environmental assessment and management, including applicable international environmental agreements.

Table 4: Relevant Government Laws and Regulations

Laws, Regulations, and Standards	Details	Relevance to the Project
National Environmental Policy, 2018	The central theme of the policy is to ensure protection and improvement in environment. The policy gives a thrust to sustainable development and long-term use of natural resources. The National Environment Policy contains policy statements and strategic options with regard to population and land-use management, management and utilization of natural resources and other socio-economic sectors, as well as the necessary arrangements for the implementation of the policy.	Subproject will have site-specific impacts and will require implementation of mitigation measures to ensure protection and improvement of the environment.
Environment Court Act, 2000 and subsequent amendments in 2003	Establishment of Environment Court for trial of an offence or for compensation under environmental law, such as environment pollution.	Option to affected persons for grievances related to environmental safeguards.
National Safe Drinking Water Supply and Sanitation Policy of 1998	Ensures access to safe water and sanitation services at an affordable cost	<p>Pourashava and water sanitation authorities will take actions to prevent wastage of water. They will take necessary steps to increase public awareness to prevent misuse of water</p> <p>Pourashava shall be responsible for solid waste collection, disposal and their management</p>
National Water Act 2013 Water Rule 2018	Ensures Bangladesh water sources are free from any type of pollution. Pollution from water in urban outfalls and reservoirs, e.g., lakes, canals, ponds and ditches may result in amenity losses, fisheries depletion, health problems and fish and aquatic species contamination.	<p>Secure clearance certificate on water resource development subprojects</p> <p>The subproject will secure the necessary permit prior to the development of water supply from deep tube well.</p> <p>The subproject will implement measures (e.g. septage treatment) to ensure that water source pollution is avoided.</p>
Wetland Protection Act 2000	Advocates protection against degradation and resuscitation of natural waterbodies such as lakes, ponds, beels, khals, tanks, etc. affected by man-made interventions or other causes. Prevents the filling of publicly owned water bodies and depressions in urban areas for preservation of the natural aquifers and	The related works for subproject may impact natural water bodies. The subprojects' EMPs ensure measures are in place to protect natural water bodies and prevent draining or filling into these water bodies during construction.

Laws, Regulations, and Standards	Details	Relevance to the Project
	environment. Prevents unplanned construction on riverbanks and indiscriminate clearance of vegetation on newly accreted land.	
National Land Use Policy, 2001	Sets out guidelines for improved land-use and zoning regulations. The main objective of this policy is to ensure criteria-based uses of land and to provide guidelines for usage of land for the purpose of agriculture, housing, afforestation, commercial and industrial establishments, rail and highway and for tea and rubber gardens.	Compliance with land use and zoning regulations
Bangladesh Labor Law, 2006	It is a comprehensive law covering labour issues such as: conditions of service and employment, youth employment, benefits including maternal benefits, compensation for injuries, trade unions and industrial relations, disputes, participation of workers in company's profits, regulation of safety of dock workers, penalty procedures, administration and inspection. This Act pertains to the occupational rights and safety of factory workers and the provision of a comfortable environment for working. It also includes rules on registration of labourers, misconduct rules, income and benefits, health and fire safety, factory plan	Compliance to provisions on employment standards, occupational health and safety, welfare and social protection, labor relations and social dialogue, and enforcement. Prohibition of employment of children and adolescents.
Bangladesh Labor Rules, 2015	Includes rules on registration of laborers, misconduct rules, income and benefits, health and fire safety, factory plan	Contractors to implement occupational health and safety measures Contractor will be liable for compensation for work-related injuries
The Pourashava Act 2009 / Ordinance issued for the amendment of local government (municipality) ordinance, 2009 and 2010; The Pourashava Ordinance, 1977; Municipal Administration Ordinance, 1960	Provides guidance for subproject integrated community and workers health and hygiene at the construction and operation and maintenance stages of the project	Coordinate with Pourashava committees on disaster management measures, water and sanitation and waste management

Laws, Regulations, and Standards	Details	Relevance to the Project
Bangladesh Climate Change Strategy and Action Plan of 2009	Enhances the capacity of government ministries, civil society and private sector to meet the challenges of climate change	Integrate adaptation measures for buildings in consideration of extreme climatic events
Building Construction (Amendment) Act and Building Construction Rules, Bangladesh National Building Code	Regulates technical details of building construction and to maintain standards of building construction	Follow specifications to ensure structural integrity of buildings
Standing Order on Disaster, 1999 (Updated 2019)	Enhances capacity at all tiers of government administrative and social structures for coping with and recovering from disasters	Geographical information system (GIS) technology will be applied at the planning stage to select location of cyclone shelter considering habitation, communication facilities, distance from the nearest cyclone center, etc. Advice from the concerned District Committee should be obtained prior to final decision
National Disaster Management Act of 2012	Establishes a framework for managing disasters in a comprehensive way.	Setting-up emergency response procedures
Public Health (Emergency Provisions) Ordinance, 1994	The ordinance calls for special provisions with regard to public health. Whereas an emergency has arisen, it is necessary to make special provision for preventing the spread of human disease, safeguarding public health and providing them adequate medical service and other services essential to the health of respective community and workers in particular during the construction related work.	Relevant especially during the construction phase
The Employees State Insurance Act, 1948	It must be noted that health, injury and sickness benefit should be paid to people, particularly respective workers at workplace under the Act.	Relevant to the welfare of workers under the project.
Solid Waste Management Rules 2021	The Rules provides a comprehensive set of rules based on national 3R strategy and other national and international policies and guidelines pertaining to solid waste management. It defines the roles and responsibilities of relevant government ministries and agencies, including local government authorities	The subproject will generate solid wastes and will implement measures to comply with the IWM rules.

Laws, Regulations, and Standards	Details	Relevance to the Project
	and other stakeholders in implementing solid waste management undertakings. It also includes the environmental requirements necessary for these undertakings, provision of incentives for the promotion of sustainable waste management practices, etc.	

EMP = environmental management plan, LGI = local government institutions.

C. International Environmental Agreements

41. **Table 5** below lists the relevant international environmental agreements that the government is party to, and their relevance to the subproject.

Table 5: International Environmental Agreements Relevant to the Subproject

International Environmental Agreement	Signed/Year Ratified	Details	Relevance
United Nations Framework Convention on Climate Change (UNFCCC)	22.10.2001 13.11.2003 (amended)	Parties to take precautionary measures to anticipate, prevent or minimize the causes of climate change and mitigate its adverse effects.	The subproject is subject to the impact of climate change. Engineering designs of the subprojects consider climate change impacts, such as flooding and temperature rise. A climate change assessment is a part of the project processing, which covers all subprojects.
Paris Convention on Protection of the World Cultural and Natural Heritage, 1972	1983	Parties to ensure the protection and conservation of the cultural and natural heritage situated on territory of, and primarily belonging to, the State	The subproject location is not an archaeological or historical site. However, the related works with the subproject may impact undiscovered cultural and natural heritage relics during construction phase. The environmental management plans (EMPs) of subprojects ensure measures for chance finds.

42. **Gaps in the ADB SPS, 2009 requirements and government laws and regulation on environmental assessment.** There are no major gaps between the ADB SPS, 2009 requirements and the GoB's requirements on environmental assessment. Screening, categorization, environmental assessment and environmental management plan preparation, implementation and compliance monitoring are required. However, analysis of alternatives and public consultation and disclosure are not mandatory under the GoB's ECR (1997).

43. **Applicable Environmental Standards.** The ECR, 1997 also provides the environmental standards applicable to the project. Schedule 2 of the ECR presents the national standards for

ambient air quality and Schedule 4 of the ECR presents the national standards for ambient noise. Following requirements of ADB SPS, the subproject shall apply pollution prevention and control technologies and practices consistent with international good practice, as reflected in EHS Guidelines. When the government regulations differ from these levels and measures, the subproject shall achieve whichever is more stringent. If less stringent levels or measures are appropriate in view of specific subproject circumstances, LGED through PMU will provide full and detailed justification for any proposed alternatives that are consistent with the requirements presented in ADB SPS, 2009.

44. The tables (6,7,8, and 9) below show the comparison of the national standards and internationally recognized standards, including the applicable standards to be followed under the project per ADB SPS requirements.

Table 6: Applicable Ambient Air Quality Standards for Bangladesh Projects

Parameter	Bangladesh Ambient Air Quality Standard ($\mu\text{g}/\text{m}^3$) ^a	WHO Air Quality Guidelines ($\mu\text{g}/\text{m}^3$)	
		Global Update ^b 2005	Second Edition ^c 2000
TSP	200 (8-h)	-	-
PM ₁₀	50 (1-year) 150 (24-h)	50 (24-h) 500 (10-min)	-
PM _{2.5}	15 (1-year) 65 (24-h)	10 (1-year) 25 (24-h)	-
SO ₂	80 (1-year) 365 (24-h)	20 (24-h) 500 (10-min)	-
NO ₂	100 (1-year)	40 (1-year) 200 (1-h)	-
CO	10,000 (8-h) 40,000 (1-h)	-	10,000 (8-h) 100,000 (15-min)
Lead	0.5 (1-year)		
Ozone (O ₃)	235 (1-h) 157 (8-h)	100 (8-h)	

ADB = Asian Development Bank, CO = carbon oxide, h = hour, $\mu\text{g}/\text{m}^3$ = microgram per cubic meter, min = minute, NO₂ = nitrogen dioxide, PM_{2.5} = particulate matter 2.5, PM₁₀ = particulate matter 10, SO₂ = sulfur dioxide, TSP = total suspended particle, WHO = World Health Organization.

^a Based-on SRO 220-Law 2005 (Amendment of Schedule 2 of ECR, 1997). Air Quality Management Project of Bangladesh <http://www.doe-bd.org/aqmp/standard.html>

^b IFC World Bank Group. 2007. *Environmental, Health and Safety General Guidelines*. Washington, D.C.

^c WHO Regional Office for Europe. 2000. *Air Quality Guidelines for Europe, Second Edition*. Copenhagen.

Table 7: Ambient Noise Quality Standards

Receptor/ Source	National Noise Standard Guidelines, 1997 ^a (dB)		WHO Guidelines Value For Noise Levels Measured Out of Doors ^b (One Hour LA _q in dBA)	
	Day	Night	07:00 – 22:00	22:00 – 07:00
Industrial area	75	70	70	70
Commercial area	70	60	70	70
Mixed Area	60	50	55	45
Residential Area	50	40	55	45
Silent Zone	45	35	55	45

^a Schedule 4 of ECR, 1997.

^b WHO. 1999. *Guidelines for Community Noise*; World Bank Group. 2007. *Environmental, Health and Safety General*

Table 8: Applicable Standards for Sound Originating from Motor Vehicles or Mechanized Vessels (Schedule 5 of ECR, 1997)

Category of Vehicles	Unit	Standards	Remarks
*Motor Vehicles (all types)	dBa	85	As measured at a distance of 7.5 meters from exhaust pipe.
		100	As measured at a distance of 0.5 meter from exhaust pipe.
Mechanized Vessels	dBa	85	As measured at a distance of 7.5 meters from the vessel which is not in motion, not loaded and is at two thirds of its maximum rotating speed.
		100	As measured at a distance of 0.5 meter from the vessel which is in the same condition as above.

* At the time of taking measurement, the motor vehicle shall not be in motion and its engine conditions shall be as follows:-

- (a) Diesel engine – maximum rotating speed.
- (b) Gasoline engine –at two thirds of its maximum rotating speed and without any load.
- (c) Motorcycle – If maximum rotating speed is above 5000 rpm; two-thirds of the speed, and if maximum rotating speed is less than 5000 rpm, three-fourth of the speed.

Table 9: Applicable Drinking Water Quality Standards for Bangladesh Projects

National Standards for Drinking Water (Schedule 3, Rule 12B of ECR 1997)			WHO Guidelines for Drinking Water Quality 4th Edition incorporating the first addendum, 2017
Parameter	Unit	Standards	
Aluminum	mg/l	0.2	None established
Ammonia (NH ₃)	mg/l	0.5	None established
Arsenic	mg/l	0.05	0.01
Barium	mg/l	0.01	1.3
Benzene	mg/l	0.01	0.01 ^b
BOD5 20°C	mg/l	0.2	-
Boron	mg/	1.0	2.4

National Standards for Drinking Water (Schedule 3, Rule 12B of ECR 1997)			WHO Guidelines for Drinking Water Quality 4th Edition incorporating the first addendum, 2017
Cadmium	mg/l	0.005	0.003
Calcium	mg/l	75	-
Chloride	mg/l	150 – 600 ^a	None established
Carbon tetrachloride	mg/l	0.01	0.004
1,1-Dichloroethylene	mg/l	0.001	-
1,2-Dichloroethylene	mg/l	0.03	0.05 (1,2-Dichloroethene)
Tetrachloroethylene	mg/l	0.03	0.04 (tetrachloroethene)
Trichloroethylene	mg/l	0.09	0.02 (trichloroethene)
Pentachlorophenol	mg/l	0.03	0.009
2,4,6 -Trichlorophenol	mg/l	0.03	0.2 (2,4,6 trichlorophenol)
Chlorine (residual)	mg/l	0.2	0.2 ^c
Chloroform	mg/l	0.09	0.3
Chromium (hexavalent)	mg/l	0.05	0.05
Chromium	mg/l	0.05	0.05
COD	mg/l	4	-
Coliform (fecal)	n/100 ml	0	Must not be detectable in any 100 ml sample
Coliform (total)	n/100 ml	0	Must not be detectable in any 100 ml sample
Color	Hazen unit	15	None
Copper	mg/l	1	2
Cyanide	Mg/l	0.1	None
Detergents	mg/l	0.2	-
DO	mg/l	6	-
Fluoride	mg/l	1	1.5
Hardness (as CaCO ₃)	mg/l	200 – 500	-
Iron	mg/l	0.3 – 1.0	-
Kjeldahl nitrogen (total)	mg/l	1	-
Lead	mg/l	0.05	0.01
Magnesium	mg/l	30 – 35	-
Manganese	mg/l	0.1	-
Mercury	mg/l	0.001	0.006
Nickel	mg/l	0.1	0.07
Nitrate	mg/l	10	50
Nitrite	mg/l	<1	3
Odor	mg/l	Odorless	-
Oil and grease	mg/l	0.01	-
pH	--	6.5 – 8.5	-
Phenolic compounds	mg/l	0.002	-
Phosphate	mg/l	6	-
Phosphorus	mg/l	0	-
Potassium	mg/l	12	-
Radioactive materials (gross alpha activity)	Bq/l	0.01	-

National Standards for Drinking Water (Schedule 3, Rule 12B of ECR 1997)			WHO Guidelines for Drinking Water Quality 4th Edition incorporating the first addendum, 2017
Radioactive materials (gross beta activity)	Bq/l	0.1	-
Selenium	mg/l	0.01	0.04
Silver	mg/l	0.02	-
Sodium	mg/l	200	-
Suspended particulate matters	mg/l	10	-
Sulfide	mg/l	0	-
Sulfate	mg/l	400	-
Total dissolved solids	mg/l	1,000	-
Temperature	°C	20-30	-
Tin	mg/l	2	-
Turbidity	NTU	10 ^d	-
Zinc	mg/l	5	-

^a In coastal area 1000. Reference: Bangladesh Gazette, Addendum, August 28, 1997 Source: Department of Environment (DOE).

^b For substances that are considered carcinogenic, the guidance value is the concentration in drinking water associated with an upper-bound excess lifetime cancer risk of 10^{-5} (one additional case of cancer per 100,000 of the population ingesting drinking water containing the substance as the guidance value for 70 years). Concentrations associated with upper-bound estimated excess lifetime cancer risks of 10^{-4} and 10^{-6} can be calculated by multiplying and dividing, respectively, the guideline value by 10 (WHO, 2017).

^c For effective disinfection, there should be residual concentration of free chlorine of ≥ 0.5 mg/l after at least 30min contact time at pH < 8.0. A chlorine residual should be maintained throughout the distribution system. At the point of delivery, the minimum residual concentration of free chlorine should be 0.2 mg/l.

^d The FS advises producing treated water that conforms to WHO guidelines and Bangladesh drinking water quality ECR 1997. One of the two most important parameters reduced by the WTP is turbidity (the other is microbiological matter, by providing a multi-stage barrier). In Section 10.3, the FS quotes WHO and Bangladesh standards of 10 and 5 NTU respectively. We recommend that the turbidity in the treated water leaving the WTP should never exceed 1.0 NTU and that the operational guideline should be set at 0.5 NTU, to be achieved 95% of the time. The design of the process units and their controls should accommodate these recommendations. Operational procedures must be devised to achieve these recommendations. Computerized monitoring equipment must be provided and staff trained in its use to display real-time trends and record events. Laboratory staff must monitor, record, and report treated water quality parameters to review past trends and predict operational changes, if required.

^e If less stringent levels or measures are appropriate in view of specific project circumstances, the executing agency will provide full and detailed justification for any proposed alternatives that are consistent with the requirements presented in ADB SPS.

III. DESCRIPTION OF THE SUBPROJECT

A. Subproject Location and Area

45. The proposed cyclone shelter will be in Lalmohan Pourashava. The Pourashava is located under Lalmohan Upazila in Bhola District of Barishal Division on the southern part of Bengal Basin. It is 235 kilometers away from Dhaka City. Lalmohan is the second largest Upazila of Barishal District in respect of population came into existence in 1874. The Pourashava was established in the year 9 December 1990, which is located between 22.3211°N latitudes and between 90.7482°east longitudes. It is bounded by Borhanuddin and Tazumuddin upazilas on the north, Charfasson upazila on the south, Manpura upazila on the east, Dashmina and Bauphal upazilas on the west. The river Tetulia flows on the part of northern boundary line and eastern boundary line from north to south of the Pourashava. The Pourashava is categorized as 'Ka' (the term 'Ka' is the Bengali word means First category or 'A' category). It occupies an area of 7.61 sq. km and consists of 9 wards and 14 mouzas.

46. Ground-level elevation of Lalmohan varies from 1.09 meter to 3.51 meter among the adjacent lands and roads. Lowest land elevation is found in the Ward No. 9 and highest in the Ward No. 4. Height of the high land is varied from 2.5 meter to 3.0 meter.

47. The cyclone shelter subproject e-GP/CTCRP/LALM/CS-01 is proposed on a vacant, flat space within the compound of Gazi Bari Madrasha, Ward No. 07, Lalmohan Pourashava, District: Lalmohan (22°20'30.16"N, 90°43'35.06"E) is mostly semi urban area. There is no vegetation except little grass and 8 small mahogany trees and 14 areca palm (betel nut) trees identified at the site. There are, no protected areas, wetlands, mangroves, or estuaries in or near the subproject location. There are no forest areas either, within or near the locations. The location map is shown in **Figure 2**. The vicinity of the proposed subproject location is shown in **Figure 3** and **Figure 4**. A small pond and two tin shed houses are nearby the proposed site.

Figure 2: Location and Map of Lalmohan Pourashva

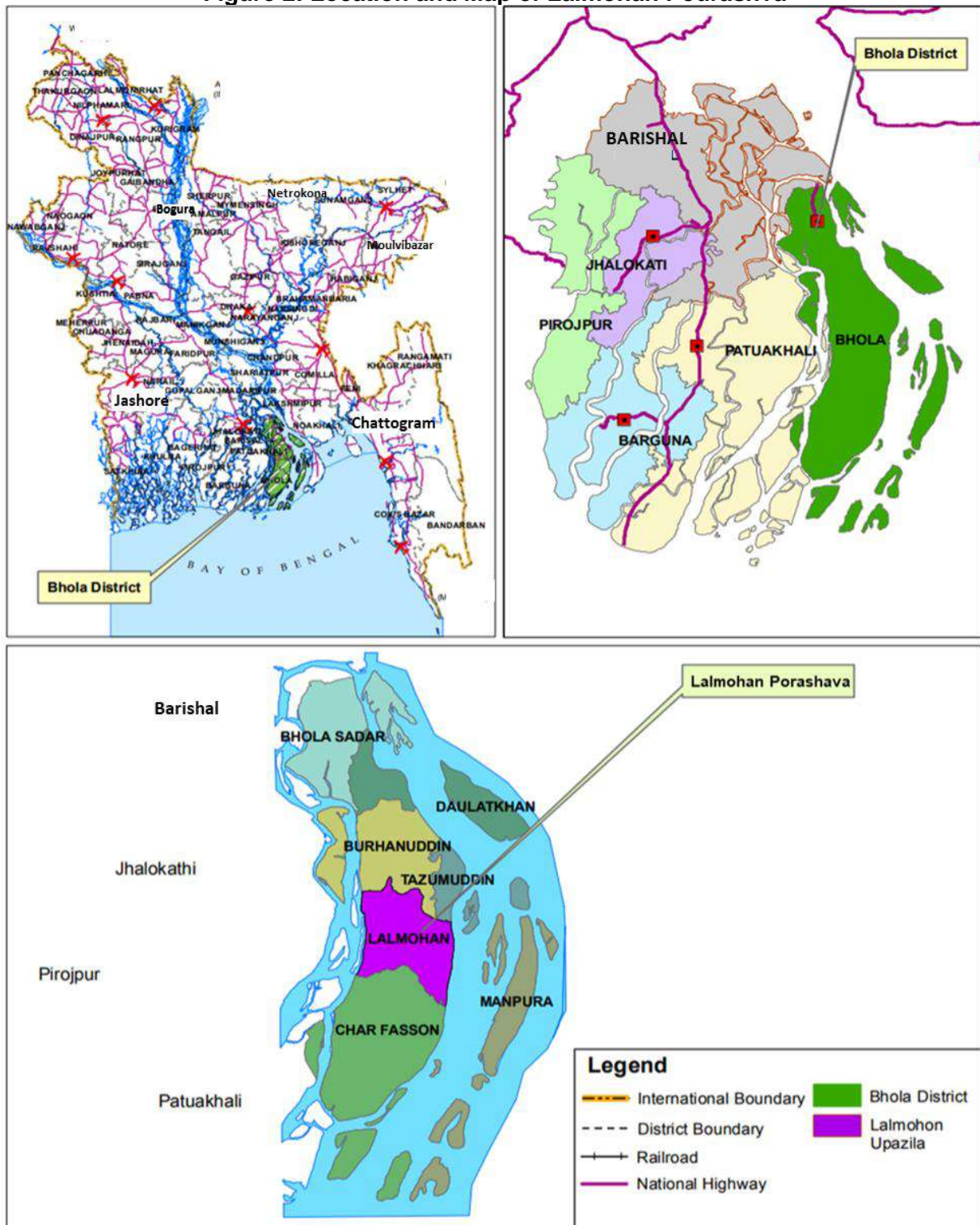


Figure 5: Photos of the Site for the Cyclone Shelter

B. Subproject Scope and Components

48. Investments under this subproject include construction of cyclone shelter. As per the requirements of LGED, the cyclone shelter-multipurpose buildings will be provided with essential facilities like (i) separate toilets for male, female and pregnant women; (ii) care room for pregnant-women; (iii) water supply with deep tube-well, (iv) furniture, (v) rainwater harvesting system, and (vi) septic tank and soak pit for waste water treatment and disposal. Table below summarizes the design and components of the multipurpose shelter:

Table 10: Summary of Subproject Components and Description

Component	Description/Provisions	Total Area/ Usable Area Capacity
Ground Floor	<ul style="list-style-type: none"> Floor area Ramp area Multiple entries including large ramp for disabled, cattle, each entry with small ramps Staircase to access first floor Raised platform with ramp Open space with columns 	Total area 291.86 square meters
First Floor	<ul style="list-style-type: none"> Large ramp from ground floor to first floor for disabled person, cattle Two tubewells for water supply Water taps, drains Staircase 	Total area: 291.86 square meters
Second floor	<ul style="list-style-type: none"> Classrooms, teacher room and storage Pregnant woman/lactating mother care room Male-female toilet Tubewell, wide passage Stair case 	Total area: 291.86 square meters
Rooftop	<ul style="list-style-type: none"> Staircase 2000 ltr plastic tanks, rainwater harvesting, solar panels 	Total area: 330.86 square meters
Water supply	Deep tube wells including pumping system (2 units)	
Sewage System	Two-chambered septic tank	Total volume 24 cubic meters

Component	Description/Provisions	Total Area/ Usable Area Capacity
Power Supply	From rural electrification network Solar panels	Solar panel, total generating capacity 4 kwatt
Location	GPS Position	22°20'30.16"N, 90°43'35.06"E

49. The multipurpose cyclone shelter at Lalmohan Pourashava, Ward-07 is one of the proposed subproject components for the coastal town under the project. It will be used as emergency accommodation for affected communities in Lalmohan during cyclones or other extreme weather events in the future but will also be utilized as a classroom for most of the year.

50. The cyclone shelter building will have three floors each, first and second floors will be used as classrooms, teachers' room and store etc. and a rooftop level and will occupy a footprint of about 291.86 square meters (sqm) over a plot with total area of 10,572 sqm. It can accommodate 540 people (0.6 square meters of floor area per person) on two floors. For assured sanitary conditions, each floor has the provision of two Water Closets (WC) on one side of the building for male and three WCs for women at the other side of the building, including one isolated WC for pregnant women. The entire cyclone shelter cum Madrasha will be plastered with anti-salinity and damp proofing admixture. Based on preliminary design (Figures 7 to Figure 10)

51. The building will have the following specifications:

- Faculties and the design thereof, of the 3 storey buildings, is based on tropical cyclones and storm surges; and wind velocity to take care of climate variability and other extreme events;
- Each of the Cyclone Shelters is to provide protective facilities for the public residing in the respective immediate catchment area for meeting basic human needs for at least 540 persons (capacity of 1 person per square metre), inclusive of provision for access by the disabled and vulnerable groups, during periods of extreme storms events;
- The buildings will have three floors each; first and second floors will be used as Madrasha classrooms, teachers' room and store etc. For assured sanitary conditions, each floor has the provision of two Water Closets (WC) on one side of the building for male and three WCs for women at the other side of the building, including one isolated WC for pregnant women. The ground floor will have one ground level open plan auditorium for public gatherings, functions and dual purpose for cattle protection during times of excessive storm events. Refer **Figure 6** for plan of the ground floor, **Figure 7** for plan of the first floor and **Figure 8** for plan of the second floor.
- Two overhead and integral water storage reservoirs have been provided for roof rainwater harvesting. The storage tanks have been placed below the roof and above each toilet block, which will be used during appropriate periods for rainwater storage, as well as for pumped water storage. Two separate compartments have been provided to facilitate segregated use, rainwater and pumped supply; and to provide standby capabilities during periodic maintenance of the reservoirs. Refer to **Figure 9** for roof floor plan.
- Ramp access provisions are given at the front entrance stepped locations for ease of access by the disabled, for unaided access to the ground floor area. Further access of the disabled, to the first and second floors, shall be through aided means.

- The ground floor (plinth level) will be raised by 1500 mm from the original ground in accordance with the Climate Change adaptation measures to make the structure climate resilient. Besides, Gazi Bari Madrasha compound (open area/field) will also be raised by 600 mm from existing ground level to avoid the water logging and easy access to the cyclone shelter. To fix the amount of raising for open area, proposed formation level of the nearby road and plinth level of existing adjacent buildings has also been considered. Arshed ali Eatim Khana (Ward-04) has the land ownership for the proposed structure. The proposed floor area is 1003.86 sqm and accommodation will be at least 540 persons. Refer to **Figure 10** for land development plan.

52. The **Table 11** below summarizes the basic data on design and components of the multipurpose shelter:

Table 11: Basic Data on Proposed Cyclone Shelter

S. No.	Description	Unit	Quantity
1	Earthwork		
i)	Earth filling work, earth work in excavation	cum	524.716
ii)	Sand filling	cum	697.308
2	Building structure		
i)	Brick flat soling work	Sqm	424.646
ii)	Brick work	Cum	208.244
iii)	Mass concrete (cc) RCC works	Cum	458.285
iv)	Polythene sheet	Sqm	456.192
v)	Reinforcement	Kg	115217.56
vi)	Plaster	Sqm	5154.679
vii)	Painting & whethor coat	Sqm	3415.996
viii)	Cast-in-situ piles concreting	Cum	462.112
ix)	Pile integrity test for all pile	Set	6
x)	Admixture	Sqm	3098.084
xi)	Water proofing	Sqm	347.067

Source: Detailed Design of Cyclone Shelter, LGED

53. Figures (Figure 6 to 10) below present the layout plan and floor plans for the proposed multipurpose cyclone shelter.

Figure 6: Ground Floor Plan for the Cyclone Shelter

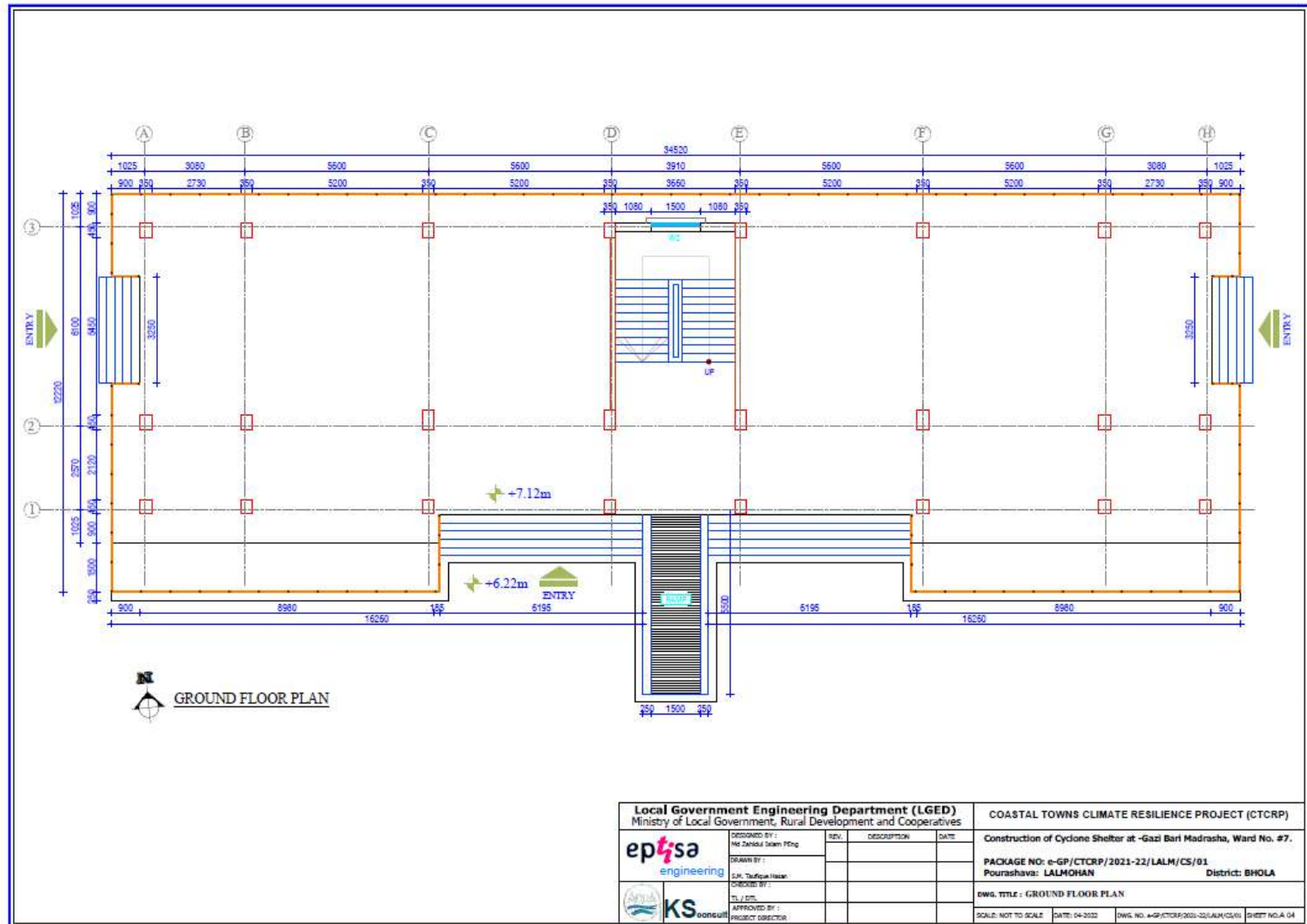


Figure 7: First Floor Plan for the Cyclone Shelter



Figure 8: Second Floor Plan for the Cyclone Shelter



Figure 9: Roof Plan for the Cyclone Shelter

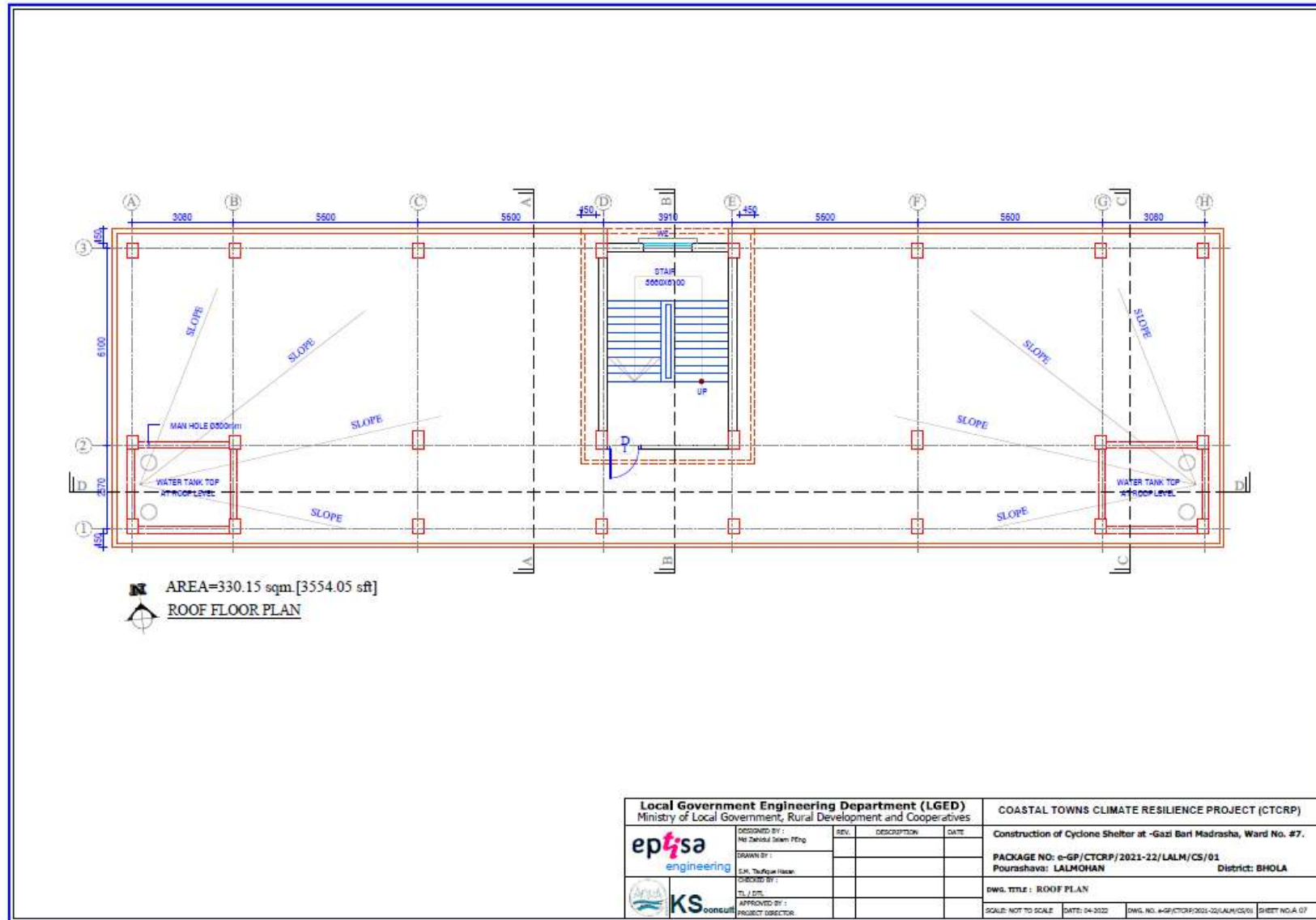
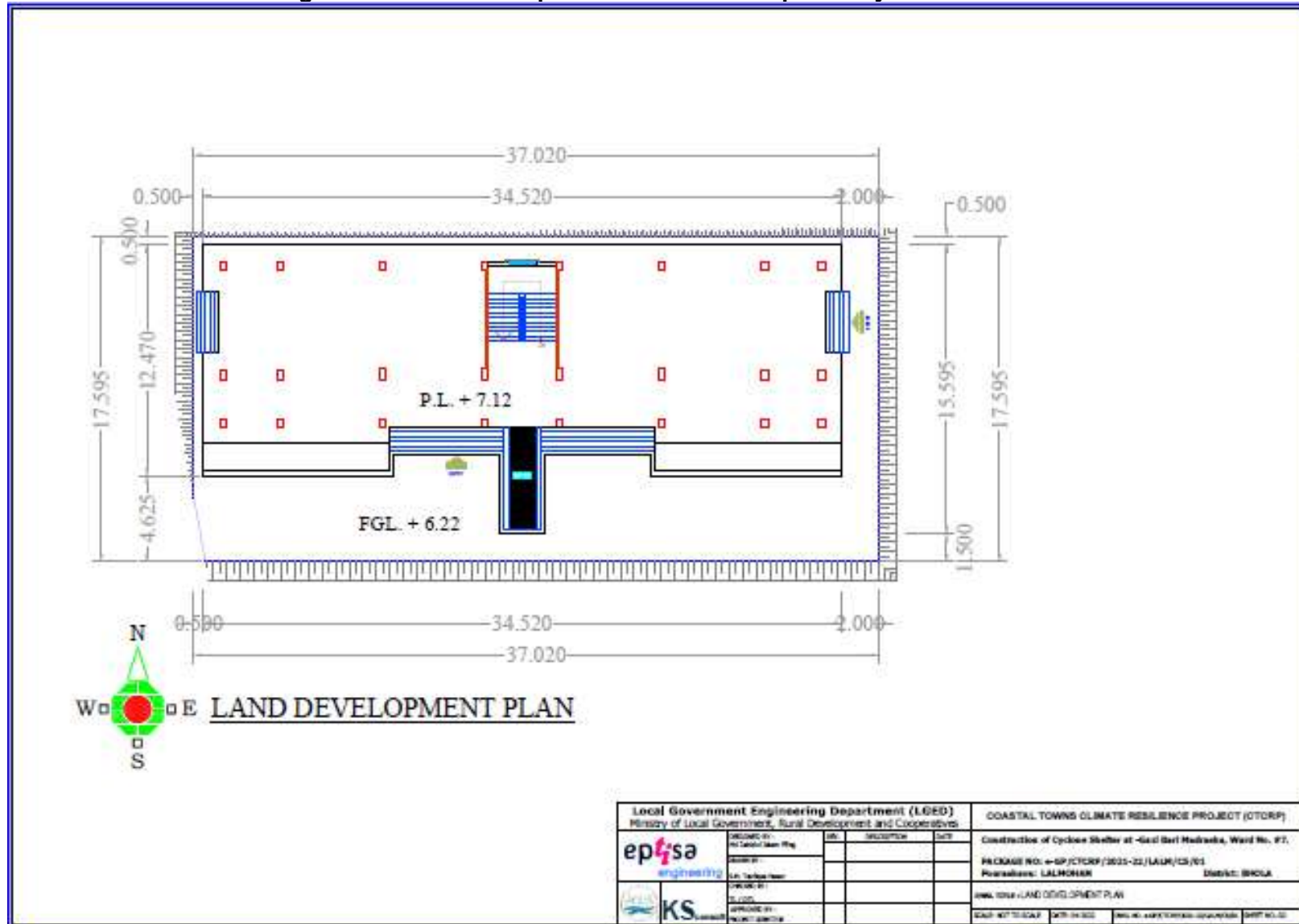


Figure 10: Land Development Plan of the Proposed Cyclone Shelter



C. Project Implementation Schedule

54. The design for the Gazi Bari Madrasha, Ward No. 07 Cyclone shelter was finalized in March 2022. Cyclone Shelter is planned to be implemented in a period of 12 months by post-qualified contractors under a single envelope single stage bidding process through National Competitive Bidding (NCB) procedures.

D. Resource Utilization

55. Gravel, sand, and aggregate will be required for the civil construction part of this project, most of which are available in Bangladesh, and may, however, need to be transported over long distances. Reinforcing steel (both mild and high grade) is produced in the country. However, a guarantee of quality, quantity, and delivery schedule is important. All these materials and other construction materials will be sourced from legitimate entities authorized by the government.

IV. ANALYSIS OF ALTERNATIVES

56. The primary objective of the “analysis of alternatives” is to identify the location/technology for a particular subproject that would generate the least adverse impact and maximize the positive impacts. The preliminary assessment of the project included an analysis of alternatives, addressing the optimal match between required technical specifications and site conditions, as well as addressing any concerns for environmental, social, and economic features in each location.

57. With Current Proposal. The proposed sites are within the existing Gazi Bari Madrasha, Ward No. 07 under Lalmohan Pourashava with ample of space for constructing building. The sites are well connected with paved RCC roads. However, no tree removal is required. Based on the Rapid Environmental Assessment (REA) Checklist provided in the Environmental Assessment and Review Framework (EARF) of ADB for this Coastal Towns Climate Resilience Project (CTCRP), it was found that the current proposal will have the minimal effect on environment and society. In addition, the implementation of the subproject will contribute to physical improvement and socio-economic development in the Pourashava and will eventually lead to better quality of life of the people. A summary of impacts based on the selected location is given in the following Table 12.

58. A summary of impacts based on the selected location (Alternate 3) is given in the following table.

Table 12: Assessment of Environmental Impacts Based on Proposed Subproject Location

Sector	Impact
Land (Government-owned land is to be given priority)	No (proposed cyclone shelter will be built on the existing school area)
Presence Agricultural/cropped land	No
Village affected	No
Families affected	No
Loss of structures	No
Impact on Common properties	No
Trees to be chopped down	Yes (8 small mahogany trees and 14 areca palm (betel nut) trees)
Presence of sensitive ecosystem	No
Presence of waterbody	The Lalmohon Khal, part of the river Tentulia is about 250 m from the site. The Tentulia river is about 600 m from the site. Beside there are few numbers of small ponds foreseen around the proposed site, which is dried up during summer.
Tribal population affected	No

59. **No-project Alternative and Implications.** The “no-project” option means that no cyclone shelter will be built in Lalmohan Pourashava. This scenario will result in impaired climate change resiliency of the community. This is not a viable option since there is no cyclone shelter nearby that can be used in time of disaster. The “no-project” scenario will also not be able to supplement the current Madrasha facilities.

V. DESCRIPTION OF BASELINE ENVIRONMENT

A. Baseline Information

60. The primary objective of this chapter is to provide an environmental baseline of the proposed cyclone shelter site. Baseline data includes an inventory of physical, ecological, and socio-economic parameters. Baseline environmental data presented in this chapter are based on available secondary information. No sampling for air quality, noise, and water quality were conducted. Baseline environmental monitoring for such will be conducted before the start of construction. The Integrated Biodiversity Assessment Tool (IBAT) was used to screen the potential risks in the protected areas or critical habitats that may exist around the project sites.

B. Project Influence Area

61. Impacts and risks were analyzed in the context of the project's area of influence, which encompasses the area where the cyclone shelter will be constructed, its immediate vicinity, access road, and the location of construction phase facilities such as the worker's camp, storage, and disposal areas.

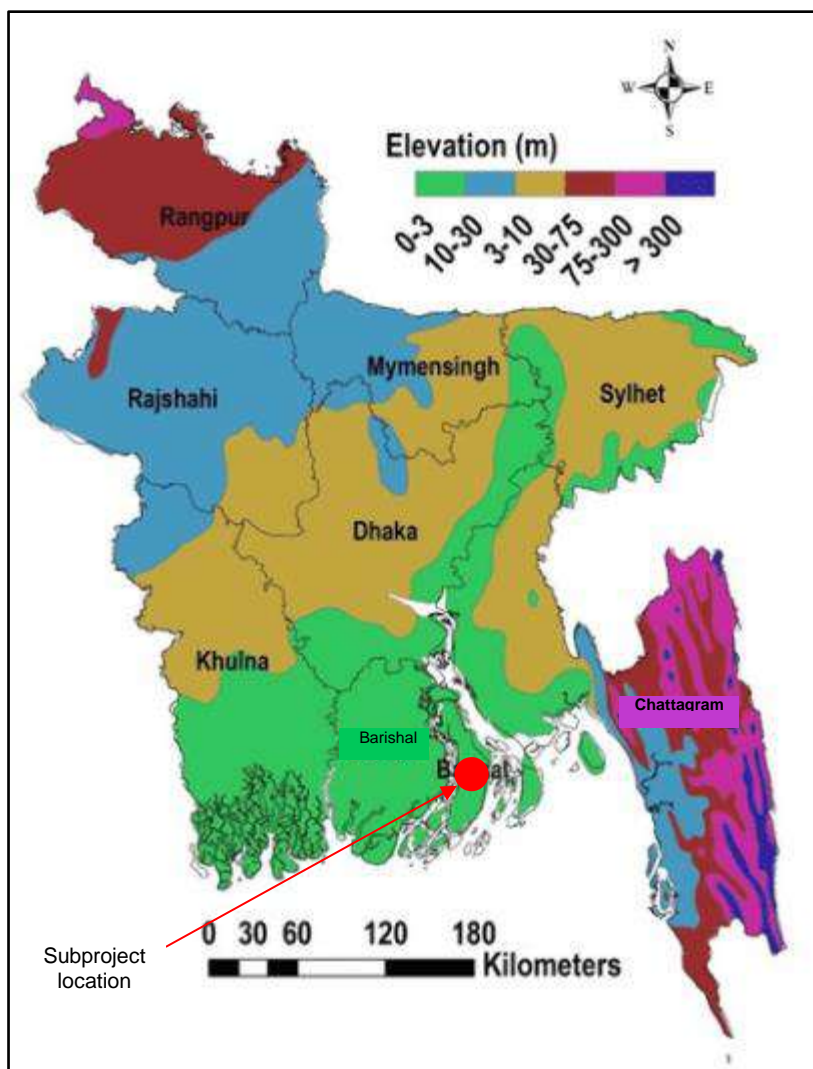
62. The primary impact will be confined mostly within the boundary of the proposed cyclone shelter construction area. Delivery of construction materials to the site would extend the PIA. This means that during the transport of construction materials, the impact area is extended along the roads being traversed by the transporting equipment.

C. Physical Environment

63. **Topography.** Lalmohan Pourashava area is located in the southern part of the Bengal Basin marking a part of Bhola district. From topographic analysis using the Digital Elevation Model (DEM) concept it has been found that the Reduced Levels (RLs) inside the region are low, 2 m on average.

64. Lalmohan Pourashava is the same as other Pourashavas (which are on low-floodplain land) in Bangladesh. Pourashava is mainly medium-high land except for some low-lying strips, canals, and rivers. Except for some areas of the north and northeastern part, other areas are covered by vast tracks of agricultural land including spotted waterbodies. The Lalmohan Khal which is a branch of river Tentulia cross within the Pourashava. The major canal named Lalmohan Khal originated from the Tetulia river. One is the canals flow through the middle of the Pourashava and another passes through the east side which is adjacent to the Pourashava boundary. A sharp meandering is being formed on the northeastern point of the Pourashava and it is outside Ward No. 8 and adjacent to Ward No. 6. Existing natural drainage network and direction of natural flow depends on the elevation of the area. The minimum and maximum ground level varies from 0.3 m to 2.7 m and average height is 1.24 m. From the survey, it is observed that except ward no 5, all the wards have flat land. The alignment of natural channels is in somewhere 1.0 meters to 2.5 meters high than the normal river water. (Source: Lalmohan Pourashava Master Plan: 2011-2031). The elevation map showing the location of the subproject site is the below figure.

Figure 11: Elevation Map Showing Subproject Location

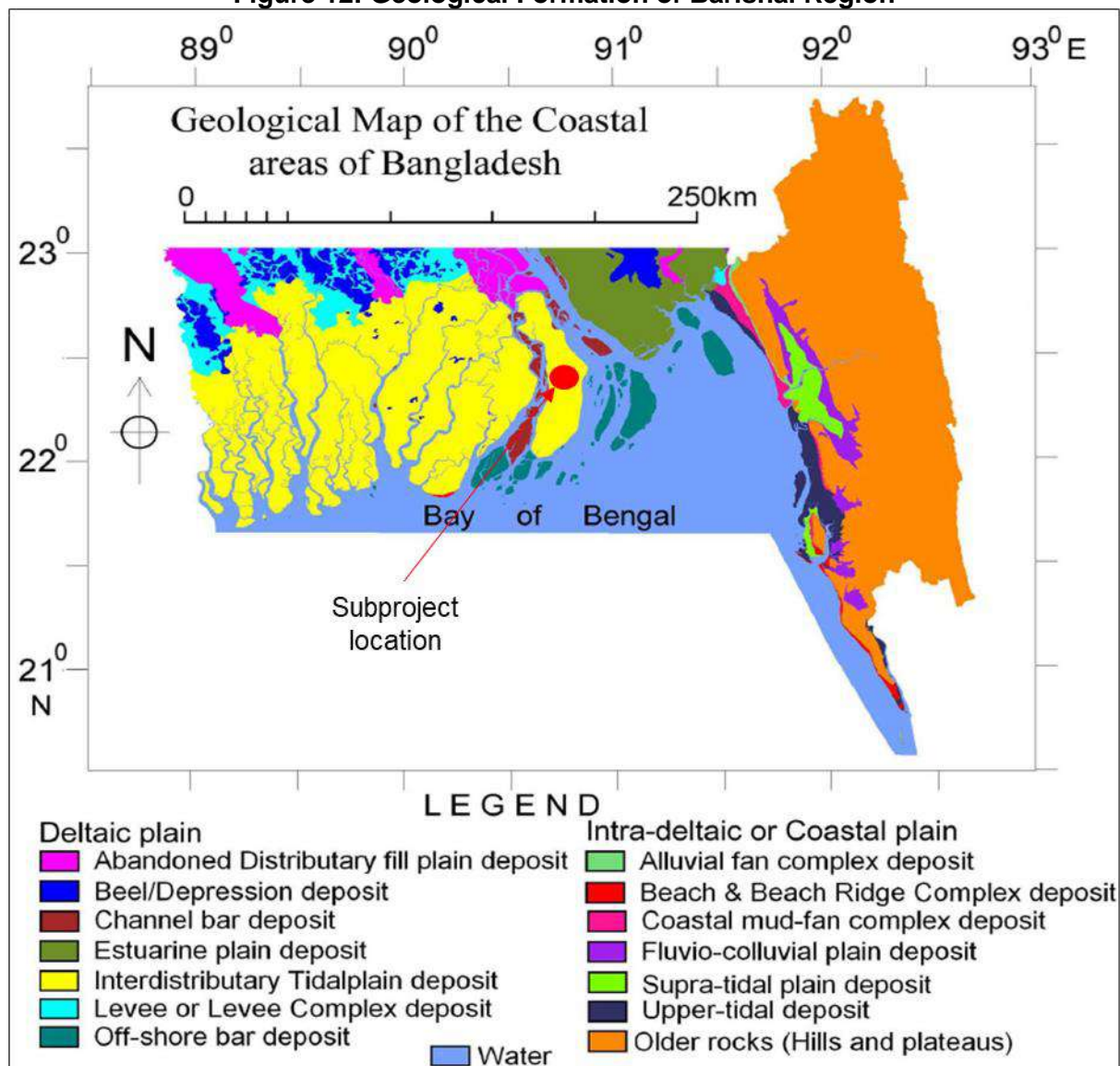


Source: www.researchgate.net

65. **Geology:** Lalmohan area is part of the young Meghna estuarine floodplain and is situated in an active. delta Bhola Island. In the young Meghna estuarine floodplain area, new deposition and erosion are constantly taking place on the margins, continuously altering the shape of the land areas. The Ganges delta is formed by the confluence of the Ganges (local name Padma), Brahmaputra (Jamuna), and Meghna rivers and their respective tributaries. The Ganges unites with the Jamuna (main channel of the Brahmaputra) and later joins the Meghna, finally flowing into the Bay of Bengal. The Ganges Delta and its surroundings are one of the largest alluvial plains in the world. It faces the Bay of Bengal and rivers flowing in the low land take their source from the Himalayan mountains. The deposition of sediments was vastly controlled by quaternary sea level fluctuation, climatic conditions, and tectonic activities (Umitsu 1987). The Bengal Basin was filled with sediments of Tertiary and Quaternary age (Morgan and McIntire 1959; Umitsu 1985, 1987, 1993). Mainly the Ganges deltaic deposits of Late Holocene to recent age cover the study area. The modern deltaic plain in the western Bengal Basin can be divided into two regions: the Upper Delta plain of meander belts of the Ganges– Bhagirathi rivers in the north; and the lower delta plain with numerous tidal creeks in the south (Das et. al. 1996). The lower deltaic plain,

formed in Pleistocene–Holocene time, is characterized by the presence of an extensive clay layer of varying thickness (15–76 m) which is underlain by silt, sand, and gravel (Deshmukh and Goswami 1973). See **Figure 12** for geological map of the region.

Figure 12: Geological Formation of Barishal Region

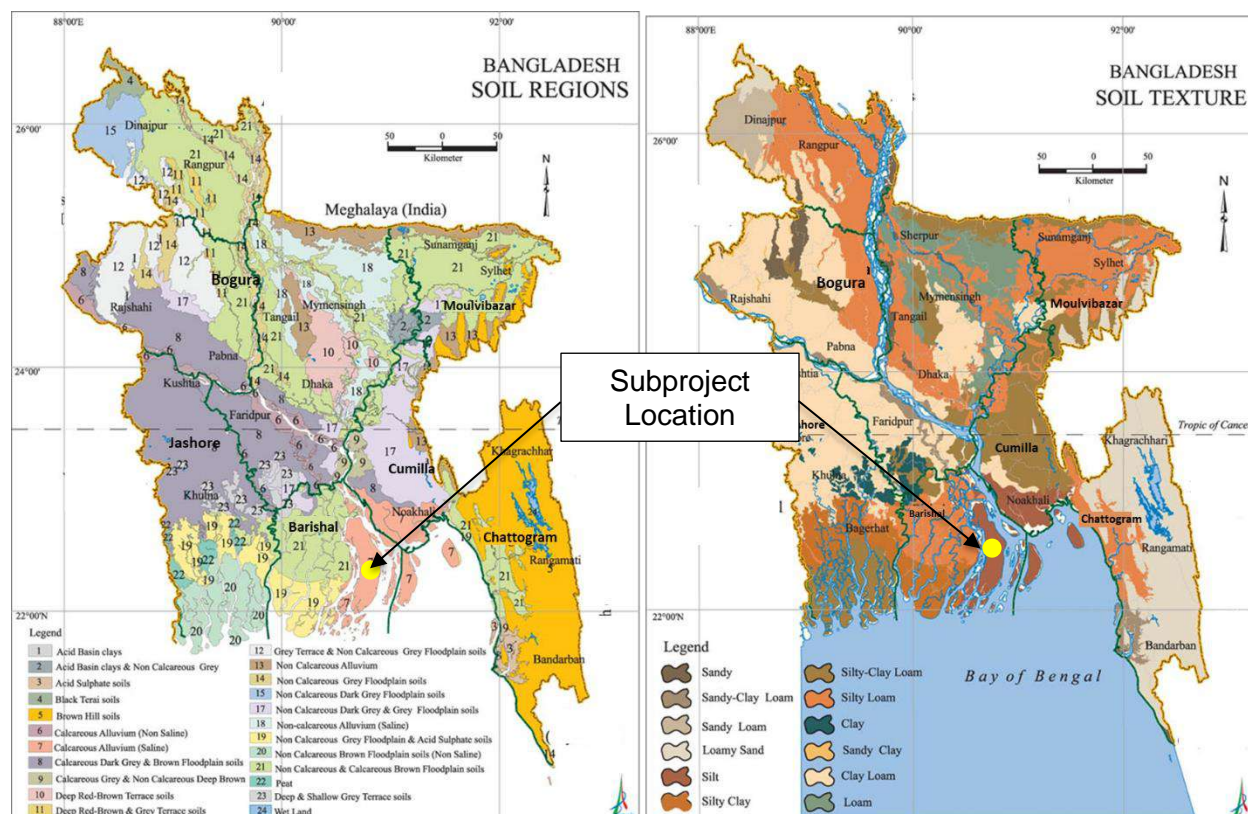


Source: Geological Survey of Bangladesh, 2017

66. **Soil:** Based on the general soil map and soil texture map of Bangladesh, Bhola District has grey floodplain soils with silt texture which are finally stratified and are slightly calcareous. In many, but not all parts, the soil surface becomes saline to varying degrees in the dry season (FAO/UNDP, 1986). Lamohan Pourashava is located mainly in low-lying plain land. Local differences in elevation generally vary below 1m with only a very gentle slope. The land is comprised of loamy soil and sandy soil. Presence of organic matter content in the soil is moderate. The soil is low saline at a depth of 50-70 feet in and around the subproject areas throughout the year. About 95% of this area comprises of Calcareous Alluvium Soils and the other 5% are Calcareous Grey Floodplain soils. Calcareous Alluvium Soils are stratified or raw alluvium throughout or below the cultivated layer. They are calcareous throughout or part of it and lack

having diagnostic subsoil horizon. This alluvium on the Lower Meghna estuarine floodplain is slightly calcareous grey to olive, finely stratified silts. Calcareous Grey Floodplain soils have grey matrix cambic B-horizon and lime in the profiles. They range from silt loam and silty clay loam on riverbanks and floodplain ridges to silty clays in basins.

Figure 13: General soil map (left) and Soil Texture Map (right) of Bangladesh



Source: FAO 1988 and Banglapedia.

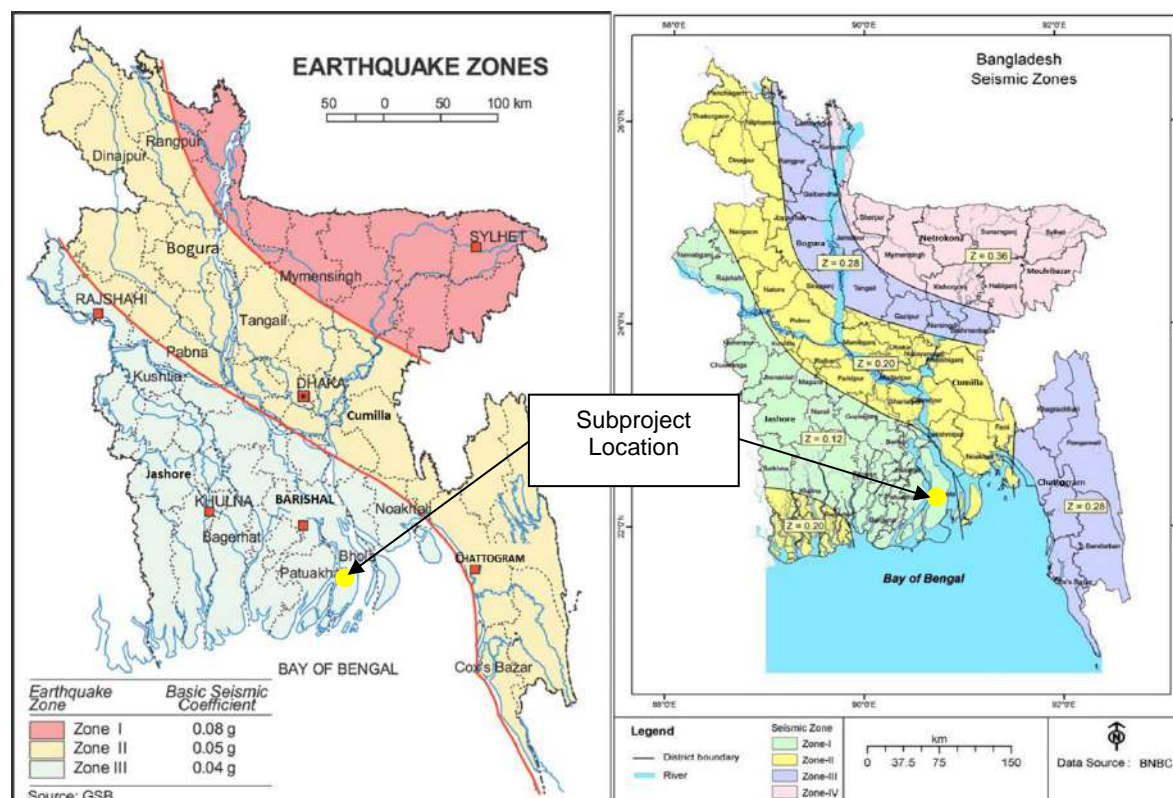
67. **Seismicity.** Twenty-six, 38 and 36 percent of Bangladesh fall within the high, moderate, and low-risk zones in terms of earthquake vulnerability, respectively. The distribution of recorded earthquakes indicates a major clustering of seismicity around the Dauki Fault and scattering of other events along other major fault systems of Bangladesh. The magnitude of the earthquakes is moderate (4-6, magnitude in Richter scale) and the majority of them are at shallow depths. Based on the Geological Survey of Bangladesh (GSB, undated¹⁷), Lalmohan Pourashava, Bhola, falls in the low-intensity seismic zone (Zone-III, Basic Seismic Coefficient 0.04g).

68. The Bangladesh National Building Code (2020),¹⁸ on the other hand, divides Bangladesh into four categories of seismic zone according to intensity, i.e., very high, high, moderate and low (Figure 13). Lalmohan Pourashava, Bhola falls within seismic zone 1 ($Z = 0.12$).

¹⁷ Geological Survey of Bangladesh (GSB) (undated) Earthquake Zones of Bangladesh. Publication type: Map. Available at: <http://www.gsb.gov.bd/site/view/commondoc/Geo-scientific%20Map/>, date accessed: 15 May 2020.

¹⁸ Bangladesh National Building Code (BNBC) (2020) Bangladesh National Building Code (BNBC), Housing and Building Research Institute, Dhaka, Bangladesh.

Figure 14: Earthquake and Seismic Zone Maps of Bangladesh



Sources: Geological Survey of Bangladesh, 2001; Bangladesh National Building Code, 2020

69. **Climate:** The climate in Barishal Division is a combination of Tropical Savannah (Aw) and Tropical Monsoon (Am) according to the Köppen-Geiger climate classification (Beck et al. 2018¹⁹) (Figure 15). The subproject site has a Tropical Monsoon (Am) climate.

70. **Temperature and Rainfall:** Temperature rises steadily from January to April, remains fairly steady from April to October and then falls to reach the lowest in January. The maximum monthly temperature is 32 degrees Celsius in April and May and the minimum average monthly temperature is 14 degrees Celsius in January. The monsoon starts in June and maximum rainfall is experienced from July to September. Annual rainfall the maximum is 306 mm and lowest about 1.6 mm. The average annual rainfall data from 2001 to 2015 of the area as approximately 1493 mm, with about 95% of the mean annual rainfall occurring during the period from April to October, and 60% during June-September and minimum precipitations are reported during the months of November to February (Source: climatetoolbox.org).

¹⁹ Beck, H., Zimmermann, N., McVicar, T. et al. Present and future Köppen-Geiger climate classification maps at 1-km resolution. Sci Data 5, 180214 (2018). <https://doi.org/10.1038/sdata.2018.214>

Figure 15: Köppen-Geiger Climate Classification and Location of Subproject (Red Star)

Köppen-Geiger climate classification map for Bangladesh (1980–2016)

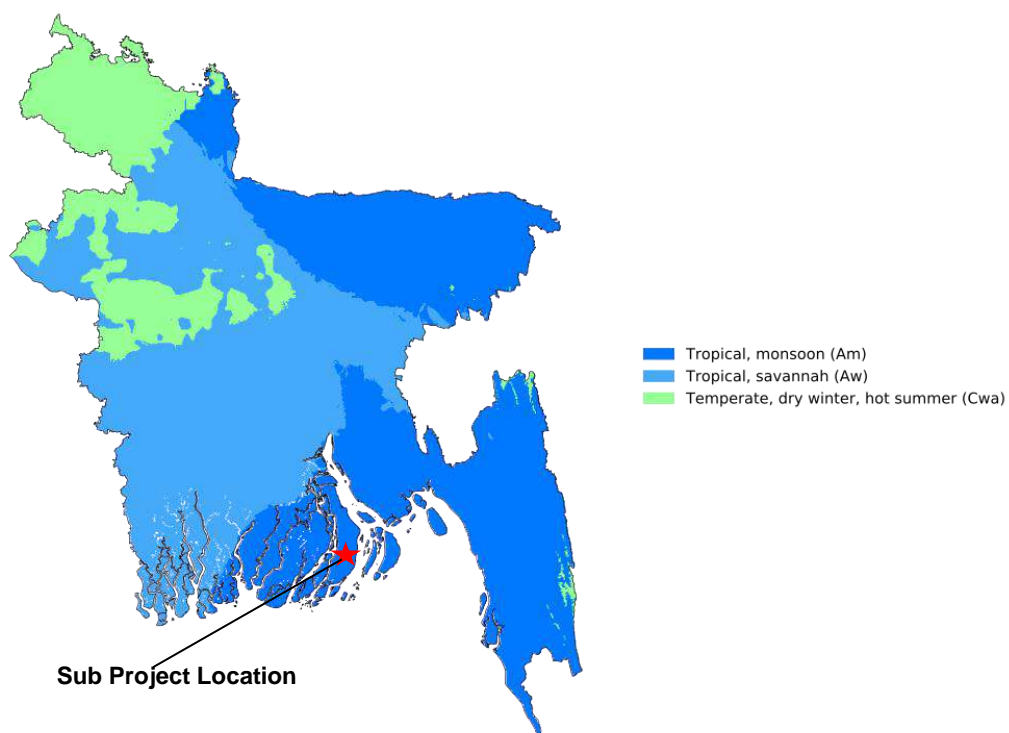
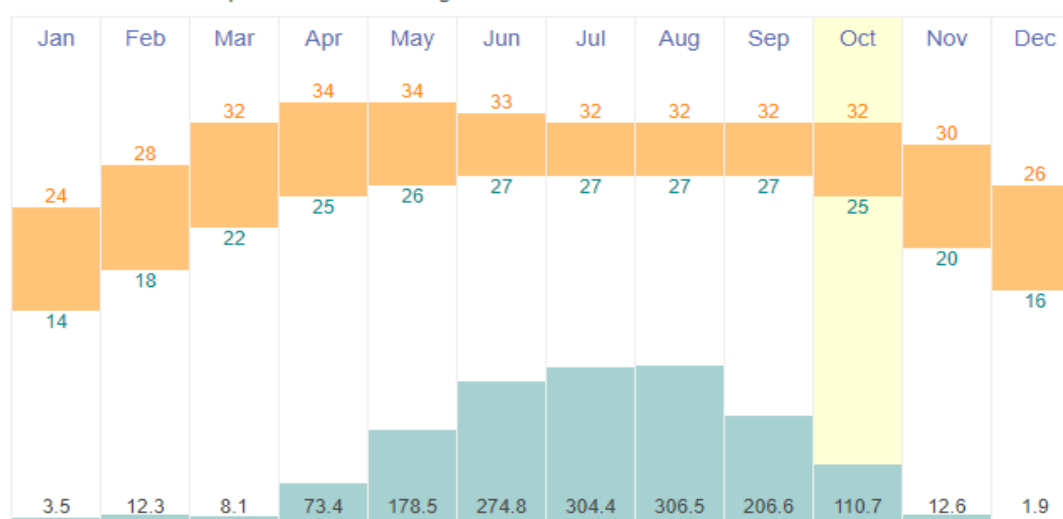


Figure 16: Temperature and Precipitation Pattern in Lalmohan (Bhola)
Annual Weather Averages in Bhola

Based on weather reports collected during 2005–2015.



Source: Meteoblue.com

71. **Surface Water.** The hydrological condition of Lalmohan is getting of inferior quality day by day. The Tetulia River is located in 600 m away from the subproject area. One canal (Khal) is found in 250 m north side of site. Under this Pourashava about 609 ponds and 89 ditches are the sources of surface water. In the existing school field, one low lying area also exists in the west

side. These water bodies are being used for fish farming, bathing, washing & domestic purposes, etc. Local fish species are reported to be found in the water bodies. Surface water bodies are sweet and useable for domestic purpose but need treatment in case of using for drinking purpose.

72. There is no available information on surface water quality for the nearest receiving body of water. Surface water pollution is originating from the use of insecticide and chemical fertilizers in crop fields. Wash out rainwater from crop fields to the nearest water sources with chemicals is causing water pollution. Cattle bathing and flow of wastewater from domestic use discharge into the ponds, khals and river have also been identified as reasons for surface water contamination. Baseline surface water quality sampling and analysis will be conducted before the start of construction activities.

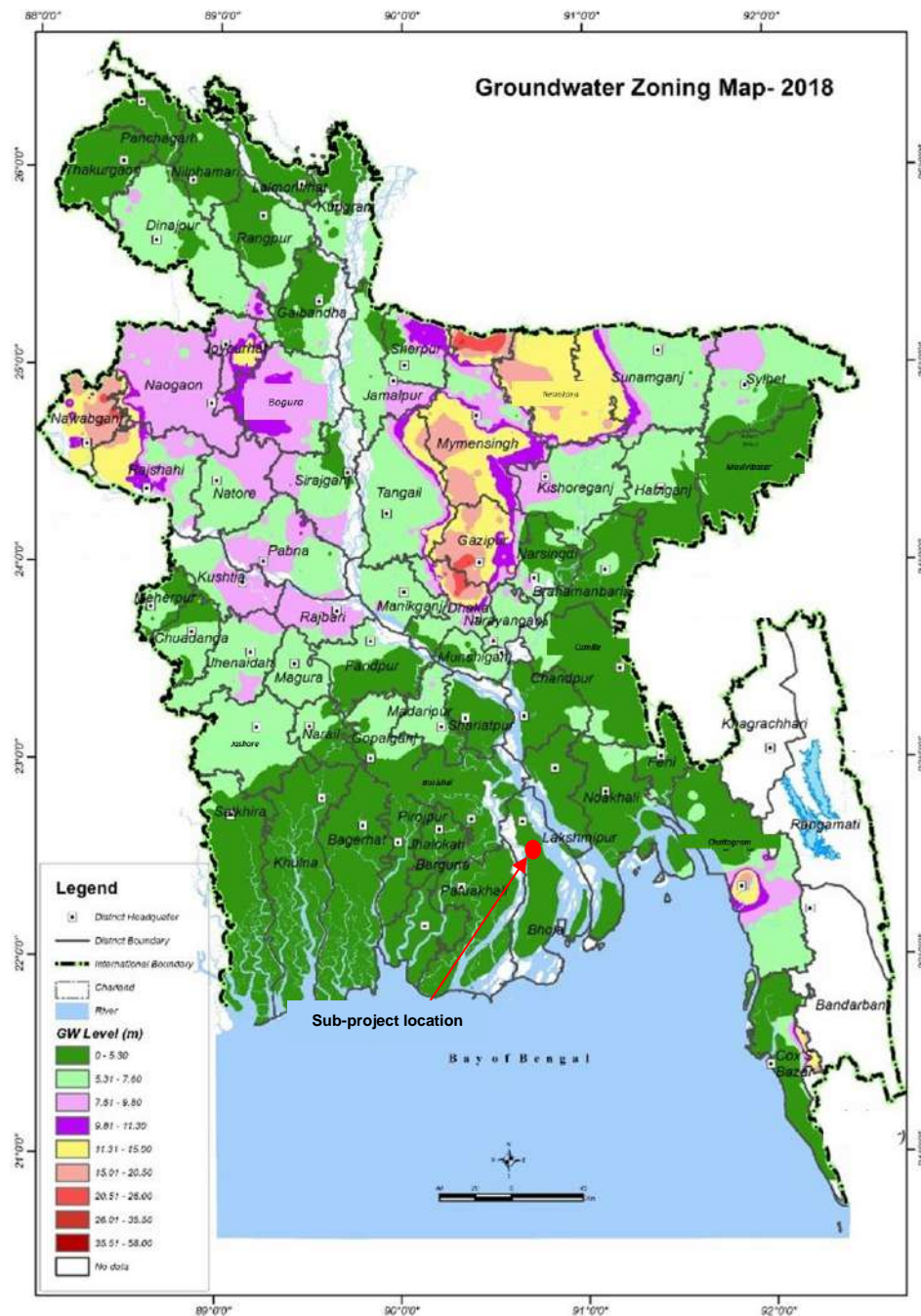
73. **Groundwater.** The study area falls within the Ganges-Brahmaputra-Meghna (GBM) delta. Silts and clays predominate in the upper few meters of the GBM delta system, forming a surficial aquitard, generally less than 10 m thick with typical specific yield values of 2–3%, and vertical permeability values in the range $3\text{--}8 \times 10^3$ m/d. The aquifers are mostly medium-to fine and medium-to-coarse sands, with a permeability of 40–80 m/d. Short-term pumping tests on the Holocene aquifers indicate a leaky response, but for longer pumping periods the aquifer is best described as regionally unconfined. The principal mineralogical components of the Holocene sands are quartz, plagioclase feldspars, potassium feldspars, micas (muscovite, biotite and chlorite), and clays (smectite, kaolinite and illite). Deep clayey aquitards exist in coastal regions and the sands below the aquitards are commonly referred to as the deep aquifer. Based on a recent study of sampled well depths, aquifers are considered as shallow (<70 m), inter-mediate (70 – 180 m) and deep (>180 m) aquifer (Majumdar and Shimada, 2019).²⁰ Based on the groundwater zoning map of 2010 of the Bangladesh Agricultural Research Council (Figure 17), Bhola District has a groundwater depth of 0-5.3 meters. **Figure 17** Groundwater zonation map of Bangladesh²¹

74. The lower deep aquifer is found at a depth of 900 ft to 950ft. Deep aquifers with fresh water in the Pourashava are exploited to meet the demand of water for inhabitants. The contractor will be required to establish the baseline groundwater quality at the site before the start of construction. Groundwater table varies from 1100-1200 feet and it is the main source of potable water in the subproject area as it is free from contaminants. Shallower aquifers having depth around 500-600 feet surrounding the subproject area are full of saline, iron & arsenic [DPHE, 2017, BADC website]. Rain water harvesting system is not visible in the subproject site.

²⁰ Majumder, Ratan & Shimada, Jun. (2019). Tracing Groundwater Flow Systems with Hydrogeochemistry in Bengal Delta Aquifers, Bangladesh. Indian Journal of Science and Technology, Vol 12(12), DOI: 10.17485/ijst/2019/v12i12/140862, March 2019.

²¹ BARC (2015) Bangladesh agricultural research council, September 2015. URL <http://www.barc.gov.bd/>, date accessed: 15 May 2020.

Figure 17: Groundwater Zoning Map of Bangladesh

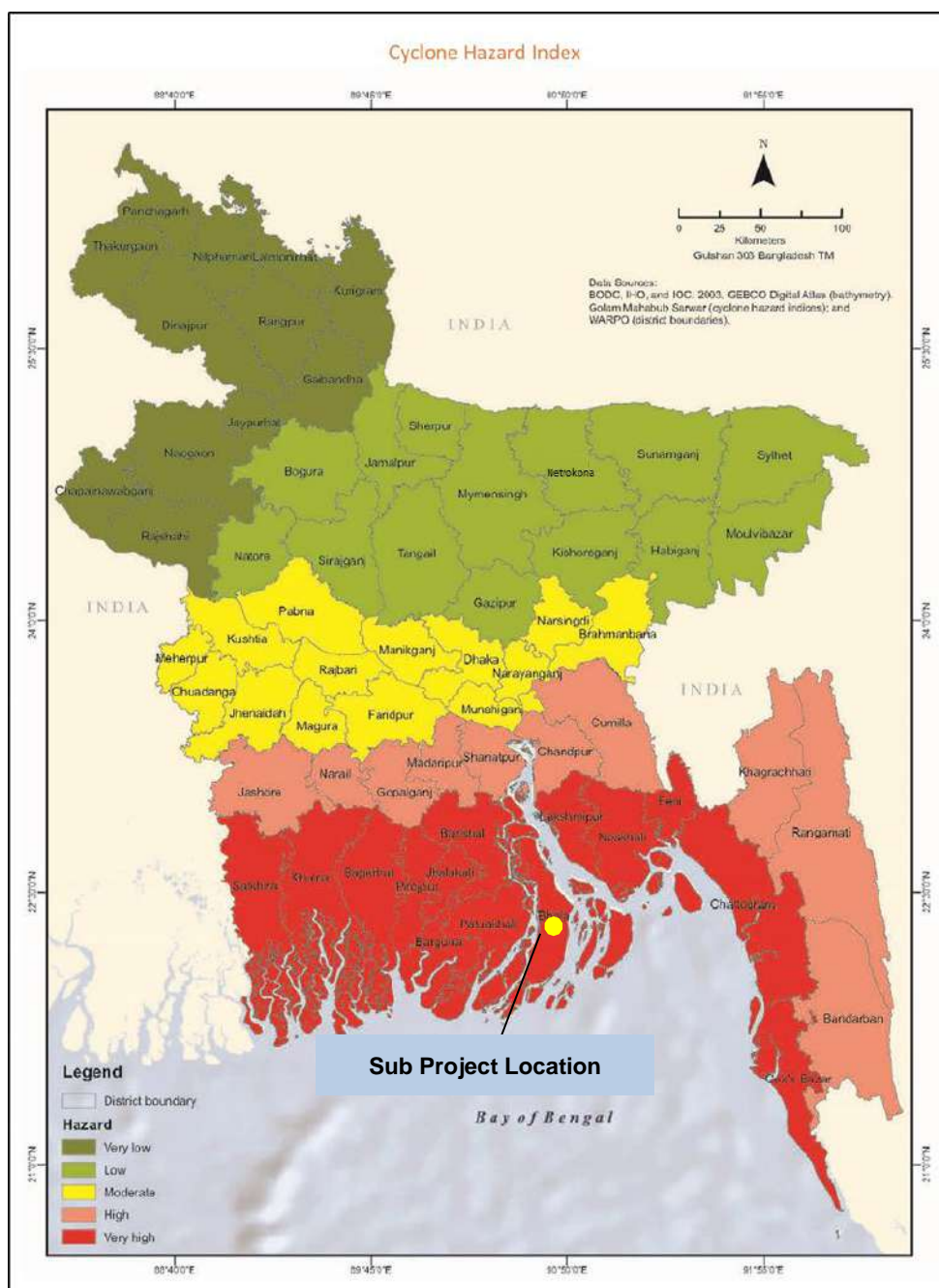


Source: Bangladesh agricultural research council, September 2018

75. **Natural Hazards.** Large portion of subproject area surrounded by rivers and canals and being adjacent to the Bay of Bengal, natural disasters visit the district every year. Subsequently, the inhabitants of the district suffer much from the disaster. In addition to this, the climate change effect has speed up the frequency of natural disasters like, cyclones, tidal surges, excessive rainfall, rising temperature, increased salinity, landslide, erosion of riverbanks, thunderstorms,

etc., and these are the major disasters for Bhola district. Cyclones are mostly observed in Lalmohan Pourashova, with the former highly affecting the area (**Figure 18**).

Figure 18: Cyclone Risk Map of Bangladesh

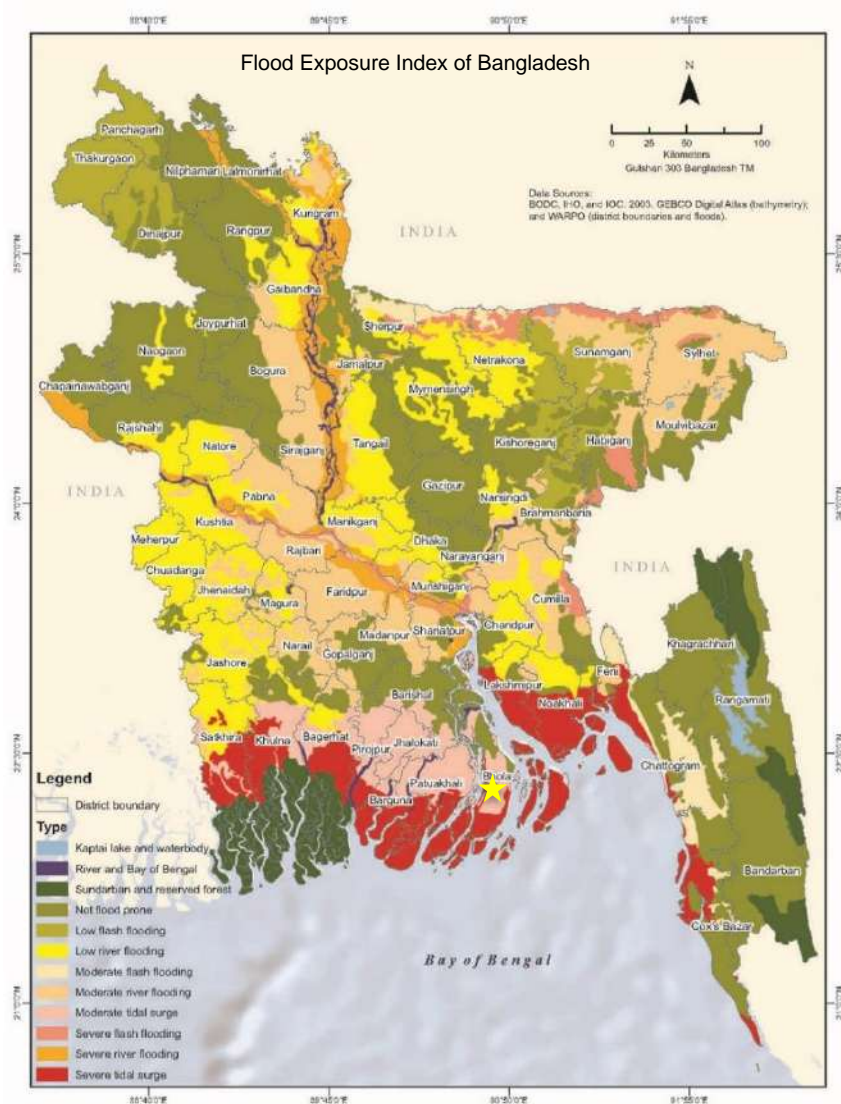


Source: Bangladesh Climate and Disaster Risk Atlas. ADB. December 2021

76. **Flooding** is a common phenomenon in Bangladesh. The major cause of flood is monsoon rainfall runoff from upstream catchments, with more than 90 percent from outside Bangladesh. Five floods during the last fifty years were extensive and devastating and these are the floods of 1970, 1998, and 2007. **Figure 19** below shows that the project area falls in the “high” flood exposure zone.

77. As Lalmohan Pourashava is an island, water logging is not a significant phenomenon in this Pourashava. The subproject area is mostly flood free and elevation is higher than normal local flood level. Locals reported that the site does not suffer from waterlogging. The area is also raised from the ground level by 1.3 meters. However, extreme flood events occurred in 1970 when water was 06 feet high for 7 days, 5 feet high for 04 days in 1998-, and 5-feet water level was raised in 2007 for 03 days. In addition, heavy rainfall causes the water stagnation in the subproject area during rainy season.

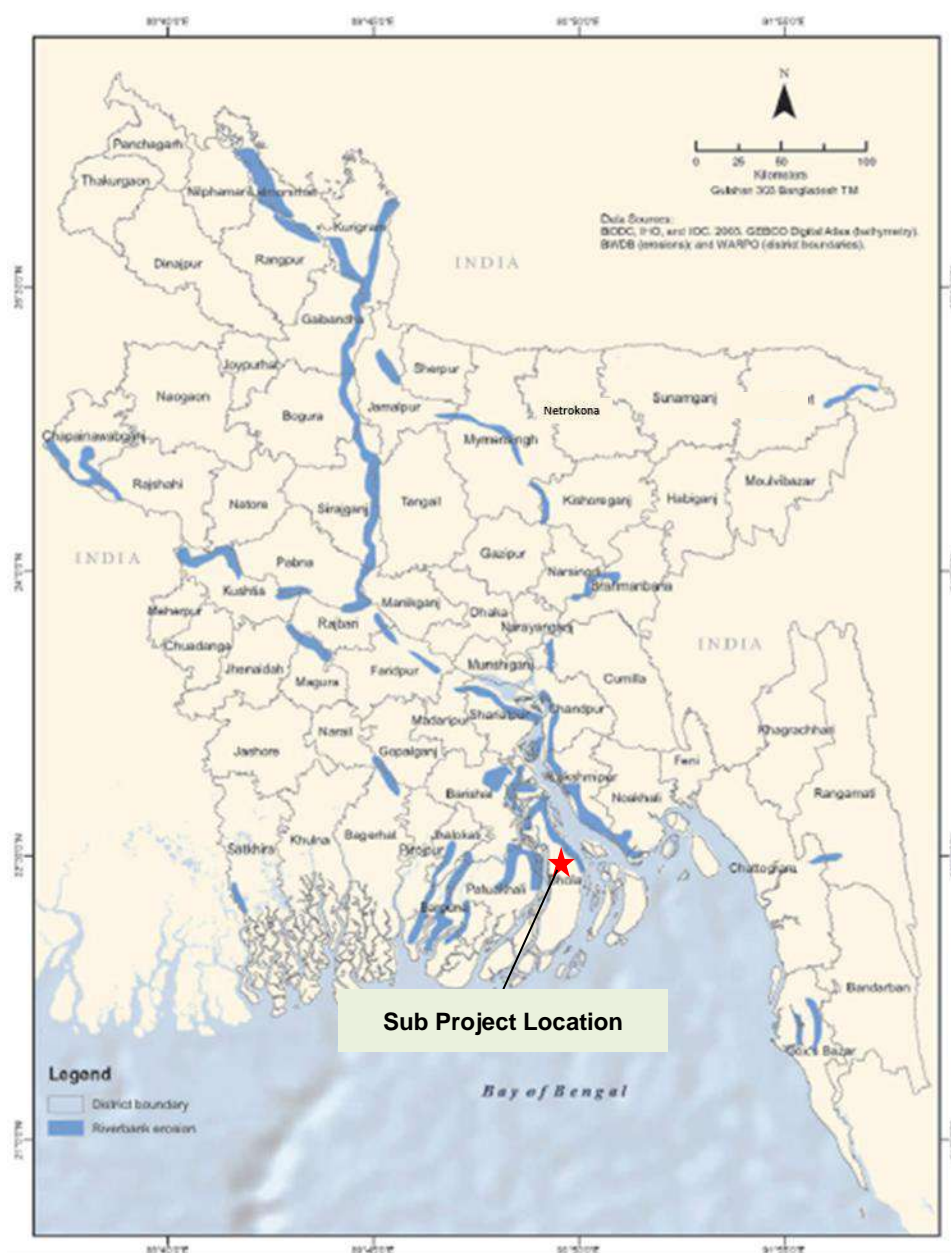
Figure 19: Flood Prone Areas of Bangladesh and Classifications



Source: Bangladesh Climate and Disaster Risk Atlas. ADB. December 2021

78. Lalmohan is a region where riverbank erosion does not occur (**Figure 20**). However, the subproject site is approximately 250 m from the Lalmonon Khal, part of the river Tentulia and the Tentulia river is about 600 m from the site.

Figure 20: Areas with Riverbank Erosion in Bangladesh



Source: Bangladesh Climate and Disaster Risk Atlas. ADB. December 2021

79. **Air Quality.** Baseline data on air quality for the subproject area is not available. There is no major source of air pollution adjacent to the proposed site. The Lalmohan Launch Ghat is about 620 m from the site. The contractor will be required to establish the baseline air quality before the start of construction. Baseline air quality will be established during the detailed design/before contract award and included in the updated IEE.

80. **Noise Level.** Baseline data on noise for the subproject area is not available. There is no major source of noise pollution at the proposed site. Sources of noise in the subproject site include motor vehicles (Nochimon/Tomtom) and people chatting. The contractor will be required to

establish the baseline noise levels before the start of construction. Baseline noise levels will be established during the detailed design/before contract award and included in the updated IEE.

D. Biological Environment

81. The cyclone shelter is proposed on a vacant, flat space within the Madrasha complex. No vegetation except little grass and 8 small trees of mahogany and 10-14 areca palm (betel nut tree) is observed within the site. There are no forests within or immediately at the proposed site. There are no national parks or sanctuaries. There are also no rare or endangered species reported. There is no notable land-based natural habitat within or immediate to the vicinity of the subproject site. There are no protected areas, wetlands, mangroves, or estuaries in or near the subproject location. The reference²² data regarding flora, fauna, birds, reptiles and fish is given as follows:

82. **Terrestrial Fauna Species.** Mammals that are commonly seen this area are ndian pipistelle (*Pipistrellus corromandra*), tickel's bat. (*Hesperoptenus tickelli*), benji (*Herpestes edwardsi*), dhari Indur/rat (*Bandicota bengalensis*), indur (*Rattus rattus*) metho indur (*Mus Booduga*), shial/ jackal (*Canis aureus*), ud biral (*Aonyx cinerea*) and dura kathbirali (*Funambulus pennanti*). Some species of mammals are now rarely seen in the island. These are banar (*Macaca mullata*), khek shial (*Vulpes bengalensis*), kahrgosh (*Lepus nigricollis*),sajaru (*Atherurus macrourus*), khatash (*Viverra zibetha*), shusuk (*Neophocaena phocaenoides*) etc.

83. The avi fauna is represented by both resident and migrant birds. A total of 90 species of birds belonging to 48 families seen in Lalmohan area. Black-headed Ibis (*Threskiornis melanocephalus*) are Vulnerable as per IUCN 2015, v3 Red List of Threatened Species. Some common species are, House Crow, Indian Cuckoo, White throated Muniya, Black headed Bulbul, Indian Pond heron, barn Owl, Vernal Hanging Parrot etc. Different species of birds are commonly found on the island. These are doel (*Copsychus saularis*), babui (*Ploceus philippinus*), tuntuni (*Orthotomus sutorius*), lejnachani (*Rhipidura albicollis*), tila munia (*Lonchura punctulata*), crow (*Cornus spendens*), dar kak (*Corvus macrorhynchos*), bhat shalik (*Acridotheres tristis*), sharui (*Passer domesticus*), kaliphecha (*Glaucidium radiatum*), choto fingei (*Dicirix macrocerus*), holdey pakhi (*Oriolus Xanthornus*), kaththokra (*Picus myrmecophoneus*), machranga (*Alcedo atthis*), laxmi pencha (*Tyto alba*), tia (*Psillacula Krameri*), tila ghugu (*Strepto pelia chinensis*, dahuk (*Amaurornis phoenicurus*), kana korchy bok (*Ardeola grayii*), panikaor (*Orilusxanthornus*) etc. The migrant birds that come to visit different swamps of the island are tibe tan shrike (*Lenius tephronotus*), khuntey hans (*Anas clypeata*), giria hans (*Anas querquedula*), goganbar (*Podiceps cristatus*) chokachaki (*Tedorna ferruginea*), badami koshai pakhi (*Lanuis cristatus*), lenja hans (*Anas acu ta*), khonjan (*Motacilla cinerea*) and booted warbler (*Happlais caligata*).

84. Common batagur (*Batagur baska*), Green Sea Turtle (*Chelonia mydas*), hawksbill Turtle (*Eretmochelys imbricata*) and Gharial (*Gavialis gangeticus*) are Critically Endangered as per IUCN 2015, v4 Red List of Threatened Species. Crowned River Turtle (*Hardella thurjii*) are Endangered as per IUCN 2015, v4 Red List of Threatened Species. Olive Ridley Sea Turtle (*Lepidochelys olivacea*) and Ring Lizard (*Varanus salvator*) are Vulnerable as per IUCN 2015, v4 Red List of Threatened Species. Due to indiscriminate destruction of their natural habitat, many of the wild fauna of the island have been declining since long. As a result, some of the reptiles have now become rare. Few of the species that are still observed are gui shap (*Varanas bengalensis*), ghargini shap (*Lycodon jara*), dhora shap (*Xenodrophis piscator*), paina shap (*Enhydris enhydris*), gokhra (*Naja naja*), tiktiki (*Hemidactylus brooki*), shanda (*Gekko gecko*), dhum kasim (*Trionyx hurum*) and kori kaitta (*Kachuga tecta*). A total of 4 species of amphibians

²² Source District Statistics 2011, BBS

belong to 2 families in the study area. None of those possess any threatened status as per IUCN 2015.v4 Red List of Threatened Species. Most common amphibians are kuno bang (*Bufo melanostictus*), venpu bang (*Kaloula pulchra*), bhawa bang (*Rana tigerina*), kotkoti kang (*Rana Cyanophlyctis*) etc.

85. A large variety of fish is found in different water bodies of the district. Clown Knife Fish (*Chitala chitala*) are Endangered as per IUCN 2015, v3 Red List of Threatened Species. Long-whiskered Catfish (*Sperata aor*) are Vulnerable as per IUCN 2015, v3 Red List of Threatened Species. Fish resources of this district are represented by indigenous, exotic, brakish and marine varieties. In the fresh water the popular species are ruhi (*Labco rohita*), katla (*Catla catlaa*), mrigel (*Cirrhinus mrigala*), calbaus (*Labeo calbasu*), magur (*Clarius batrachas*), shing (*Heteropneustes fossilis*), koi (*Anumbas testudineus*), airh (*Mystus aor*), boal (*Wallago attu*), shaul (*Channa striatus*), phali (*Notopterus notopterus*) etc. Exotic fishes like silver carp (*Hypophthalmichthys molitrix*) mirror carp (*Cyprinus carpio*), telapia (*Oreochromis mossambicus*), nilotica (*Oreochromis niloticus*) etc. have also been introduced in the island. Among brackish water fishes, koral (*Lates callearifer*), Bata (*Labco bata*), khorsola (*Rhinomugil corsula*), bacha (*Eatropichthys vacha*), pabda (*Ompok pabda*), tatkini, gangchela (*Salmostoma acinaces*) etc. are the most common. Besides, marine fishes like bhetki (*Lates callearifer*), illis (Hilsa Ilisha), topshi (*Polynemus paradiseus*), datina (*Acanthopagrus latus*), terabhangon (*Polynemus indicus*), bhola (*Scheema semiluctuosa*) etc. are commonly found. However, some of these varieties, especially those which inhabit the marshes and tanks, are dwindling due to over catching and other reasons such as use of insecticides and pesticides for crop production, etc.

86. **Flora Species:** Much of the Bhola district is an intermediate level island, but falls within the active delta as there has been diluvian in the east and accretions in the north-west. The whole island is affected by the movements of the lower Meghna channel. Since the land, regarded as very fertile on account of rich alluvial soils, it is suitable for cultivation of various crops.

87. Various types of agricultural crops are cultivated in the island. Among cereal crops, aman covers the largest area followed by aus, boro and wheat. The acreage under jute is the minimal. Other crops include khesari, mug, musur, gram, potato, sugarcane, onion and garlic, betel leaf, tobacco and different kinds of vegetable, betel nut, betel leaf and chillies are the main cash crops. Common fruit crops grow in the area are mango, jackfruit, guava, banana, papaya, amra, chalta, coconut etc.

88. The most common tree of the area is the mango (*Mangifera indica*). It is the principal tree in the groves that surrounds the viallage homesteads. The groves that surround the homesteads, represent various types of commonly planted trees. These are mango (*Mangifera indica*), kalojam/black berry (*Syzygium cumini*), amra (*Spondia pinnata*), guava (*Psidium guajava*), coconut (*Cocos nucifera*), betelnut (*Arccca catechu*), kantel/jackfruit (*Artocarpus heterophyllus*), kadam (*Anthocephalus cadamba*), jambura (*Citrus decumana*), and mandar (*Erythrina variegata*).

89. Wayside trees are karoy (*Albizzia procera*), tentul (*Tamariandus indica*), neem (*Azadirachta indica*), hijol (*Barringtonia acutangula*), banyan (*Ficus benghalensis*), oshot (*Ficus religiosa*), raintree (*Samanca saman*), and pitraj (*Aphanamixls polystachia*).

90. The swamps, ditches and many of the water tanks contain a rich variety of species. Besides the above, the entire coastal belt of the island has recently been covered with trees like Australian acacia, babla (*Acacia nilotica*), jarul (*Lgerstroemia speciosa*), coconut (*Cocos nucifera*), betel nut (*Areca catechu*) etc. Moreover, in different ponds ditches and beels of this area, various hydrophytes likevallisneira, hydrilla, potamogetan, lemna and floating ferns like salvinia and azola gown in abundance. Other aqua plants like lotus (*Nelumbo nucifera*), various

species of waterlily (*Nymphaea nouchali*) and the introduced weed known as water hyacinth (*Eichhornia crassipes*) are spectacularly seen in different shallow water bodies.

91. **Protected Areas and Critical Habitats.** Protected areas (PAs) are “especially dedicated to the protection and maintenance of biological diversity and associated cultural resources, which are managed through legal or other effective means” (IUCN, 1994). They are “designated or regulated and managed to achieve specific conservation objectives” (Mulongoy & Chape, 2004). Three types of protected areas were defined under the Bangladesh Wildlife Preservation Act, 1973; i.e., National Park, Wildlife Sanctuary and Game Reserve. There is no PA within 10km of the site (Figure 21).

92. The Integrated Biodiversity Assessment Tool (IBAT) was used to screen the presence of protected areas or critical habitats around the subproject site (area of analysis of 10 km radius). Screening results show there is no protected area within the 10-km radius of the site, which confirms the illustration in **Figure 21**. Results also show that there is one key biodiversity area (KBA) within the 10-km radius and two protected areas within 50 km of the site. From the same IBAT screening, 65 IUCN Red List species of concern are identified within the default area of analysis of 50-km radius (see Appendix 2 for the results of IBAT screening). The subproject site is already a built-up area and the probability of these species being found at the site is very low.

Figure 21: Protected Areas of Bangladesh



Sources: (Left) Forest Department, 2021;

E. Socio-economic Environment

93. **Demography.** As of the 2011 Bangladesh census, Lalmohan Pourashava has an area of 6.65 sqm with a population of 20522 (Source: Community Report, Bhola District, 2012 & Lalmohan Pourashava Master Plan: 2011-2031 Structure Plan). Population density is at 11 persons per square kilometer. Ward 7 has a total population of 1638 people and a density of 13 persons per square kilometer.

Table 13: Households and Population of Lalmohan Pourashava

Ward No.	Base Year Households 2011	Base Year Population 2011	Area (acre)	Density (person per acre)
1	286	1338	110.64	12
2	341	1692	120.04	14
3	385	2047	219.60	12
4	563	2737	186.54	15
5	511	2547	250.47	7
6	674	3110	164.30	12
7	327	1638	238.46	13
8	683	3232	261.52	12
9	448	2171	329.39	7
Total	4218	20522	1880.96	11

Source: Lalmohon Pourashava Master Plan (2011-2031)

94. Five-hundred forty people can be accommodated by the cyclone shelter at a time.

95. **Land use pattern, status of housing and built-up infrastructure.** Land use profile of Lalmohan Pourashava indicates dominance of agricultural lands (about 52.71% of the total) followed by residential land (about 22.12%), water bodies (8%) and circulation network (2.4%). According to Lalmohan Pourashava land use plan, the housing area comprises mixed residential, commercial, urban, semi-urban and rural homesteads, slums and squatters. about 64.7% households concentrated in potential core area and 29.3% households concentrated in fringe area.

96. The proposed cyclone shelter will be built within the existing madrasa land which is vacant. The site is surrounded by residential structures (tin sheds) and agricultural lands.

97. **Literacy rate and educational institutions.** Educational institutions include 72 madrasa. The rate of literacy of Lalmohan Pourashava is as per BBS 2001, in Lalmohan Pourashava the literacy rate is about 32.2% where the national level the literacy rate is about 53.3%.

98. **Household Income.** About 94.7% of the households at Lalmohan Pourashava have their own housing structures. Considering other assets, it has been observed that according to BBS 2001, about 35.50% households own agricultural lands. There are different types of income groups of people living at Lalmohan Pourashava area. About 38.2% of the households' incomes are within the range of Tk 5001.00 – Tk.10, 000.00 per month. Further, 24.7% of the household have income per month Tk. 2500.00– Tk. 5000.00, 5.3% have below 2500.00 Tk per month, 14.1% have 10,001.00- Tk. 15,000.00 Tk, 12.4 % have Tk. 15,001.00– Tk. 20,000.00 and 5.3% have monthly income above 20000.00 Tk.

99. **Health centers.** There is only one government hospital known as Lalmohan Upazila Health Complex, however, there are few numbers of clinics and diagnostic centers and 25 community clinics.

100. **Physical Cultural Resources.** The subproject components are not immediately located near historical, cultural and archaeological sites, except a grave nearby the school. The project activity, access to this site will not be disturbed the existing grave. There are no other scheduled or unscheduled archaeological, paleontological, or architectural sites of heritage listed by local and/or national authority.

VI. ANTICIPATED ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

102. Environmental impact assessment is the systematic identification and evaluation of the potential impacts (effects) of proposed projects, plans, programs, or legislative actions relative to the physical, chemical, biological, cultural, and socioeconomic components of the total environment. ADB SPS (2009) requires the assessment of environmental impacts during the different stages of the project, including project design/pre-construction, construction, and operation phases, and the formulation of corresponding mitigation measures to avoid, minimize or offset environmental impacts.

A. Design/Pre-Construction Phase Impacts and Mitigation Measures

103. **Integration of EMP in bidding documents and contracts.** Lack of awareness by contractors on ADB SPS requirements may result in insufficient budget and non-implementation of EMP.

104. To ensure that EMP will be provided with sufficient budget and implemented:

- (i) The PMU will incorporate the costs of implementing OHS and the EMP as well as specific provisions requiring contractors to comply with all other conditions required by ADB into the bidding and contract document.
- (ii) Once the Contractor is selected, the PIU with support from PMSC will inform contractors on their responsibilities in EMP implementation, in compliance with ADB and government requirements, self-monitoring and reporting procedures.

105. **Updating of IEE.** The PMU shall update the IEE in case of change in design/based on the final detailed design and submit the same for review and clearance of ADB.

106. **Provisions for connection to service infrastructure.** Unplanned construction activity may be necessary in case of absence of service infrastructure at the site.

107. To avoid unplanned construction activity, the PMU and PIU shall confirm the location, capacity, functionality and connection readiness of water, sewerage, electricity, heating and legal landfills to avoid wastewater dumping, ad-hoc connection arrangements, or inappropriate waste disposal during the construction phase.

108. **Impacts of Climate Change.** The subproject site is approximately 250 meters away from the nearest khal. Extreme weather events such as heavy rainfall and tidal surges may lead to flooding of the surrounding area. The region is vulnerable to excessive rainfall as identified in the baseline chapter. Poor drainage and unplanned development also contribute to the added vulnerability of structures to extreme climatic events. Failure to address extreme rainfall events and associated vulnerability/hazards in the designs may lead to damage to the structure and pose threat of nuisance in the locality which may include hydrological hazard, poor structure life etc.

109. The design of the cyclone shelter will consider future changes in climate patterns such as flooding due to extended monsoon seasons and increased level of precipitation, droughts, and increased global temperature, among others.

110. The impacts of climate change will be mitigated during the design and planning stage for the cyclone shelter and access road. Among these measures are the following:

- (i) Elevate the level of the cyclone shelter and access road to a height more than enough to compensate for the likely maximum flooding level. The differences in water level between base and future time should be computed as it is needed to estimate the additional height required for the foundation of the cyclone shelter and access road and making them safer against climate change-induced flooding;
- (ii) The proposed subproject area might have to drain a significant additional discharge due to climate change-induced higher rainfall during extreme events. Therefore, adequate number of drainage facilities along with comparatively larger openings should be considered in structure;
- (iii) Ensure that climate resilient structural design taking climate projections into account, which may require designing structures beyond the requirements of Bangladesh Building Code;
- (iv) Selection of latest weather resistant paints and construction materials so that the structures can withstand heavy rainfall, heat, and flooding;
- (v) Consider modern Rainwater Harvesting (RWH) technologies for a more sustainable water supply source;
- (vi) Consider solar panels and energy saving lights in design.

111. **Impacts to local hydrology.** Locals reported that the site does not suffer from waterlogging. The school area is also raised from the ground level. Failure to consider the local hydrology in the siting and design planning may lead to local waterlogging problems and obstruction of natural water flows in the vicinity.

112. To address these impacts, the design will consider the following:

- (i) detailed assessment of the microhydrology and topography of the project site;
- (ii) orient the cyclone shelter building such that it will not impede flow of water in natural drainages in the area;
- (iii) design according to the sloping of the subproject area;
- (iv) avoid conventional raised plinth design that blocks water runoff, rather design should prioritize structure built on raised columns that can allow water to pass through; and
- (v) design needs to consider additional drainage facilities and water storage.

113. **Disruption of Existing Utilities.** Construction activities may disrupt existing utilities installed underground.

114. To avoid/minimize or manage the disruption of existing utilities, the following measures will be implemented:

- (i) conduct investigation at site to determine all the existing utilities that will likely be disturbed during construction phase; and
- (ii) coordinate with agencies responsible for the maintenance of the utilities and formulate a plan to minimize disruption of services during construction phase. The plan must be formulated in coordination with LGED and stakeholders at the site. Where required, the responsible agency shall be requested by PIU to carry out the necessary works at the time required and at the cost of the subproject.

115. **Encroachment of private land, damage to private and common properties and cultural resources.** The cyclone shelter will be in a vacant space within school grounds. No

encroachment of private land, nor damage to private and common properties and cultural resources is envisaged.

116. **Material sourcing.** Sand/silt material for the construction should not be sourced from illegal quarry sites.

117. As a measure,

- (i) the bid documents should include a clause on material sourcing that will require the contractor to source construction materials from legal or government-approved sources only.
- (ii) no new quarry sites shall be used for the subproject;
- (iii) verify suitability of all material sources and obtain approval of PMU/Divisional/Regional Office or PIU; and
- (iv) document all sources of materials and include in the monthly reporting to the PIU.

118. **Water source – Groundwater Quantity and Quality.** Groundwater is the main source of water in Lalmohan. Drinking water supply for the cyclone shelter will also be sourced from tube wells, which will be installed as part of the design of the subproject. The extraction of groundwater for use in the cyclone shelter is not expected to significantly increase the overall extraction in the Pourashava because the future users of the facility are the residents, which already depended on the same resource. There will be no other new users apart from these people. This means that the total demand for the whole Pourashava will not significantly change. Moreover, the use of cyclone shelter will be only during emergency situations like cyclones or floods. In the area, and the water abstraction will therefore be confined to such situation. However, feasibility of groundwater extraction will be reviewed during detailed design. As part of this subproject, it is also proposed to develop rainwater harvesting system to collect and store water for use, which will reduce the dependence on groundwater to some extent. Rainwater harvesting system will include system to recharge of groundwater using the surplus water. This water however will be used mostly for non-potable purposes, and groundwater will be used for drinking. As stated in baseline profile, there is presence of high levels of arsenic in shallow tube wells at several places in of Lalmohan Upazila, However, this is not detected in deep groundwater tube wells. Arsenic contamination of drinking water is detrimental to the health of future users of the cyclone shelter.

119. To avoid any health risks from the drinking water supply:

- (i) Review the feasibility of groundwater abstraction to ensure that there is no over extraction; undertake measures such as rainwater harvesting to minimize the dependence on groundwater, and besides harvesting rainwater for reuse, implement groundwater recharge system to augment groundwater resource
- (ii) The bid documents should include a requirement that Contractor will ensure that tube wells are installed or drilled to appropriate depths wherein water quality shows compliance with the drinking water quality standards, particularly for arsenic parameter.
- (iii) During the installation of tube wells, the Contractor will undertake groundwater quality sampling and analysis to ensure that water from these tube wells is in compliance with the drinking water quality standards.²³

²³ In the possibility that groundwater does not comply with the national drinking water quality standards, a treatment will be introduced. The PMU, through a design expert engaged separately or through the PMSC, shall prepare the design. Accordingly, the final design will be provided to the contractor for implementation. Any cost implications will be discussed by PMU and contractor based on applicable contract provisions.

- (iv) If the groundwater quality is not suitable and does not comply with drinking water standards, provide on-site water treatment facility suitable to treat the groundwater to meet the applicable drinking water standards.
- (v) Design rainwater harvesting system to collect, store and supply rainwater in such a way that it is not contaminated during the process; adopt standard methods for design, construction and maintenance as per national standards and international good practice
- (vi) Utilize stored water from rainwater harvesting for non-potable uses; avoid using this water for potable purposes (drinking and cooking); in unavoidable circumstances, water shall be treated/disinfected prior to use; standard operating guidelines shall be put in place for emergency use of stored water for potable purposes, and necessary facilities to treat/disinfect stored water on-site should be put in place

120. **Consents, Permits and Clearances.** Failure to obtain necessary consents, permits, and other appropriate regulatory clearances can result in design revisions and work stoppage.

121. All the necessary consents, permits, and clearances shall be obtained before the start of civil works. Environmental clearance for the entire Project will be obtained by the PMU from the Department of Environment prior to award of contract. LGED will contact the Upazila Parishad for clearance and NOC for construction. Additionally, any permits or consents required from relevant government agencies for construction activities near locally recognized monuments, cultural resources or any other important structures, will be obtained.

122. **EMP Implementation Training.** If the contractors and construction supervision engineers are not aware about the requirements of this EMP, the project may not proceed and comply with ADB and GoB environmental policies.

123. The PMU, Divisional/Regional Office, PIU and contractors will be required to undergo training/capacity building on EMP implementation. Methodology of capacity and training activities are discussed in Part D of Chapter IX hereof. The capacity building program will be participatory to the extent possible to make it more effective, with learning by doing, role playing, group exercises, on-the-job training, etc. Pre- and post-training assessment will be conducted to measure the effectiveness of the program.

124. **Community awareness on project activities and impacts.** Lack of community awareness on project activities may result in potential community health and safety concerns and complaints.

125. Before the start of project construction, consult with relevant authorities of affected establishments/institutions (e.g. schools, colleges or hospitals) on the plan and schedule works so that construction activities do not interfere or disturb the operations of these entities (due to noise, dust, movement of vehicles,) and also considering safety and security of users of these establishments/institutions. Further, that the community should be made aware of the details of project activities. Important information to be disseminated to the people are, among others, the following:

- (i) Overview and objectives of the proposed project;
- (i) Preliminary and/or final detailed design of proposed project components;
- (ii) Potential environmental and social impacts (positive and negative) of the project, and the proposed mitigation measures for the perceived negative impacts; and

- (iii) Grievance redress mechanism and contact details of the project.

B. Construction Phase Impacts and Mitigation Measures

126. **Construction Planning.** Inadequate planning could lead to non-implementation of EMP during the construction phase and result in significant environmental impacts leading to non-compliance with ADB's environmental safeguard requirements.

127. To ensure that EMP will be implemented during the construction phase, the contractor should, prior to start of construction activities:

- (i) Designate an Environmental Health and Safety Officer (EHSO).
- (ii) Conduct training on the rationale for and implementation of the SEMP and EMP to enhance general understanding and clarify responsibilities regarding implementation, including monitoring and reporting, must also be provided to relevant staff of contractors (including EHSOs)
- (iii) The Contractor will be required to submit to PMU, for review and approval, a SEMP including (a) proposed sites/locations for construction work camps, storage areas, hauling roads, lay down areas, disposal areas for solid and hazardous wastes, (b) specific mitigation measures following the approved EMP; (c) monitoring program as per EMP; and (d) budget for SEMP implementation. No works can commence prior to approval of SEMP. The SEMP will include the following:
 - (a) Construction Compound Management Plan (specifically considering the school compound)
 - (b) Construction Traffic Management Plan;
 - (c) Construction Health and Safety Plan (including COVID-19 H&S guidance);
 - (d) Materials Management Plan;
 - (e) Noise and Vibration Management Plan
 - (f) Water Quality Management Plan;
 - (g) Dust Management Plan;
 - (h) Waste Management Plan; and
 - (i) Emergency Incident Response Plan.

128. **Removal of Trees.** The site is proposed on a vacant space within the school complex. Minimal tree cutting is envisaged. As a mitigation measure, tree cutting will be avoided, or minimized as possible. Tree cutting permits shall be obtained and replacement tree planting shall be implemented in accordance with government regulations.

129. **Excavation, soil erosion and sediment mobilization.** Excavation for cyclone shelter construction will generate loose soil which can be carried through surface run-off during a rainfall.

130. During construction phase, the Contractor shall implement the measures at all times to control soil erosion that shall include, but not be limited to, the following:

- (i) The Contractor shall plan his works to minimize surface excavation works during the rainy season where practicable.
- (i) Precautions to be taken at any time of year when rainstorms are likely, actions to be taken when a rainstorm is imminent or forecast, and actions to be taken during or after rainstorms shall be developed by the Contractor.
- (ii) The earthwork sites where exposed land surface is vulnerable to runoff shall be consolidated and/or covered.

- (iii) Any borrow pits established by contractors near any of the sites should be rehabilitated promptly once the required materials have been extracted, with slopes reshaped and revegetated to prevent the development of erosion problems;
- (iv) Channels, earth bunds, netting, tarpaulin and/or sandbag barriers shall be used on site to manage surface water runoff and minimize erosion.
- (v) The overall slope of the works areas and construction yards shall be kept to a minimum to reduce the erosive potential of surface water flows.
- (vi) Monitor groundwater quality that could exist close to the working areas to ensure compliance.

131. **Surface water pollution.** Silt-laden run-off from stockpiled materials, solid wastes and domestic wastewater from the construction camp, and leaks from chemical storage areas and machineries may contaminate or result in water pollution if disposed or discharged directly to local drainage network leading to nearby khal.

132. To mitigate these impacts, the contractor will be required to:

- (i) Provision of temporary sedimentation canal and/or silt traps along construction areas, particularly alignments that are adjacent to receiving bodies of water or canals.
- (ii) The measures to address soil erosion at the proposed facilities will consist of measures as per design, or as directed by the PMSC to control soil erosion, sedimentation, and water pollution. All temporary sedimentation, pollution control works, and maintenance thereof will be deemed incidental to the earthwork or other items of work.
- (iii) All temporary discharge points shall be located, designed and constructed in a manner that will minimize erosion in the receiving channels.
- (iv) Ensure proper compaction of refilled soil and there shall not be any loose soil particles on the top; the material shall be refilled in layers and compacted properly layer by layer.
- (v) Use surplus soil for beneficial purposes such as in any other construction activities, or to raise the level of low lying areas.
- (vi) Avoid scheduling of excavation work during the monsoon season. Earthworks during dry season.
- (vii) Confine construction area including the material storage (sand and aggregate) so that runoff will not enter the site.
- (viii) Ensure that drains are not blocked with excavated soil
- (ix) Stockyards at least 50 meters (m) away from watercourses.
- (x) Fuel and other petroleum products stored at storage areas away from water drainage and protected by impermeable lining and bunded 110%.
- (xi) Daily control of machinery and vehicles for leakages
- (xii) No obstruction in flowing water.
- (xiii) For effluents from workplace, camps, and offices, provide treatment arrangements such as retention ponds and septic tanks which should be incorporated in the facility designs. A sewage management plan has to be prepared by the contractor and agreed with the PMSC.
- (xiv) Monitor water quality according to the environmental monitoring plan.

133. For management and final disposal of solid wastes following mitigation, contractor will be required to apply the follow-up measures such as:

- (i) collection of recyclable solid wastes and supply to scrap vendors;
- (ii) ensure all the camp wastes and construction wastes are placed in the designated waste collection pits away from receiving water;
- (iii) establishment of separate bunded and lined areas with 110% volume for the storage of all the toxic material wastes, including batteries, oil filters, mobile, burnt oils, etc. at the construction site; and
- (iv) consultation with PIU on the proper disposal of all residual wastes.

134. **Groundwater use and contamination.** Increased demand for groundwater is anticipated during the construction phase for construction activities and personal consumption by workers. Uncontrolled extraction of water may affect availability of water to locals. In addition, construction waste, if left unattended, will result in percolation of leachate through the soil strata reaching the groundwater table contaminating it.

135. It is necessary that arrangement for safe drinking water is made prior to start of work. Water will be supplied for consumption only after adequate analysis and requisite treatment. The workers may also be trained on the need for judicious use of freshwater resources. The contractors will use water in consideration to its value as a resource. Mitigation measures will include:

- (i) Prevent pollutants from contaminating the soil and the groundwater;
- (ii) All tube wells, test holes, monitoring wells that are no longer in use or needed shall be properly decommissioned;
- (iii) Storage of lubricants and fuel at least 50 m from water bodies;
- (iv) Storage of fuel and lubricants in double hulled tanks. Fuel and other petroleum products stored at storage areas away from water drainage and protected by impermeable lining and bunded 110%;
- (v) Daily control of machinery and vehicles for leakages;
- (vi) Collection of waste during construction activities;
- (vii) Provide uncontaminated water for dust suppression;
- (viii) Enclose the construction area to prevent unauthorized access.

136. **Drainage Congestion.** Construction material getting into surface run off or uncontrolled disposal may cause drainage congestion. The impact of these on hydrology is expected to be more pronounced during post monsoon period with rapid movement of rainwater through existing drainage structures, which if blocked by construction waste and debris may cause flooding or waterlogging in neighboring areas.

137. The contractor shall adopt a site clearance procedure that separates topsoil and stores it under appropriate conditions for reuse as instructed by the Engineer. Wastes and construction debris will not be disposed in a manner that these would end up in drainage canals. The on-site storage of excessive quantities of unwanted spoil and aggregate materials should be avoided. Where storage is necessary, the Contractor shall ensure heaps and stockpiles are located at sites that they do not permit direct runoff into watercourses and are on land sloping at less than 1.5%. All heaps shall be of a size and stability that will ensure the risk of mass movement during period of heavy rainfall is minimized.

138. **Impact on Air Quality.** There will be two main sources of air emissions, i.e., mobile sources and fixed sources during construction phase. Mobile sources are mostly associated with vehicles involved in construction activities. On the other hand, air pollution from fixed sources is

mainly from generator sets, construction equipment (e.g., compressors) and excavation/ grading activities.

139. Dust and gaseous emissions will be generated by the construction machinery. Pollutants of primary concern include particulate matter (PM₁₀). However, suspended dust particles are coarse and settle within a short distance of the construction area. Therefore, the impact will be direct but temporary, and will be restricted to areas in close vicinity of the construction activities only.

140. Construction work also involves breaking up, digging, transporting, and dumping large quantities of dry material. The particulate matter from these can cause health impacts, i.e., respiratory problems, irritation in eyes and reduction in visibility.

141. In the conduct of construction activities and the operation of equipment, contractors shall utilize all practical methods to control, prevent and otherwise minimize atmospheric emissions, specifically:

- (i) Take every precaution to reduce the levels of dust at construction sites, and not exceeding the pre-project ambient air quality standards.
- (vii) Fit all heavy equipment and machinery with air pollution control devices that are operating correctly.
- (viii) Vehicles travelling to and from the construction site must adhere to speed limits to avoid producing excessive dust.
- (ix) Reduce dust by spraying stockpiled soil, excavated materials, and spoils.
- (x) Cover with tarpaulin vehicles transporting soil and sand.
- (xi) Cover stockpiled construction materials with tarpaulin or plastic sheets.
- (xii) Heavy equipment and transport vehicles shall move only in designated areas and roads.
- (xiii) Water spraying to access roads, camp sites and work sites to reduce dust emissions.
- (xiv) Machines and vehicles must be regularly examined and maintained to comply with requirements of technical specifications.
- (xv) All vehicles, equipment, and machinery used for construction will be regularly maintained to ensure that pollution emission levels comply with the relevant requirements of DOE. Copies of conformance will be submitted regularly to the PMSC.
- (xvi) Repair and maintain access roads, as necessary.
- (xvii) Monitor air quality according to the environmental monitoring plan.
- (xviii) clean wheels and undercarriage of vehicles prior to leaving construction site;
- (xix) prohibit burning firewood in work and labor camps (promote liquified petroleum gas for cooking purposes and electric heater for heating purposes);
- (xx) use vehicles that have government-issued permits and registrations; and
- (xxi) prohibit open burning of solid waste.

142. **Noise.** Noise-emitting construction activities include earthworks, concrete mixing, concrete formation works, movement and operation of construction vehicles and equipment, and loading and unloading of coarse aggregates, among others. The vulnerable groups who are susceptible to construction noise include (i) onsite workers who are the most exposed to the highest noise levels generated from different construction activities due to their proximity to the noise sources; and (ii) neighboring communities and other sensitive receptors (such as

worshippers at church/mosque, students at schools and other educational institutes, patients at hospitals etc.).

143. The significance of noise impact will be higher at the immediate vicinity of the subproject site where noise-sensitive receptors are situated. Noise levels should not exceed the national standards for noise or WHO noise level guidelines, whichever is more stringent, or result in increase in background noise level of 3 decibels at the nearest receptor location off-site.²⁴

144. Mitigation measures to reduce the noise impacts off-site at the nearest sensitive receptors include the following:

- (i) Consult with school authorities and plan noisy works, which may interfere with the school operation, appropriately; these works can either be conducted out of school hours or holidays
- (ii) Provide prior information to the local public, including institutions such as schools and hospitals along alignments that may be affected, about the work schedule;
- (iii) Use equipment that emits the least noise, well-maintained and with efficient mufflers. Install silencers if necessary and practical;
- (iv) Avoid use of noisy equipment or doing noisy works at night time near residential areas;
- (v) Limit engine idling to a maximum of one minute;
- (vi) Spread out the schedule of material, spoil and waste transport;
- (vii) Minimize drop heights when loading and unloading coarse aggregates; and
- (viii) Avoid use of horns unless it is necessary to warn other road users or animals of a vehicle's approach.
- (ix) Implement a complaint handling system (grievance redress mechanism)

145. On-site construction noise shall be mitigated to ensure a safe work environment by implementing an on-site occupational health and safety plan, which considers national and international requirements. The plan shall include the following measures:

- (i) Earmuffs/protective hearing equipment shall be made available to all workers in noise critical areas
- (ii) Training on how and when to use protective hearing equipment shall be conducted as part of the workers' induction sessions.
- (iii) Place visually clear instructions in areas where noise emissions are significant.
- (iv) Measure noise level according to the environmental monitoring plan.

146. **Construction wastes generation.** The construction work is likely to generate considerable quantities of waste soil and other solid wastes. Indiscriminate disposal of the soil and waste, excess construction material, concrete, packing materials, containers, lubricants and oils may affect the soil, landscape and aesthetics of local environment and the worker's and community's health and safety.

147. To mitigate the impacts, the contractor will implement the following to manage wastes:

- (i) Dispose excess spoils per the Spoil Management Plan attached in Appendix 4;
- (ii) Avoid stockpiling of excess excavated soils as far as possible;

²⁴ IFC World Bank Group. 2007. [*Environmental, Health and Safety \(EHS\) Guidelines – General EHS Guidelines: Environmental – Noise Management*](#).

- (iii) Avoid disposal of any debris and waste soils in or near water bodies/ rivers;
- (iv) Coordinate with PIU for beneficial uses of excess excavated soils or immediately dispose to designated areas;
- (v) Clean construction waste such as excess soil or rubble should be used in landscaping on site or given to landowners and developers seeking fill material.
- (vi) The contractors should take every opportunity to reduce the amounts of waste generated and collect recyclable material for processing by local operators.
- (vii) Contractor shall implement waste segregation on site.
- (viii) Receptacles for solid waste should be provided for the use of workers, and their contents should be disposed of in officially sanctioned local landfills.
- (ix) Construction waste should also be disposed of in legal local landfills.
- (x) Clean construction waste such as excess soil or rubble should be used in landscaping on site or given to landowners and developers seeking fill material.
- (xi) Waste auditing. The contractor will record the quantity in tons and types of waste and materials leaving site during the construction phase;
- (xii) Waste fuels/oils may be generated from equipment used on-site during construction and may be classified as hazardous waste. Such wastes will be stored in a secure, bunded area on-site prior to collection by relevant parties;
- (xiii) Remove all wreckage, rubbish, or temporary structures which are no longer required.

148. **Disturbance to terrestrial flora and fauna.** The subproject area is a built-up area and no impact to flora and fauna is envisaged. No mitigation is necessary.

149. **Impacts on aquatic ecology.** There are no water bodies (e.g., khal, pond) located close to the proposed cyclone shelter location, so construction is not expected to cause adverse impact on aquatic habitat (e.g., through discharge of waste/ wastewater from sub-project activities, spills and leaks of oil/ chemical, in the absence of any mitigation/management). No mitigation is necessary.

150. **Impacts to protected areas and critical habitats.** Subproject area is located within a built-up area that too far from ecologically sensitive areas. Therefore, no impact is predicted. No mitigation measure is necessary.

151. **Impact to Traffic.** Extra traffic movement during transport of materials and machineries during peak construction time will disrupt the normal traffic at the area at a moderate significance. A traffic plan needs to be devised before construction goes onboard.

152. A traffic management plan (TMP) will be developed prior to construction and approved by the PIU. The TMP shall include the following: (i) installation of clear signages; (ii) barricades; (iii) lightings at night; and (iv) markers to direct traffic movement in sites, among others. A sample TMP is attached with this IEE as Appendix 5. Emergency response plan must be prepared for any traffic accident during construction.

153. **Disruption of Public Access.** Public access to the school may be disrupted during construction activities.

154. Mitigation measures to ensure safe access to the school shall be implemented by the contractor. Among which are the following:

- (i) Prior coordination with the school and surrounding community on operation and

- work schedules.
- (ii) As necessary, increase workforce for speedy completion;
- (iii) Inform through display board about nature, duration of construction and contact for complaints;
- (iv) Schedule material deliveries on low pedestrian traffic hours;
- (v) Restore damaged properties and utilities;
- (vi) Erect and maintain barricades if required;
- (vii) Pedestrian access to school and mosque will be maintained with the use of walking boards. Wheelchair and disabled access shall be maintained.
- (viii) Surfaced roads shall be subject to road cleaning and unsurfaced roads to dust suppression, the methodology and frequency of which shall be included in the traffic management plan.

155. Impacts on physical cultural resources (PCR) and chance finds. The subproject will not encroach into or run over any physical cultural resources (PCRs). The subproject area is also not a potential archaeological area and therefore no significant impact is envisaged. However, as a precautionary approach, the contractor will be required to implement the following measures in the event of a chance finds:

- (i) strictly follow the protocol by coordinating immediately with PIU and Bangladesh Department of Archaeology for any suspicion of chance finds during excavation works;
- (ii) stop work immediately to allow further investigation if any finds are suspected; and
- (iii) request authorized person from the Bangladesh Department of Archaeology to observe when excavation resumes for the identification of the potential chance finds and comply with further instructions.

156. Occupational health and safety risks. Safety risks and health issues arise from storage, handling and transport of hazardous construction material. Construction workers are also at risk of accidents due to moving vehicles, and other construction related activities. Workers are also exposed to high level of pollution from dust, exhaust of vehicles and machinery and noise. Further, if workers do not keep to regulated working hours, the risk of accident events will be higher due to fatigue. Insufficient supply and improper use of personal protective equipment (PPE) and lack of safety procedures may cause injuries or fatal accidents. Spread of COVID-19 is also a risk to manage among workers. It is expected that, at peak time there will be 30-40 workers at a time on each site, which can easily trigger COVID-19 human transfers. There is also a risk of transmitting COVID-19 to the residents.

157. The contractor will be required to implement the following measures:

- (i) All relevant provisions of the Bangladesh Labor Act, 2006 and relevant WHO guidelines will be adhered to, concerning the provision of adequate measures to avoid contracting and/or spreading diseases during construction phase;
- (ii) Follow international best practices on occupational health and safety such as those in Section 4.2 of World Bank EHS Guidelines on Construction and Decommissioning Activities;²⁵

²⁵ IFC World Bank Group. 2007. [*Environmental, Health, and Safety \(EHS\) Guidelines – General EHS Guidelines: Construction and Decommissioning*](#).

- (iii) Follow established occupational health and safety protocol on emerging infectious diseases such as the corona virus disease (COVID19). See Appendix 6 for a sample guidance note in responding to COVID19;
- (iv) A readily available first aid unit, including an adequate supply of sterilized dressing material and appliances, will be provided as per the factory rules. Suitable transport will be provided to facilitate the transfer of injured or ill persons to the nearest hospital;
- (v) Other first aid medical equipment and nursing staff will be made available or arranged on-call;
- (vi) The contractor will, at his own expense, conform to all disease prevention instructions as may be given by PMU/Divisional/Regional Office and/or PIU;
- (vii) Provide regular health check-ups, sanitation and hygiene, health care, and control of epidemic diseases to the workforce;
- (viii) The contractor shall provide at cost all labor and materials and construct/install and maintain site safety, hard barricading, flexible green net, signboards, temporary day/light traffic diversions throughout the construction activities according to the specifications and provide personal protective equipment (PPE) to all the laborers working at the construction site;
- (ix) Launch awareness programs concerning human trafficking and the possibility of spread of sexually transmitted diseases (STDs) and HIV/AIDS using brochures, posters, and signboards;
- (x) Make available first aid kits, ambulance facilities, and fire extinguishers in camp sites, if any;
- (xi) Compensation for the loss of life (a zero tolerance to loss of life policy should be developed and implemented) or for any type of injuries; and
- (xii) Provide insurance to the workers. Health and safety training for all site personnel is very important and must be mandatory.

158. **Community health and safety risks.** Communities will be moderately exposed to threats due to impacts on air and water quality, ambient noise level; mobility of people, goods, and services; accesses to properties, economic activities, and social services; service disruptions, etc. Construction workers may potentially bring communicable diseases in the community, including COVID-19.

159. To mitigate these impacts, the contractor will be required to implement the following measures:

- (i) Completely isolate the construction site from school compounds, by proper barricading, access restriction and posting security guards so that no students/children or any public enters the construction site
- (ii) Since the access road to school and site is same, plan construction related transport activities in consultation with school authorities; no construction vehicles should use the access during school opening, closing and recess times that coincide with the movement of students and staff on access road. Create awareness among drivers on specific and additional precautions to be taken
- (iii) Code of conduct for workers includes restricting workers in designated areas, no open defecation, no littering, no firewood collection, no fire except designated places, no trespassing, no residence at construction sites, and no obligation to potentially dangerous work;

- (iv) Follow International best practices on community health and safety such as those in Section 4.3 of World Bank Environmental Health and Safety (EHS) Guidelines on Construction and Decommissioning Activities;²⁶
- (v) Follow established community health and safety protocol on emerging infectious diseases such as COVID19. See Appendix 6 for a sample guidance note in responding to COVID19;
- (vi) Implement measure to prevent proliferation of vectors of diseases at work site;
- (vii) Maintain a complaint logbook in worker's camp and take action promptly of complaints. Follow the established GRM of the overall project (CTCRP);
- (viii) Schedule transportation activities by avoiding peak traffic periods;
- (ix) Clean wheels and undercarriage of haul trucks prior to leaving construction site;
- (x) Educate drivers: limit speed not more than 30 km/h in settlements and avoid use of horn;
- (xi) Earmark parking place for construction equipment and vehicles when idling; no parking shall be allowed on the roads, that may disturb the traffic movement;
- (xii) Provide prior information to local people, particularly any affected institutions (e.g., schools/madrasa, hospitals, mosques or places of worship, etc.) nearby about work schedules;
- (xiii) Noise barriers must be installed in between the construction site and any institutions (e.g. schools/madrasa, hospitals, mosques or places of worship, etc.) to reduce the impact noise to these receptors;
- (xiv) Provide adequate space and lighting, temporary fences, reflectorized barriers and signages at the work site; and
- (xv) Ensure contractor has staff trained on emergency response.

160. **Post-construction clean-up and reinstatement.** Construction debris, spoils, and excess construction materials may pose hazards to properties, community and environment if left unattended after construction.

161. The contractor will reinstate all working areas and access routes as work proceeds during construction. All plant, equipment, materials, temporary infrastructure and vehicles will be removed at the earliest opportunity and the surface of the ground restored as near as practicable to its original condition. The following generic measures should be taken:

- (i) Remove all spoils wreckage, rubbish, or temporary structures (such as buildings, shelters, and latrines) which are no longer required;
- (ii) All excavated areas shall be reinstated to original condition;
- (iii) All disrupted utilities restored;
- (iv) All affected structures rehabilitated/compensated;
- (v) The area that previously housed the construction camp is to be checked for spills of substances such as oil, paint, etc. and these shall be cleaned up;
- (vi) All hardened surfaces within the construction camp area shall be ripped;
- (vii) All imported materials removed, and the area shall be top soiled and regressed using guidelines set out in the re-vegetation specification that forms part of this document;
- (viii) The contractor must arrange the cancellation of all temporary services;
- (ix) Request PIU to report in writing that worksites and camps have been vacated and restored to pre-project conditions before acceptance of work.

²⁶ IFC World Bank Group. 2007. [*Environmental, Health, and Safety \(EHS\) Guidelines – General EHS Guidelines: Construction and Decommissioning.*](#)

C. Operation Phase Impacts and Mitigation Measures

162. Wear and tear of the building including breakdown of electrical and plumbing fixtures/systems, and risk of fire and natural hazards are anticipated during the operation phase.

163. **Building wear and tear.** The operator or management of the cyclone shelter and access road will ensure to carry out maintenance works on the building as may be needed. The cyclone shelter will have a pool of trained and certified electricians, plumbers and masons who will be on call in case repairs are required. Other maintenance requirements are regular cleaning of the complex by the cyclone shelter operator or management.

164. **Fire and Natural Hazards.** The operator or management of the cyclone shelter and access road will ensure that the focal resident person or caretaker is trained in using fire extinguishers and that these are regularly checked and maintained. The emergency numbers of Fire, Police must be posted near the fire extinguisher or at a visible location. The management must also ensure for the conduct of periodic fire drills, posting of emergency exit plans, designating evacuation areas, dissemination of other emergency plan information, and all other activities that will raise awareness among users of the building (teachers, students, etc.) on how to behave and respond in times of fire or natural disasters.

165. **Water shortage.** The design of the cyclone shelter includes rainwater harvesting system, which will significantly reduce the demand for water during the operation phase and adequate water tanks will be installed onsite as well as part of the design. Rainwater harvesting system will be designed to collect, store and supply rainwater in such a way that it is not contaminated during the process adopting standard methods for design, construction and maintenance as per national standards and international good practice. Stored water from rainwater harvesting will be used for non-potable uses. In unavoidable circumstances of using this water for potable purposes (drinking and cooking), water shall be treated/disinfected prior to use. Standard operating guidelines shall be put in place for emergency use of stored water for potable purposes, and necessary facilities to treat/disinfect stored water on-site should be also put in place. Groundwater from deep tube wells will be used for potable purposes. Groundwater will be tested and will be treated if needed to meet drinking water standards.

166. **Liquid and Solid Waste generation.** This is not a significant concern as the operation of the cyclone shelter as school during most time of the year is not expected to generate significant amount of solid wastes. All generated wastes can be easily serviced by the municipal waste disposal service providers. The management or operator will promote proper waste segregation, storage and disposal procedures and ensure that garbage is not allowed to accumulate on the premises. The design of the shelter will include septic tanks, which can be desludged/emptied on a regular basis by vacuum tanker services to avoid overaccumulation sludge in septic tank. In the future, when the area is connected to a sewage treatment plant, the cyclone shelter will then be connected to the sewer pipeline network.

D. Cumulative Impacts and Mitigation Measures

167. There are no similar construction or project activities in the area that would result in cumulative environmental impacts. Direct impacts including, among others, increase in noise levels, fugitive dust, and common air emissions near the construction areas, are temporary in nature and will not result in cumulative adverse impacts to people and environment with the implementation of mitigation measures discussed in this IEE report.

E. Unanticipated Impacts during Construction and Operation

In the event of unanticipated environmental impacts not considered as significant during implementation and not considered in the IEE and EMP, the PMU shall prepare a corresponding time-bound and budgeted corrective action plan acceptable to ADB, and ensure that these are implemented by the contractor/s and reported accordingly in environmental monitoring reports to ADB. If unanticipated environmental impacts deemed as significant become apparent during project implementation, the PMU will: (i) inform and seek ADB's advice; (ii) assess the significance of such unanticipated impacts; (iii) evaluate the options available to address them; and (iv) update the IEE including EMP. ADB will help the borrower mobilize the resources required to mitigate any adverse unanticipated impacts or damage.

F. Environmental Benefits and Enhancement Measures

168. Aside from offering a safe place for evacuation of people and cattle during cyclone events, the project also has the following environmental and social benefits:

- (i) temporary employment for construction workers, equipment maintenance and support staff.
- (ii) additional facility for school use
- (iii) solar panels will supply electricity to the cyclone shelter, lowering the need to draw energy from the grid.

VII. INFORMATION DISCLOSURE, CONSULTATION AND PARTICIPATION

A. Consultation and Participation

169. Meaningful consultation is an essential part of the environmental assessment process which enables the incorporation of all relevant views of affected people and other stakeholders into decision making, such as project design, mitigation measures, and the sharing of development benefits and opportunities, and implementation issues. The process also helps avoid potential conflicts with stakeholders for smooth project implementation. The findings from the public consultations are documented and considered in the development of the EMP, especially in identifying the significant impacts of the proposed Project and developing the corresponding mitigation measures.

170. Consultations may be conducted through focus group discussions, interviews, and town meetings. During these activities, implementation of COVID-19 health and safety measures as per local and national guidelines must be observed.

171. The key stakeholders to be consulted include:

- (i) Project beneficiaries;
- (ii) Elected representatives, community leaders and representatives of community-based organizations;
- (iii) Local non-government organizations (NGOs);
- (iv) Local government and relevant government agency representatives, including local authorities responsible for land acquisition, protection and conservation of forests and environment, archaeological sites, religious sites, and other relevant government departments;
- (v) Residents, shopkeepers, businesspeople, and farmers who live and work near the subproject.

B. Public Consultations Conducted

172. Public consultation meetings were held with the key stakeholders, madrasa management committee and community people in line with the ADB's requirements pertaining to environmental, economic and social considerations. Consultation with locals and key stakeholders helped in identifying the felt needs and apprehensions related to the project and their priorities. There were three public consultation meetings held for the cyclone shelter in Lalmohan Pourashava which covered the first, second and third or the selected site. These were attended by a total of 13 participants, all male. The public consultation for the selected site for the cyclone shelter was held on 05 May 2022 at Gazi Bari Madrasa, Ward No. 07.

173. Topics of discussions during the consultation include the following:

- (i) Opinions of local people for construction of cyclone shelter at this place
- (i) Ownership of land and conditions for offering land for cyclone shelter
- (ii) Resettlement and Environmental issues
- (iii) Support of local community for construction and maintenance

174. Key issues raised by the participants and discussed the PMU, local Pourashava engineers are Summarized in the **Table 14**.

Table 14: Summary of Public Consultation

Key issues raised by the participants	Response by Project Proponent
What is the construction plan of the proposed cyclone shelters	It will be three storied building with required facilities for women and children
Who will be responsible for construction and operations	Pourashava will execute the construction work and Madrasha authority will be responsible for operation and maintenance of the proposed cyclone shelter.
How will Pourashava support cost for major maintenance	This is the responsibility of the Pourashava to manage required fund for repair and maintenance, as well as logistics during disaster period for realizing development objective of this project
What will be the criteria for labour recruitment during construction?	This largely depends on the types of job and will be assessed on a case-to-case basis by the contractor according to needs.
Happy for this project, as it comes to solve the problem of shelter during storms	Accepted thankfully
How does this project help vulnerable people, people with disabilities?	The layout has provided separate space for male, female and pregnant women including separate toilet. Ramp access to ground floor is provided to take care of people with disabilities.
Priority for jobs should also consider women; women can do the same work.	Priority will include women and there will not be any discrimination in daily wages.
Raised the issue of employment, he suggested that the local people should be the first ones to be employed in the project.	The consultant team explained that local people will be employed accordingly to job requirement.
Wishes to speed up the project	It was explained that implementation will take place immediately after the rainy season after getting all necessary clearance from the authority.
The construction creates lot of dust and noise, is there any increase anticipated.	The increase in dust and noise at construction site will be mitigated by the contractor through project IEE.

175. A no objection certificate has been given by the Gazi Bari Madrasha Committee for the use of the compound for the construction of the emergency/multipurpose cyclone shelter.

Figure 22: Participants in Public Consultation for the Cyclone Shelter Subproject

176. Minutes, attendance sheets and photos of public consultation, and the no objection certificate from school committee is in **Appendix 7**.

C. Future Consultations during Detailed Design Stage

177. Stakeholder consultations will continue during the detailed design stage and throughout the project implementation. PMU and PMSC will ensure that consultations will be conducted as meaningful per definition of ADB SPS 2009. The summary of the IEE will be locally disclosed in an accessible place and in a form and language(s) understandable to affected people and other stakeholders before consultations to give stakeholders a chance to read it and consult experts.

D. Information Disclosure

178. Information shall be disclosed through public consultation and making available relevant documents in public locations. The following documents will be submitted to ADB for disclosure on its website: ²⁷

- (i) IEE report (including subproject EMP);
- (ii) Updated IEE (including EMP) and corrective action plan prepared during project implementation, if any; and
- (iii) Environmental monitoring reports.

179. The EA/IA will send a written endorsement to ADB for disclosing these documents on the ADB website. The PIUs will provide relevant safeguard information in a timely manner, in an accessible place and in a form and language understandable to affected people and other stakeholders. For illiterate people, other suitable communication methods will be used. For the benefit of the community, the summary of the IEE will be translated in Bangla and made available at: (i) office of PMU; and (ii) offices of the contractors. Hard copies of the IEE report will also be available at the PMU and accessible to citizens as a means of disclosing the document and at the same time creating wider public awareness. On demand, the person seeking information can obtain a hard copy of the complete IEE document at the cost of photocopy from the office of the Project Director, on a written request and payment for the same. Electronic version of the IEE will be placed in the official website of LGED after approval of the documents by Government and clearance from ADB. Disclosure will follow ADB's Access to Information Policy, 2018.

²⁷ Per ADB SPS, 2009, prior to disclosure on ADB website, ADB reviews the "borrower's/client's social and environmental assessment and plans to ensure that safeguard measures are in place to avoid, wherever possible, and minimize, mitigate, and compensate for adverse social and environmental impacts in compliance with ADB's safeguard policy principles and Safeguard Requirements 1-4." Upon its receipt of acceptable safeguard documents and endorsement by PMU, ADB discloses the same on ADB website.

VIII. GRIEVANCE REDRESS MECHANISM

180. A common GRM will be in place for social, environmental, or any other grievances related to the project; the resettlement plans (RPs), RSECPs and IEEs will follow the GRM described below, which is developed in consultation with key stakeholders. The GRM will provide an accessible and trusted platform for receiving and facilitating resolution of affected persons' grievances related to the project. The multi-tier GRM for the project is outlined below, each tier having time-bound schedules and with responsible persons identified to address grievances and seek appropriate persons' advice at each stage, as required.

181. Across the *Pourashava*, awareness on grievance redress procedures will be generated through a public awareness campaign. The project implementation unit (PIU) under the guidance of Deputy Project Director PMU and Deputy Director Regional Municipal Support Unit of Divisional/Regional Office will conduct *pourashava*-wide awareness campaigns to ensure that poor and vulnerable households are made aware of grievance redress procedures and entitlements and will work with the PIU safeguards assistant to help ensure that their grievances are addressed.

182. Affected persons will have the flexibility of conveying grievances/suggestions by dropping grievance redress/suggestion forms in complaints/suggestion boxes that will be installed by project *pourashavas* or through telephone hotlines at accessible locations, by e-mail, by post, WhatsApp or by writing in complaints register that will be kept in *pourashava* offices. Appendix 8 has the sample grievance registration form. Careful documentation of the name of the complainant, date of receipt of the complaint, address/contact details of the person, location of the problem area, and how the problem was resolved will be undertaken. The Deputy Project Director from project management unit PMU, Divisional/Regional Office and PIU will have the overall responsibility for timely grievance redressal on environmental and social safeguards issues and for registration of grievances, related disclosure, and communication with the aggrieved party.

183. **Grievance redress process.** In case of grievances that are immediate and urgent in the perception of the complainant, the Social Coordinator, Contractor and Social Safeguard and Environment Specialist from the project management and supervision consultants (PMSC) on-site will provide the most easily accessible or first level of contact for quick resolution of grievances. Contact phone numbers and names of the concerned PIU safeguards assistant, contractors, PMU safeguards officer, PMSC environmental and social safeguards specialists will be posted at all construction sites at visible locations.

184. **First Level Grievance, Pourashava Level PIU.** The contractors, PIU Safeguard and Gender Focal person can immediately resolve issues on-site or at lalmohan *pourashava* level in consultation with each other and with the support of Administrative Officer of *Pourashava*, designated municipal ward councilor and will be required to do so within 7 days of receipt of a complaint/grievance. Assistance of ward level coordination committees (WLCC) will be sought if required for resolution of the issue, by any one or all of them jointly. The first level grievance redress team will comprise of the following members:

- (i) Chief Executive Officer or in his absence *Pourashava* Secretary
- (ii) Executive Engineer, *Pourashava* (Safeguard and Gender Focal person)
- (iii) Administrative Officer, *Pourashava*
- (iv) Municipal Ward Councilor (designated)
- (v) EHS Supervisor/Social Coordinator, Contractor

185. The town-level grievance redress team shall have at least one women member. In addition, for project-related grievances, representatives of affected persons, community-based organizations (CBOs), and eminent citizens must be invited as observers in GRC meetings. In case of any impacts on small ethnic communities (SECs), in subproject towns (example: Kuakata), the grievance redress team must have representation of the affected SECs, the chief of the SEC group as traditional arbitrator (to ensure that traditional grievance redress systems are integrated) and/or an NGO working with SECs.

186. **Second Level Grievance, Divisional/Regional Office, Division Level.** All grievances that cannot be redressed within 7 days at PIU level will be brought up to the Divisional/Regional Office level. Second level grievance redress team headed by the Deputy Project Director, Divisional/Regional Office supported by the Assistant Directors (environment, social safeguard and gender) and Construction Supervision and Safeguards Engineers /Asst. Supervision and Safeguards Engineers, PMSC will attempt to resolve the grievance /complaint within 7 days. At the Divisional/Regional Office level, the composition of 2nd level grievance redress team will be as follows:

- (i) Deputy Director
- (ii) Assistant Director (Safeguards, Livelihood and Gender)
- (iii) Construction Supervision and Safeguards Engineers /Asst. Supervision and Safeguards Engineers, PMSC (Support)

187. **Third Level Grievance, PMU Level.** All grievances that cannot be redressed within 7 days at Divisional/Regional Office level will be brought up to the PMU level. The Divisional/Regional Office safeguards team will refer any unresolved or major issues to the PMU level grievance redress team, that will be headed by the Project Director and will have Deputy Project Director, social safeguard, environment safeguards and gender Assistant Directors, and PMSC, who will resolve the complaints/grievances within 15 days. The PMU level grievance team will comprise of:

- (i) Project Director, PMU
- (ii) Deputy Project Director (Safeguards, Livelihoods and Gender)
- (iii) Sub Assistant Engineer Safeguards
- (iv) Social, Environment and Gender Specialist, PMSC (support)

188. The grievance redress process is represented in **Figure 23**.

189. Despite the project GRM, an aggrieved person shall have access to the country's legal system at any stage and accessing the country's legal system can run parallel to accessing the GRM and is not dependent on the negative outcome of the GRM.

190. **ADB Accountability Mechanism.** In the event that the established GRM is not in a position to resolve the issue, the affected person can also use the ADB Accountability Mechanism (AM) through directly contacting (in writing) the Complaint Receiving Officer (CRO) at ADB headquarters or the ADB Bangladesh Resident Mission (BRM). Before submitting a complaint to the Accountability Mechanism, it is necessary that an affected person makes a good faith effort to solve the problem by working with the concerned ADB operations department and/or BRM. Only after doing that, and if they are still dissatisfied, will the Accountability Mechanism consider the complaint eligible for review. The complaint can be submitted in any of the official languages of ADB's developing member countries. The ADB Accountability Mechanism information will be

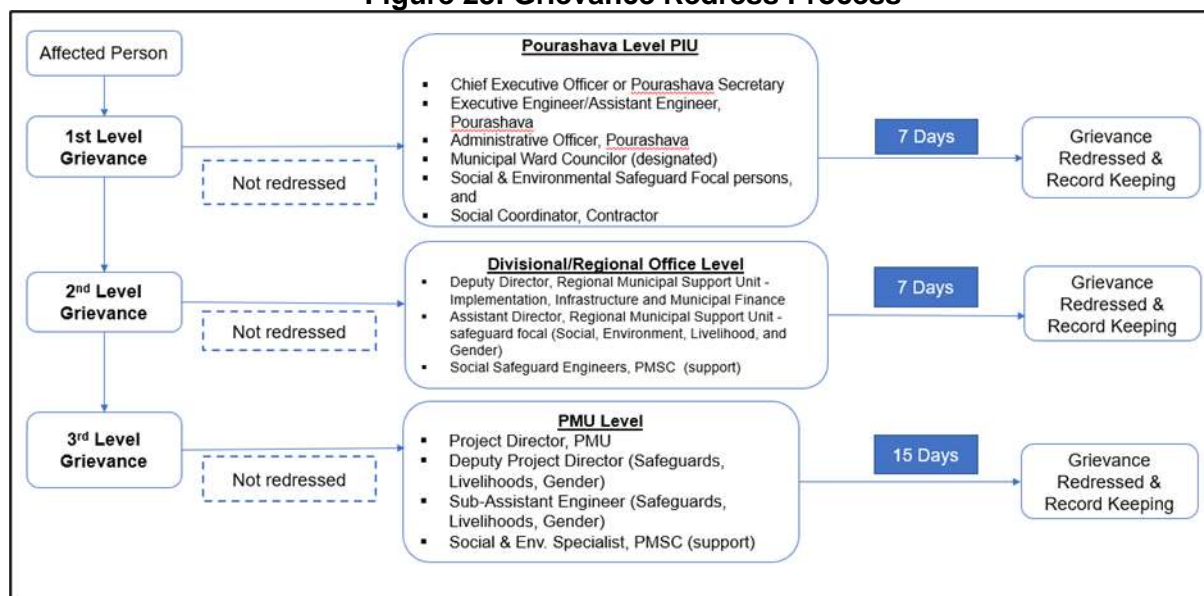
included in the project-relevant information to be distributed to the affected communities, as part of the project GRM.

191. **Documentation and Record keeping.** All GRC documents will be maintained by Contractor and PMU. Record of all complaints received, and action taken will be maintained at both at the field level and the PMU. This information will be available for review and verification by supervision consultants and ADB or any third party. All the grievance records will be updated regularly and easily accessible on-site.

192. **Information dissemination methods of the GRM:** GRC procedures and operational rules will be publicized widely through community meeting and pamphlets in Bengali so that the affected persons are aware of their rights and obligation, and procedures of grievance redress. Grievances received, and responses provided will be documented and reported back to the affected persons.

193. **Costs:** All costs involved in resolving the complaints (meetings, consultations, communication, and reporting/information dissemination) will be borne by the PMU.

Figure 23: Grievance Redress Process



GRC = grievance redressal committee; PIU = project implementation unit; PMSC = project management and supervision consultants; PMU = project management unit

Note: In case of project towns where impacts to SEC are assessed, the PIU-level grievance redress committee/team will have representation of the affected SECs.

IX. ENVIRONMENTAL MANAGEMENT PLAN

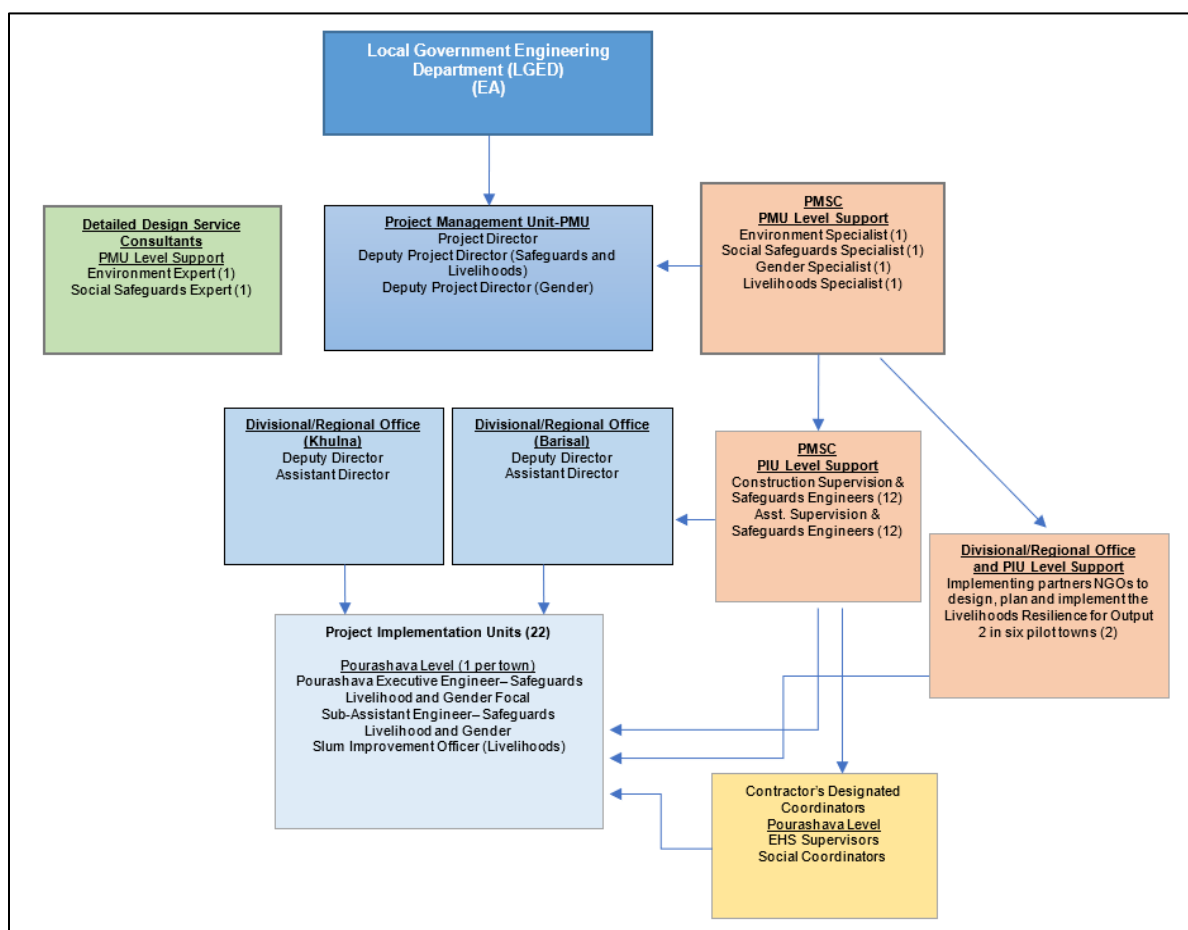
194. This environmental management plan (EMP) has been prepared in accordance with the ADB's Safeguard Policy Statement 2009. This EMP identifies the minimum requirements with regard to the appropriate mitigation, monitoring, inspection and reporting mechanisms that need to be implemented throughout design, construction and operation periods of the project, to avoid, minimize or offset the potential environmental impacts identified in the chapter on Anticipated Environmental Impacts and Mitigation Measures of this IEE. This chapter also discusses the institutional arrangement, roles, and responsibilities for the effective implementation of the EMP.

A. Institutional Arrangement

195. The Ministry of Local Government, Rural Development and Cooperatives, acting through its Local Government Engineering Department (LGED), will be the Executing Agency. Pourashavas or towns selected to be beneficiaries of the project are the implementing agencies

196. Figure 24: Institutional Arrangement for Safeguards **Figure 24** below shows the institutional arrangement for safeguards of the overall project.

Figure 24: Institutional Arrangement for Safeguards



DDSC = Detailed Design Service Consultant; EHS = Environment, Health, and Safety; PIU = Project Implementation Unit; PMSC = project management supervision consultant; PMU = project management unit

197. **Project Management Unit (PMU).** A PMU will be created within LGED to support the management and supervision of the project. The PMU will coordinate environment safeguards planning and implementation and ensure that the environmental assessment and review framework is followed during subproject implementation. The PMU will be headed by a project director (PD) of Executive Engineer rank. The PD will be supported by a Deputy Project Director (DPD) who is also a permanent staff of LGED and will serve as the environmental safeguards focal person in the PMU on concurrent capacity. The PMU will be assisted by two consultant teams, namely: Detailed Design Service Consultant (DDSC) and Project Management and Supervision Consultant (PMSU). DDSC and PMSU will each include an Environment Specialist who will support in the efficient overall implementation of environmental safeguards of the project, through tasks described in relevant paragraphs below. The PMU will work closely with the Divisional/Regional Offices and project implementation units (PIUs) at the *Pourashava* level. The PMU will have the following responsibilities with regard to environmental safeguards

- (i) Ensure subprojects comply with the national and local statutory and legal environmental requirements, ADB SPS 2009, EARF and environmental safeguards provisions of the ADB loan covenant;
- (ii) Ensure subprojects conform to exclusion criteria and subproject selection guidelines as stipulated in the EARF;
- (iii) Review and approve the environmental categorization of future subprojects;
- (iv) Review and approve subproject IEE reports, including EMPs, and ensure that subproject IEEs and EMPs are updated based on final detailed designs and submit to ADB for review, clearance and disclosure prior to bid invitation;
- (v) Ensure that robust chance find protocol is put in place and implemented properly;
- (vi) Engage competent heritage experts and oversee conduct of heritage assessment study for towns where there are notified heritage areas close by (such as for example in Bagerhat); and ensure that no works/sites are located within 1 km from the boundary of any UNESCO notified heritage area or within monuments protected by Department of Archaeology, Government of Bangladesh;
- (vii) Ensure that updated/final IEEs based on final detailed design are provided to the construction contractor prior to start of construction ;
- (viii) Ensure that the IEEs including EMPs are updated in case of changes in detailed design that may occur during implementation phase, and submitted to ADB for review, clearance and disclosure;
- (ix) Ensure that IEEs with EMPs are included in bidding documents and civil works contracts;
- (x) Ensure that the requirement for contractors to prepare their respective Health and Safety (H&S) Plans including COVID-19 H&S Plans is included in bidding documents and civil works contracts;
- (xi) Review and approve site-specific EMPs (SEMPs) of contractors;
- (xii) Provide oversight on environmental management aspects of the project, and ensure EMPs and SEMPs are implemented by contractors;
- (xiii) Establish a system to monitor environmental safeguards of the Project including monitoring the indicators set out in the monitoring plan of the IEE;
- (xiv) Facilitate timely and ensure overall compliance with all national and local government rules and regulations regarding site and environmental permits/clearances/approvals as well as any other environmental requirements as relevant;
- (xv) Review, monitor and evaluate effectiveness with which the EMPs, SEMPs, and Health and Safety Plans are implemented, and recommend necessary corrective actions to be taken;

- (xvi) With support from PMSC, consolidate quarterly monitoring reports from the Divisional/Regional Offices and/or PIUs and submit semi-annual environmental monitoring reports (SEMRs) to ADB;
- (xvii) Ensure availability of budget for safeguards activities;
- (xviii) Ensure adequate awareness campaigns, information disclosure among affected communities and timely disclosure of final IEEs/EMPs and SEMRs, including corrective action plans, if any, in project website and in a form accessible to the public;
- (xix) Address any grievances brought through the grievance redress mechanism (GRM) described in this IEE report in a timely manner;
- (xx) Undertake regular review of safeguards-related loan covenants, and the compliance during project implementation; and
- (xxi) Organize periodic capacity building and training programs on safeguards for stakeholders, PMU, Divisional/Regional Offices, PIUs and contractors.

198. **Divisional/Regional Office of LGED, Division Level.** The Divisional/Regional Office in Barishal will be responsible for overall implementation of the subprojects within the Division. The Assistant Director of the Regional Municipal Support Unit of the Divisional/Regional Office will be responsible for Social and Environmental Safeguards, Livelihoods and Gender, with support by PMSC in the implementation of social and environmental safeguard plans and gender action plan (GAP). The Divisional/Regional Office will undertake internal monitoring and supervision and record observations throughout the project period to ensure that the safeguards and mitigation measures are provided as intended.

199. The PMU and Divisional/Regional Office of LGED will jointly oversee safeguards implementation by the pourashava/town level PIU, coordinate public consultations, information disclosure, regulatory clearances and approvals, implementation of resettlement plans, EMP implementation, and grievance redressal.

200. The key tasks of the Divisional/Regional Office on environmental safeguards, through the Divisional/Regional Office Assistant Director (Environmental Safeguards) as lead and PMSC as support, will be as follows:

- (i) Supervise PMSC to coordinate with PIU, conduct consultations with affected persons and key stakeholders, and update PMU accordingly for all subproject locations;
- (ii) Ensure and support preparation and/or updating of this IEE report by DDSC and submit to PMU for review and approval and submission to ADB;
- (iii) Support PIU to obtain no objection certificates and/or permits required for the subproject at the local or pourashava level, other than those certificates or permits that are to be obtained by the contractor;
- (iv) Provide all necessary support to heritage expert in the conduct of heritage assessment study in subproject towns close to UNESCO heritage areas, and coordinate with DDSC to ensure that component sites are away from these UNESCO heritage areas (1.5-2 km), and in any case, no works/sites shall be located within 1 km from the boundary of any UNESCO heritage area or within monument/sites protected by Department of Archaeology, Government of Bangladesh;
- (v) Supervise PIU to ensure no subproject civil works will commence until all relevant statutory requirements are obtained;

- (vi) Support PMU to ensure IEE report is included in bidding documents and civil works contracts;
- (vii) Guide PIU to ensure EMP of subproject is implemented effectively and efficiently;
- (viii) Consolidate monthly environmental monitoring reports received from PIU (and other PIUs in the Division) and prepare quarterly environmental monitoring reports to PMU;
- (ix) Guide PIU to conduct continuous public consultation and awareness with affected persons and other key stakeholders;
- (x) Address any environment-related grievances brought about through the GRM promptly;
- (xi) Organize an induction course for the training of contractors, preparing them on EMP implementation and monitoring, GRM and actions towards any unanticipated environmental impacts that may occur during implementation; and
- (xii) Liaise with the district administration, and other division-level stakeholders, as and when required.

201. **Project Implementation Unit (PIU), Pourashava/Town Level.** The PIU, such as the Burhanuddin PIU for this subproject, will be established and staffed with a safeguards and gender focal person (Executive Engineer/Assistant Engineer, pourashava). The PIU will be assisted by PMSC. and will receive support from the Divisional/Regional Office environment, social and gender Assistant Directors and region level Construction Supervision and Safeguards Engineers, PMSC. The PIU will be responsible for implementation of the IEE/resettlement plan/resettlement and small ethnic community plan (RSECP)/GAP. The Executive Engineer (safeguards, livelihoods, and gender focal person) with the support of the Construction Supervision and Safeguards Engineers, PMSC will support PMU safeguards Deputy Project Directors and Sub Assistant Engineers in subproject implementation. The Slum Improvement Officer at the pourashava will be responsible for livelihood intervention tasks and responsibilities.

202. Key tasks and responsibilities of the PIUs on environmental safeguards, through the PIU safeguard and gender focal person as lead and division-level PMSC as support, are as follows:

- (i) Ensure compliance with government and ADB requirements on environmental safeguards;
- (ii) Provide all necessary support to heritage expert in the conduct of heritage assessment study in subproject towns close to UNESCO heritage areas, and coordinate with DDSC to ensure that component sites are away from these UNESCO heritage areaw (1.5-2 km), and in any case, no works/sites shall be located within 1 km from the boundary of any UNESCO heritage area or within monument/sites protected by Department of Archaeology, Government of Bangladesh;
- (iii) With support from PMSC, review and approve site-specific EMPs (SEMPs) prepared by contractor;
- (iv) Conduct regular site visits, including spot checks, to ensure the EMP and/or SEMP are properly implemented;
- (v) Review monthly reports from contractor;
- (vi) Prepare quarterly reports on all aspects concerning environmental assessment, management, and monitoring;
- (vii) Obtain approval of the quarterly reports from the Project Engineer, and submit approved reports to Divisional/Regional Office;
- (viii) Address any grievances brought about through the GRM as described in the IEE report in a timely manner; and

- (ix) Support all other environmental safeguards-related activities and tasks of the PMU/Divisional/Regional Office as may be needed.

203. Detailed Design Service Consultants (DDSC). The project will be supported by the DDSC. The DDSC will be staffed by an Environment Expert, Heritage / Archaeological Expert, and a Social Safeguard Expert. DDSC will support PMU in designing and planning of subproject components. The DDSC will screen all subprojects for climate resilience, conduct technical surveys and detailed studies, heritage assessment studies, and prepare all engineering designs, bidding and safeguard documents. In collaboration with the PMSC Environmental Safeguards and Heritage/Archaeological Experts, the tasks of the DDSC Environmental Safeguards and Heritage Experts are as follows:

- (i) Screen and categorize the subproject based on the EARF;
- (ii) Update/Finalize the initial environmental examination (IEE) report including environmental management plans (EMP) based on final detailed design of the subproject and in accordance with ADB SPS and national laws, regulations, policies and guidelines; and
- (iii) Ensure that technical design team works closely with the Heritage Expert; select subproject sites/work area as far as away from UNESCO heritage area if any, and in any case, no works/sites shall be located within 1 km from the boundary of UNESCO heritage area or within monument/sites protected by Department of Archaeology, Government of Bangladesh;
- (iv) Ensure that all recommendations made in the heritage assessment study are integrated into finalization of subproject sites, detailed designs, and construction methodologies; and
- (v) Conduct due diligence of associated facilities and/or audit of existing facilities, if any, during the detailed design phase, as defined in ADB SPS

204. Project Management Supervision Consultant (PMSC) The PMSC will provide project management and supervision services to support the PMU. PMU will provide support to the LGED, PMU for project management, and administration, construction supervision and quality control, safeguard compliance, municipal services operation and maintenance, monitoring and evaluations, and other activities as appropriate. PMSC will have an Environment Specialist, a Social Safeguard Specialist, Heritage/Archaeological Expert, and a Gender Specialist

The key responsibilities of PMSC on environmental safeguards (PMU level and PIU level), with the support of heritage expert to be assigned in subproject towns where heritage areas are likely to be affected, are to fulfil collaborative tasks with the DDSC Environment Specialist and Heritage Expert and provide expert support to PMU, Divisional/Regional Office and PIU on the following:

- (i) Screen and categorize final components of the subproject based on the EARF;
- (ii) Update/Finalize the initial environmental examination (IEE) report including environmental management plans (EMP) based on final detailed design of the subproject and in accordance with ADB SPS and national laws, regulations, policies and guidelines;
- (iii) Engage heritage expert to review the works sites before the start of works, and confirm on site by joint verification with PIU and heritage management authority that project component sites are away from UNESCO notified heritage area, and no works are located within 1 km of the boundary and are not within the monument/sites protected by Department of Archaeology, Government of Bangladesh;

- (iv) Ensure that all recommendations made in the heritage assessment study are implemented;
- (v) Conduct due diligence of associated facilities and/or audit of existing facilities, if any, during the detailed design phase, as defined in ADB SPS;
- (vi) Conduct of meaningful consultations and ensure issues/concerns/suggestions raised are incorporated in the design and updated/final IEE report;
- (vii) Ensure relevant provisions from the updated/final IEE report and EMP are incorporated in the bid and contract documents;
- (viii) Establish grievance redressal mechanism and ensure members of the grievance committee have the necessary capacity to resolve project-related issues/concerns;
- (ix) Together with the social safeguards experts, conduct safeguards capacity building to ensure PMU, Divisional/Regional Office and PIU have the capacity to implement, monitor, and report on implementation of EMP, resettlement plans and indigenous peoples plans (if any); and
- (x) Monitor implementation of EMP at all work sites, including all potential safeguard issues identified in the safeguard documentation mentioned above;
- (xi) Monitor any unanticipated environmental risks or impacts that arise during construction, implementation or operation of the subproject that were not considered in the IEE report and EMP. Prepare corrective action plans and ensure that these are implemented by the contractor and reported accordingly in environmental monitoring reports to ADB; and
- (xii) Undertake all other tasks to ensure the subproject complies with ADB SPS and national environmental laws, rules, and regulations.

205. **Civil Works Contract and Contractor.** The IEE with EMP will form part of bidding and contract documents and verified by PMU. The Contractor will be required to designate an environment, health and safety officer (or equivalent) to ensure implementation of EMP during civil works. Contractor is to carry out all environmental mitigation and monitoring measures outlined in their contract and the IEE. The Contractor will be required to submit to PMU, for review and approval, a SEMP including (i) proposed sites/locations for construction work camps, storage areas, hauling roads, lay down areas, disposal areas for solid and hazardous wastes; (ii) specific mitigation measures following the approved EMP; (iii) monitoring program per EMP; and (iv) budget for SEMP and EMP implementation. No works can commence until SEMP is approved by PMU.

206. Specifically, the Contractor will have the following responsibilities, among others that will be included in the bid and contract documents:

- (i) Ensure that the infrastructure development works are carried out in an environmentally friendly manner, minimizing environmental impacts while ensuring the health and safety of all its workers and the minimizing disturbance to the surrounding environment and communities;
- (ii) Consideration of ADB SPS, national regulations and the EMP during bid preparation and cost estimation;
- (iii) Hire or designate a full time Environment, Health and Safety Officer (or equivalent) responsible for compliance to ADB SPS requirements, national regulations and the EMP. The officer/staff must have a clear terms of reference and responsibilities to ensure that all environmental and social concerns are properly managed;
- (iv) Ensure regular reporting to the PIU on work progress and alert management on any potential issues or delays;

- (v) Strictly follow National COVID 19 protocols and other COVID-19 related instructions issued by the government, and immediately report to the PIU upon detection of COVID positive cases at the subproject site;
- (vi) Obtain the necessary permits and clearances, if any is required for the contractor, to implement the subproject;
- (vii) Ensure that all worker recruitment and OHS requirements are complied;
- (viii) Take necessary corrective action to rectify any non-conformance, including actions related to grievances;
- (ix) Institute an emergency plan for natural calamities/disasters and accidents at the site; and
- (x) Follow chance finds procedures to discovery of any physical cultural artifact.

207. A copy of the EMP/approved SEMP will be kept on-site during the construction period at all times. Non-compliance with, or any deviation from, the conditions set out in the EMP/SEMP constitutes a failure in compliance and will require corrective actions.

208. PMU will ensure that bidding and contract documents include specific provisions requiring contractors to comply with: (i) all applicable labor laws and core labor standards on (a) prohibition of child labor as defined in national legislation for construction and maintenance activities; (b) equal pay for equal work of equal value regardless of gender, ethnicity, or caste; and (c) elimination of forced labor; and with (ii) the requirement to disseminate information on sexually transmitted diseases, including HIV/AIDS, to employees and local communities surrounding the proposed project sites.

B. Environmental Management Plan (EMP)

209. The EMP is necessary on the grounds that it will manage the environment by offsetting the negative impacts with possible mitigation measures and enhancing the positive impacts within the allocated fund from the project. Thus, the main objectives of the EMP for the construction of the access road project are:

- (i) Define the responsibilities of the project proponents in accordance with the three project phases (design, construction and operation);
- (ii) Facilitate the implementation of the mitigation measures by providing the technical details of each project impact, and proposing an implementation schedule of the proposed mitigation measures;
- (iii) Define a monitoring mechanism and identify monitoring parameters to ensure that all proposed mitigation measures are completely and effectively implemented;
- (iv) Identify training requirements at various levels and provide a plan for the implementation of training sessions;
- (v) Identify the resources required to implement the EMP and outline corresponding financing arrangements; and Providing a cost estimate for all proposed EMP actions

210. The Environmental Management Plan (EMP) matrix is presented in Table 15: Environmental Management Plan. This summarizes the potential environmental impacts, mitigation measures, responsible entity for implementation and monitoring, and cost of implementation.

Table 15: Environmental Management Plan

Table 10: Environmental Management Plan				
Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
			Implementation	Monitoring/ Supervision
1. Preparation of site-specific EMP and updating of IEE				
Integration of EMP in bidding documents and contracts	Lack of awareness by contractors on ADB SPS requirements may result in insufficient budget and non-implementation of EMP	<ul style="list-style-type: none">• The PMU will incorporate the costs of implementing OHS and the EMP as well as specific provisions requiring contractors to comply with all other conditions required by ADB into the bidding and contract document.• Once the Contractor is selected, the Divisional/Regional Office/PIU with support from PMSC will inform contractors of their responsibilities in EMP implementation, in compliance with ADB and government requirements, self -monitoring and reporting procedures.	PMU, PMSC	EA
Updating of IEE	IEE and EMP out of date due to changing conditions or design	<ul style="list-style-type: none">• The PMU shall update the IEE in case of change in design/based on the final detailed design and submit the same for review and clearance of ADB.	PMU, PMSC	EA
Integration of climate change considerations in design	Extreme weather events such as heavy rainfalls and tidal surges leading to flooding in the area	<ul style="list-style-type: none">• The impacts of climate change will be mitigated upfront during the design and planning stage for the cyclone shelter and access road. Among these measures are the following:<ul style="list-style-type: none">▪ Elevate the level of the cyclone shelter and access road to a height more than enough to compensate for the likely maximum flooding level. The differences in water level between base and future time should be computed as it is needed to estimate the additional height required for the foundation of the cyclone shelter and access road and making them safer against climate change-induced flooding;▪ The proposed subproject area might have to drain a significant additional	PIU, DDC	PMU, Divisional/Regional Office,, PMSC

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
			Implementation	Monitoring/Supervision
		<p>discharge due to climate change-induced higher rainfall during extreme events. Therefore, adequate number of drainage facilities along with comparatively larger openings should be considered in structure;</p> <ul style="list-style-type: none"> ▪ Selection of latest weather resistant paints and construction materials so that the structures can withstand heavy rainfall, heat, flooding, and strong winds recorded in recent history; ▪ Consider modern Rainwater Harvesting (RWH) technologies for a more sustainable water supply source ▪ Consider solar panels and energy saving lights in design; and ▪ Maximum possible efforts have to be made for minimizing cutting of trees, and instead institute some tree plantation around the subproject site with Indigenous/native species of trees 		
Local hydrology	Local waterlogging problems and obstruction of natural water flows in the vicinity	<ul style="list-style-type: none"> • Detailed assessment of the microhydrology and topography of the project site; • orient the cyclone shelter building such that it will not impede flow of water in natural drainages in the area; • Design according to the sloping of the subproject area; • avoid conventional raised plinth design that blocks water runoff, rather design should prioritize structure built on raised columns that can allow water to pass through; and • Design needs to consider additional drainage facilities and water storage. 	PIU, DDC	PMU, Divisional/Regional Office,, PMSC
Disruption of Existing Utilities	Disruption of infrastructure and services	<ul style="list-style-type: none"> • Conduct investigation at site to determine all the existing utilities that will likely be disturbed during construction phase; and 	PIU, DDC	PMU, PMSC

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
			Implementation	Monitoring/ Supervision
		<ul style="list-style-type: none"> Coordinate with agencies responsible for the maintenance of the utilities and formulate a plan to minimize disruption of services during construction phase. The plan must be formulated in coordination with LGED and stakeholders at the site such as the managements of Madrasa and mosque. Where required, the responsible agency shall be requested by PIU to carry out the necessary works at the time required and at cost of the subproject. 		
Material sourcing	Sourcing of aggregates from illegal quarries	<ul style="list-style-type: none"> The bid documents should include a clause on material sourcing that will require the contractor to source construction materials from legal or government-approved sources only. No new quarry sites shall be used for the subproject; Verify suitability of all material sources and obtain approval of PMU/Divisional/Regional Office or PIU; and document all sources of materials and include in the monthly reporting to the PIU. 	PMU, Divisional/Regional Office, PIU	EA, ADB
Groundwater water quality and quantity – source of water	Groundwater may have arsenic levels that could be detrimental to the health of future users of the cyclone shelter	<ul style="list-style-type: none"> Review the feasibility of groundwater abstraction to ensure that there is no overextraction; undertake measures such as rainwater harvesting to minimize the dependence on groundwater, and besides harvesting rainwater for reuse, implement groundwater recharge system to augment groundwater resource The bid documents should include a requirement that Contractor will ensure that tube wells are installed or drilled to appropriate depths wherein water quality shows compliance with the drinking water 	PMU, DDC,	EA

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
			Implementation	Monitoring/ Supervision
		<p>quality standards, particularly for arsenic parameter.</p> <ul style="list-style-type: none"> During the installation of tube wells, the Contractor will undertake groundwater quality sampling and analysis to ensure that water from these tube wells are in compliance with the drinking water quality standards (see Table 9 of this IEE report for the complete set of drinking water quality standards). If the groundwater quality is not suitable and does not comply with drinking water standards, provide on-site water treatment facility suitable to treat the groundwater to meet the applicable drinking water standards. 	DDC, Contractor	PMU/ Divisional/Regional Office,, PIU
Rainwater harvesting system – source of water	Poor quality of water due to improper design and/or operation	<ul style="list-style-type: none"> Design rainwater harvesting system to collect, store and supply rainwater in such a way that it is not contaminated during the process; adopt standard methods for design, construction and maintenance as per national standards and international good practice Utilize stored water from rainwater harvesting for non-potable uses; avoid using this water for potable purposes (drinking and cooking); In unavoidable circumstances, water shall be treated/disinfected prior to use; standard operating guidelines shall be put in place for emergency use of stored water for potable purposes, and necessary facilities to treat/disinfect stored water on-site should be put in place 	PIU, DDC, Contractor	PMU, Divisional/Regional Office,, PMSC
Disruption of existing utilities	Damage to existing underground and overground utilities in the	<ul style="list-style-type: none"> Conduct investigation at site to determine all the existing utilities that will likely be disturbed during construction phase. 	PIU, DDC, Contractor	PMU, Divisional/Regional Office,, PMSC

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
			Implementation	Monitoring/ Supervision
	area will disrupt services to the people.	<ul style="list-style-type: none"> Subsequently, liaise with each of the agencies responsible for the maintenance of these utilities and formulate plan to minimize disruption of services during construction phase. The plan must be formulated in coordination with LGED and stakeholders at the site such as the managements of Madrasa and mosque. Where required, the responsible agency shall be requested by PIU to carry out the necessary works at the time required and at cost of the subproject. 		
Material Sourcing	Sourcing of raw materials such as aggregates from illegal quarries will impact the environment, in particular the river canals where illegal quarrying for sand happens.	<ul style="list-style-type: none"> The bid documents should include a clause on material sourcing that will require the contractor to source construction materials legal or government-approved sources only. 	PMU, PMSC	EA, ADB
Consents, permits and clearances	Failure to obtain necessary consents, permits, and clearances can result in design revisions and/or stoppage of the Works.	<ul style="list-style-type: none"> All necessary local clearances and no objection certificates will be obtained prior to award of contract. LGED will contact the Madrasha Committees for land records and other necessary papers that are required for clearance for construction. The School Committees will issue the NOCs to LGED as well as local Upzilla Parishad. Environmental clearance will be obtained prior to award of contract. 	PMU, PIU, PMSC	EA, ADB
EMP Implementation Training	If the contractors and construction supervision engineers are not aware about the requirements of this EMP, the project may not proceed and comply	<ul style="list-style-type: none"> The PMU, Divisional/Regional Office, PIU and contractors will be required to undergo training on EMP implementation. The capacity building program will be participatory to the extent possible to make it more effective, with learning by doing, role 	PMU, Divisional/Regional Office, PIU, PMSC	EA, ADB

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
			Implementation	Monitoring/ Supervision
	with ADB and GoB environmental policies.	playing, group exercises, on-the-job training, etc. Pre- and post-training assessment will be conducted to measure the effectiveness of the program.		
Community Awareness on Project Activities and Impacts	Lack of community awareness on project activities may result in potential community health and safety concerns and complaints.	<ul style="list-style-type: none"> • Before the start of project construction, a meaningful consultation with the affected communities will be conducted. This meaningful consultation will aim to engage community stakeholders, listen to their views, and try to come to a common understanding about the need for an improved drainage system and the sacrifices that need to be made to achieve it. To aid in the consultation process, it is important that the community should be made aware of project activities. Important information to be disseminated to the people are, among others, the following: • Overview and objectives of the proposed project; • Preliminary and/or final detailed design of proposed project components; • Potential environmental and social impacts (positive and negative) of the project, and the proposed mitigation measures for the perceived negative impacts; and • Grievance redress mechanism and contact details of the project. • Consult with school authorities, plan and schedule works accordingly so that construction works do not interfere school operation (due to noise, dust, movement of vehicles,) and also considering safety and security of school children, staff etc. 	Divisional/Regional Office, PIU, Contractor	PMU, PMSC
2. Construction phase				

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
			Implementation	Monitoring/ Supervision
Construction Planning	Inadequate planning could lead to non-implementation of EMP during the construction phase and result in significant environmental impacts leading to non-compliance with ADB's environmental safeguard requirements.	<ul style="list-style-type: none"> Consult with school authorities, plan and schedule works accordingly so that construction works do not interfere school operation (due to noise, dust, movement of vehicles,) and also considering safety and security of school children, staff etc. Designate an Environmental Health and Safety Officer (EHSO). Conduct training on the rationale for and implementation of the SEMP and EMP to enhance general understanding and clarify responsibilities regarding implementation, including monitoring and reporting, must also be provided to relevant staff of contractors (including EHSOs) The Contractor will be required to submit to PMU, for review and approval, a SEMP including (a) proposed sites/locations for construction work camps, storage areas, hauling roads, lay down areas, disposal areas for solid and hazardous wastes, (b) specific mitigation measures following the approved EMP; (c) monitoring program as per EMP; and (d) budget for SEMP implementation. No works can commence prior to approval of SEMP. The SEMP will include the following: <ul style="list-style-type: none"> i. Construction Compound Management Plan; ii. Construction Traffic Management Plan; iii. Construction Health and Safety Plan (including COVID-19 H&S guidance); iv. Materials Management Plan; v. Noise and Vibration Management Plan vi. Water Quality Management Plan; vii. Dust Management Plan; viii. Waste Management Plan; and 	Contractor	PMU, Divisional/Regional Office, PIU, PMSC

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
			Implementation	Monitoring/ Supervision
		ix. Emergency Incident Response Plan.		
Excavation Works	Excavations may affect local drainage patterns if surface and groundwater collect in voids as they are being dug.	<ul style="list-style-type: none"> All excavations shall be done to the minimum dimension as required for safety and working facility. The excavation shall be executed in such manner, that the contractor does not damage or interfere with existing services or structures. If damage or interference is so caused, the contractor shall make arrangements with the supply and/or building owner to execute the repairs at the contractor's own cost. All excavations and other work shall be carried out during nighttime at busy road section. Road drains and channels shall be kept free from obstructions at all times. 	Contractor	PMU, Divisional/Regional Office, PIU, PMSC
Removal of trees	The site is proposed on a vacant space within the school complex. Minimal tree cutting is envisaged.	<ul style="list-style-type: none"> As a mitigation measure, tree cutting will be avoided, or minimized as possible. Tree cutting permits shall be obtained and replacement tree planting shall be implemented in accordance with government regulations. 	Contractor	PMU, Divisional/Regional Office, PIU, PMSC
Excavation, soil erosion and sedimentation	Excavation for cyclone shelter construction will generate loose soil which can be carried through surface run-off during a rainfall.	<ul style="list-style-type: none"> The Contractor shall plan his works to minimize surface excavation works during the rainy season where practicable. Precautions to be taken at any time of year when rainstorms are likely, actions to be taken when a rainstorm is imminent or forecast, and actions to be taken during or after rainstorms shall be developed by the Contractor. The earthwork sites where exposed land surface is vulnerable to runoff shall be consolidated and/or covered. 	Contractor	PMU, Divisional/Regional Office, PIU, PMSC

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
			Implementation	Monitoring/ Supervision
		<ul style="list-style-type: none"> Any borrow pits established by contractors near any of the sites should be rehabilitated promptly once the required materials have been extracted, with slopes reshaped and revegetated to prevent the development of erosion problems; Channels, earth bunds, netting, tarpaulin and or sandbag barriers shall be used on site to manage surface water runoff and minimize erosion; The overall slope of the works areas and construction yards shall be kept to a minimum to reduce the erosive potential of surface water flows; Monitor groundwater quality that could exist close to the working areas to ensure compliance. 		
Surface water pollution	Silt-laden run-off from stockpiled materials, solid wastes and domestic wastewater from the construction camp, and leaks from chemical storage areas and machineries may contaminate or result in water pollution if disposed or discharged to directly to local drainage network leading to nearby khal	<ul style="list-style-type: none"> Provision of temporary sedimentation canal and/or silt traps along construction areas, particularly alignments that are adjacent to receiving bodies of water or canals; The measures to address soil erosion at the proposed facilities will consist of measures as per design, or as directed by the PMSC to control soil erosion, sedimentation, and water pollution. All temporary sedimentation, pollution control works, and maintenance thereof will be deemed incidental to the earthwork or other items of work; All temporary discharge points shall be located, designed and constructed in a manner that will minimize erosion in the receiving channels; Ensure proper compaction of refilled soil and there shall not be any loose soil particles on 	Contractor	PMU, Divisional/Regional Office, PIU, PMSC

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
			Implementation	Monitoring/ Supervision
		<p>the top; the material shall be refilled in layers and compacted properly layer by layer;</p> <ul style="list-style-type: none"> • Use surplus soil for beneficial purposes such as in any other construction activities, or to raise the level of low lying areas. • Avoid scheduling of excavation work during the monsoon season. Earthworks during dry season; • Confine construction area including the material storage (sand and aggregate) so that runoff will not enter the site; • Ensure that drains are not blocked with excavated soil; • Stockyards at least 50 meters (m) away from watercourses; • Fuel and other petroleum products stored at storage areas away from water drainage and protected by impermeable lining and bunded 110%; • Daily control of machinery and vehicles for leakages; • No obstruction in flowing water; • For effluents from workplace, camps, and offices, provide treatment arrangements such as retention ponds and septic tanks which should be incorporated in the facility designs. A sewage management plan has to be prepared by the contractor and agreed with the PMSC; • Monitor water quality according to the environmental monitoring plan; • Collection of recyclable solid wastes and supply to scrap vendors; • Ensure all the camp wastes and construction wastes are placed in the designated waste collection pits away from receiving water; 		

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
			Implementation	Monitoring/ Supervision
		<ul style="list-style-type: none"> Establishment of separate bunded and lined areas with 110% volume for the storage of all the toxic material wastes, including batteries, oil filters, mobile, burnt oils, etc. at the construction site; and Consultation with PIU on the proper disposal of all residual wastes. 		
Groundwater use and contamination	Increased demand for groundwater is anticipated during the construction phase for construction activities and personal consumption by workers. Uncontrolled extraction of water may affect availability of water to locals. In addition, construction waste, if left unattended, will result in percolation of leachate through the soil strata reaching the groundwater table contaminating it.	<ul style="list-style-type: none"> It is necessary that arrangement for safe drinking water is made prior to start of work. Water will be supplied for consumption only after adequate analysis and requisite treatment. The workers may also be trained on the need for judicious use of freshwater resources. The contractors will use water in consideration to its value as a resource. Mitigation measures will include: <ul style="list-style-type: none"> Prevent pollutants from contaminating the soil and the groundwater; All tube wells, test holes, monitoring wells that are no longer in use or needed shall be properly decommissioned; Storage of lubricants and fuel at least 50 m from water bodies; Storage of fuel and lubricants in double hulled tanks. Fuel and other petroleum products stored at storage areas away from water drainage and protected by impermeable lining and bunded 110%; Daily control of machinery and vehicles for leakages; Collection of waste during construction activities; (Provide uncontaminated water for dust suppression; 	Contractor	PMU, Divisional/Regional Office, PIU, PMSC

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
			Implementation	Monitoring/ Supervision
		<ul style="list-style-type: none"> Enclose the construction area to prevent unauthorized access. 		
Drainage Congestion	Construction material getting into surface run off or uncontrolled disposal may cause drainage congestion, flooding or waterlogging in neighboring areas.	<ul style="list-style-type: none"> The contractor shall adopt a site clearance procedure that separates topsoil and stores it under appropriate conditions for reuse as instructed by the Engineer. Wastes and construction debris will not be disposed in a manner that these would end up in drainage canals. The on-site storage of excessive quantities of unwanted spoil and aggregate materials should be avoided. Where storage is necessary, the Contractor shall ensure heaps and stockpiles are located at sites that they do not permit direct runoff into watercourses and are on land sloping at less than 1.5%. All heaps shall be of a size and stability that will ensure the risk of mass movement during period of heavy rainfall is minimized. 	Contractor	PMU, Divisional/Regional Office, PIU, PMSC
Impact on Air Quality	Construction activities including transport and storage of raw materials will likely create dust and emissions that could deteriorate ambient air quality in the area.	<ul style="list-style-type: none"> Take every precaution to reduce the levels of dust at construction sites, and not exceeding the pre-project ambient air quality standards. Fit all heavy equipment and machinery with air pollution control devices that are operating correctly. Vehicles travelling to and from the construction site must adhere to speed limits to avoid producing excessive dust. Reduce dust by spraying stockpiled soil, excavated materials, and spoils. Cover with tarpaulin vehicles transporting soil and sand. 	Contractor	PMU, Divisional/Regional Office, PIU, PMSC

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
			Implementation	Monitoring/ Supervision
		<ul style="list-style-type: none"> • Cover stockpiled construction materials with tarpaulin or plastic sheets. • Heavy equipment and transport vehicles shall move only in designated areas and roads. • Water spraying to access roads, camp sites and work sites to reduce dust emissions. • Machines and vehicles must be regularly examined and maintained to comply with requirements of technical specifications. • All vehicles, equipment, and machinery used for construction will be regularly maintained to ensure that pollution emission levels comply with the relevant requirements of DOE. Copies of conformance will be submitted regularly to the PMSC. • Repair and maintain access roads, as necessary. • Monitor air quality according to the environmental monitoring plan. • Clean wheels and undercarriage of vehicles prior to leaving construction site; • Prohibit burning firewood in work and labor camps (promote liquified petroleum gas for cooking purposes and electric heater for heating purposes); • Use vehicles that have government-issued permits and registrations; and • Prohibit open burning of solid waste. 		
Noise	Noise generation may disturb nearby sensitive receptors (e.g. school, etc.,)	<ul style="list-style-type: none"> • Consult with school authorities and plan noisy works, which may interfere with the school operation, appropriately; these works can either be conducted out of school hours or holidays 	Contractor	PMU, Divisional/Regional Office, PIU, PMSC

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
			Implementation	Monitoring/ Supervision
		<ul style="list-style-type: none"> • Provide prior information to the local public, including institutions such as schools and hospitals along alignments that may be affected, about the work schedule; • Use equipment that emits the least noise, well-maintained and with efficient mufflers. Install silencers if necessary and practical; • Restrict noisy activities to day time, except in areas near schools, places of worship, and other institutions which may be likely disturbed during day time. Consider night time works in these areas; • Avoid use of noisy equipment or doing noisy works at night time near residential areas; • Limit engine idling to a maximum of one minute; • Spread out the schedule of material, spoil and waste transport; • Minimize drop heights when loading and unloading coarse aggregates; and • Avoid use of horns unless it is necessary to warn other road users or animals of a vehicle's approach; • On-site construction noise shall be mitigated to ensure a safe work environment by implementing an on-site occupational health and safety plan, which considers national and international requirements. The plan shall include the following measures: <ul style="list-style-type: none"> ○ Ear muffs/protective hearing equipment shall be made available to all workers in noise critical areas ○ Training on how and when to use protective hearing equipment shall be conducted as part of the workers' induction sessions. 		

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
			Implementation	Monitoring/Supervision
		<ul style="list-style-type: none"> ○ Place visually clear instructions in areas where noise emissions are significant. ○ Measure noise level according to the environmental monitoring plan. 		
Disruption of Public Access	Public access to the school may be disrupted during construction activities.	<ul style="list-style-type: none"> • Prior coordination with the school, and surrounding community on operation and work schedules. • As necessary, increase workforce for speedy completion; • Inform through display board about nature, duration of construction and contact for complaints; • Schedule material deliveries on low pedestrian traffic hours; • Restore damaged properties and utilities; • Erect and maintain barricades if required; • Pedestrian access to school and mosque will be maintained with the use of walking boards. Wheelchair and disabled access shall be maintained. • Surfaced roads shall be subject to road cleaning and unsurfaced roads to dust suppression, the methodology and frequency of which shall be included in the traffic management plan. 	Contractor	PMU, Divisional/Regional Office, PIU, PMSC
Impact on PCR and Chance Finds	The subproject will not encroach into or run over any physical cultural resources (PCRs). The subproject area is also not a potential archaeological area and therefore no significant impact is envisaged.	<ul style="list-style-type: none"> • Strictly follow the protocol by coordinating immediately with PIU and Bangladesh Department of Archaeology for any suspicion of chance finds during excavation works; • Stop work immediately to allow further investigation if any finds are suspected; and • Request authorized person from the Bangladesh Department of Archaeology to 	Contractor	PMU, Divisional/Regional Office, PIU, PMSC

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
			Implementation	Monitoring/ Supervision
	Excavation activities might encounter chance finds	observe when excavation resumes for the identification of the potential chance finds, and comply with further instructions.		
Occupational Health and Safety	Construction activities could create health and safety risks to construction workers	<ul style="list-style-type: none"> • All relevant provisions of the Bangladesh Labor Act, 2006 and relevant WHO guidelines will be adhered to, concerning the provision of adequate measures to avoid contracting and/or spreading diseases during construction phase; • Follow international best practices on occupational health and safety such as those in Section 4.2 of World Bank EHS Guidelines on Construction and Decommissioning Activities; • Follow established occupational health and safety protocol on emerging infectious diseases such as the corona virus disease (COVID19). See Appendix 6 for a sample guidance note in responding to COVID19; • A readily available first aid unit, including an adequate supply of sterilized dressing material and appliances, will be provided as per the factory rules. Suitable transport will be provided to facilitate the transfer of injured or ill persons to the nearest hospital; • Other first aid medical equipment and nursing staff will be made available or arranged on-call; • The contractor will, at his own expense, conform to all disease prevention instructions as may be given by PMU/Divisional/Regional Office and/or PIU; • Provide regular health check-ups, sanitation and hygiene, health care, and control of epidemic diseases to the workforce; • The contractor shall provide at cost all labor and materials and construct/install and 	Contractor	PMU, RPM Divisional/Regional Office, PIU, PMSC

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
			Implementation	Monitoring/Supervision
		<p>maintain site safety, hard barricading, flexible green net, signboards, temporary day/light traffic diversions throughout the construction activities according to the specifications and provide personal protective equipment (PPE) to all the laborers working at the construction site;</p> <ul style="list-style-type: none"> • Launch awareness programs concerning human trafficking and the possibility of spread of sexually transmitted diseases (STDs) and HIV/AIDS using brochures, posters, and signboards; • Make available first aid kits, ambulance facilities, and fire extinguishers in camp sites, if any; • Compensation for the loss of life (a zero tolerance to loss of life policy should be developed and implemented) or for any type of injuries; and • Provide insurance to the workers. Health and safety training for all site personnel is very important and must be mandatory. 		
Community Health and Safety	Construction activities could create health and safety risks to community people.	<ul style="list-style-type: none"> • Completely isolate the construction site from school compound, by proper barricading, access restriction and posting security guards so that no students/children or any public enters the construction site • Since the access road to school and site is same, plan construction related transport activities in consultation with school authorities; no construction vehicles should use the access during school opening, closing and recess times that coincide with the movement of students and staff on access road. Create awareness among drivers on specific and additional precautions to be taken 	Contractor	PMU, Divisional/Regional Office, PIU, PMSC

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
			Implementation	Monitoring/ Supervision
		<ul style="list-style-type: none"> • Code of conduct for workers includes restricting workers in designated areas, no open defecation, no littering, no firewood collection, no fire except designated places, no trespassing, no residence at construction sites, and no obligation to potentially dangerous work; • Follow International best practices on community health and safety such as those in Section 4.3 of World Bank Environmental Health and Safety (EHS) Guidelines on Construction and Decommissioning Activities; • Follow established community health and safety protocol on emerging infectious diseases such as COVID19. See Appendix 6 for a sample guidance note in responding to COVID19; • Implement measure to prevent proliferation of vectors of diseases at work site; • Maintain a complaint logbook in worker's camp and take action promptly of complaints. Follow the established GRM of the overall project (CTCRP); • Schedule transportation activities by avoiding peak traffic periods; • Clean wheels and undercarriage of haul trucks prior to leaving construction site; • Educate drivers: limit speed not more than 30 km/h in settlements and avoid use of horn; • Earmark parking place for construction equipment and vehicles when idling; no parking shall be allowed on the roads, that may disturb the traffic movement; 		

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
			Implementation	Monitoring/ Supervision
		<ul style="list-style-type: none"> • Provide prior information to local people, particularly the Madrasa and mosques nearby about work schedules; • Noise barriers must be installed in between the construction site and Madrasa/mosque sites to reduce the noise level; • Provide adequate space and lighting, temporary fences, reflectorized barriers and signages at the work site; and • Ensure contractor has staff trained on emergency response. 		
Construction wastes generation	Inadequate management of construction wastes will result in negative impact on the soil, aesthetic beauty of area and workers' and community's health and safety.	<ul style="list-style-type: none"> • Dispose excess spoils per the Spoil Management Plan attached in Appendix 4; • Avoid stockpiling of excess excavated soils as far as possible; • Avoid disposal of any debris and waste soils in or near water bodies/rivers; • Coordinate with PIU for beneficial uses of excess excavated soils or immediately dispose to designated areas; • Clean construction waste such as excess soil or rubble should be used in landscaping on site or given to landowners and developers seeking fill material. • The contractors should take every opportunity to reduce the amounts of waste generated and collect recyclable material for processing by local operators. • Contractor shall implement waste segregation on site. • Receptacles for solid waste should be provided for the use of workers, and their contents should be disposed of in officially sanctioned local landfills. • Construction waste should also be disposed of in legal local landfills. 	Contractor	PMU, Divisional/Regional Office, PIU, PMSC

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
			Implementation	Monitoring/ Supervision
		<ul style="list-style-type: none"> • Clean construction waste such as excess soil or rubble should be used in landscaping on site or given to landowners and developers seeking fill material. • Waste auditing. The contractor will record the quantity in tons and types of waste and materials leaving site during the construction phase; • Waste fuels/oils may be generated from equipment used on-site during construction and may be classified as hazardous waste. Such wastes will be stored in a secure, bunded area on-site prior to collection by relevant parties; • Remove all wreckage, rubbish, or temporary structures which are no longer required. 		
Post-construction clean-up and reinstatement	Construction debris, spoils, and excess construction materials may pose hazards to properties, community and environment if left unattended after construction.	<ul style="list-style-type: none"> • The contractor will reinstate all working areas and access routes as work proceeds during construction. All plant, equipment, materials, temporary infrastructure and vehicles will be removed at the earliest opportunity and the surface of the ground restored as near as practicable to its original condition. • The following generic measures should be taken: <ul style="list-style-type: none"> ○ Remove all spoils wreckage, rubbish, or temporary structures (such as buildings, shelters, and latrines) which are no longer required; ○ All excavated areas shall be reinstated to original condition; ○ All disrupted utilities restored; ○ All affected structures rehabilitated/compensated; ○ The area that previously housed the construction camp is to be checked for 	Contractor	PMU, Divisional/Regional Office, PIU, PMSC

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
			Implementation	Monitoring/ Supervision
		<p>spills of substances such as oil, paint, etc. and these shall be cleaned up;</p> <ul style="list-style-type: none"> ○ All hardened surfaces within the construction camp area shall be ripped; ○ All imported materials removed, and the area shall be top soiled and regressed using guidelines set out in the re-vegetation specification that forms part of this document; ○ The contractor must arrange the cancellation of all temporary services; ○ Request PIU to report in writing that worksites and camps have been vacated and restored to pre-project conditions before acceptance of work. 		
4. Operation and maintenance phase				
Operation and maintenance of the cyclone shelter and access road.	Wear and tear of the building including breakdown of electrical and plumbing fixtures/systems, and risk of natural hazards and fire are anticipated during the operation phase.	<p>Building maintenance</p> <ul style="list-style-type: none"> • The operator or management of the cyclone shelter and access road will ensure to carry out maintenance works on the building as may be needed. • The cyclone shelter will have a pool of trained and certified electricians, plumbers and masons who will be on call in case repairs are required. Other maintenance requirements are regular cleaning of the complex by the cyclone shelter operator or management. <p>Fire and Natural Hazards</p> <ul style="list-style-type: none"> • The operator or management of the cyclone shelter and access road will ensure that the focal resident person or caretaker is trained in using fire extinguishers and that these are regularly checked and maintained. 	Lalmohan Pourashava	LGED

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
			Implementation	Monitoring/ Supervision
		<ul style="list-style-type: none"> The emergency numbers of Fire, Police must be posted near the fire extinguisher or at a visible location. The management must also ensure for the conduct of periodic fire drills, posting of emergency exit plans, designating evacuation areas, dissemination of other emergency plan information, and all other activities that will raise awareness among users of the building (teachers, students, etc.) on how to behave and respond in times of fire or natural disasters. <p>Water supply</p> <ul style="list-style-type: none"> Maintain the rainwater harvesting system, and ensure that system is operated and maintained as designed Conduct periodical testing of groundwater and stored water (rainwater) and treated water (if on-site treatment facilities installed), ensure that drinking water meets the applicable standards Provide on-site simple-to-use water testing kits for emergency use Put in place standard operating guidelines/procedures for operation and maintenance of water supply system, including emergency use of stored water for potable purposes, and treatment / disinfection prior to use <p>Liquid and Solid Waste generation.</p> <ul style="list-style-type: none"> This is not a significant concern as the operation of the cyclone shelter as school during most time of the year is not expected to generate significant amount of solid wastes. 		

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
			Implementation	Monitoring/ Supervision
		<ul style="list-style-type: none"> • All generated wastes can be easily serviced by the municipal waste disposal service providers. The management or operator will promote proper waste segregation, storage and disposal procedures and ensure that garbage is not allowed to accumulate on the premises. • The septic tanks will be desludged/emptied by vacuum tanker services when needed 		

C. Environmental Monitoring Program

211. Monitoring of mitigation measures during construction is the responsibility of the Lalmohan PIU and PMU, supported by the PMSC Environmental Specialist, while monitoring of mitigation measures during operation phase is the responsibility of Lalmohan Pourashava and LGED. **Table 16** shows the proposed Environmental Monitoring Program for this subproject, which specifies the various monitoring activities, indicating location, frequency of monitoring and responsibility.

Table 16: Environmental Monitoring Program

Activities or Items to Monitor	Location	Responsible for Activities	Monitoring Method	Monitoring Frequency	Monitoring Responsibility
PRE-CONSTRUCTION					
Secure Environmental Compliance Certificate (ECC) from Department of Environment	PMU office	PMU, PMSC	Copy of approved ECC	Before construction activities	PMU, PMSC
IEEs and EMPs are included in bid and contract documents	PMU office	PMU, PMSC	Copies of bid and contract documents	Before approval tender document	PMU, Divisional/Regional Office, PMSC
Site-specific EMP (SEMP) submitted by Contractor for approval by PIU	PIU office	Contractor, PIU	Copy of approved SEMP	Before construction activities commence	PMU, Divisional/Regional Office, PMSC
Spoil management plan (SMP) submitted by Contractor for approval by PIU	PIU office	Contractor, PIU	Copy of approved SMP	Before construction activities commence	PMU, Divisional/Regional Office, PMSC
Traffic management plan (TMP) submitted by Contractor for approval by PIU	PIU office	Contractor	Copy of approved TMP	Before construction activities commence	PMU, Divisional/Regional Office, PMSC
Secure all other necessary permits and licenses from relevant government agencies		Contractor	Copies of permits and licenses	Before construction activities commence	PIU, PMSC
Conduct of baseline ambient air quality and noise level monitoring	Subproject site	Contractor	Site visits and observations, Contractor records, Results of noise level measurements, Results of laboratory analyses (if necessary)	Before construction activities commence	PMU, Divisional/Regional Office, PIU, PMSC
Conduct of baseline surface water quality monitoring	Subproject site	Contractor	Site visits and observations, Contractor records, Results of laboratory	Before construction activities commence	PMU, Divisional/Regional Office, PIU, PMSC

Activities or Items to Monitor	Location	Responsible for Activities	Monitoring Method	Monitoring Frequency	Monitoring Responsibility
			analyses (if necessary)		
CONSTRUCTION					
Implementation of SEMP; including implementation of community and occupational health and safety measures.	Subproject site	Contractor	Site visits, Contractor records,	Weekly or as needed	PMU, Divisional/Regional Office, PIU, PMSC
Implementation of SMP	Subproject site	Contractor	Site visits, Contractor records	Weekly or as needed	PIU, PMSC
Implementation of TMP	Subproject site	Contractor	Site visits, Contractor records	Weekly or as needed	PIU, PMSC
Conduct of ambient air quality and noise level monitoring	Subproject site	Contractor	Site visits and observations, Contractor records, Results of noise level measurements, Results of laboratory analyses (if necessary for ambient air quality)	Quarterly or as needed	PMU, Divisional/Regional Office, PIU, PMSC
Conduct of surface water quality monitoring	Subproject site	Contractor	Site visits and observations, Contractor records, Results of laboratory analyses (if necessary)	At least semi-annual or as needed	PMU, Divisional/Regional Office, PIU, PMSC
Conduct of groundwater quality monitoring	Subproject site	Contractor	Results of laboratory analyses for groundwater samples.	Scheduled during drilling for and installation of tube wells.	PMU, Divisional/Regional Office, PIU, PMSC
Develop and apply archaeological protocol to protect chance finds	Subproject site	Contractor, PMU, PIU, PMSC	Contractor records	Once until protocol is approved	PMU, Divisional/Regional Office, PIU, PMSC
Provide EHS training for all personnel	Subproject site	Contractor	Contractor records; Interviews to workers	Monthly	PIU, PMSC
Keep accident reports and records	Subproject site	Contractor	Contractor records; Interviews to workers and	Monthly	PIU, PMSC

Activities or Items to Monitor	Location	Responsible for Activities	Monitoring Method	Monitoring Frequency	Monitoring Responsibility
			community people		
Employ workforce from communities near sites	Subproject site	Contractor	Contractor records	Monthly	PIU, PMSC
Implementation of EHS measures at construction camps	Construction camp site	Contractor	Site visits; Interviews to workers at camp	Monthly	PIU, PMSC
OPERATION AND MAINTENANCE					
Maintenance of all facilities at cyclone shelter	Subproject site	Cyclone Shelter Management	Site observations	Monthly	LGED
Prevent run-off/deposit of foreign materials (oil, grease, solid waste, plastics) into watercourses, and clean drain periodically; dispose of materials removed from drains	Subproject site	Cyclone Shelter Management	Site observations	Monthly	LGED
Monitoring of water quality: <ul style="list-style-type: none"> Groundwater – raw water quality Treated water quality – if treatment is required and provided Rainwater harvesting storage tanks 	Subproject site	Cyclone Shelter Management	Laboratory testing	Once prior to start of operation of cyclone shelter Pre and post monsoon - (annually twice) Prior to use during emergencies using on-site test kits	PIU, LGED

EHS = environmental, health and safety; EMP = environmental management plan; IEE = initial environmental examination; LGED = Local Government Engineering Division; PMSC = project management and supervision consultant; PIU = project implementation unit; PMU = project management unit; SMP = spoil management plan; TMC = traffic management plan.

D. Capacity Development Training

212. The PMSC Environment Specialist and Social Safeguard Specialist will be responsible for training the PMU Divisional/Regional Office, PIU and contractors. Training modules will need to cover safeguards awareness and management in accordance with both ADB and government requirements as specified below:

- (i) Environmental Safeguards
 - (a) sensitization on ADB's safeguard policy on environment;
 - (b) introduction to environment and environmental considerations in urban infrastructures;
 - (c) review of IEEs and integration into the project detailed design;
 - (d) improved coordination within nodal departments; and
 - (e) monitoring and reporting system. The contractors will be required to conduct environmental awareness and orientation of workers prior to deployment to work sites.
- (ii) Social Safeguards
 - (a) sensitization on ADB's policies on Involuntary Resettlement and Indigenous People;
 - (b) introduction to social safeguards assessment and document requirements;
 - (c) Consultation and participations requirements;
 - (d) Project GRM and ADB's Accountability Mechanism; and
 - (e) monitoring and reporting system.

213. **Methodology.** Capacity building activities will be achieved through combination of practical methodologies available such as lecture and workshop training by experts, on-the-job training and mentoring, and continuing team meetings and exercises. The PMSC Environment Specialist will spearhead the designing of specific programs appropriate for the target participants or stakeholders, including the execution of these programs during the different implementation phases of the CTCRP, which includes the subproject. Pre-training and post-training assessment will be an integral part of the overall program to measure its effectiveness, and identify any other needed interventions to improve effectiveness, if necessary.

214. As fundamental component for the capacity building program, basic lectures and seminar training sessions will be provided by the PMSC Environment Specialist to strengthen the awareness of project stakeholders on the requirements of ADB SPS and government environmental laws, rules and regulations. Modules will be prepared and customized based on the skills set and needs of the different stakeholders. The entire training will cover basic principles of environmental assessment and management mitigation plans and programs, implementation techniques, monitoring methods and tools. A proposed lecture and seminar training program along with the frequency of sessions is presented in the following **Table 17**.

Table 17: Sample Lecture and Seminar Training Program for Environmental Management

Items	Pre-construction	Construction	
Training Title	Orientation workshop	Orientation program/ workshop for contractors and supervisory staff	Experiences and best practices sharing
Purpose	To make the participants aware of the environmental safeguard requirements of ADB and Government of Bangladesh and	To build the capacity of the staff for effective implementation of the designed EMPs aimed at	To share the experiences and best practices aimed at learning

Items	Pre-construction	Construction	
	how the project will meet these requirements	meeting the environmental safeguard compliance of ADB and Government of Bangladesh	lessons and improving implementation of EMP
Contents	<p>Module 1: Orientation ADB Safeguards Policy Statement Government of Bangladesh Environmental Laws and Regulations</p> <p>Module 2: Environmental Assessment Process ADB environmental process, identification of impacts and mitigation measures, formulation of an environmental management plan (EMP), implementation, and monitoring requirements Review of environmental assessment report to comply with ADB requirements Incorporation of EMP into the project design and contracts</p>	<p>Roles and responsibilities of officials/contractors/consultants towards protection of the environment Environmental issues during construction Implementation of EMP Monitoring of EMP implementation Reporting requirements</p>	<p>Experiences on EMP implementation – issues and challenges Best practices followed</p>
Duration	1 day	1 day	1 day on a regular period to be determined by PMU and PMSC
Participants	PMU, Divisional/Regional Office and PIU staff (technical and environmental) involved in the project implementation	PMU, Divisional/Regional Office, PIU, Contractors	PMU, Divisional/Regional Office, PIU, Contractors

E. Environmental Management and Monitoring Plan Implementation Cost (Indicative)

215. Most of environmental mitigation and enhancement measures are integrated into the design and cost are included as part of the civil works contract. Some items need to be incorporated in the Bill of Quantities (BOQ) of this subproject including the environmental monitoring costs. The environmental costs presented in table below are tentative provisions based on experience of undertaking similar works under different LGED projects. For the details of environmental costs under civil works contract, individual contract package bid document may be consulted. Contractors will bear the direct costs of all mitigation measures during construction, which will be included in the tender and contract documents; this includes features built into facility designs to prevent environmental impacts from arising. The PIU (Lalmohan Pourashava) will bear the costs related to mitigation measures during operation. Costs related to environmental supervision during construction will be borne by the PIU, the PMU (for the activities of the environmental consultants) and by the contractors (for monitoring work carried out by the EHS Officer/s). During the operation phase, monitoring costs will be borne by the Pourashava and/or the PIU.

Table 18: Indicative Environmental Management and Monitoring Cost

(The following items are rough estimates and some costs of Contractor in BOQs and other budgets of PMU, Divisional/Regional Office or PIU may not be included. These activity items and costs need to be reviewed and finalized by PMU in case of change/s in the design.)

Item No.	Description of Items	Unit	Quantity	Unit Rate (BDT)	Item Total (BDT)
1	Institutional Arrangements and Capacity Building/GRC Implementation /Training	Module	3	100,000	100,000
2	Indicative Environmental Management Plan Budget for Bill of Quantities (BOQ) Various environmental impact mitigation measures				
(i)	Dust suppression measures (excluding watering for compaction) to the entire satisfaction of the engineer-in-charge, site safety plan	Lumpsum	2	50,000	100,000
(ii)	Establishment of composite, waste treatment and disposal, spillage and spoil management and leakage of water	Lumpsum	1	125,000	125,000
(iii)	Covid-19 Prevention Response: Providing and maintaining temporary isolation facilities, Installation of cautionary sign in term of health & safety signs and preventive messages against Covid-19, Providing PPEs considering covid-19, Providing and maintaining a Portable hand wash station including wash basin, plastic water tank, plastic tap (Bibcock), hand wash liquid soap/soap etc.	Lumpsum	1	170,000	170,000
(iv)	Environmental Monitoring : air quality monitoring PM 2.5, PM 10, SO ₂ , NO _x and CO	1	3 ^a	25,000	75,000
(v)	Environmental Monitoring: ground water quality (pH, Turbidity, Total Coliform, Fecal Coliform, Arsenic, Salinity, Chloride, Dissolve Oxygen)	1	3	10,000	30,000
(vi)	Environmental Monitoring: surface water quality (pH, Turbidity, Total Coliform, Fecal Coliform, Arsenic, Salinity, Chloride, Dissolve Oxygen)	1	3 ^b	10,000	30,000
(vii)	Environmental Monitoring : Noise level	1	3 ^a	5,000	15,000
(viii)	Soil Quality (Organic matter, Lead (Pb),Iron (Fe) Oil & Grease, Salinity	1	3	15,000	45,000
Indicative Cost					690,000.00

^a Number of sampling activity is indicative. Air quality sampling or noise level monitoring may not be necessary when construction activities do not generate air pollutants or high noise level that are detrimental to the environment, nearby residents, or the workers. Ambient air quality and noise level measurements will be

done at the construction sites and other critical areas/points where sensitive receptors exist. ^b Surface water quality sampling will only be conducted when surface water is deemed affected by the construction works. Therefore, the no. of sampling activity is indicative. Sampling will be done on the downstream of an affected water body.

X. MONITORING AND REPORTING

216. PMU will monitor the overall progress of EMP implementation of the entire CTCRP through the different subproject jurisdictions, including the cyclone shelter subproject in Lalmohan Pourashava. The PMU, Divisional/Regional Office and PIU will undertake their respective roles in site inspections and document review to verify compliance with the EMP and SEMP, and progress toward the final outcome. The contractor will conduct day-to-day implementation of the SEMP.

217. The contractor will submit monthly reports to the PIU/Divisional/Regional Office. The monthly reports will include compilation of copies of monitoring sheets accomplished and duly signed by the contractor's EHS Officer (or equivalent) on a daily basis. A sample daily monitoring sheet which can be used by the contractor is in **Appendix 9**. This monitoring sheet is indicative which can be further enhanced depending on the actual situations at subproject construction site.

218. The PIU/Divisional/Regional Office will submit quarterly environmental monitoring reports to PMU, which will include summary of monthly monitoring activities of contractor and results of any independent monitoring or inspection activities of the PIU and/or Divisional/Regional Office. In the conduct of these independent inspection activities, PIU and/or Divisional/Regional Office will be supported by PMSC in this regard. A sample inspection checklist is in Appendix 10. This checklist is indicative which can be further enhanced depending on the actual situations at subproject construction site.

219. PMU shall consolidate quarterly reports from the PIUs including PIU in Lalmohan, and results of its independent monitoring or inspection activities. PMU shall accomplish semi-annual environmental monitoring report (SEMRs) starting from the effectivity date up to the end of construction phase, which shall be submitted to ADB for review and disclosure on ADB website. The template for the SEMR is attached as Appendix 11. The PMU shall prepare and submit annual environmental monitoring report during the operation phase until project completion. Submission of these reports to ADB will be within thirty (30) days from the end date of reporting period.

XI. CONCLUSION AND RECOMMENDATION

220. The Lalmohan Multi-purpose Cyclone Shelter at Gazi Bari Madrasha, (Ward No. 07) will result in significant environmental benefits because of improved infrastructure and facilities for emergency response during calamities in Lalmohan Pourashava.

221. Potential environmental impacts were assessed based on secondary data, stakeholder consultations, and field visits at the cyclone shelter site. The cyclone shelter site is in a residential and there is no sensitive ecological area (protected area or critical habitats) within at least 10-km radius of the subproject location. Sixty-five IUCN Red List species of concern were identified within the 50-km radius default area of analysis; however, the probability of these species being found at the site is very low.

222. Impacts were assessed based on the location and project activities during the pre-construction, construction, and operation phases. The subproject component, i.e., the cyclone shelter, will involve straightforward construction and is unlikely to cause significant adverse impact. Usual construction-related impacts such as noise, dust generation, silt generation, construction waste generation, and occupational and community health and safety risks including the spread of COVID-19, among others, will be localized and temporary and can be readily mitigated through the measures indicated in the EMP. Potential adverse impacts that are associated with the operation phase (i.e., the period when the cyclone shelter is used for multiple purposes) can be mitigated upfront through incorporation of environmental requirements in the detailed engineering design, including climate change adaptation measures.

223. Public consultation was conducted as part of the environmental assessment process. The stakeholders expressed support for the development of the cyclone shelter in the subproject site. Results of the consultation were documented and considered in the formulation of the environmental management plan. Public consultation will continue throughout the project implementation.

224. Based on the results of the IEE, no further environmental assessment such as EIA is required and the classification of Category B per ADB SPS is confirmed. However, per the Environmental Conservation Rules of Bangladesh (ECR, 1997), the project is categorized as “Orange-B” category. Hence, preparation of an initial environmental examination (IEE) and environmental management plan (EMP) based on DOE approved terms of reference is mandatory. Approval of the IEE and EMP and issuance of the Environmental Compliance Certificate (ECC) must be obtained from the DOE prior to award of civil works contracts.

225. This IEE has been prepared based on preliminary designs of the subproject. If the design is revised or modified, the PMU, with support from PMSC, shall update this draft IEE based on final detailed design and submit to ADB for review and disclosure. No work can commence until the final IEE is approved by ADB and provided to the Contractor, and the SEMP is approved by the PIU or Divisional/Regional Office.

APPENDIX 1: RAPID ENVIRONMENTAL ASSESSMENT (REA) CHECKLIST

Instructions:

- (i) The project team completes this checklist to support the environmental classification of a project. It is to be attached to the environmental categorization form and submitted to the Environment and Safeguards Division (SDES) for endorsement by the Director, SDES and for approval by the Chief Compliance Officer.
- (ii) This checklist focuses on environmental issues and concerns. To ensure that social dimensions are adequately considered, refer also to ADB's (a) checklists on involuntary resettlement and on tribes, minor races, ethnic sects and communities;²⁸ (b) poverty reduction handbook; (c) staff guide to consultation and participation; and (d) gender checklists.
- (iii) Answer the questions assuming the "without mitigation" case. The purpose is to identify potential impacts. Use the "remarks" section to discuss any anticipated mitigation measures.

Country/Project Title:

Coastal Towns Climate Resilience Project (CTCRP)

Sector Division:

SAUW/SARD

Screening Questions	Yes	No	Remarks
A. Subproject Siting Is the subproject area			
▪ Densely populated?		✓	The proposed cyclone shelter is not within a densely populated area.
▪ Heavy with development activities?		✓	There are no heavy development activities in the area.
▪ Adjacent to or within any environmentally sensitive areas?			
• Cultural heritage site		✓	Based on desk review of locations and field verifications by PMU, there is no environmentally sensitive cultural heritage site adjacent or near the subproject site. One archaeological site, Gazi Bari Madrasha, (Ward No. 07), is in Lalmohan Upazila. It is located 7 kilometers away from the proposed cyclone shelter location.
• Protected Area		✓	Based on desk review of locations and field verifications by PMU, there is no protected area adjacent or near the subproject site.
• Wetland		✓	Based on desk review of locations and field verifications by PMU, the existing khal (Lalmohan) is located 250 m far from the site and the Tulatuli River is 600 m from the subproject site but some small pond and ditches.

²⁸ Groups or population identified as Indigenous Peoples within the context of ADB's Safeguard Policy Statement will be referred to in this document as *tribes, minor races, ethnic sects and communities* (following the request of the Government of Bangladesh).

Screening Questions	Yes	No	Remarks
<ul style="list-style-type: none"> • Mangrove 		✓	Based on desk review of locations and field verifications by PMU, there is no mangrove adjacent or near the subproject site.
<ul style="list-style-type: none"> • Estuarine 		✓	Based on desk review of locations and field verifications by PMU, there is no estuarine adjacent or near the subproject site.
<ul style="list-style-type: none"> • Buffer zone of protected area 		✓	Based on desk review of locations and field verifications by PMU, there is no buffer zone of protected area encompassing or near the subproject site.
<ul style="list-style-type: none"> • Special area for protecting biodiversity 		✓	Based on desk review of locations and field verifications by PMU, there is no special area for protecting biodiversity encompassing or near the subproject site.
<ul style="list-style-type: none"> • Bay 		✓	Based on desk review of locations and field verifications by PMU, there is no bay near the subproject site.
B. Potential Environmental Impacts			
Will the Subproject cause:			
<ul style="list-style-type: none"> ▪ impacts on the sustainability of associated sanitation and solid waste disposal systems and their interactions with other urban services. 	✓		The subproject involves construction of cyclone shelter building cum school building. Once built, the subproject will require additional urban resources and services to maintain its sanitation and solid waste disposal systems. This impact is mitigated by integrating into the design appropriate sanitation facilities such as septic tanks to manage its own liquid waste and septage. Solid waste collection will be coordinated with town garbage collection system.
<ul style="list-style-type: none"> ▪ deterioration of surrounding environmental conditions due to rapid urban population growth, commercial and industrial activity, and increased waste generation to the point that both manmade and natural systems are overloaded and the capacities to manage these systems are overwhelmed? 		✓	Not anticipated, but the construction phase of the subproject will add to generation of waste temporarily, and therefore will also add burden to the existing services in the town, such as sanitation, sewerage, and waste disposal. During operation phase (or when the cyclone shelter is completed and used), it is expected that this impact will be minimal due to integration of effective waste management into the design of the cyclone shelter.

Screening Questions	Yes	No	Remarks
▪ degradation of land and ecosystems (e.g. loss of wetlands and wild lands, coastal zones, watersheds and forests)?		✓	Not applicable. The subproject site is not adjacent or near any of these types of ecosystems.
▪ dislocation or involuntary resettlement of people?		✓	Not anticipated per social safeguards due diligence report.
▪ disproportionate impacts on the poor, women and children, Indigenous Peoples, or other vulnerable group?		✓	Not anticipated. The subproject is a pro-poor and gender-inclusive undertaking as it aims to provide emergency shelter for the communities most especially those less privileged (low-income) population of the town, during cyclones or extreme weather events,
▪ degradation of cultural property, and loss of cultural heritage and tourism revenues?		✓	The site was and will continue to be used for emergency housing and educational purposes. The subproject site is not within or near (at distances that could not impact or influence) any of the environmentally sensitive areas or cultural properties. The land use in the mixed use area for residential and institutional purposes and will not conflict with tourism activities in the town, if any.
▪ occupation of low-lying lands, floodplains, and steep hillsides by squatters and low-income groups, and their exposure to increased health hazards and risks due to pollutive industries?		✓	Not applicable. The nature of the subproject is only on construction and operation of educational or residential structure in government owned land. The subproject does not involve industrial activities.
▪ water resource problems (e.g. depletion/degradation of available water supply, deterioration for surface and ground water quality, and pollution of receiving waters)?	✓		Construction of the new building at the site will potentially increase siltation of nearby canals or contaminate receiving bodies of water. However, this impact will be mitigated through implementation of measures in the EMP.
▪ air pollution due to urban emissions?	✓		Construction and transport activities will potentially affect ambient air quality due to dust and vehicle smoke emissions. However, this impact will be mitigated through implementation of measures in the EMP.
▪ risks and vulnerabilities related to occupational health and safety due to physical, chemical, and biological hazards during subproject construction and operation?	✓		Construction activities and exposure to various occupational hazards at the sites will pose risks to workers. However, this can be mitigated through the implementation of the EMP, particularly occupational health and safety measures both at work sites and construction camp sites.

Screening Questions	Yes	No	Remarks
▪ road blocking and temporary flooding due to land excavation during rainy season?		✓	Not anticipated. The work site is far from the main road. The site has enough space to accommodate all construction works, heavy equipment and raw materials. No temporary flooding is expected because works will be undertaken mostly during dry season.
▪ noise and dust from construction activities?	✓		Construction activities will result to noise and dust generation, although temporary and limited to the subproject site. However, this can be mitigated through the implementation of the EMP.
▪ traffic disturbances due to construction material transport and wastes?		✓	Not anticipated. The nature of works in the construction and rehabilitation of drainages will not be intensive on the use of transport vehicles. Nevertheless, all necessary transporting of construction materials and wastes will be undertaken during non-busy hours of the day.
▪ temporary silt runoff due to construction?	✓		This is anticipated if excavation works are undertaken during the rainy season. However, measures to avoid or minimize runoff are included in the EMP, such as for example, avoiding or minimizing heavy excavation works during monsoon season.
▪ hazards to public health due to ambient, household and occupational pollution, thermal inversion, and smog formation?		✓	Not applicable.
▪ water depletion and/or degradation?		✓	Not anticipated. The nature of works does not require tremendous amount of water, nor will it degrade water supply sources.
▪ overpaying of ground water, leading to land subsidence, lowered ground water table, and salinization?		✓	The design of the cyclone shelter will include deep tube wells. However, it is expected that the volume of water requirement will be minimal considering that the facility will only be utilized as a madrasa (school) during most times of the year.
▪ contamination of surface and ground waters due to improper waste disposal?	✓		This is anticipated during the construction and operation phases of the subproject. The EMP of the subproject will provide measures to avoid or minimize this impact, such as following the mandatory waste disposal through town's garbage collection services.

Screening Questions	Yes	No	Remarks
<ul style="list-style-type: none"> pollution of receiving waters resulting in amenity losses, fisheries and marine resource depletion, and health problems? 	✓		Construction of the new building at the site will potentially increase siltation of nearby canals or receiving bodies of water. However, this impact will be mitigated through implementation of measures in the EMP.
<ul style="list-style-type: none"> large population influx during subproject construction and operation that causes increased burden on social infrastructure and services (such as water supply and sanitation systems)? 		✓	Not anticipated. Labor requirements will be sourced locally.
<ul style="list-style-type: none"> social conflicts if workers from other regions or countries are hired? 		✓	Not anticipated. Labor requirements will be sourced locally.
<ul style="list-style-type: none"> risks to community health and safety due to the transport, storage, and use and/or disposal of materials such as explosives, fuel and other chemicals during operation and construction? 	✓		Construction activities will include transport and use materials that could pose risks to community health and safety. However, this can be mitigated through the implementation of related measures in the EMP. These measures include implementation of the IFC EHS guidelines on construction and decommissioning related to community health and safety.
<ul style="list-style-type: none"> community safety risks due to both accidental and natural hazards, especially where the structural elements or components of the subproject are accessible to members of the affected community or where their failure could result in injury to the community throughout subproject construction, operation, and decommissioning? 	✓		Construction activities will pose risks to community health and safety. However, this can be mitigated through the implementation of related measures in the EMP. These measures include implementation of the IFC EHS guidelines on construction and decommissioning related to community and occupational health and safety.

A Checklist for Preliminary Climate Risk Screening

Country/Project Title: BAN: Coastal Towns Climate Resilience Project (CTCRP)

Sector: SAUW/SARD

Subsector:

Division/Department:

Screening Questions		Score	Remarks ²⁹
Location and Design of project	Is siting and/or routing of the project (or its components) likely to be affected by climate conditions including extreme weather-related events such as floods, droughts, storms, landslides?	1	Project needs to consider extreme climate conditions
	Would the project design (e.g., the clearance for bridges) need to consider any hydro-meteorological parameters (e.g., sea-level, peak river flow, reliable water level, peak wind speed etc.)?	1	Project needs to consider extreme rainfall events
Materials and Maintenance	Would weather, current and likely future climate conditions (e.g. prevailing humidity level, temperature contrast between hot summer days and cold winter days, exposure to wind and humidity hydro-meteorological parameters likely affect the selection of project inputs over the life of project outputs (e.g. construction material)?	0	
	Would weather, current and likely future climate conditions, and related extreme events likely affect the maintenance (scheduling and cost) of project output(s)?	1	Flooding frequency may aggravate under current Climate Change scenario
Performance of project outputs	Would weather/climate conditions, and related extreme events likely affect the performance (e.g. annual power production) of project output(s) (e.g. hydro-power generation facilities) throughout their design lifetime?	1	Cyclone or flooding event may affect the performance of the project

Options for answers and corresponding score are provided below:

Response	Score
Not Likely	0
Likely	1
Very Likely	2

Responses when added that provide a score of 0 will be considered low risk project. If adding all responses will result to a score of 1-4 and that no score of 2 was given to any single response, the project will be assigned a medium risk category. A total score of 5 or more (which include providing a score of 1 in all responses) or a 2 in any single response, will be categorized as high-risk project.

Result of Initial Screening (Low, Medium, High): **Medium**

Other

Comments: _____

Prepared by: PMU

²⁹ If possible, provide details on the sensitivity of project components to climate conditions, such as how climate parameters are considered in design standards for infrastructure components, how changes in key climate parameters and sea level might affect the siting/routing of project, the selection of construction material and/or scheduling, performances and/or the maintenance cost/scheduling of project outputs.

Appendix 2: Result of Integration Biodiversity Assessment Tool Screening



Integrated Biodiversity Assessment Tool

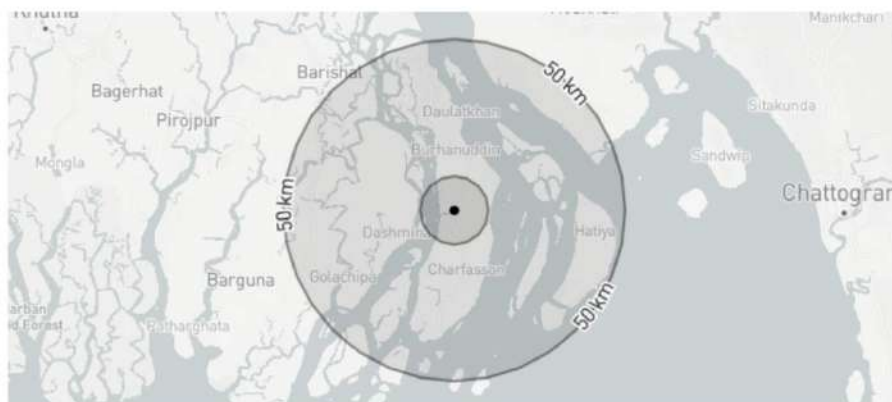
World Bank Group Biodiversity Risk Screen

BAN-CTCRP - LALMOHON CS SUBPROJECT

- **Country:** Bangladesh
- **Location:** [22.3, 90.7]
- **IUCN Red List Biomes:** Marine, Freshwater, Terrestrial
- **Created by:** Miguel Diangan

Overlaps with:

Protected Areas	1 km: 0	10 km: 0	50 km: 2	2
World Heritage (WH)	1 km: 0	10 km: 0	50 km: 0	0
Key Biodiversity Areas	1 km: 0	10 km: 1	50 km: 0	1
Alliance for Zero Extinction (AZE)	1 km: 0	10 km: 0	50 km: 0	0
IUCN Red List	65			
Critical Habitat	Likely			



Displaying project location and buffers: 1 km, 10 km, 50 km



This report is based on IFC Performance Standard 6 (PS6) but applies to World Bank Environmental and Social Standard 6 (ESS6)





About this report

The recommendations stated alongside any Protected Areas and Key Biodiversity Areas identified in this report are determined by the following:

Protected Areas:

- 'Highest risk. Seek expert help' is stated if the report identifies a designation that includes either 'natural' or 'mixed world heritage site'.
- 'Assess for Critical Habitat' is stated if the report identifies a Strict Nature Reserve, Wilderness Area or National Park as coded by IUCN protected area categories Ia, Ib and II.
- 'Assess for biodiversity risk' is stated if the report identifies any other type of protected area.

Key Biodiversity Areas:

- 'Highest risk. Seek expert help' is stated if the report identifies an Alliance for Zero Extinction site.
- 'Assess for Critical Habitat' is stated if the report identifies Critically Endangered or Endangered species OR species with restricted ranges OR congregatory species as coded in the IUCN Red List of Threatened Species.
- 'Assess for biodiversity risk' is stated if the report identifies any other type of Key Biodiversity Area.

IBAT provides initial screening for Critical Habitat values. Performance Standard 6 (PS6) defines these values for Critical Habitat (PS6: para. 16) and legally protected and internationally recognized areas (PS6: para. 20). PS6 will be triggered when IFC client activities are located in modified habitats containing "significant biodiversity value," natural habitats, Critical Habitats, legally protected areas, or areas that are internationally recognized for biodiversity. References to PS6 and Guidance Note 6 (GN6) are provided to guide further assessment and detailed definitions where necessary. Please see <https://www.ifc.org/ps6> for full details on PS6 and GN6.

This report identifies restricted range species according to the KBA Standard definition (hyperlink KBA Standard <https://portals.iucn.org/library/sites/library/files/documents/2016-048.pdf>):

Species having a global range size less than or equal to the 25th percentile of range-size distribution in a taxonomic group within which all species have been mapped globally, up to a maximum of 50,000 km². If all species in a taxonomic group have not been mapped globally, or if the 25th percentile of range-size distribution for a taxonomic group falls below 10,000 km², restricted range should be defined as having a global range size less than or equal to 10,000 km². For coastal, riverine and other species with linear distributions that do not exceed 200 km width at any point, restricted range is defined as having a global range less than or 15 equal to 500 km linear geographic span (i.e. the distance between occupied locations furthest apart).

Note, sites supporting restricted range species can qualify as KBAs under criterion B2. These are sites that hold a significant proportion of the global population size of multiple restricted-range species, and so contribute significantly to the global persistence of biodiversity at the genetic and species level.

The report screens for known risks within a standard 50km buffer of the coordinates used for analysis. This buffer is not intended to indicate the area of impact. The report can be used to:

- Scope risks to include within an assessment of risks and impacts





- Identify gaps within an existing assessment of risks and impacts
- Prioritize between sites in a portfolio for further assessment of risks and impacts
- Inform a preliminary determination of Critical Habitat
- Assess the need for engaging a biodiversity specialist
- Identify additional conservation experts or organizations to inform further assessment or planning

WARNING: IBAT aims to provide the most up-to-date and accurate information available at the time of analysis. There is however a possibility of incomplete, incorrect or out-of-date information. All findings in this report must be supported by further desktop review, consultation with experts and/or on-the-ground field assessment as described in PS6 and GN6. Please consult IBAT for any additional disclaimers or recommendations applicable to the information used to generate this report.

Please note, sensitive species data are currently not included in IBAT reports in line with the [Sensitive Data Access Restrictions Policy for the IUCN Red List](#). This relates to sensitive Threatened species and KBAs triggered by sensitive species.

Legal disclaimer

The Integrated Biodiversity Assessment Tool (IBAT) and IBAT products, which include the IBAT Portal, reports, and data, are owned by IBAT Alliance and accessible by paid subscription.

The IBAT and IBAT products may contain reference to or include content owned and provided by the International Bank for Reconstruction and Development ("IBRD"), the International Development Association ("IDA"), the International Finance Corporation ("IFC"), the Multilateral Investment Guarantee Agency ("MIGA"), and the International Center for Settlement of Investment Disputes ("ICSID") (collectively, the "World Bank Group" or "WBG", individually, the "WBG Member"). The content owned and provided by the WBG Members (the "Member Content") is the respective property of the WBG Member and is protected under general principles of copyright.

The use of Member Content in IBAT and IBAT products is under license and intended for informational purposes only. Such use is not intended to constitute legal, securities, or investment advice, an opinion regarding the appropriateness of any investment, or a solicitation of any type. Additionally, the information is provided on a strictly "as-is" basis, without any assurance or representation of any kind.

The WBG Member does not guarantee the accuracy, reliability or completeness of any Member Content included in IBAT or IBAT products or for the conclusions or judgments described therein. The WBG Member accepts no responsibility or liability for any omissions or errors (including, without limitation, typographical errors and technical errors) in any Member Content whatsoever or for reliance thereon. The boundaries, colors, denominations, and other information shown on any map in IBAT do not imply any judgment on the part of WBG Member concerning the legal status of any territory or the endorsement or acceptance of such boundaries. The findings, interpretations, and conclusions expressed in the IBAT and the IBAT products do not necessarily reflect the views of the WBG Member, its member countries, Executive Directors, or the governments it represents.

The WBG Members are international organizations established under their respective constituent agreement among their member countries. IBRD owns the WBG logos and trademark. The logos and other trademarks, service marks,





graphics of a WBG Member are the tradenames, trademarks or registered trademarks of that WBG Member (the "WBG Member Mark"). The WBG logo and trademark and WBG Member Marks may not be copied, imitated, or used, in whole or in part, without the prior written permission of WBG or its Members, as appropriate. All other queries on rights and licenses, including subsidiary rights, should be addressed as follows. If to IFC, to IFC's Corporate Relations Department, 2121 Pennsylvania Avenue, N.W., Washington, D.C. 20433. If to MIGA, to MIGA's Legal Affairs and Claims Group (Attn: Chief Counsel, Operations & Policy), 1818 H Street N.W., U12-1204, Washington, D.C. 20433. If to IBRD and/or IDA, to the Office of the Publisher, The World Bank, 1818 H Street N.W., Washington, D.C. 20433; Email: pubrights@worldbank.org





Priority Species

Habitat of significant importance to priority species will trigger Critical Habitat status (See PS6: para 16). IBAT provides a preliminary list of priority species that could occur within the 50km buffer. This list is drawn from the IUCN Red List of Threatened Species (IUCN RL). This list should be used to guide any further assessment, with the aim of confirming known or likely occurrence of these species within the project area. It is also possible that further assessment may confirm occurrence of additional priority species not listed here. It is strongly encouraged that any new species information collected by the project be shared with species experts and/or IUCN wherever possible in order to improve IUCN datasets.

IUCN Red List of Threatened Species - CR & EN

The following species are potentially found within 50km of the area of interest.

For the full IUCN Red List please refer to the associated csv in the report folder.

Species Name	Common Name	Taxonomic Group	IUCN Category	Population Trend	Biome
Batagur dhongoka	Three-striped Roofed Turtle	REPTILIA	CR	Decreasing	Terrestrial, Freshwater
Sphyma lewini	Scalloped Hammerhead	CHONDRICHTHYES	CR	Decreasing	Marine
Sphyma mokarran	Great Hammerhead	CHONDRICHTHYES	CR	Decreasing	Marine
Pristis zijsron	Green Sawfish	CHONDRICHTHYES	CR	Decreasing	Marine
Rhina ancylostoma	Bowmouth Guitarfish	CHONDRICHTHYES	CR	Decreasing	Marine
Rhynchobatus australiae	Bottlenose Wedgefish	CHONDRICHTHYES	CR	Decreasing	Marine
Rhynchobatus laevis	Smoothnose Wedgefish	CHONDRICHTHYES	CR	Decreasing	Marine
Glaucostegus granulatus	Sharpnose Guitarfish	CHONDRICHTHYES	CR	Decreasing	Marine



Species Name	Common Name	Taxonomic Group	IUCN Category	Population Trend	Biome
<i>Glaucostegus obtusus</i>	Widenose Guitarfish	CHONDRICHTHYES	CR	Decreasing	Marine
<i>Glaucostegus thouin</i>	Clubnose Guitarfish	CHONDRICHTHYES	CR	Decreasing	Marine
<i>Rhinobatos annandalei</i>	Bengal Guitarfish	CHONDRICHTHYES	CR	Decreasing	Marine
<i>Rhinobatos lionotus</i>	Smoothback Guitarfish	CHONDRICHTHYES	CR	Decreasing	Marine
<i>Sonneratia griffithii</i>		MAGNOLIOPSIDA	CR	Decreasing	Terrestrial, Marine
<i>Pristis pristis</i>	Large-tooth Sawfish	CHONDRICHTHYES	CR	Decreasing	Marine, Freshwater
<i>Calidris pygmaea</i>	Spoon-billed Sandpiper	AVES	CR	Decreasing	Terrestrial, Marine, Freshwater
<i>Batagur baska</i>	Northern River Terrapin	REPTILIA	CR	Decreasing	Terrestrial, Marine, Freshwater
<i>Glaucostegus typus</i>	Giant Guitarfish	CHONDRICHTHYES	CR	Decreasing	Marine
<i>Maculabatis bineeshi</i>	Shorttail Whipray	CHONDRICHTHYES	CR	Decreasing	Marine
<i>Pelochelys cantorii</i>	Asian Giant Softshell Turtle	REPTILIA	CR	Decreasing	Terrestrial, Marine, Freshwater
<i>Glyphis gangeticus</i>	Ganges Shark	CHONDRICHTHYES	CR	Decreasing	Marine, Freshwater



Species Name	Common Name	Taxonomic Group	IUCN Category	Population Trend	Biome
<i>Geoclemys hamiltonii</i>	Spotted Pond Turtle	REPTILIA	EN	Decreasing	Terrestrial, Freshwater
<i>Hardella thurjii</i>	Crowned River Turtle	REPTILIA	EN	Decreasing	Terrestrial, Freshwater
<i>Morenia petersi</i>	Indian Eyed Turtle	REPTILIA	EN	Decreasing	Terrestrial, Freshwater
<i>Orcaella brevirostris</i>	Irrawaddy Dolphin	MAMMALIA	EN	Decreasing	Marine, Freshwater
<i>Panthera tigris</i>	Tiger	MAMMALIA	EN	Decreasing	Terrestrial
<i>Rhincodon typus</i>	Whale Shark	CHONDRICHTHYES	EN	Decreasing	Marine
<i>Varanus flavescens</i>	Yellow Monitor	REPTILIA	EN	Decreasing	Terrestrial
<i>Carcharhinus amblyrhynchos</i>	Grey Reef Shark	CHONDRICHTHYES	EN	Decreasing	Marine
<i>Anoxypristis cuspidata</i>	Narrow Sawfish	CHONDRICHTHYES	EN	Decreasing	Marine
<i>Nilssononia gangetica</i>	Indian Softshell Turtle	REPTILIA	EN	Decreasing	Terrestrial, Freshwater
<i>Nilssononia hurum</i>	Indian Peacock Softshell Turtle	REPTILIA	EN	Decreasing	Terrestrial, Freshwater
<i>Platanista gangetica</i>	Ganges River Dolphin	MAMMALIA	EN	Decreasing	Freshwater
<i>Eusphyra blochii</i>	Winghead Shark	CHONDRICHTHYES	EN	Decreasing	Marine



Species Name	Common Name	Taxonomic Group	IUCN Category	Population Trend	Biome
<i>Holothuria scabra</i>	Golden Sandfish	HOLOTHUROIDEA	EN	Decreasing	Marine
<i>Holothuria lessona</i>	Golden Sandfish	HOLOTHUROIDEA	EN	Decreasing	Marine
<i>Thelenota ananas</i>	Prickly Redfish	HOLOTHUROIDEA	EN	Decreasing	Marine
<i>Urogymnus polylepis</i>	Giant Freshwater Whipray	CHONDRICHTHYES	EN	Decreasing	Marine, Freshwater
<i>Rhinoptera jayakari</i>	Oman Cownose Ray	CHONDRICHTHYES	EN	Decreasing	Marine
<i>Mobula birostris</i>	Oceanic Manta Ray	CHONDRICHTHYES	EN	Decreasing	Marine
<i>Tringa guttifer</i>	Spotted Greenshank	AVES	EN	Decreasing	Terrestrial, Marine, Freshwater
<i>Calidris tenuirostris</i>	Great Knot	AVES	EN	Decreasing	Terrestrial, Marine
<i>Rynchops albigollis</i>	Indian Skimmer	AVES	EN	Decreasing	Terrestrial, Freshwater
<i>Haliaeetus leucoryphus</i>	Pallas's Fish-eagle	AVES	EN	Decreasing	Terrestrial, Freshwater
<i>Aquila nipalensis</i>	Steppe Eagle	AVES	EN	Decreasing	Terrestrial
<i>Leptoptilos dubius</i>	Greater Adjutant	AVES	EN	Decreasing	Terrestrial, Freshwater
<i>Telatrygon crozieri</i>	Indian Sharpnose Ray	CHONDRICHTHYES	EN	Decreasing	Marine



Species Name	Common Name	Taxonomic Group	IUCN Category	Population Trend	Biome
<i>Pateobatis bleekeri</i>	Bleeker's Whipray	CHONDRICHTHYES	EN	Decreasing	Marine
<i>Pastinachus gracilicaudus</i>	Narrow Cowtail Ray	CHONDRICHTHYES	EN	Decreasing	Marine
<i>Mobula mobular</i>	Spinetail Devil Ray	CHONDRICHTHYES	EN	Decreasing	Marine
<i>Aetobatus flagellum</i>	Longhead Eagle Ray	CHONDRICHTHYES	EN	Decreasing	Marine
<i>Lamiopsis temminckii</i>	Broadfin Shark	CHONDRICHTHYES	EN	Decreasing	Marine
<i>Himantura uamak</i>	Coach Whipray	CHONDRICHTHYES	EN	Decreasing	Marine

Restricted Range Species

Species Name	Common Name	Taxonomic Group	IUCN Category	Population Trend	Biome
<i>Rhinobatos lionotus</i>	Smoothback Guitarfish	CHONDRICHTHYES	CR	Decreasing	Marine
<i>Ophisternon bengalense</i>	Bengal Mud Eel	ACTINOPTERYGII	LC OR LR/LC	Stable	Marine, Freshwater
<i>Bengala elanga</i>	Bengala Barb	ACTINOPTERYGII	LC OR LR/LC	Unknown	Freshwater
<i>Xenentodon cancila</i>		ACTINOPTERYGII	LC OR LR/LC	Unknown	Freshwater
<i>Oreichthys cosuatis</i>		ACTINOPTERYGII	LC OR LR/LC	Unknown	Freshwater





Species Name	Common Name	Taxonomic Group	IUCN Category	Population Trend	Biome
<i>Oryzias dancena</i>	Indian Ricefish	ACTINOPTERYGII	LC OR LR/LC	Stable	Marine, Freshwater
<i>Pseudosphromenus cupanus</i>	Spiketail Paradise Fish	ACTINOPTERYGII	LC OR LR/LC	Stable	Freshwater
<i>Oryzias latipes</i>	Spotted Ricefish	ACTINOPTERYGII	LC OR LR/LC	Unknown	Marine, Freshwater
<i>Macrobrachium scabriculum</i>		MALACOSTRACA	LC OR LR/LC	Unknown	Freshwater
<i>Macrobrachium rude</i>		MALACOSTRACA	LC OR LR/LC	Unknown	Freshwater
<i>Macrobrachium rosenbergii</i>	Giant River Prawn	MALACOSTRACA	LC OR LR/LC	Unknown	Freshwater
<i>Leptocarpus fluminicola</i>		MALACOSTRACA	LC OR LR/LC	Unknown	Freshwater
<i>Fregetta tropica</i>	Black-bellied Storm-petrel	AVES	LC OR LR/LC	Decreasing	Terrestrial, Marine



Biodiversity features which are likely to trigger Critical Habitat


Protected Areas

The following protected areas are found within 1 km and 10 km and 50 km of the area of interest.
For further details please refer to the associated csv file in the report folder.

Area name	Distance	IUCN Category	Status	Designation	Recommendation
Char Kukri-Mukri	50 km	IV	Designated	Wildlife Sanctuary	 Assess for biodiversity risk
Nijhum Dweep	50 km	IV	Designated	National Park	 Assess for biodiversity risk

Key Biodiversity Areas

The following key biodiversity areas are found within 1 km and 10 km and 50 km of the area of interest.
For further details please refer to the associated csv file in the report folder.

Area name	Distance	IBA	AZE	Recommendation
Ganges-Brahmaputra-Meghna delta	10 km	Yes	No	 Assess for critical habitat

Species with potential to occur

Area Taxonomic group	Total assessed species	Total (CR, EN & VU)	CR	EN	VU	NT	LC	DD
REPTILIA	87	17	3	6	8	3	64	3
CHONDRICHTHYES	84	67	15	25	27	10	6	1
MAGNOLIOPSIDA	61	2	1	1	0	3	52	4



Area Taxonomic group	Total assessed species	Total (CR, EN & VU)	CR	EN	VU	NT	LC	DD
AVES	305	15	1	6	8	17	273	0
MAMMALIA	53	9	0	3	6	4	40	0
ANTHOZOA	8	2	0	1	1	2	3	1
HOLOTHUROIDEA	30	5	0	3	2	0	14	11
ACTINOPTERYGII	508	8	0	0	8	8	456	36
LILIOPSIDA	44	1	0	0	1	1	41	1
AMPHIBIA	18	0	0	0	0	0	18	0
INSECTA	76	0	0	0	0	0	76	0
HYDROZOA	2	0	0	0	0	0	2	0
MALACOSTRACA	20	0	0	0	0	0	18	2
GASTROPODA	109	0	0	0	0	0	104	5
POLYPODIOPSIDA	4	0	0	0	0	0	4	0
BIVALVIA	34	0	0	0	0	0	31	3
ARACHNIDA	2	0	0	0	0	0	2	0



Recommended citation

IBAT PS6 & ESS6 Report. Generated under licence 159-34947 from the Integrated Biodiversity Assessment Tool on 09 October 2022 (GMT). www.ibat-alliance.org

Recommended Experts and Organizations

For projects located in Critical Habitat, clients must ensure that external experts with regional expertise are involved in further assessment (GN6: GN22). Clients are encouraged to develop partnerships with recognized and credible conservation organizations and/or academic institutes, especially with respect to potential developments in natural or Critical Habitat (GN6: GN23). Where Critical Habitats are triggered by priority species, species specialists must be involved. IBAT provides data originally collected by a large network of national partners, while species information is sourced via the IUCN Red List and affiliated Species Specialist Groups. These experts and organizations are listed below. **Please note that this is not intended as a comprehensive list of organizations and experts. These organizations and experts are under no obligation to support any further assessment and do so entirely at their discretion and under their terms. Any views expressed or recommendations made by these stakeholders should not be attributed to the IFC or IBAT for IFC partners.**

Birdlife Partners

URL: <https://www.birdlife.org/worldwide/partnership/birdlife-partners>

Directory for Species Survival Commission (SSC) Specialist Groups and Red List Authorities

URL: <https://www.iucn.org/commissions/ssc-groups>

APPENDIX 3: SOLID WASTE MANAGEMENT PLAN

Consequences	Mitigation measures	Records	Reporting	Responsibility
Debris disposal	<ul style="list-style-type: none"> a. The debris disposal site should be identified which are preferably barren or low-lying areas away from settlements. b. Prior concurrence will be taken from concerned Govt. Authorities or landowner c. Due care should be taken during site clearance and disposal of debris so that public/ private properties are not damage or effected, no traffic is interrupted. d. All efforts should be made to use debris in road construction or any other public utilities. e. The debris should be stored at site ensuring that existing water bodies and drains within or adjacent to the site are kept safe and free and no blocking of drains occurs. 	<ul style="list-style-type: none"> • Generation and disposal quantity with location of disposal • Recyclable s waste generation and disposal • Domestic waste disposal locations details 	The waste generation and disposal details will form part of quarterly report to the PIU	Prime Responsibility: Contractor will be responsible for waste management and reporting Supervisor Responsibility: CSE/PIU/P MSC
Dust	<ul style="list-style-type: none"> a. All dust prone material should be transported in a covered truck. b. All liquid waste like oils and paint waste should be stored at identified locations and preferably on a cemented floor. c. Provision of spill collection pit will be made in the floor to collect the spilled oil or paint. These should be sold off to authorized recyclers. d. All domestic waste generated at construction camp preferably be composted in portable mechanized composter. The composted material will be used as manure. In case composting is not feasible, the material will either be disposed off through municipal waste disposal system or disposed of through land burial. The dump site must be covered up with at least six-inch-thick layer of soil. e. Only appropriately design and compliant landfills will be used for disposing waste 	Visual inspection by CSE/PMSC supervisor and note as checklist record	The waste generation and disposal details will form part of quarterly report to the PIU	Supervisor Responsibility: CSE/PIU/P MSC
Oil/chemical spills	<ul style="list-style-type: none"> a. All efforts should be made that no chemical/ oily waste spill over to ground or water bodies. b. All precautions should be followed for emergency preparedness and 	Visual inspection by CSE/PMSC supervisor and note as checklist record	The waste generation and disposal details will form part of	Supervisor Responsibility: CSE/PIU/P MSC

Consequences	Mitigation measures	Records	Reporting	Responsibility
	occupational health & safety during construction and handling a waste. c. Provision of fire extinguishers will be made at the storage area		quarterly report to the PIU	
Traffic movement with waste	a. Adequate traffic control signals and barriers should be used in case traffic is to be diverted during debris disposal. All efforts should be made to ensure avoidance of traffic jam, which otherwise results in air pollution, noise pollution and public unrest. b. Hazardous waste and chemicals should be stored in a dedicated storage area that has: 1) weather protection, 2) solid impermeable surface and drainage to treatment system, 3) security fence/lock, 4) primary and secondary containment with 110% volume for liquids.	Visual inspection by CSE/PMSC supervisor and note as checklist record	The waste generation and disposal details will form part of quarterly report to the PIU	Supervisor y Responsibility: CSE/PIU/P MSC
Domestic waste	a. Domestic waste shall only be disposed of at the approved, appropriately designed, compliant waste management facility (landfill). Land burial of waste shall not be permitted.	Visual inspection by CSE/PMSC supervisor and note as checklist record	The waste generation and disposal details will form part of quarterly report to the PIU	Supervisor y Responsibility: CSE/PIU/P MSC

APPENDIX 4: SPOIL MANAGEMENT PLAN

A. Spoil Types

Spoil is defined as any earthen material that is surplus to requirements or unsuitable for reuse in fill and embankments (such as unsuitable rock and soil material) or material that is contaminated. This plan has been prepared to facilitate the beneficial reuse of all material, ensuring that none is disposed off-site, except if unsuitable for reuse.

Fill is defined as earthen material excavated from one location along the corridor (for example, for a detention basin or cut excavations) and relocated elsewhere as compacted fill. Cut and fill material will generally not be stockpiled but will be removed from the excavation site and transported directly to the construction face for immediate reuse as compacted fill. Unsuitable excavated material will primarily be transported to identified locations within the road corridor for reuse or, if space is not available, will be stored temporarily off-site for reuse later.

Select material is defined as earthen material of comparatively higher quality, necessary for engineered backfill and incorporation in upper earthworks layers as part of the overall pavement design. Typically, on the HEA project this will include high strength sandstone and low/medium strength claystone, siltstones and sandstones. Wherever possible, select material will be sourced on site, and stockpiled as necessary until incorporated in the works. However, preliminary investigations suggest that a considerable proportion of the select material required for the project will need to be sourced from off site.

Unsuitable (non-contaminated) material on the construction project is generally composed of silty, sandy, gravely and organic clays; sandy silts; clayey, silty and gravely sands and carbonaceous rock.

This material will be reused on the project in the following ways:

- widen embankments where possible;
- land contouring;
- landscaping mounds;
- landscape treatments; and
- noise mounds (if required).

Topsoil will be stripped and recovered for reuse in landscaping and revegetation. On average, the top 100mm of topsoil will be collected for future use.

B. Spoil strategy

The following provides an overview of the spoil management strategy for achieving the key spoil management objectives:

- Minimize the amount of spoil generated: This requirement will be achieved by ensuring that the design minimizes the volume of spoil generated from excavation (a key driver for this is the need to minimize our construction footprint in order to reduce clearing). It should be noted that the minimization of spoil generation is a standard process in developing designs and planning construction activities as there are significant financial savings in minimizing spoil generation and management.
- Classify the spoil generated using recognized guidelines and its geotechnical characteristics: There is no Waste Classification Guidelines to follow in Bangladesh. The geotechnical characteristics of spoil therefore are important to consider as it will determine the potential engineering uses of spoil.
- Maximize the beneficial reuse of spoil on site based on its classification (both contamination category and geotechnical characteristics): Some of the spoil generated is expected to be able to be reused on site and will be suitable as general fill across the site. Some spoil may be unsuitable; however, this may be used for inclusion in capped landscaping mounds or features. Some spoil material, mainly due to its geotechnical characteristics will not be suitable for reuse.

- Maximize the beneficial reuse of spoil off site based on its classification (both contamination category and geotechnical characteristics): Whilst it is the general intention to try and re-use all material on-site some of the spoil generated may be able to be reused off site on other projects. Further investigation into the needs of the numerous nearby mine sites will continue in this regard. Some spoil material due to its geotechnical characteristics will not be suitable for reuse.
- Dispose of spoil off site based on its contamination classification: Spoil unable to be reused on site or off site would be disposed of at a facility that has the appropriate development approval and Environment Protection License to receive and store the relevant waste classification of the spoil.
- Manage the excavation, storage, transport reuse and disposal of spoil to minimize impacts and meet other environmental requirements: This includes implementing mitigation measures to manage potential impacts on traffic and soil and water, dust generation and contamination of spoil (e.g. onsite - dust control, erosion and sedimentation controls, monitoring and validation for contamination and Potential Acid Sulphate Soils, offsite – tracking and monitor spoil/fill movements and quality (contamination), haulage routes, impacts on public safety and roads and public amenity, noise impacts and required compliance requirements (i.e. approvals and consents/licenses).

C. Spoils generating activities

Spoil generated by construction will primarily come from excavation works. The spoil is expected to vary in content with silty, sandy, gravely and organic clays; sandy silts; clayey, silty and gravely sands and carbonaceous rock.

The activities associated with the generation and management of spoil and fill materials are:

- Clearing of vegetation;
- Selection of material;
- Clearing of topsoil;
- Excavation of earthen material;
- Blasting of earthen material (if required);
- Transport of earthen material;
- Storage/stockpiling of spoil, topsoil and mulch; and
- Reuse of spoil, topsoil and mulch.

APPENDIX 5: GENERIC TRAFFIC MANAGEMENT PLAN (TMP)

A. Principles

One of the prime objectives of the Contractor's **TMP** is to ensure the safety of all the road users along the work zone, and to address the following issues:

- (i) the safety of pedestrians, bicyclists, and motorists travelling through the construction zone;
- (ii) protection of work crews from hazards associated with moving traffic;
- (iii) mitigation of the adverse impact on road capacity and delays to the road users;
- (iv) maintenance of access to adjoining properties; and
- (v) Addressing issues that may delay the project.

B. Operating Policies for TMP

The following principles will help promote safe and efficient movement for all road users (motorists, bicyclists, and pedestrians, including persons with disabilities) through and around work zones while reasonably protecting workers and equipment.

- 1) Make traffic safety and temporary traffic control an integral and high-priority element of every project from planning through design, construction, and maintenance.
- 2) Inhibit traffic movement as little as possible.
- 3) Provide clear and positive guidance to drivers, bicyclists, and pedestrians as they approach and travel through the temporary traffic control zone.
- 4) Inspect traffic control elements routinely, both day and night, and make modifications when necessary.
- 5) Pay increased attention to roadside safety in the vicinity of temporary traffic control zones.
- 6) Train all persons that select, place, and maintain temporary traffic control devices.
- 7) Keep the public well informed.
- 8) Make appropriate accommodation for abutting property owners, residents, businesses, emergency services, railroads, commercial vehicles, and transit operations.

Figure A1 to Figure A6 illustrates the operating policy for TMP for the construction of water pipes and the sewers along various types of roads.

C. Analyze the Impact Due to Street Closure

Apart from the capacity analysis, a final decision to close a particular street and divert the traffic should involve the following steps:

- a) Approval from the ULB/CMC/Public Works Department (PWD) to use the local streets as detours;
- b) consultation with businesses, community members, traffic police, PWD, etc, regarding the mitigation measures necessary at the detours where the road is diverted during the construction;
- c) Determining of the maximum number of days allowed for road closure, and incorporation of such provisions into the contract documents;
- d) Determining if additional traffic control or temporary improvements are needed along the detour route;
- e) Considering how access will be provided to the worksite;
- f) Contacting emergency service, school officials, and transit authorities to determine if there are impacts to their operations; and
- g) Developing a notification program to the public so that the closure is not a surprise. As part of this program, the public should be advised of alternate routes that commuters can take or will have to take as result of the traffic diversion.

If full road-closure of certain roads within the area is not possible, due to inadequate capacity of the detour arrangements, the full closure can be restricted to weekends with the construction commencing on Thursday night and ending on Sunday morning prior to the morning peak period. The traffic management guidelines are as follows:

- Review construction schedule and methods;
- Identify initial traffic recirculation and control policy;
- Identify routes for traffic diversions;
- Analyze adverse impact & mitigation at the detours;
- Begin community consultation for consensus;
- Finalize or determine alternate detours;
- Identify temporary parking (on and off -street);
- Discuss with CMC, owner, community for use;
- Coordinate with the Traffic Police to enforce traffic and diversions;
- Install traffic control devices (traffic cones, signs, lightings, etc);
- Conduct campaigns, publicity, and notify public about street closure; and
- Develop a mechanism to address public grievances regarding disruptors of traffic, utilities, etc.

D. Public Awareness and Notifications

As per discussions in the previous sections, there will be travel delays during the constructions, as is the case with most construction projects, albeit on a reduced scale if utilities and traffic management are properly coordinated. There are additional grounds for travel delays in the area, as most of the streets lack sufficient capacity to accommodate additional traffic from diverted traffic as a result of street closures to accommodate the works.

The awareness campaign and the prior notification for the public will be a continuous activity which the project will carry out to compensate for the above delays and minimize public claims as result of these problems. These activities will take place sufficiently in advance of the time when the roadblocks or traffic diversions take place at the particular streets. The reason for this is to allow sufficient time for the public and residents to understand the changes to their travel plans. The project will notify the public about the roadblocks and traffic diversion through public notices, ward level meetings and city level meeting with the elected representatives.

The PIU will also conduct an awareness campaign to educate the public about the following issues:

- a) Traffic control devices in place at the work zones (signs, traffic cones, barriers, etc.);
- b) defensive driving behavior along the work zones; and
- c) Reduced speeds enforced at the work zones and traffic diversions.

It may be necessary to conduct the awareness programs/campaigns on road safety during construction. The campaign will cater to all types of target groups i.e. children, adults, and drivers. Therefore, these campaigns will be conducted in schools and community centers. In addition, the project will publish a brochure for public information. These brochures will be widely circulated around the area and will also be available at the PIU, and the contractor's site office. The text of the brochure should be concise to be effective, with a lot of graphics. It will serve the following purpose:

- a) Explain why the brochure was prepared, along with a brief description of the project;
- b) Advise the public to expect the unexpected;
- c) Educate the public about the various traffic control devices and safety measures adopted at the work zones;
- d) Educate the public about the safe road user behavior to emulate at the work zones;
- e) Tell the public how to stay informed or where to inquire about road safety issues at the work zones (name, telephone, mobile number of the contact person; and
- f) Indicate the office hours of relevant offices.

E. Install Traffic Control Devices at the Work Zones and Traffic Diversion Routes

The purpose of installing traffic control devices at the work zones is to delineate these areas to warn, inform, and direct the road users about a hazard ahead, and to protect them as well as the workers. As proper delineation is a key to achieve the above objective, it is important to install good traffic signs at the work zones. The following traffic control devices are used in work zones:

- Signs
- Pavement Markings
- Channelizing Devices
- Arrow Panels
- Warning Lights

Procedures for installing traffic control devices at any work zone vary, depending on road configuration, location of the work, construction activity, duration, traffic speed and volume, and pedestrian traffic. Work will take place along major roads, and the minor internal roads. As such, the traffic volume and road geometry vary. The main roads carry considerable traffic; internal roads in the new city areas are wide but in old city roads very narrow and carry considerable traffic. However, regardless of where the construction takes place, all the work zones should be cordoned off, and traffic shifted away at least with traffic cones, barricades, and temporary signs (temporary “STOP” and “GO”).

Figure A1 to Figure A6 illustrate typical set-ups for installing traffic control devices at the work zone of the area, depending on the location of work on the road way, and road geometrics. The Contractor would need to consider such Traffic Management situations for these typical arrangements and others that may occur during road construction works. The Contractor would need to coordinate closely with the road management and road police authorities and submit their Traffic Management proposals, with not less than a month's prior notice, to the PIU for obtaining prior approval, before any closure of roads are considered.

- Work on Shoulder or Parking Area;
- Work with Lane Closure: Low Traffic;
- Work on Lane Closure With Yield Sign on Two Lane: Low Volume;
- Work on Lane Closure With Single Flag Operator on Two Lane : Low Volume;
- Lane Closure: Two Flag Operators on Two Lane Road; and
- Street Closure with Detour.

The work zone should take into consideration the space required for a buffer zone between the workers and the traffic (lateral and longitudinal) and the transition space required for delineation, as applicable. For the works, a 30 cm clearance between the traffic and the temporary STOP and GO signs should be provided. In addition, at least 60 cm is necessary to install the temporary traffic signs and cones.

Traffic police should regulate traffic away from the work zone and enforce the traffic diversion result from full street closure in certain areas during construction. Flaggers/ personnel should be equipped with reflective jackets at all times and have traffic control batons (preferably the LED type) for regulating the traffic during night time.

In addition to the delineation devices, all the construction workers should wear fluorescent safety vests and helmets in order to be visible to the motorists at all times. There should be provision for lighting beacons and illumination for night constructions.

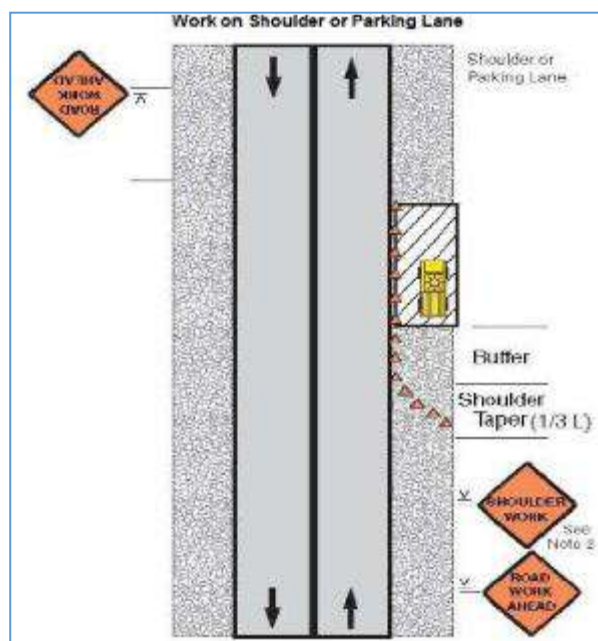


figure A1 Work with shoulder or Parking area

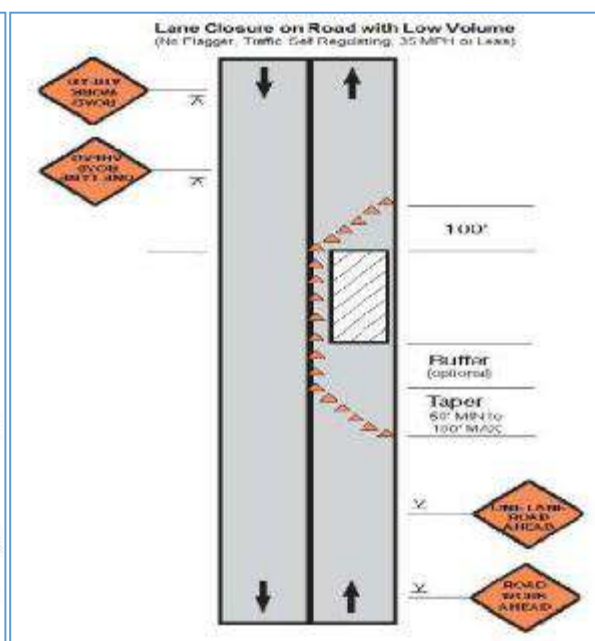


figure A2 Work with lane closure: low traffic

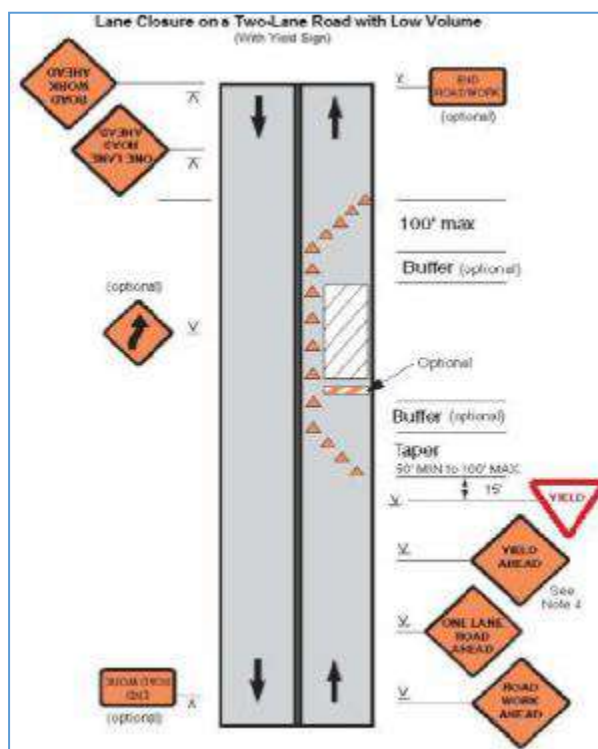


figure A3 Work on Lane Closure with Yield Sign on Two Lane: Low Volume

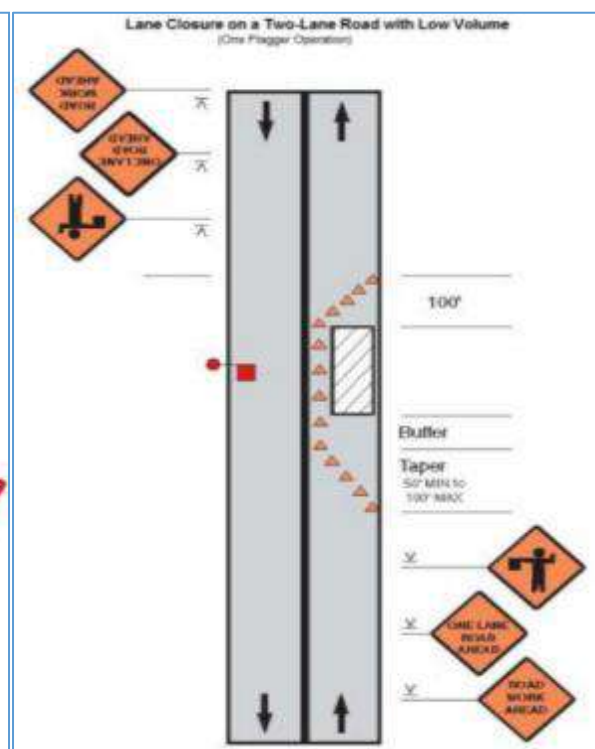


figure A4 Work on Lane Closure with Single Flag Operator on Two Lane: Low Volume

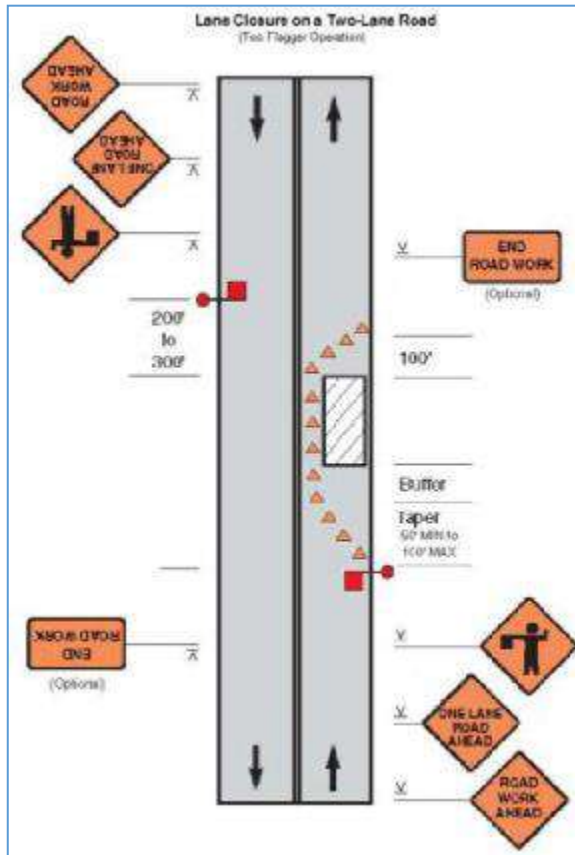
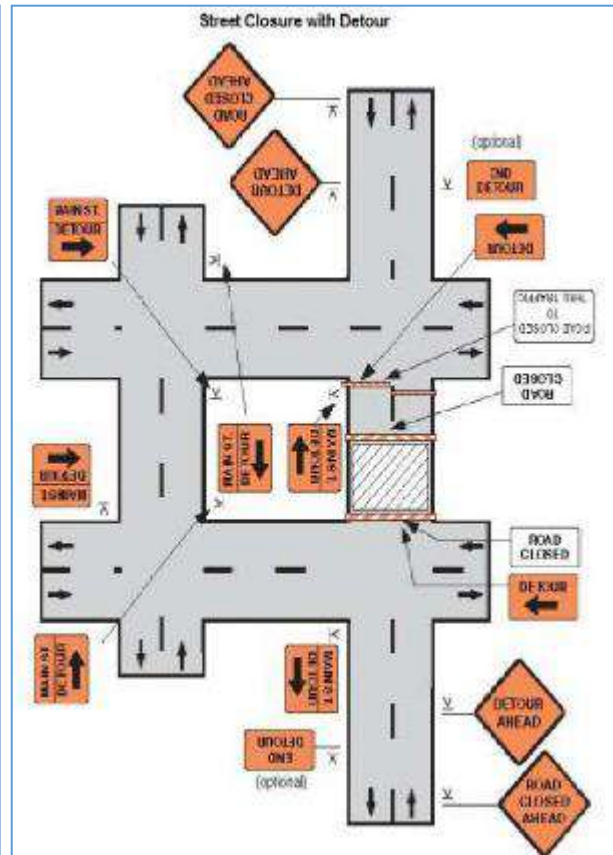


Figure A5 Lane Closure: Two Flag Operators on Two Lane Road



APPENDIX 6: BANGLADESH GOVERNMENT GUIDELINE IN RESPONSE TO COVID-19 IN WORKSITES



কোভিড-১৯ এর জন্য কর্মক্ষেত্র প্রস্তুতকরণ

প্রথম সংস্করণ

২৩,০৩,২০২০



কোভিড-১৯ এর জন্য কর্মক্ষেত্র প্রস্তুতকরণ

২০২০ সালের জানুয়ারি মাসে বিশ্ব স্বাস্থ্য সংস্থা (WHO) একটি নতুন ধরনের করোনা ভাইরাস জনিত রোগের প্রাদুর্ভাব ঘোষণা করে, যার সূচনা হয় চীনের হবেই প্রদেশে। বিশ্ব স্বাস্থ্য সংস্থা (WHO) এর বিবৃতি অনুযায়ী করোনা ভাইরাস রোগটি (কোভিড-১৯) বিশ্বের অন্যান্য দেশে ছড়িয়ে পড়ার একটি উচ্চ ঝুঁকি রয়েছে।

বিশ্ব স্বাস্থ্য সংস্থা (WHO) এবং জনস্বাস্থ্য কর্তৃপক্ষ বিশ্বব্যাপী কোভিড-১৯ এর প্রাদুর্ভাব নিয়ন্ত্রণের জন্য কাজ করছে। তবে দীর্ঘমেয়াদী সাক্ষ্য এখন পর্যন্ত অর্জিত হয়নি। এই রোগের বিস্তার রোধ করতে হলে ব্যবসায়ী, চাকুরীজীবীসহ সমাজের সর্বস্তরের মানুষকে অবশ্যই কার্যকরী ভূমিকা পালন করতে হবে।

কোভিড-১৯ যেভাবে ছড়ায়

কোভিড-১৯ আক্রান্ত রোগীর হাঁচি, কাশির মাধ্যমে রোগটি সংক্রমিত হয়ে থাকে। হাঁচি, কাশির মাধ্যমে রোগটির জীবাণু নিকটবর্তী বস্তুর পৃষ্ঠতল - যেমন ডেস্ক, টেবিল বা টেলিফোন/ মোবাইল ইত্যাদির উপর পড়ে যা সহজেই মানুষের হাতের সংস্পর্শে আসে, পরবর্তীতে এই জীবাণু মুক্ত হাত দ্বারা চোখ, নাক বা মুখ স্পর্শ করার মাধ্যমে তারা আক্রান্ত হতে পারে। আবার যারা কোভিড-১৯ আক্রান্ত ব্যক্তির এক মিটারের মধ্যে অবস্থান করে, তারাও হাঁচি-কাশি হতে ডিটকে আসা ক্ষুদ্র কণার সাথে মিশ্রিত জীবাণু দ্বারা আক্রান্ত হতে পারে। কোভিড-১৯ এ সংক্রমিত হলে বেশিরভাগ ব্যক্তি হালকা/সাধারণ লক্ষণগুলি অনুভব করে এবং নিজ থেকেই সুস্থ হয়ে যায়। কিছু রোগীর ক্ষেত্রে গুরুতর অসুস্থতা লক্ষ্য করা যায় এবং হাসপাতালে নেওয়ার প্রয়োজন হতে পারে। সাধারণত ৪০ বা তদোর্ধ্ব বয়সী রোগী, রোগ প্রতিরোধ ক্ষমতা কম এমন ব্যক্তির (যেমন- ক্যান্সার, ডায়াবেটিস, হৃদরোগ এবং ফুসফুসের রোগে আক্রান্ত ব্যক্তি) ক্ষেত্রে ঝুঁকির মাত্রা বেশী।

আমরা এখানে যা জানব-

১. কর্মক্ষেত্রে কোভিড-১৯ এর বিস্তার রোধ করার সহজ উপায়।
২. সভা, সমাবেশ এবং জনসমাগমে কোভিড-১৯ এর ঝুঁকিগুলি এড়িয়ে চলার উপায়।
৩. কর্তৃপক্ষ ও কর্মীগণের ভ্রমণকালীন সময়ে সাবধানতা।
৪. কোভিড-১৯ ছড়িয়ে পড়লে কর্মক্ষেত্র প্রস্তুতকরণ।

১. কর্মক্ষেত্রে কোভিড-১৯ এর বিস্তার রোধ করার সহজ উপায়

যে সকল কর্মক্ষেত্রে কোভিড-১৯ এর সংক্রমণ ছড়িয়ে পড়েনি সেখানকার দায়িত্বপ্রাপ্ত কর্মকর্তাগণ তাদের নিজ কর্মক্ষেত্রে নিম্নোক্ত বিষয়গুলো নিশ্চিত করবেন-

- কর্মস্থল পরিষ্কার-পরিচ্ছন্ন এবং স্বাস্থ্যকর কিনা তা নিশ্চিতকরণঃ
জীবাণুনাশক দিয়ে ডেস্ক ও টেবিলের পৃষ্ঠতল এবং নিত্য ব্যবহার্য বস্তু (যেমন- টেলিফোন, কীবোর্ড) নিয়মিত মুছতে হবে। কারন পৃষ্ঠতলে থাকা জীবাণু দ্বারা সহজে সংক্রমণের সম্ভাবনা থাকে।
- কর্মচারী, গ্রাহকদের নিয়মিত এবং যথাযথভাবে হাত ধোয়ার অভ্যাস করানোঃ
সাবান-পানি দিয়ে হাত ধোয়া, কেননা সাবান দিয়ে হাত পরিষ্কার করলে ভাইরাস ধ্বংস হয় এবং কোভিড-১৯ এর বিস্তারে বাধা সৃষ্টি হয়।

- কর্মক্ষেত্রের প্রবেশপথে বা আশেপাশে সহজে দৃষ্টিগোচর হয় এমন স্থানে হ্যান্ড স্যানিটাইজার রাখার ব্যবস্থা করা।
- সঠিকভাবে হাত ধোয়ার নির্দেশনা সম্বলিত পোস্টার দৃষ্টিগোচর স্থানে প্রদর্শন করা এবং স্থানীয় জনস্বাস্থ্য কর্তৃপক্ষের সাহায্য নিন।
- হাত ধোয়ার ব্যাপারে উৎসাহিত করার জন্য পেশাদার জনস্বাস্থ্য কর্মকর্তার দিবনির্দেশনা, বিভিন্ন সভায় প্রদত্ত সচেতনতামূলক বার্তা এবং ইন্টারনেটে ব্যবহৃত গ্রহনযোগ্য এবং বিশ্বাসযোগ্য তথ্যাদি ব্যবহার করা।
- কর্মী, ঠিকাদার এবং গ্রাহকদের সাবান ও পানি দিয়ে হাত ধোয়ার ব্যবস্থা নিশ্চিত করা।
- কর্মক্ষেত্রে শ্বাস-প্রশ্বাস জনিত স্বাস্থ্যবিধি প্রচার করা-
 - ✓ শ্বাস প্রশ্বাসজনিত পরিচ্ছন্নতার ব্যাপারে পোস্টার প্রদর্শন। কেননা, শ্বাস প্রশ্বাসের পরিচ্ছন্নতা কোভিড-১৯ সংক্রমণ রোধ করে।
 - ✓ শ্বাস প্রশ্বাসজনিত পরিচ্ছন্নতায় উৎসাহিত করার জন্য কর্মক্ষেত্রে পেশাদার জনস্বাস্থ্য কর্মকর্তার দিবনির্দেশনা, বিভিন্ন সভায় প্রদত্ত সচেতনতামূলক বার্তা এবং ইন্টারনেটে ব্যবহৃত গ্রহনযোগ্য এবং বিশ্বাসযোগ্য তথ্যাদি ব্যবহার করা।
 - ✓ কর্মস্থলে কর্মচারীদের বিশেষ করে যাদের সর্দি বা কাশি আছে তাদের জন্য ফেস মাস্ক/কাগজের টিস্যু/বুমাল সংজ্ঞালতা করা ও তাদের ব্যবহৃত ফেস মাস্ক/কাগজের টিস্যু/বুমালের যথাযথ ব্যবস্থাপনা এবং ধ্বংস করা নিশ্চিত করা।
- অনুরী পেশাদারী কাজে ভ্রমণে যাওয়ার আগে কর্মচারী এবং ঠিকাদারদের “ভ্রমণ সম্পর্কিত আত্মীয় নির্দেশনা” ছেনে নেওয়ার পরামর্শ দেয়া।
- কর্মচারী, ঠিকাদার এবং সেবা গ্রহণকারীদের এই মর্মে অবহিত করা যে, যদি কোনভাবে কোভিড-১৯ তাদের নিজ নিজ এলাকায় ছড়িয়ে পড়তে শুরু করে (হালকা কাশি বা স্রল জ্বর ৯৯ ডিগ্রি ফারেনহাইট বা তার সামান্য বেশি হয়) তাহলে তাদেরকে বাড়িতেই থাকতে হবে বা বাড়িতে থেকেই কাজ করতে হবে। এসময় চিকিৎসকের পরামর্শ অনুযায়ী সাধারণ ঔষধ যেমন প্যারাসিটামল, আইবুপ্রোফেন বা অ্যাসপিরিন ইত্যাদি ঔষধগুলি গ্রহণ করা যেতে পারে।
- যদি কারো কোভিড-১৯ এর খুব সাধারণ লক্ষণও দেখা দেয় তাহলে তাকে অবশ্যই সার্বক্ষণিক ঘরের মধ্যে থাকতে হবে। একথা দৃঢ়ভাবে প্রচার করতে হবে।
- কর্মস্থলে উপরোক্ত বার্তা সম্বলিত পোস্টার প্রদর্শন করুন এবং অন্যান্য মাধ্যমে যেমন স্থানীয় যোগাযোগের চ্যানেলগুলিতে (ক্যাবল অপারেটর/কমিউনিটি রেডিও) প্রচার করুন।
- স্থানীয় জনস্বাস্থ্য কর্তৃপক্ষ কর্তৃক অনুমোদিত এবং প্রত্বতকৃত বার্তা প্রচারের সামগ্রীসমূহের ব্যবহার নিশ্চিত করুন।
- সংবেদনশীল এই সময়ে, কর্মীদের অসুস্থতাজনিত ছুটির অনুমোদন নিশ্চিত করতে হবে।

উপরে উল্লেখিত ব্যবস্থা গ্রহণের মাধ্যমে কোভিড-১৯ এর বিতরণ রোধ করা সম্ভব।

২. সভা, সমাবেশ ও জনসমাগমে কোভিড-১৯ এর সম্ভাব্য ঝুঁকিগুলি এড়িয়ে চলার উপায়

সভা এবং সমাবেশ আয়োজকদের কোভিড-১৯ এর সম্ভাব্য ঝুঁকি নিয়ে ভাবতে হবে কারণ-

- সভায় বা সমাবেশে উপস্থিত অনেকেই অন্ধায়ে এই ভাইরাস বহন করতে পারে যার ফলে অন্যরা তাদের সংস্পর্শে এসে কোভিড-১৯ এ সংক্রমিত হতে পারে।
- অধিকাংশ মানুষের জন্য কোভিড-১৯ মারাত্মক না হলেও অনেকের জন্য এটা মারাত্মক ও জীবনঘাতী হতে পারে। প্রতি ৫ জনের ১ জন কোভিড-১৯ আক্রান্ত রোগীর হাসপাতালে চিকিৎসা প্রয়োজন।

কোভিড-১৯ ঝুঁকি প্রতিরোধ বা হ্রাস করার জন্য বিবেচিত মূল বিষয়গুলি নিম্নরূপঃ

ক) সভা বা অনুষ্ঠানের পূর্বে-

- কোন সভা করার পূর্বে সভা স্থানের যথাযথ কর্তৃপক্ষের পরামর্শ মোতাবেক ব্যবস্থা গ্রহণ করা।
- সভা বা অনুষ্ঠানে সংক্রমণ প্রতিরোধের জন্য একটি প্রত্নতি পরিকল্পনা গ্রহণ করা।
- সকলের উপস্থিতিতে সভা বা অনুষ্ঠান আয়োজনের প্রয়োজন কিনা তা বিবেচনা করা। টেলিফোনকোলে বা ইন্টারনেটের মাধ্যমে অনলাইনে সভা আয়োজন করা সম্ভব কিনা তা যাচাই করে দেখা।
- সভা বা অনুষ্ঠানটি ছোট পরিসরে করা যেতে পারে কি না সেটি বিবেচনা করা যাতে লোক সমাগম কম হয়।
- জনস্বাস্থ্য এবং স্বাস্থ্যসেবা কর্তৃপক্ষের সাথে আগেই যোগাযোগ করা এবং তাদের সকল রকম তথ্য দিয়ে সহযোগিতা করা। তাদের পরামর্শ ও সুপারিশ মেনে চলতে হবে।
- সভায় কোভিড-১৯ এর সংক্রমণ প্রতিরোধের যথাযথ ব্যবস্থাপনার নিমিত্তে সকলের জন্যে টিসু, সাবান এবং হ্যান্ড স্যানিটাইজারসহ সকল প্রয়োজনীয় সামগ্রীর পর্যাপ্ত সরবরাহ নিশ্চিত করা। প্রয়োজনে উপকরণগুলোর প্রি-অর্ডার করা।
- স্বাস্থ্যকর্মীর সমস্যার উপসর্গ কারো মাঝে দেখা দিলে তার জন্য মেডিক্যাল/পার্মিডিক্যাল মাস্ক সরবরাহের ব্যবস্থা রাখতে হবে।
- যেখানে কোভিড-১৯ ভাইরাস বিস্তার লাভ করছে সেখানে সক্রিয় পর্যবেক্ষণ নিশ্চিত করতে হবে। সভায় অংশগ্রহণকারীদের আগাম পরামর্শ দিতে হবে যে, যদি তাদের কারো মধ্যে কোভিড-১৯ সংক্রমণের এর কোন লক্ষণ দেখা যায় বা কেউ যদি অসুস্থতা বোধ করেন তাহলে সভায় তাদের উপস্থিতি হওয়া কাম্য নয়।
- সভা/ অনুষ্ঠানের আয়োজক অবশ্যই অংশগ্রহণকারী, খাবার পরিবাহনকারী এবং দর্শকদের মোবাইল/ টেলিফোন নম্বর, ই-মেইল ও তাদের বাসস্থানের বিস্তারিত ঠিকানা সংগ্রহ করবেন। যদি কোন অংশগ্রহণকারী সন্দেহজনক সংক্রামক ব্যাধিতে আক্রান্ত হয়ে থাকেন তাহলে তার সকল তথ্য স্থানীয় জনস্বাস্থ্য কর্তৃপক্ষকে সরবরাহ করতে হবে এবং তথ্য প্রদান নিশ্চিত করবেন। কোন অংশগ্রহণকারী তার কোন তথ্য স্থানীয় জনস্বাস্থ্য কর্তৃপক্ষকে প্রদানে অস্বীকৃতি জানালে তিনি ঐ অনুষ্ঠান বা সভায় অংশগ্রহণ করতে পারবে না।
- সভায় অংশগ্রহণকারী কারো মধ্যে কোভিড-১৯ সংক্রান্ত যে কোন ধরনের উপসর্গ (শুকনো কাশি, জ্বর, অসুস্থতা) দেখা দিলে নিম্নোক্ত ব্যবস্থা গ্রহণ করতে হবে-
 - অসুস্থ বোধ করছে বা লক্ষণ রয়েছে এমন ব্যক্তিকে জনসমাগম হতে বিচ্ছিন্ন করে নিরাপদে রাখার জন্য একটি বক্স বা অঞ্চল চিহ্নিত করতে হবে।
 - সেখান থেকে অসুস্থ ব্যক্তিকে কিভাবে নিরাপদে স্বাস্থ্যকেন্দ্রে/হাসপাতালে স্থানান্তরিত করা যায় তার পরিকল্পনা থাকতে হবে।
 - যদি সভায় বা অনুষ্ঠানে অংশগ্রহণকারী কোন সদস্য, কর্মী বা পরিষেবা প্রদানকারীর কোভিড-১৯ টেস্টের ফল পজিটিভ হয় সেক্ষেত্রে কি করণীয় তা পূর্বেই ঠিক করে রাখতে হবে।

- কর্মক্ষেত্রের স্বাস্থ্যসেবা প্রদানকারী অথবা জনস্বাস্থ্য কর্তৃপক্ষ অথবা স্বাস্থ্য বিভাগকে গৃহীত সকল পরিকল্পনাগুলো সম্পর্কে পূর্বেই অবহিত করতে হবে।

খ) সভা বা অনুষ্ঠান চলাকালীন সময়ে -

- আয়োজিত সভা বা অনুষ্ঠানে অংশগ্রহণকারীদেরকে মৌখিক বা লিখিত ভাবে কোভিড-১৯ সংক্রান্ত সকল তথ্য প্রদান করতে হবে। অনুষ্ঠানের নিরাপত্তার স্বার্থে আয়োজক কর্তৃক গৃহীত পদক্ষেপ সম্পর্কে অংশগ্রহণকারীদের অবহিত করতে হবে।
- স্পর্শহীন সঞ্চোধনের উপায়গুলি প্রচার ও অনুশীলন করতে হবে এবং অন্যের সংস্পর্শ যথাসম্ভব পরিহার করতে হবে।
- সভায় অংশগ্রহণকারীদের নিয়মিত হাত ধোয়া বা হ্যান্ড রাব বা অ্যালকোহল সমৃদ্ধ হ্যান্ড-স্যানিটাইজার ব্যবহারে উৎসাহিত করতে হবে।
- অংশগ্রহণকারীরা যেন হাঁচি বা কাশি দেয়ার সময় টিস্যু ব্যবহার করে অথবা কনুইয়ের ভাঁজে হাঁচি-কাশি দেয় সে বিষয়ে বারবার অবহিত করতে হবে এবং পরবর্তীতে সেই টিস্যু বা কাপড় যেন ঢাকনা যুক্ত পাশে ফেলে দিতে পারে সেই ব্যবস্থা করতে হবে।
- জ্বরুরি অবস্থায় যোগাযোগের জন্য অংশগ্রহণকারীদের একটি ঠিকানা অথবা হটলাইন নম্বর সরবরাহ করতে হবে যাতে তারা পরামর্শের জন্য যোগাযোগ করতে পারে বা কোন তথ্য দিতে পারে।
- অনুষ্ঠানের ডেন্যুটিতে সহজে দৃশ্যমান হয় এমন একাধিক জায়গায় অ্যালকোহল সমৃদ্ধ হ্যান্ড-স্যানিটাইজার বা হ্যান্ড রাব রাখার ব্যবস্থা করতে হবে।
- আসনগুলো এমনভাবে সাজাতে হবে যাতে অংশগ্রহণকারীরা পরস্পরের থেকে কমপক্ষে এক মিটার দূরে অবস্থান করতে পারে।
- পর্যাপ্ত বাতাস চলাচলের সুব্যবস্থা নিশ্চিত করার জন্য যখনই সম্ভব ডেন্যুর জানালা এবং দরজা খুলে রাখতে হবে।
- যদি কেউ অসুস্থতা অনুভব করে তবে পূর্বপরিকল্পিত প্রকৃতি অনুসরণ করুন বা জ্বরুরি নাম্বারে যোগাযোগ করুন।
- সভাস্থলের আঞ্চলিক পরিস্থিতি বা অংশগ্রহণকারীদের সাম্প্রতিক ভ্রমণের উপর নির্ভর করে অসুস্থতাবোধ করা ব্যক্তিকে একটি সম্পূর্ণ বিচ্ছিন্ন কক্ষে রাখতে হবে। তাকে একটি মাস্ক সরবরাহ করুন যাতে বাড়ি ফিরাতে পথের অন্য কাউকে সংক্রমিত না করে। অন্যথায় পূর্বনির্ধারিত সনাক্তকরণ কেন্দ্রে নিয়ে যান।
- সকল অংশগ্রহণকারীকে তাদের সহযোগিতার জন্য ধন্যবাদ জ্ঞাপন করতে হবে।

গ) সভা বা অনুষ্ঠান পরবর্তী করণীয় -

- কমপক্ষে এক মাসের জন্য সমস্ত অংশগ্রহণকারীদের নাম এবং যোগাযোগের ঠিকানা সংগ্রহে রাখুন। যাতে অনুষ্ঠান পরবর্তীতে অসুস্থ হয়ে পড়া যে কোন অংশগ্রহণকারীকে জনস্বাস্থ্য কর্তৃপক্ষ সহজেই খুঁজে বের করতে পারে।
- যদি সভা বা অনুষ্ঠানে কোন সন্দেহভাজন কোভিড-১৯ রোগীকে পাওয়া যায় তবে তাকে আলাদা করতে হবে। অন্যান্য অংশগ্রহণকারীদের এ বিষয়ে জানাতে হবে এবং তাদেরকে পরবর্তী ১৪ দিন পর্যন্ত কোন ধরনের লক্ষণ দেখা যায় কিনা তা প্রতিদিন পর্যবেক্ষণ করার ও দিনে দু'বার করে দেহের তাপমাত্রা পরিমাপের পরামর্শ দিতে হবে।

- যদি তাদের কারো হালকা কাশি বা জ্বর (যেমন ৩৭.৩ ডিগ্রি সেন্টিগ্রেড/ ৯৯.২ ডিগ্রী ফারেনহাইট বা তার বেশি) হয় তবে তাদেরকে বাড়িতে থাকা এবং পরিবার হতে সাময়িকভাবে বিচ্ছিন্ন থাকার পরামর্শকরণে হবে। এর অর্থ হল পরিবারের সদস্যসহ অন্যান্য ব্যক্তিবর্গের সাথে ঘনিষ্ঠ যোগাযোগ (কমপক্ষে ১ মিটার দূরত্ব) এড়িয়ে চলতে হবে।
- স্থানীয় জনস্বাস্থ্য কর্তৃপক্ষকে সভায় অংশগ্রহণকারীদের সাম্প্রতিক ভ্রমণ এবং উপসর্গের বিশদ তথ্য প্রদান করতে হবে।
- সকল অংশগ্রহণকারীকে তাদের সহযোগিতার জন্য ধন্যবাদ জ্ঞাপন করতে হবে।

৩. কর্তৃপক্ষ ও কর্মীগণের ভ্রমণকালীন সময়ে সাবধানতাঃ

ক) ভ্রমণের আগে-

- কোভিড-১৯ সংক্রমিত এলাকার সর্বশেষ পরিস্থিতি সম্পর্কে সংশ্লিষ্ট সংস্থার কর্মকর্তা এবং কর্মচারীদের অবশ্যই জেনে নিতে হবে।
- সর্বশেষ তথ্যের ভিত্তিতে সংস্থার কর্মকর্তা-কর্মচারীদের আসন্ন ভ্রমণ পরিকল্পনা সম্পর্কিত সুযোগ সুবিধা এবং ঝুঁকিগুলো মূল্যায়ন করতে হবে।
- কোভিড-১৯ ছড়িয়ে পড়া এলাকায় অসুস্থ এবং ঝুঁকিতে থাকা কর্মচারীদের প্রেরণ করা যথাসম্ভব এড়িয়ে চলতে হবে।
- কোভিড-১৯ আক্রান্ত এলাকায় ভ্রমণের পূর্বে সংশ্লিষ্ট কর্মচারীদেরকে কোভিড-১৯ সম্পর্কে বিজ্ঞ এবং উপযুক্ত কোন ব্যক্তি (যেমন- সংস্থার স্বাস্থ্যসেবা প্রদানকারী, স্থানীয় জনস্বাস্থ্য কর্তৃপক্ষ) দ্বারা ঐ স্থানের সুযোগ সুবিধা সম্পর্কে অবহিত করতে হবে।
- ভ্রমণ করতে যাওয়া কর্মচারীদের হ্যান্ড রাব / হ্যান্ড স্যানিটাইজার এর ছোট বোতল (১০০ মিলি এর নীচে) সরবরাহ করতে হবে যাতে তারা নিয়মিত হাত পরিষ্কার রাখতে পারে।

খ) ভ্রমণের সময়:

- বারবার হাত ধোয়ার বিষয়ে উৎসাহিত করতে হবে এবং হাঁচি-কাশি আছে এমন লোকদের কাছ থেকে কমপক্ষে এক মিটার/তিন ফুটের অধিক দূরে থাকতে সংশ্লিষ্ট কর্মকর্তা-কর্মচারীদের নির্দেশ দিতে হবে।
- ভ্রমণের সময় কর্মচারীদের কেউ অসুস্থ বোধ করলে তার জন্য করণীয় এবং কার সাথে যোগাযোগ করবেন তা জানিয়ে দিতে হবে।
- কর্মকর্তা-কর্মচারীরা যেখানে ভ্রমণ করবেন সেখানকার স্থানীয় কর্তৃপক্ষের নির্দেশাবলী যেন সঠিকভাবে মেনে চলে সেটা নিশ্চিত করতে হবে যেমন- যদি স্থানীয় কর্তৃপক্ষ তাকে কোন জায়গায় যেতে নিষেধ করেন তাহলে সেখানে না যাওয়া। কর্মকর্তা-কর্মচারীদের স্থানীয় ভ্রমণ, চলাচল বা বড় সমাবেশ সম্পর্কিত বিধিনিষেধ মেনে চলতে হবে।

গ) ভ্রমণ থেকে ফিরে আসলে:

- কোভিড-১৯ ছড়িয়ে পড়া এলাকা থেকে ফিরে আসা কর্মচারীদের কোভিড-১৯ এর উপসর্গ পর্যবেক্ষণের জন্য ১৪ দিনের নজরদারিতে (কোয়ারেন্টাইনে) রাখতে হবে। তাদের শরীরের তাপমাত্রা দিনে দুবার করে মাপতে হবে। এসময় তারা বাড়িতেই অবস্থান করবে।

- ✓ যেসব ক্ষুদ্র ও মাঝারী ব্যবসা প্রতিষ্ঠানগুলো অনুরীক্ষেত্রে নিজস্ব কর্মীদের স্বাস্থ্য ও কল্যাণের বিষয় নিশ্চিত করতে সমর্থ নয় তাদেরকে আগ্রিম স্থানীয় স্বাস্থ্যসেবা প্রদানকারীদের সাথে যৌথ পারস্পরিক সহযোগিতার পরিকল্পনা করতে হবে।
- ✓ এই পরিকল্পনা তৈরির জন্য স্থানীয় ও জাতীয় পর্যায়ের জনস্বাস্থ্য কর্তৃপক্ষ সহযোগীতা প্রদানেরও প্রস্তাব দিতে পারে।

মনে রাখা অনুরী:

কোভিড-১৯ এর জন্য প্রস্তুত হওয়ার সময় এখনই। এক্ষেত্রে সাধারণ সতর্কতা এবং সঠিক পরিকল্পনা গ্রহণ কোভিড-১৯ প্রতিরোধে বড় ভূমিকা রাখতে পারে। অবিলম্বে নেয়া সঠিক পদক্ষেপ আপনার কর্মক্ষেত্র ও কর্মচারীদের রক্ষা করতে সহায়তা করবে।

COVID-19 Health and Safety Guidance for the Construction Workforce

COVID-19 Health and Safety Guidance for the Construction Workforce

INSTRUCTIONS

Contractors are required to ensure health and safety of the workers and employees in accordance with environmental health and safety (EHS) provisions of the contract which is in line with ADB SPS 2009 and Bangladesh Labor Law 2006 (Chapter VIII). A supplementary EHS guidelines was prepared to ensure that workers and employees are safe from Pandemic COVID-19 infection while working at the construction sites. This guideline should be used as a supplement to the project's Environmental Health and Safety (EHS) guidelines for the workers. Contractors are encouraged to prepare a site-specific Environmental Health and Safety (EHS) guidelines for reopening the sites and mobilizing labor and resources and get it approved by Executing Agency. The EHS guidelines and COVID-19 EHS guidelines should be available at worksite all the time with no exception.

Prerequisites for Reopening Worksite

1. Consider reopening at limited scale by identifying and engaging essential labor force
2. Avoid worker intensive works as much as possible; encourage use of equipment
3. Engage fulltime EHS professional to oversee the implementation of EHS guidelines
4. Engage a medical professional to prepare health record of the workers and daily health checkup
5. Ensure coverall Personal Protective Equipment (PPE) for medical professional
6. Prepare a list of equipment and vehicles to be used frequently and ensure routine disinfection
7. Make available thermometer, soap, hand sanitizer, disinfectant, and PPE (mask, gloves, boot) at worksite and camp
8. Place adequate number of washbasins, disinfectant tub, dispenser for sanitizer
9. Establish electronic payment system (e.g., BKash, Nagad, Rocket) to pay the daily wage
10. Follow the guidance as provided below.



Locate the closest medical facility equipped with COVID -19 and contact them.



Place washbasins and disinfectant tub for shoes.



Engage EHS professional. Engage Medical professional (fulltime/ part-time).



Place a few COVID-19 signed covered trash bin for disposal of used PPEs.



Supply soap and sanitizer to labor and staff for after office for disinfection.

Worksite Entrance Protocol



Everyone entering the worksite must wear a mask and gloves.



During worksite entry que, maintain physical distance of minimum 1m (3ft).



Every personnel should wash their hands with soap for 20 seconds. Display hand washing protocol at entrance.



Spray bottom of shoes of every personnel entering worksite/campsite with disinfectant. Disinfect all vehicles entering site.



use thermometer gun to check temperature. If body temperature found $> 37^{\circ}\text{C}$ send to the designated medical facility.

Worksite Management



Frequently clean and disinfect highly used tools, machineries and surfaces (e.g. tables, toilets) by workers.



Mandatory morning briefing on COVID awareness at site maintaining physical distance.



Use alcohol-based wipe to clean tools, equipment, vehicle before and after use.



Discourage gathering at site. Discourage unnecessary entrance and exit at site.

Camp Management

1. Provide soap, sanitizer, washing facility and safe water at the workers' dwelling. Encourage frequent hand washing.
2. Ensure separate covered bin for disposal of used PPEs.
3. Protect against heat, cold, damp, noise, fire, and disease-carrying animals.
4. Maintain good housekeeping and social distancing in kitchens, meal rooms, canteens.
5. Ensure personal distance at least 1 meter (3 feet), preferably 2m (6ft) during lunch, dinner and prayer.
6. Ensure ample ventilation at the camp.



Place covered waste bins at worksite
Do not forget to dispose your used PPEs in the bins!!

Work at Site Awareness



Inform the designated ESH/Medical personnel immediately if any person starts showing the symptoms of COVID-19.



Encourage respiratory etiquette, including covering coughs and sneezes. Don't touch nose/eye/mouth if not washed recently, do not spit.



Encourage the workers at camp to go out for supplies not more than once a week.



Shorten toolbox meetings. Initiate remote meeting protocol to avoid physical contact.



Stay informed. Get news from WHO and Government news outlets. Ask your EAs. Ask ADB.

COVID-19 Health and Safety guidance for the construction workforce

COVID-19 Health and Safety Guidance for the Construction Workforce

USE OF THIS DOCUMENT

This document should be used as a supplement to the Environmental Health and Safety (EHS) Manual for the workers. Make all the documents available at site all the time. Executing Agencies (EAs) are responsible for providing both documents to the contractors. Contractors should provide both documents at site. The current document should be used in conjunction with ESH manual. Consider this document as 'live document' which should be updated as new information available. A site-specific version of this document should be adopted for specific project sites.

Section 1: Pre-requisite for reopening/opening worksite/campsite:

1. Plan to open/reopen worksite at limited scale (i.e., only essential works at worksite). Map essential/unavoidable works that must be attended at this moment. Identify and engage essential labor force initially. Increase labor force step by step as necessary. Do not engage labor until necessary preparation is done as stipulated in the next paragraphs.
2. Locate the closest medical establishment equipped with COVID -19 response facilities. Establish contact with the medical facility and make agreements with them for cases of potential COVID patient from the work site.
3. Engage a full time EHS professional at site. Also engage a part-time/fulltime medical professional based on the workforce and project size/type.
4. Prepare list of potential workforce/labors. With the help of the EHS/medical professional prepare health records of the labors to be engaged. Seek assistance from registered medical centers if required. Keep the record at site office.
5. Purchase thermometer gun, soap, hand sanitizer, disinfectants and PPEs (mask, hand gloves, hard shoes etc.) and keep it at worksite office. Disinfectants can be diluted bleaching power as directed by Environmental Protection Agency (EPA).
6. Establish site entrance protocol as depicted in **Section 2** below. Redesign the site safety notices/signboards/protocol according to the guidelines provided in this document.
7. Arrange washbasin, soap and clean water at the entrance of every worksite/campsite. Also keep either a disinfectant tub for shoes or keep disinfectant spray that must be sprayed under the boots/hard shoes of the persons entering worksite. Put signboard/poster in front of the washbasin instructing the workers/staff/site visitors to wash both hands for 20 seconds. The board/poster should also display proper hand washing techniques as per WHO guidelines.
8. Provide every personnel working in the site with mask, hand gloves and hard shoes for their personal use. Strictly follow the HSE manual at site. The contractor must have a copy of the HSE manual at site. For assistance contact with relevant EAs.
9. Identify and note a list of commonly used machines/tools and surfaces (e.g. tables, doorknobs, handrail etc.) by workers and camp site dwellers.

10. Make arrangements of electronic payment system affordable for the workers (e.g., bKash, Nogod, Rocket etc.). Update company policies of paid sick leave, medical allowance and medical insurance.

Section 2: Worksite entrance protocol

1. Everyone entering the worksite must wear a mask, gloves and hard shoes. Strictly follow and implement the EHS manual at worksite.
2. At the entrance of the worksite/camp site every personnel must wash their hands for 20 second with maintaining a distance of at least 1m (3 ft) from each other. At this rate 180 person can enter the site in an hour. Depending on this calculation (hourly rate 180pax per washbasin) the contractor can calculate the number of washbasins he/she needs to provide. The wash basins should maintain at least 1.5m distance from each other and the entrance queue must maintain 1m distance from each other.
3. Spray bottom of shoes of every personnel entering worksite/campsite with disinfectant or provide shoe storage for worker storing shoe in poly bag before entering the worksite.
4. Procure and use a thermometer gun to check temperature of everyone entering the site. If body temperature is found > 37 degrees, send this person to the designated medical facility for further examination and follow instruction of the medical person in-charge.
5. Prepare disinfectant using ICCDR, B or EPA registered household disinfectant formula (e.g., diluted bleaching powder) and disinfect vehicles upon entry to the worksite/campsite.

Section 3: Daily worksite protocols

1. A designated EHS and medical person should stay all time during work. The EHS/Medical person should also monitor campsite. He/she will be in charge of ensuring physical distances (minimum 1m) among workers, disinfecting surfaces that are commonly used and investigate workers/site personnel health and safety.
2. The designated EHS/medical person (or assistant) must frequently clean and disinfect highly used tools and machineries by workers and surfaces including doorknobs, handrails, toilets, work surfaces, and common areas such as tables, assembly place etc.
3. At the start and end of the day disinfect the total worksite. For campsite, disinfect the total area before the workers/camp dwellers are back from site.
4. Always check if the stock of disinfectant, PPEs, medical supplies are sufficient.
5. Encourage site personnel/camp dwellers to not touch their eyes, mouth or nose if not washed thoroughly with soap recently. Also discourage hand shaking or hugs.
6. Arrange a mandatory site brief on COVID awareness in the morning. The session must be conducted by the EHS/medical professional.
7. Encourage workers/site personnel/camp dwellers to inform the designated ESH/Medical personnel immediately if any colleague starts showing the symptoms of COVID-19.
8. While worksites are commonly well ventilated (if not make sure the work sites are well ventilated), ensure that the camp sites including the rooms designated for the camp dwellers are well ventilated and spacious.
9. Before sharing common tools/machines at worksite, ensure to disinfect.
10. Discourage site personnel to gather and gossip at any time, rather encourage physical distance while chatting/discussing.
11. Keep the day-to-day toolbox meetings as short as possible. Ensure physical distance during meetings.
12. Increase use for internet/phone-based meetings/site visits as much as possible to avoid travelling and physical communication.
13. Restrict worksite personnel to go outside unnecessarily. Also restrict campsite personnel to go outside without any valid cause.

14. If any person related at worksite/campsite fall victim to COVID-19 or being kept isolated for pre-caution, consider paid leave with no exception allowed.

Section 4: Everyday training

1. Train workers on how to properly put on, use/wear, and take off protective clothing and equipment. The on-site EHS/Medical person should be in-charge of these trainings. These trainings must maintain the WHO's social distancing protocol. Make these trainings mandatory at worksites. Provide 10-15 minutes of a workday for such 'training and encouragement' activities.
2. Encourage respiratory etiquette, including covering coughs and sneezes. Train the site personnel as needed.
3. Contact with EAs/ADB designated professional for any help with training material/knowledge/miscellaneous.

Section 5: Campsite management

1. Ensure sufficient stock of soap, sanitizer, washing facility and safe water at the workers' dwelling (both camp site and home). Encourage frequent hand washing and social distancing at campsite.
2. Ensure a separate covered bin in place at every campsite/worker's dwelling for disposal of used PPEs.
3. Check and ensure if camps are well ventilated and protected against heat, cold, damp, noise, fire, and disease-carrying animals.
4. Maintain good housekeeping and social distancing in kitchens, meal rooms, canteens and toilets. Make sure campsites are using sanitary toilets.
5. Ensure personal distance at least 1 meter (3 feet), preferably 2m (6ft) during lunch, dinner and prayer.

Section 6: Knowledge management and documentation

1. During COVID-19 outbreak new information is coming everyday as the science develops. Site management needs to evolve as new information/current protocol emerges. It is difficult for site medical/EHS professional to keep up with the new knowledge/information that is coming every day in absence of fast internet. Hence, he/she should keep in close contact with the designated EAs/ADB professional for updated information and protocol. This documents also needs to be considered as live document and should be updated as necessary.

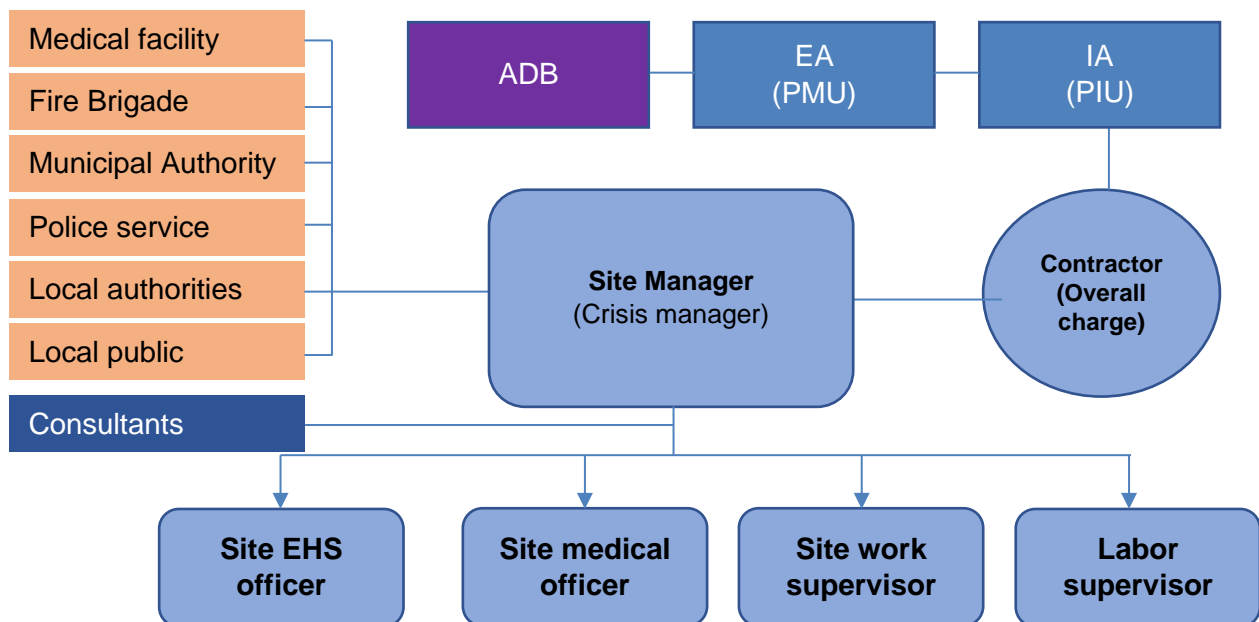
Emergency response team (COVID-19)

EMERGENCY/CRISIS RESPONSE TEAM (Roles and Responsibilities)

A. Overview

An integrated approach to emergency response involves a range of stakeholders, including the primary responder (i.e., the contractor), supervision consultants, the secondary responder (i.e., EA/IAs) and the tertiary responder (i.e., Donor agencies (e.g., ADB)) along with the local authorities, regulatory agencies and the general public. Such a system therefore requires robust processes regarding information dissemination, training, and designation of responsibility, management actions, monitoring, control, and corrective actions. The Emergency/Crisis Response Team therefore needs to be fully equipped and well communicated.

B. Organization chart of crisis response team



Explanation of color code:

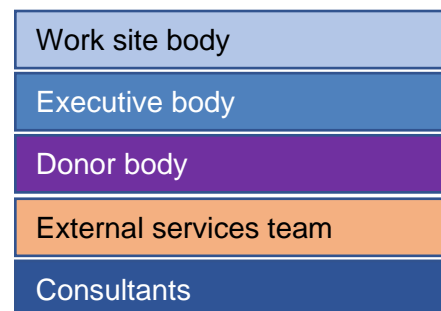


Figure: Organization chart of the crisis management team

Table: Crisis response team

No.	Name	Designation	Mobile no.
1		Site Manager	
2		EHS officer	
3		Medical officer	
4		Worksite supervisor	
5		Labor supervisor	
6		Contractor	
7		Local hospital	
8		Local police station	
9		Local fire brigade	
..			

APPENDIX 7: RECORD OF FOCUS GROUP DISCUSSION

Name of the component: Cyclone Shelter
Location: Gazi Bari Madrasha, Word 07
Number of Participants=13 ;(Male- 13 and Female- 0)
Date: 5 May 2020
Time: 12.00 pm
Conducted by: Md.Sohidul Islam
Designation: Assistant Engineer Lalmohon Pourashava

Issues discussed

- Opinions of local people for construction of cyclone shelter at this place;
- Ownership of land and conditions for offering land for cyclone shelter
- Resettlement and Environmental issues
- Support of local community for constructions and maintenance;

Summary of FGD

The community people, representatives and concerned officials of the Pourashava are quite aware about CTCRP and Cyclone Shelters to be constructed under this project. During feasibility phase FGD and Public consultations were conducted with the representatives, officials and community people for site selection and construction of cyclone shelter at the proposed location. The representatives of Pourashava, Institutions and local people considered that the selected sites are suitable from technical and social point of view. The management offered these lands for the construction of the cyclone shelter free of cost. In addition, the management committee assured that they would provide maintenance service on a regular basis. The selected sites are free from resettlement and environmental impacts.

The local people have expressed their greater interest for this cyclone shelter for their safety during disaster period and using this facility for education purpose. They have also assured that they will provide required support in construction, operations and maintenance of this cyclone shelter. Pourashava, Institutions' management and local community will be responsible for providing required services for construction, operation and maintenance of cyclone shelter. The services/uses of cyclone shelter will result in saving lives of local people and reduce damage to their properties that caused due to irregular disaster in this coastal area. The Pourashava & Madrasha management will replace unauthorised family & replant trees for environmental protection and producing more fruits in this land. The Madrasha management and students expressed their great interest to build up this proposed cyclone shelter in this land, because they will use it as class room in most of the time except disaster period.

The local people male and women equally interested for construction of the cyclone shelter at this place. During disaster people will have easy access to this shelter. The community as a whole will support construction of cyclone shelter and provide maintenance service on



Photo of FGD: Gazibari Madrasa, (Word 07), Lalmohan

Summary of Public Consultation

Date	Place / Location	Participants (with sex disaggregated data)	Key issues raised by the participants	Response by Project Proponent
5/5/2020	Gazi Bari Madaras ha	Total: 13 Male: 13 Female: 0	What is the construction plan of the proposed cyclone shelters	It will be three storied building with required facilities for women and children
			Who will be responsible for construction and operations	Pourashava will execute the construction work and Madrasha authority will be responsible for operation and maintenance of the proposed cyclone shelter.
			How will Pourashava support cost for major maintenance	This is the responsibility of the Pourashava to manage required fund for repair and maintenance, as well as logistics during disaster period for realizing development objective of this project
			What will be the criteria for labour recruitment during construction?	This largely depends on the types of job and will be assessed on a case-to-case basis by the contractor according to needs.
			Happy for this project, as it comes to solve the problem of shelter during storms	Accepted thankfully
			How does this project help vulnerable people, people with disabilities?	The layout has provided separate space for male, female and pregnant women including separate toilet. Ramp access to ground floor is provided to take care of people with disabilities.

			Priority for jobs should also consider women; women can do the same work.	Priority will include women and there will not be any discrimination in daily wages.
			Raised the issue of employment, he suggested that the local people should be the first ones to be employed in the project.	The consultant team explained that local people will be employed accordingly to job requirement.
			Wishes to speed up the project	It was explained that implementation will take place immediately after the rainy season after getting all necessary clearance from the authority.
			The construction creates lot of dust and noise, is there any increase anticipated.	The increase in dust and noise at construction site will be mitigated by the contractor through project IEE.

Attendance Sheet for FGD

**Second Coastal Towns Environmental Infrastructure Improvement Project
(SCTEIP-II)
Local Government Engineering Department (LGED)**

Name of Pourashava: Lalrecha
Date:


Word No:
Time:

SL.NO	Name	Mobile No	Signature
1.	সুপারভাইজার ফজল	০১৭৯২০৭২০০	[Signature]
2.	আই.এম. জাহাঙ্গীর হোসেন	০১৪২০৫০২০৪৫	[Signature]
3.	মি: হাফিজ	০১৭১৫৩২০২২	[Signature]
4.	মি: বাবুল আলম	০১৭১৪১৫০৫৪৭	[Signature]
5.	মি: মাহবুব হোসেন	০১৭৪৬৪৩৬৪১	[Signature]
6.	মি: মাহবুব	০১৩০৪৩০৩৭২৭	[Signature]
7.	মি: মোহাম্মদ হুমায়ুন	০১৭১৩০৭৩৫২০	[Signature]
8.	মি: মো: মোহাম্মদ আল	০১৭২১৭৪৫৭৭	[Signature]
9.	মি: মো: মোহাম্মদ আল	০১৩১৫৬১২১৭৬	[Signature]
10.	মি: মো: মোহাম্মদ আল	০১৭৩৬৭৪৭৩৩৬	[Signature]
11.	মি: মো: মোহাম্মদ আল	০১৭১২৭৩২২৭৬	[Signature]
12.	মি: মো: মোহাম্মদ আল	০১৭৩০৪০০২০০	[Signature]
13.	মি: মো: মোহাম্মদ আল	০১৭৬৬৬৬৫৬৭	[Signature]
14.			
15.			
16.			
17.			
18.			
19.			
20.			
21.			
22.			

No Objection Certificate from Lalmohan Paurashova

গণপ্রজাতন্ত্রী বাংলাদেশ সরকার

৳১০০



৳১০০

৪৮৬১৭০৭

অনাপত্তি নামা

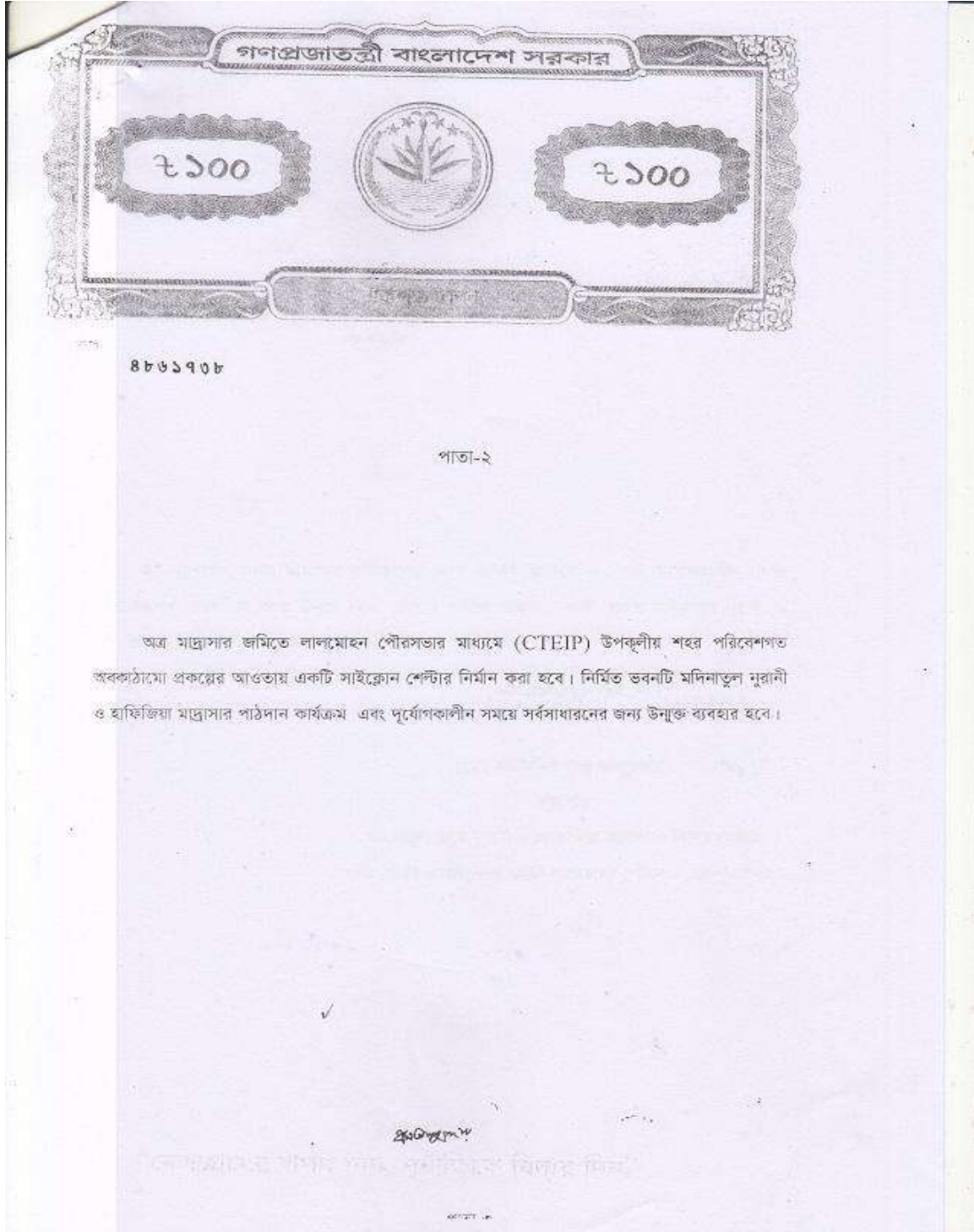
আমি নিম্ন স্বাক্ষরকারী মোঃ মহিউদ্দিন বাচ্চু তাপুকদার সভাপতি মদিনাতুল উলুম নূরানী ও হাফেজিয়া মাদ্রাসা ও সিন্দাহ বোর্ডিং, গাজি বাড়ির দরজা, ৭নং ওয়ার্ড লালমোহন পৌরসভা, জেলা-ভোলা।

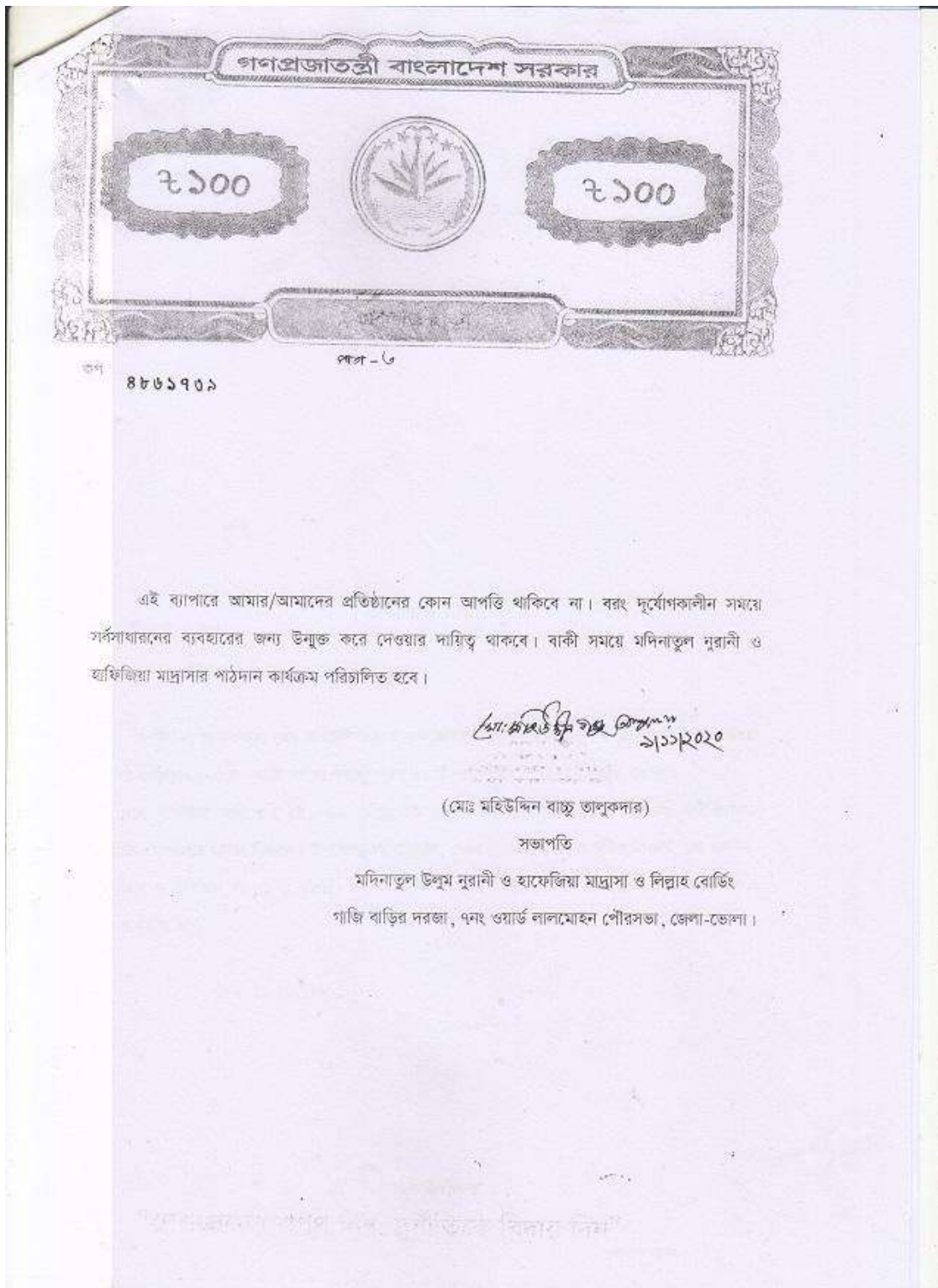
এই মর্মে অঙ্গিকার করিতেছি যে, অত্র প্রতিষ্ঠানটি ভোলা জেলার লালমোহন পৌরসভার ৭নং ওয়ার্ডে অবস্থিত। মাদ্রাসার জমির বিবরণ। উপজেলা-লালমোহন, জেলা-ভোলা। মৌজাঃ মুন্সির হাওলা, জে এল নং- ১৮, এস এ খতিয়ান নং ৪১ ও ২৩৯। এস এ দাগ নং ২৪৬, ২৪৮, ২৫০ ও ২৫১। জমির পরিমাণ = ৪৮১৩ ডেসিমেল।

২০/০৫/২০২০

চলমান পাতা-

NOC for the proposed Cyclone Shelter at Gazi Bari Madrasa under CTEIP project. Based on the meeting held on 20/05/2020 the Madrasa Management Committee providing the NOC about the proposed cyclone shelter within the madrasa premises mentioning that a total 4813 decimal land (4813 decimal under Muza: Mounshi Hawla, JL No. 18, S A Khotian No-41, 239 and Dag- No 246, 248, 250, and 251, 4813decimal,). The Madrasa committee does not have any objection to construing the cyclone shelter within the madrasa complex.





Meeting organized by the Madrasa Management Committee on 09/11/2020 where secretary, joint-secretary, general secretary, cashier and member took part. In the meeting discussed about

providing the NOC about the proposed cyclone shelter within the madrasa premises mentioning that total 25 decimal land will be provided to construct a Cyclone Shelter under the CTEIP project which will not only support the during disaster period to the local habitants but also support the Madrasa to operate schooling in a better condition (classrooms, teachers' room, toilet facility etc.)

Annexure 7 Governing Body Regulation

রেজুলেশন বহি মিটিং নং

প্রতিষ্ঠানের নাম মাদিনাতুল উলুম নূরানী ও হাজেজিয়া মাদ্রাসা

মিটিং-এর স্থান মাদ্রাসা কক্ষ

তারিখ ০৯/০১/২০২০ রোজ দুসোহর সময় সন্ধ্যা ৭টা

উপস্থিত সদস্যগণের নাম যাকুর

পরিচয় কোরান মেদক তেলোয়াহ মোনার পর
 সভার কার্যক্রম- শুধু ক্রমা সূত্রপতি মাহাদমুর
 নির্দেশে- প্রতিষ্ঠান দুই নং হাজেজিয়া (মাদ্রাসা) জাকির
 মোহাম্মদ সাব্বের- বিদ্যুৎ ও গ্যাসের সিস্টেম সমূহ পাঠ
 করিয়া উপস্থিত সদস্যগণকে জানান।
 ১নং আলোচ্য- বিদ্যুৎ আলোচনা:- পূর্ববর্তী সভার
 সিদ্ধান্তের উপর কাহারো কোন আপত্তি পাওয়া
 যায় নাই।

* সিদ্ধান্ত:- পূর্ববর্তী সভার সিদ্ধান্ত সমূহ - মর্ব মজমুতি -
 ক্রমে অনুমোদিত হয়।

* * দ্বিতীয় আলোচ্য বিদ্যুৎ ও গ্যাসের আলোচনা:-
 মোক্তা আলোচনার প্রথমে মাদ্রাসার প্রধান শিক্ষক
 জনাব মোহাম্মদ জাকির মোহাম্মদ মোদক জানান যে
 উপস্থিত সদস্যগণের পরিদর্শন ও অবকাঠামো পর্যালোচনা
 লালিমোহাম্মদ মোদক সাব্বের একই ধরনের আলোচনা
 কেন্দ্রে আতিথ্য- হুজুর জাকির মোদক সাব্বের ৭৩৬নং
 ভাষার তিনজন কমিশনারের মজমুতি মোদক সাব্বের
 সভার মাননীয় মেয়র মেয়র মাহাদমুর মোদক সাব্বের
 মাহাদমুর হুজুর মোদক সাব্বের আলোচনা কেন্দ্রে ৭নং
 ওয়ার্ডের মাদিনাতুল উলুম নূরানী ও হাজেজিয়া
 মাদ্রাসার কার্যক্রম প্রতিষ্ঠিত ২৩নং অধ্যক্ষকে
 মোদক সাব্বের উপস্থিত সদস্যগণ কাউন্সিলের বৃদ্ধের
 মোদক সাব্বের ও মেয়র মাহাদমুর মোদক সাব্বের
 হুজুর মোদক সাব্বের।

এরপর মাদ্রাসার শিক্ষক কার্যক্রম হুজুর- ধানিকাতা
 আলোচনা কেন্দ্রে- ৩৭ জন- জাকির মোদক সাব্বের
 জাকির মোদক সাব্বের আলোচনার মর্ব মজমুতি মোদক
 সাব্বের সিদ্ধান্ত হুজুর মোদক সাব্বের পর পূর্ণাঙ্গ উপস্থিত
 করা হইল।

রেজুলিউশন বহি

মিটিং নং

প্রতিষ্ঠানের নাম মাদিনা কুল উলুখ নুরানী ড হাফেজিয়া মাদরাসা

মিটিং-এর স্থান মাদরাসা কক্ষ

তারিখ ০৩/০১/২০২০ রোজ সোমবার সময় সকাল ৭টা

উপস্থিত সদস্যগণের নাম

স্বাক্ষর

১/ অফিসিয়ার বাচ্চু আলীদার -

অফিসিয়ার

২/ জনাব মোহাম্মদ কবীর -

মোহাম্মদ কবীর

৩/ মোহাম্মদ আলী আমিন -

মোহাম্মদ আলী

৪/ মোঃ জাকির হোসেন

জাকির হোসেন

৫/ মোঃ আবদুল হক

আবদুল হক

৬/ মোঃ মোহাম্মদ আলী

মোহাম্মদ আলী

৭/ মোঃ ইমদাদুল হক

ইমদাদুল হক

৮/ মোঃ মোহাম্মদ আলী

মোহাম্মদ আলী

৯/ মোঃ মোহাম্মদ আলী

মোহাম্মদ আলী

১০/ মোঃ মোহাম্মদ আলী

মোহাম্মদ আলী

১১/ মোঃ মোহাম্মদ আলী

মোহাম্মদ আলী

১২/ মোঃ মোহাম্মদ আলী

মোহাম্মদ আলী

১৩/ মোঃ মোহাম্মদ আলী

মোহাম্মদ আলী

১৪/ মোঃ মোহাম্মদ আলী

মোহাম্মদ আলী

১৫/ মোঃ মোহাম্মদ আলী

মোহাম্মদ আলী

১৬/ মোঃ মোহাম্মদ আলী

মোহাম্মদ আলী

১৭/ মোঃ মোহাম্মদ আলী

মোহাম্মদ আলী

১৮/ মোঃ মোহাম্মদ আলী

মোহাম্মদ আলী

১৯/ মোঃ মোহাম্মদ আলী

মোহাম্মদ আলী

২০/ মোঃ মোহাম্মদ আলী

মোহাম্মদ আলী

২১/ মোঃ মোহাম্মদ আলী

মোহাম্মদ আলী

২২/ মোঃ মোহাম্মদ আলী

মোহাম্মদ আলী

২৩/ মোঃ মোহাম্মদ আলী

মোহাম্মদ আলী

২৪/ মোঃ মোহাম্মদ আলী

মোহাম্মদ আলী

২৫/ মোঃ মোহাম্মদ আলী

মোহাম্মদ আলী

২৬/ মোঃ মোহাম্মদ আলী

মোহাম্মদ আলী

২৭/ মোঃ মোহাম্মদ আলী

মোহাম্মদ আলী

২৮/ মোঃ মোহাম্মদ আলী

মোহাম্মদ আলী

২৯/ মোঃ মোহাম্মদ আলী

মোহাম্মদ আলী

রেজুলিউশন বহি

২৭/মোঃ সোঃ ২৫ আশী

মোঃ সোঃ ২৫ আশী

২৭/মোঃ ৩৭

২৭/মোঃ সোঃ সোঃ সোঃ

মোঃ সোঃ সোঃ সোঃ

২৭/মোঃ সোঃ সোঃ সোঃ

সোঃ সোঃ সোঃ

৩০/মোঃ সোঃ সোঃ সোঃ

সোঃ সোঃ সোঃ

৩০/মোঃ সোঃ সোঃ সোঃ

সোঃ সোঃ সোঃ

৩০/মোঃ সোঃ সোঃ সোঃ

সোঃ সোঃ সোঃ

৩০/মোঃ সোঃ সোঃ সোঃ

সোঃ সোঃ সোঃ

৩০/মোঃ সোঃ সোঃ সোঃ

সোঃ সোঃ সোঃ

৩০/মোঃ সোঃ সোঃ সোঃ

অন্য ৯/১১/২০২০ তারিখ রোজ মোঃ সোঃ সোঃ সোঃ
৭ ঘণ্টিকার অমল মদিনাতুল নূরানী ও হাকেকিয়া-
মাদ্রাসার কর্তৃক এক সভা অনুষ্ঠিত হইয়া সভার
অভ্যর্থিত কর্তৃক মাদ্রাসার সভা-অভ্যর্থিত কর্তৃক
মহিউদ্দিন বাচ্চু তালুকদার।

সভায় নিম্নলিখিত বিষয়গুলির আলোচনা পূর্বক
সিদ্ধান্ত গৃহীত হইয়া

* আলোচ্য বিষয়:-

১) পূর্ব-স্বীকৃত সভার সিদ্ধান্ত অনুসরণ ও অনুমোদন।

২) উপকূলীয় পরিবেশ সংরক্ষণ আইন (এআই) অধীন-
কাল (মোঃ সোঃ সোঃ সোঃ ৭ নং ওয়ার্ড) গাড়ি বাড়ির
দরজা মদিনাতুল উলুম নূরানী ও হাকেকিয়া
মাদ্রাসার মূহুর-খুর্নিয়াত আশ্রয় কেন্দ্র নির্মাণের
নিমিত্ত উক্ত প্রকল্প বাস্তবায়নের জন্য মাদ্রাসার
নিজস্ব ভূমি হস্তান্তরের আলোচনা ও সিদ্ধান্ত গ্রহণ
করা হয়।

৩) বিবরণ।

রেজুলিউশন বহি

* * সিদ্ধান্ত :- (১) লালমোহন পৌর সভার ৭ নং ওয়ার্ড
মদিনাতুল উলুম নূরানী ও হাফেজিয়া মাদ্রাসার
স্থান-কম্পাউন্ড আশ্রয়ন কেন্দ্র নির্মাণের সিদ্ধান্ত
ও প্রকৃতি প্রদানের জন্য লালমোহন পৌর সভা ও
উপকূলীয় কক্স নরিস্থানত (হাফেজিয়া) সিকলিং (সাইক্লোন) বর্ডার
অভিযান চালায় ইত্যাদি

(২) ধারিতক আশ্রয়ন কেন্দ্র নির্মাণের ক্ষেত্রে SL no-1,
Priority SL no 1, W-7/SL-5, Construction of
Cyclone Shelters Gazi Bari Madrasa at Ward
no 07 in Lal Mohan Paurashava - কে মদিনাতুল
উলুম নূরানী ও হাফেজিয়া মাদ্রাসার নিজস্ব
দখল-অবস্থান হইতে উহার চাহিদা অনুযায়ী
কম্পাউন্ড স্থান প্রদান এবং হাফেজিয়া মাদ্রাসা
(৩) ইতিপূর্বে কম্পাউন্ড স্থান (৩০ একর) নির্ধারণ ও
প্রকৃতি = ৩০ (একর) নির্ধারণ।

(৪) ইতিপূর্বে কম্পাউন্ড স্থান :- জেলা - জেলা, উপজেলা
- লালমোহন, মেডিকা - মুন্সিগঞ্জ, জেলা, ওয়ার্ড নং ০৮,
ওয়ার্ড নং ০৮ ও ২০২ - এর কাগজ নং
২৪৩, ২৪৪, ২৫০ ও ২৫১। কম্পাউন্ড স্থান
২৫ একর
আর কোন আবেদন না থাকায় উপস্থিত
সদস্যগণকে বিনামূল্যে জানাইয়া সভাপতি পাইক
সভার সমাপ্তি ঘোষণা করেন।

স্বাক্ষরিত
অভিযান
২/১০/২০২০

সভাপতি
মদিনাতুল উলুম নূরানী
হাফেজিয়া মাদ্রাসা ও সিকলিং বর্ডার
আবু বকর, লালমোহন পৌর সভা, জেলা

APPENDIX 8: SAMPLE GRIEVANCE REDRESS FORM

(To be available in English or other local languages)

The LGED welcomes complaints, suggestions, queries, and comments regarding the project implementation. We encourage any person or group with a grievance to provide their name and contact information to get in touch with you for clarification and feedback.

Should you choose to include your details but want that information to remain confidential, please inform us by writing/typing ***(CONFIDENTIAL)*** above your name. Thank you.

Date		Place of registration			
Contact Information/Personal Details					
Name		Gender	Male	Female	Age
Home Address					
Village / Town					
District					
Phone no.					
E-mail					
Complaint/Suggestion/Comment/Question					
Please provide details of the grievance (who, what, where, and how):					
<hr/> *Note: You may attach a document, letter, or note in the grievance form.					
How do you want us to reach you for feedback or updates on your comment/grievance?					

OFFICIAL USE ONLY

Registered by: (Name of official registering grievance)	
If – then mode: ▪ Note/Letter ▪ E-mail ▪ Verbal/Telephonic	
Reviewed by: (Name, Signature, Position)	
Action Taken: (Date, Venue of Meeting, Other details)	
Whether Action Taken Disclosed:	▪ Yes ▪ No
Means of Disclosure:	

GRIEVANCES RECORD AND ACTION TAKEN

Sr. No.	Date	Name and Contact No. of Complainant	Type of Complaint	Place	Status of Redress	Remarks

APPENDIX 9: SAMPLE DAILY INSPECTION/MONITORING CHECKLIST OF CONTRACTOR

Monitoring and Reporting Template Environmental Health and Safety Monitoring

A. Environmental Health and Safety Checklist

Sl. no.	Item	Exist in the worksite?		Recommendation And/ or Remarks	Time frame to comply
		Yes <input type="checkbox"/>	No <input type="checkbox"/>		
1	Site readiness (e.g. is worksite fenced and can be distinguished from general establishment? Is an EHS professional at site? Has he/she been fulltime professional? Has he/she been present at site every day?)				
2	Site access (e.g., is site access road wide and easily accessible?)				
3	Signboard with safety warnings (e.g. with general EHS safety signboards, are COVID 19 response signboards visible at every corner of worksite?)				
4	Lighting (e.g. is every corner of the worksite is well lit?)				
5	Appropriate PPEs (Helmet, Safety Shoe, Vest, Ear plug, Musk etc.) e.g. Is every person in site is wearing appropriate PPEs?				
6	Fall protection measures (e.g. is the fall protection measures at worksite appropriate and adequate?)				
7	Fire extinguishers (e.g. are they at site? How many? Are they placed at vulnerable/most accessible places?)				
8	Housekeeping (e.g., are all workers health records kept? Is the EMP and EHS manual at site? Has the morning briefing on EHS conducted? Is there any vehicle record/material register/attendance register/complain register kept?)				
9	Garbage bins (e.g., are there garbage bins at site? Are the numbers adequate? Is waste thrown to bins? Are the bins well places?)				
10	Drinking water supply (e.g. safe drinking water for worksite been supplied? Is drinking water adequate?)				
11	Sanitation facilities (e.g. is there separate male and female toilets established? Are they adequate? Hand wash materials and water being provided at toilets? Are those toilets sanitary?)				
12	Dust protection measures (e.g. is mask provided for worksite personnel? Is water sprayed frequently as needed to suppress dust? Are sand class materials covered with plastic sheets?)				
13	Noise barrier and reduction equipment (e.g. how much noise is generated by site? Does it exceed maximum human exposure limit? Are workers provided with noise reduction gears such as ear mufflers?)				
14	Shelter (e.g. is there a site office or shelter good enough to take shelter during rain or storm event?)				
15	First aid box (e.g. is there a first aid box at site? Are the contents of the first aid box adequate for primary treatment? Is the first aid box handled by at EHS/medical professional)				

16	Toolbox meetings (e.g. are toolbox meeting regularly arranged? Are records kept?)				
17	Others (many other checklists can be formulated by the EHS professional on board)				
COVID -19 protocols on top of usual EHS checklist (this applied to campsite also)					
18	COVID-19 posters/signboards (e.g., are COVID-19 awareness/protocol posters are showing all visible corners of the site?)				
19	Entrance protocol (e.g., Is the COVID-19 worksite entrance protocol been followed as stipulated in the COVID -19 response guidance? Are adequate soaps, water has been kept at site entry? Are workers at entrance que using mask, hand gloves and hard shoes? Are disinfectant spray kept at site entry to disinfect underneath the boots of entering persons?)				
20	Vehicle entry protocol (e.g. has the vehicle disinfection protocol has been initiated?)				
21	Social distancing (e.g. are the workers maintaining social distancing all the time?)				
22	Sharing tools/machineries (e.g. are the tools and machineries are wiped to disinfect before sharing/working?)				
23	Disinfecting work area (e.g. is the worksite/ common surfaces, toilets etc. are disinfected before worksite opened in the morning? Has record being kept? Has the worksite been disinfected yesterday after closing for the day?)				
24	Restriction on worksite entry and exit (e.g. has workers being discouraged to travel frequently out of worksite or entering? Has records being kept?)				
25	Stock of disinfectant (e.g. is the stock of disinfectants, soap, PPEs are adequate at worksite?)				

*Attach photos

**Enter additional criteria as required for site specific measures

Reported by (ESC)	Checked by (TL)	Approved by (EA/IA)
Name Designation Signature Date	Name Designation Signature Date	Name Designation Signature Date
Received and agreed to comply by the representative of the contractor	Name Designation Signature Date	

B. Accident/ Incident Investigation Report

Class of Incident		Reported	
<input type="checkbox"/> Injure	<input type="checkbox"/> Property/ Plant Damage	Yes <input type="checkbox"/> No <input type="checkbox"/> Details:	
<input type="checkbox"/> Near Miss	<input type="checkbox"/> Environmental	Further Action Required	
		<input type="checkbox"/> Report to Authorities <input type="checkbox"/> Other	
Details of Incident			
Date of Incident		Time of Incident	am <input type="checkbox"/> pm <input type="checkbox"/>
Witness Name		Witness Contact	
Nature of Incident			
Location of Incident			
Description of Incident			
Details of damage to equipment/property			
Injured Person/s (if applicable)			
Name			
Address			
Date of Birth			
Occupation		Employer	
Referred/transferred to			
Recommended Preventive Action			
Details			
Completed by			
Name		Position	
Signature		Date	

C. Safety patrol/inspection report form

Date						
Inspector						
No	Location	Comment/instruction	Photo	Corrective action	Deadline	Responsible person

Reported by (ESC)	Checked by (TL)	Approved by (EA/IA)
Name Designation Signature Date	Name Designation Signature Date	Name Designation Signature Date
Received and agreed to comply by the representative of the contractor	Name Designation Signature Date	

APPENDIX 10: SAMPLE INSPECTION CHECKLIST FOR PMU/DIVISIONAL/REGIONAL OFFICE /PIU

SAMPLE INSPECTION CHECKLIST

(Note: This checklist is indicative which can be further enhanced depending on the project circumstances.)

[NAME OF ADB PROJECT] SITE INSPECTION CHECKLIST

Subproject / Location: _____

Date: _____

MONITORING/INSPECTION QUESTIONS		FINDINGS			COMMENTS / CLARIFICATIONS
1.	Supervision and Management On-Site	Yes	No	NA	
	a. Is an EHS supervisor available?				
	b. Is a copy of the SEMP available?				
	c. Are daily toolbox talks conducted on site?				
2.	The Facilities	Yes	No	NA	
	a. Are there a medical and first aid kits on site?				
	b. Are emergency contact details available on-site?				
	c. Are there PPEs available? What are they?				
	d. Are the PPEs in good condition?				
	e. Are there firefighting equipment on site?				
	f. Are there separate sanitary facilities for male and female workers?				
	g. Is drinking water supply available for workers?				
	h. Is there a rest area for workers?				
	i. Are storage areas for chemicals available and with protection? in safe locations?				
3.	Occupational Health and Safety	Yes	No	NA	
	a. Are the PPEs being used by workers?				
	b. Are excavation trenches provided with shores or protection from landslide?				
	c. Is breaktime for workers provided?				
	d. How many for each type of collection vehicle is in current use?				
4.	Community Safety	Yes	No	NA	
	a) Are excavation areas provided with barricades around them?				
	b) Are safety signages posted around the sites?				
	c) Are temporary and safe walkways for pedestrians available near work sites?				
	d) Is there a record of treated wastewater quality testing/measurement?				
5.	Solid Waste Management	Yes	No	NA	

MONITORING/INSPECTION QUESTIONS		FINDINGS			COMMENTS / CLARIFICATIONS
	a. Are excavated materials placed sufficiently away from water courses?				
	b. Is solid waste segregation and management in place?				
	c. Is there a regular collection of solid wastes from work sites?				
6.	Wastewater Management	Yes	No	NA	
	a) Are there separate sanitary facilities for various types of use (septic tanks, urination, washing, etc.)?				
	b) Is any wastewater discharged to storm drains?				
	c) Is any wastewater being treated prior to discharge?				
	d) Are measures in place to avoid siltation of nearby drainage or receiving bodies of water?				
	e) Are silt traps or sedimentation ponds installed for surface runoff regularly cleaned and freed of silts or sediments?				
7.	Dust Control	Yes	No	NA	
	a. Is the construction site watered to minimize generation of dust?				
	b. Are roads within and around the construction sites sprayed with water on regular intervals?				
	c. Is there a speed control for vehicles at construction sites?				
	d. Are stockpiles of sand, cement and other construction materials covered to avoid being airborne?				
	e. Are construction vehicles carrying soils and other spoils covered?				
	f. Are generators provided with air pollution control devices?				
	g. Are all vehicles regularly maintained to minimize emission of black smoke? Do they have valid permits?				
8.	Noise Control	Yes	No	NA	
	a) Is the work only taking place between 7 am and 7 pm, week days?				
	b) Do generators operate with doors closed or provided with sound barrier around them?				
	c) Is idle equipment turned off or throttled down?				
	d) Are there noise mitigation measures adopted at construction sites?				
	e) Are neighboring residents notified in advance of any noisy activities expected at construction sites?				
9.	Traffic Management	Yes	No	NA	

MONITORING/INSPECTION QUESTIONS		FINDINGS			COMMENTS / CLARIFICATIONS
	a) Are traffic signages available around the construction sites and nearby roads?				
	b) Are re-routing signages sufficient to guide motorists?				
	c) Are the excavation sites along roads provided with barricades with reflectors?				
	d) Are the excavation sites provided with sufficient lighting at night?				
10	Recording System	Yes	No	NA	
	a) Do the contractors have recording system for SEMP implementation?				
	b) Are the daily monitoring sheets accomplished by the contractor EHS supervisor (or equivalent) properly compiled?				
	c) Are laboratory results of environmental sampling conducted since the commencement of construction activities properly compiled?				
	d) Are these records readily available at the site and to the inspection team?				

Other Issues: _____

Prepared by: _____

Name, Designation and Signature

APPENDIX 11: SEMI-ANNUAL ENVIRONMENTAL MONITORING REPORT TEMPLATE

1. Introduction

- Overall project description and objectives
- Environmental category as per ADB Safeguard Policy Statement, 2009

2. Project Safeguards Team

- Identify the role/s of Safeguards Team including schedule of on-site verification of reports submitted by consultants and contractors.

Name	Designation/Office	Email Address	Contact Number
1. PMU			
2. PIUs			
3. Consultants			

3. Overall project and subproject/package progress and status

- Indicate (i) status of design – preliminary design or final design, (ii) status of implementation - under bidding, contract awarded but no works yet, contract awarded with works, civil works completed, or O&M

Package Number	Components/List of Works	Type of Contract (specify if DBO, DB or civil works)	Status of Implementation (specify if Preliminary Design, Detailed Design, On-going Construction, Completed Works, or O&M phase) ^{1/1}	Contract Status (specify if under bidding or contract awarded)	If On-going Construction	
					%Physical Progress	Expected Completion Date

- For package with awarded contract, provide name/s and contact details of contractor/s' nodal person/s for environmental safeguards.

Package-wise Contractor/s' Nodal Persons for Environmental Safeguards

Package Name	IEE Cleared by ADB (provide date)	Contractor	HSE Nodal Person	Email Address	Contact Number

--	--	--	--	--	--

4. STATUS OF IEE PER SUBPROJECT/PACKAGE

- Provide status of updated/final IEE^[2] per package.

Package-wise Implementation Status

Package Number	Final IEE based on Detailed Design				Site-specific EMP (or Construction EMP) approved by Project Director? ^[3] (Yes/No)	Remarks
	Not yet due (detailed design not yet completed)	Submitted to ADB (provide date of submission)	Disclosed on project website (provide link)	Final IEE provided to Contractor/s (Yes/No)		

5. Compliance status with National/State/Local statutory environmental requirements^[4]

Package No.	Statutory Environmental Requirements ^[5]	Status of Compliance (Specify if obtained, submitted and awaiting approval, application not yet submitted)	Validity Date(s) (if already obtained)	Action Required	Specific Conditions that will require environmental monitoring ^[6]

6. Compliance status with environmental loan covenants

Schedule No. and Item (see Project Loan Agreement and list provisions relevant to environmental safeguards, core labor standards and occupational health and safety)	Covenant	Status of Compliance	Action Required

7. Compliance status with the environmental management plan (refer to EMP tables in approved IEE/s)

- Confirm in IEE/s if contractors are required to submit site-specific EMP (SEMP)/construction EMPs (CEMP). If not, describe the methodology of monitoring each package under implementation.
- Provide over-all compliance of the contractors with SEMP/CEMP. This should be supported by contractors' monthly monitoring reports to PIU(s) and/or verification reports of PIU(s) or project consultants. Include as appendix supporting documents such as **signed** monthly environmental site inspection reports prepared by consultants and/or contractors.

Overall Compliance with SEMP/CEMP

Package No.	Status of SEMP/CEMP Implementation (Excellent/ Satisfactory/ Partially Satisfactory/ Below Satisfactory)	Action Proposed and Additional Measures Required

- Provide description based on site observations and records:
 - Confirm if any dust was noted to escape the site boundaries and identify dust suppression techniques followed for site/s.
 - Identify muddy water was escaping site boundaries or muddy tracks were seen on adjacent roads.
 - Identify type of erosion and sediment control measures installed on site/s, condition of erosion and sediment control measures including if these were intact following heavy rain;
 - Identify designated areas for concrete works, chemical storage, construction materials, and refueling. Attach photographs of each area.
 - Confirm spill kits on site and site procedure for handling emergencies.
 - Identify any chemical stored on site and provide information on storage condition. Attach photograph.
 - Describe management of stockpiles in each work site (construction materials, excavated soils, spoils, etc.). Provide photographs.
 - Describe management of solid and liquid wastes on-site (quantity generated, transport, storage and disposal). Provide photographs.
 - Provide information on barricades, signages, and on-site boards. Provide photographs.
 - Provide information on workers labor camp(s). Provide photographs.
 - Provide information on work-related accidents and incidents. Describe actions implemented.
 - Provide information on if there are any activities being under taken out of working hours and how that is being managed.
- Provide list of trainings on environmental safeguards, core labor standards, and OSH conducted during the reporting period. Include ADB-organized workshop, trainings, seminars, etc.)

Trainings, Workshops and Seminars Conducted

Date	Topic	Conducted by	No. of Participants (Total)	No. of Participants (Female)	Remarks

- Provide the monitoring results as per the parameters outlined in the approved EMP (or site-specific EMP/construction EMP when applicable).

Summary of Environmental Monitoring Activities (for the Reporting Period)^[7]

Impacts (List from SEMP/CEMP P)	Mitigation Measures (List from SEMP/CEMP)	Parameters Monitored (As identified in the SEMP/CEMP)	Method of Monitoring (Visual, Actual Sampling, etc)	Location of Monitorin g (Provide GPS Coordinate s) ^[8]	Date of Monitorin g Conducte d	Person Who Conducted the Monitoring
Design Phase						
Pre-Construction Phase						
Construction Phase						
Operational Phase						

8. Monitoring of environmental IMPACTS on PROJECT SURROUNDINGS

- Confirm records of pre-work condition of roads, agricultural land or other infrastructure prior to starting to transport materials and construction.

Package No.	Status of Pre-Work Conditions (Recorded / Not Recorded)	Baseline Environmental Conditions (air, water, noise) Documented (Yes / No)	Action Proposed and Additional Measures Required

- Provide information on monitoring activities conducted during reporting period. If not conducted, provide justification. Compare results with baseline and internationally recognized standards.^[9]

Air Quality Monitoring Results

Site No.	Date of Testing	Site Location (Provide GPS Coordinates) ^[10]	Parameters (as required by statutory clearances or as mentioned in the IEE)			Remarks
			PM10 µg/m ³	SO ₂ µg/m ³	NO ₂ µg/m ³	

Water Quality Monitoring Results

Site	Date of Sampling	Site Location	Parameters (as required by statutory clearances or as mentioned in the IEE)	Remarks
------	---------------------	------------------	--	---------

No.			pH	Conductivity $\mu\text{S/cm}$	BOD mg/L	TS mg/L	TN mg/L	TP mg/L	

Noise Quality Monitoring Results

Site No.	Date of Testing	Site Location	LA _{eq} (dBA) (as required by statutory clearances or as mentioned in the IEE)		Remarks
			Day Time	Night Time	

9. INFORMATION DISCLOSURE AND CONSULTATIONS

- Confirm PMU/PIU/contractors provide project-related information to stakeholders, communities and/or affected people before and during construction works.^[11]
- Provide information on consultations conducted during reporting period such dates, topics discussed, type of consultation, issues/concerns raised, safeguards team member present. Attach minutes of meetings (ensure English translation is provided), attendance sheet, and photos.

Date of Consultation	Location	Number of Participants (specify total, male and female)	Issues/Concerns Raised	Response to issues/concerns

10. Grievance Redress Mechanism

- Grievance Redress Mechanism.** Provide information on establishment of grievance redress mechanism and capacity of grievance redress committee to address project-related issues/complaints. Include as appendix Notification of the GRM (package-wise if applicable).
- Complaints Received during the Reporting Period.** Provide information on number, nature, and resolution of complaints received during reporting period. Attach records as per GRM in the approved IEE. Identify safeguards team member/s involved in the GRM process. Attach minutes of meetings (ensure English translation is provided).

11. SUMMARY OF KEY ISSUES/CONCERNS identified during the reporting period AND REMEDIAL ACTIONS

- Provide corrective action plan which should include all issues/concerns, actions required to be implemented, responsible entities, and target dates.

12. STATUS OF CORRECTIVE ACTIONS FROM PREVIOUS SEMR(S)

- Provide information on corrective actions to be implemented as reported in the previous SEMR(s). Include status of implementation of feedbacks/comments/suggestions as provided by ADB, if any.

Corrective Action Plan Status

Issues/Concerns	Corrective Action	Status	Remarks

13. APPENDIXES

- Photos
- Records of consultations
- Copies of environmental clearances and permits (if not provided in the previous SEMR)
- Environmental site inspection report (if not provided in the previous SEMR)
- Other

^[1] If on-going construction, include %physical progress and expected date of completion

^[2] IEE prepared based on preliminary design and cleared by ADB with condition that updated/Final IEE based on detailed design will be submitted.

^[3] Works will not be allowed until SEMP/CEMP is approved by project implementation unit or project management unit.

^[4] All statutory clearance/s, no-objection certificates, permit/s, etc. should be obtained prior to award of contract/s. Attach as appendix all clearance obtained during the reporting period. If already reported, specify in the "remarks" column.

^[5] Specify statutory requirements: environmental clearance? Permit/consent to establish? Forest clearance? Workers/Labor permit, etc.

^[6] *Example: Environmental Clearance requires ambient air quality monitoring, Forest Clearance/Tree-cutting Permit requires 2 trees for every tree, etc.*

^[7] Attach Laboratory Results and Sampling Map/Locations

^[8] If GPS coordinate is not available, provide landmark(s) and/or chainage.

^[9] ADB Safeguard Policy Statement (SPS) Appendix 1, para 33: During the design, construction, and operation of the project the borrower/client will apply pollution prevention and control technologies and practices consistent with international good practice, as reflected in internationally recognized standards such as the World Bank Group's Environment, Health and Safety Guidelines. These standards contain performance levels and measures that are normally acceptable and applicable to projects. When host country regulations differ from these levels and measures, the borrower/client will achieve whichever is more stringent. If less stringent levels or measures are appropriate in view of specific project circumstances, the borrower/client will provide full and detailed justification for any proposed alternatives that are consistent with the requirements presented in the SPS.

^[10] If GPS coordinate is not available, provide landmark(s) and/or chainage.

^[11] Check EMP requirement on information disclosure. At a minimum, PIU thru the contractor should notify communities/affected persons/sensitive receptors 7 days and again 1 day before start of works.

SAUW IEE Review - Information Log

Instructions: Provide information based on IEE submitted by Project Management Unit (PMU). This IEE log sheet will serve as record of the review findings, comments, and/or further actions required during implementation. A copy of the IEE log sheet should be (i) provided to PMU for their record and guidance on actions during implementation; (ii) attached in the cleared IEE to be disclosed; (iii) used as reference for review of updated/final IEE and (iv) inputted in the SARD Safeguards Compliance Tracking System.

Project / Subproject:	Bangladesh: Coastal Towns Climate Resilience Project		
Project No.:	55201-001	Package Name:	Coastal Towns Climate Resilience Project – Construction of Multipurpose Cyclone Shelter in Lalmohan Pourashava
Components:	One cyclone shelters- The cyclone shelter building will have three floors and a rooftop level. The cyclone shelters will have all essential facilities, including separate toilets for male, female, and pregnant women; care room for pregnant-women, ramp for disabled persons, water supply, power supply, and septic tank with sealed bottom and sides for wastewater treatment and disposal. The site is connected through paved road having good condition; therefore, no road improvement work is required. Rainwater harvesting tank, deep tube wells and solar panels with a total capacity of four kilowatts will also be installed.		
Contract Type:	Civil Works		
Date of IEE:	October 2022		
Draft IEE?	Updated/Revised IEE?	Others	
This IEE is still considered draft based on preliminary design. Prior to award, and should there be any changes in the design, this IEE will be updated based on the final design and submitted to ADB for clearance and disclosure.			

	Activity	Status		Detailed Comments and Further Actions Required
1.	Environmental assessment has been satisfactorily conducted based on ADB REA Checklist. ³⁰	Yes	No	REA Checklist has been prepared and used as basis for the assessment. Accomplished REA Checklist is in Appendix 1.
		X		
2.	Environmental assessment based on latest project components and design	Yes	No	
		X		
3.	Statutory Requirements ³¹		Forest Clearance	Not required.
		X	No Objection Certificate	Obtained. Copy of NOC is found in Appendix.
		X	Site Location Clearance	To be obtained
		X	Environmental Compliance Certificate	To be obtained

³⁰ ADB Rapid Environmental Assessment Checklist for screening, categorization and initial basis for environmental assessment.

³¹ If applicable, include date accomplished or obtained.

Activity		Status			Detailed Comments and Further Actions Required		
		X	Permit to Construct (or equivalent)			Building construction approval/permit to be obtained. No civil works will commence unless permit to construct (or equivalent) is obtained. PMU to report status in the SEMR.	
			Permit to Operate (or equivalent)			Not applicable.	
			Others			N/A	
4.	Policy, legal, and administrative framework	Adequate		Not Adequate		Section II discusses the policy, legal and administrative framework of the subproject.	
		X					
		Included discussions and requirements of the:					
		Yes	National regulation/law on EIA				
		Yes	Environmental agency				
		Yes	Relevant international environmental agreements				
		Yes	Environmental standards (IFC's EHS Guidelines)				
5.	Anticipated environmental impacts and mitigation measures	assessed impacts and risks:		mitigation measures included:		Discussions included in Section There is no protected area within the 10-km radius of the site, however one key biodiversity area (KBA) within the 10-km radius and two protected areas within 50 km of the site. Among IUCN Red List species of concern 65 are identified within 50-km radius. The subproject site is already a built-up area and the probability of these species being found at the site is very low Discussions included in Section VI where measures for potential pollution to ambient air, surface water, and acoustic environment are described. Discussions included in Section VI where measures for potential impacts to community and occupational health and safety, including COVID19, are described. Discussions included in Section V. The subproject components are not immediately located near	
				Yes	No		n/a
		X	Biodiversity conservation				X
		X	Pollution prevention and abatement	X			
		X	Health and safety	X			
		X	Physical cultural resources				X

	Activity	Status					Detailed Comments and Further Actions Required
							historical, cultural and archaeological sites, except a grave nearby the school. The project activity, access to this site will not be disturbed the existing grave. There are no other scheduled or unscheduled archaeological, paleontological, or architectural sites of heritage listed by local and/or national authority.
		X	Cumulative impacts			X	Not applicable.
		X	Transboundary impacts			X	Not applicable.
6.	Impacts from Associated Facilities ³²	Addressed	Not Addressed	Not applicable			
					X		
7.	Analysis of Alternatives	Yes	No				An analysis of alternatives is provided in Section IV, but this is not required.
		X					
8.	EMP budget included	Yes	No				Section VI provides indicative budget for EMP implementation and monitoring.
		X					
9.	EMP implementation integrated in FAM/PAM and bid documents	Yes	No				(i) Included in PAM during loan processing. To be included in bid documents during bidding document preparation. (ii) Section II includes discussion on the inclusion of the EMP in the bid and contract documents. PMU will have the responsibility to ensure compliance with this requirement.
		X					
10.	Consultation and Participation	Yes	No				(i) Section VII discusses the conduct of consultation. (ii) Appendix 7 shows the minutes of consultative meeting, attendance sheet and photograph.
		X					
11.	Grievance Redress Mechanism	Yes	No				
		X					
		Description of GRM.					Section VIII discusses the GRM.
		GRC members identified.					Section VIII discusses the GRC membership.
		GRM established and notified?					To be confirmed/complied
12.	Disclosure	To be complied	Endorsement to disclose on ADB website				To be complied after endorsement from PMU is received by ADB.

³² ADB SPS (Appendix 1 para 6) defines associated facilities as not funded as part of the project (funding may be provided separately by the borrower/client or by third parties), and whose viability and existence depend exclusively on the project and whose goods or services are essential for successful operation of the project.

	Activity	Status		Detailed Comments and Further Actions Required
		To be complied	Disclosed on project website	To be complied by PMU once clearance of the IEE is received from ADB.
		To be complied	Relevant information available to stakeholders and affected people in language and form they understand.	To be complied by PMU once clearance of the IEE is received from ADB.
13.	Mobilized PMU Environment Specialist	Yes	No	To be confirmed/complied. Section IX discusses the institutional arrangement for the project.
14.	Mobilized PMSC Environment Specialists	Yes	No	To be confirmed/complied. Section IX discusses the institutional arrangement for the project.
15.	Confirm bid and contract documents and/or EMP include requirement for the contractor to appoint EHS supervisor and/or nodal person for environment safeguards	Yes	No	
		X		Section IX explains this role and responsibility of the contractor.
16.	If contract awarded already, confirm contractor's appointment of EHS supervisor and/or nodal person for environmental safeguards	Yes	No	
			X	The subproject has not been awarded yet. But Section IX explains this role and responsibility of the contractor.
17.	Awareness training on compliance to safeguard requirements	Yes	No	Section IX discusses the institutional capacity development program, schedule, and topics.
		X		
18.	Monitoring and Reporting	Yes	No	
		X		Section X clarifies the monitoring and reporting roles of stakeholders.
19.	Others/Remarks	Minor revisions and clarifications are suggested in the report as indicated directly in the draft IEE.		