Initial Environmental Examination

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Bangladesh: Coastal Towns Climate Resilience Project – Construction and Improvement of Roads in Bagerhat Pourashava

Packages: e-GP/CTCRP/BAGR/RD-01 and e-GP/CTCRP/BAGR/RD-02

CURRENCY EQUIVALENTS

(as of 10 June 2024)

Currency Unit = Bangladesh Taka (BDT)

BDT1.00 = \$0.00849935 \$1.00 = BDT 117.656

ABBREVIATIONS

ADB Asian Development Bank
DOE Department of Environment

EA executing agency

environmental impact assessment EΙΑ **Environmental Conservation Act** ECA **ECR Environmental Conservation Rules ECC** environmental clearance certificate **EMP** environmental management plan Government of Bangladesh **GOB GRC** grievance redress committee grievance redress mechanism GRM 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



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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) genderresponsive 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 socioeconomic 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, Kalaroa, Patharghata, Gouranadi, Charfasson, Borhanuddin, Betagi, Jhalokathi, Muladi, Chalna (Dacope), Bakerganj, Bhedarganj, Swarupkathi, Lalmohon, Nalchity, Janjira, Kuakata and Banaripara. 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. The Construction and improvement of Roads in Bagerhat Pourashava subproject involves the rehabilitation of 22 (as per DPP 25 but two roads have been taken by other project) roads with total length of 14.930 km in all nine (09) wards of the Bagerhat Pourashava. Specifically, the works will include the following: (i) dismantling, (ii) earth work, (iii) sand filling; (iv) Earth cutting (BC and SGC); (v) reinforced cement concrete (RCC) work, and (vi) bituminous carpeting (BC) works. The IEE has been prepared based on the final detailed design.

¹ ADB. 2014. <u>Third Urban Governance and Infrastructure Improvement Project</u>. Manila.

Categorization. The proposed subproject is classified as Environmental Category "B" per the ADB SPS as no significant 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.

Description of the Environment. Bagerhat Pourashava has been the study area for this IEE. Available baseline data from secondary sources were used in the assessment, while other data are to be collected or gathered during design verification phase. The subproject site is within a developed township area (Bagerhat Pourashava/Town) and surrounded by agricultural lands actively cultivated, communities, and other urban infrastructures such as highways. A summary of baseline conditions is in the following table.

Parameters	Description
Topography and Geology	The topography of Bagerhat Pourashava is mostly flat. This area is located in the Ganges tidal flood plain. The boundary between this unit and the Ganges floodplain is traditional. The tidal landscape has a low ridge and a basin relief crossed by innumerable tidal rivers and creeks. Local differences in elevation generally are less than 1m compared with 2-3m on the Ganges floodplain. The tract is of recent origin, raised by the deposition of sediments formed due to soil erosion in the Himalayas. The substratum consists mainly of Quaternary Era sediments, sand and silt mixed with marine salt deposits and clay.
Climate and meteorology	Ambient mean temperature is about 18°C-19°C in winter and 28°C-29C° in summer and the annual average rainfall is around 2000 mm. Monsoon occurs from June to September when there is heavy to very heavy rainfall. Tropical cyclones and storms do occur during summer in the month from April to June and then from September to November. Comparatively the humidity is very high in the coastal region rather than other districts of Bangladesh. Average relative humidity in Bagerhat area varies seasonally from 70% to 90%. Prevailing wind in the area are the Southerly wind from the Bay of Bengal during monsoon and Northwesterly wind from Himalayas during winter.
Hydrology	A number of khals (canals) run through the Pourashava which serve as drainage arteries. The existing primary drainage system in Bagerhat is characterized by open and natural canals traversing various parts of the Pourashava. Secondary and tertiary drains are all connected to these natural canals at various locations. The drainage system is not well planned despite recent efforts to improve the drainage system. Due to insufficient holding capacity, these drains and canals overflow and cause flooding in various parts of the Pourashava during periods of heavy rains. More severe flooding occurs when there is an extreme tide and water flows back up the drains.
Drainage and Flood Control	Drainage plays a vital role in the management of soil (salinity, soil health) in the polder area. The drainage characteristics have been divided into six classes (excessively drained, well drained, moderately well drained, imperfectly drained, poorly drained and very poorly drained) from the agriculture point of view. Total area of the net cultivable area is under poorly drained condition i.e., land that normally is flooded between depths of 0 to 110 cm continuously for more than two weeks to few months during the flood season. Timely drainage of water in rainy/monsoon season is the main constraint for growing rabi/dry land crops in the polder area.

Parameters	Description
Ambient air quality	The subproject is located in an area where air pollution has not been a problem. There are no available data for Bagerhat, but site visits and visual observations conducted in the area showed no sources of emission that could significantly deteriorate air quality. Apart from vehicular emission, other potential sources are the wood burning associated with some businesses, sawmills, ice mills and rice mills. However, it is perceived that emissions from these sources do not degrade the ambient air quality to significant extent.
Ambient Noise	The subproject area is within peri-urban to urban setting. The noise levels in the Pourashava are similar to that of any other small urban area. Noise may only be attributed to vehicles plying the roads, machineries and other related activities, and is normally in the range of 55 to 75 dB(A). Volume of traffic passing through the Pourashava roads is not significant and traffic jams are very much infrequent.
Surface Water	Surface water bodies in the subproject area have varied uses, including their use for pisciculture, irrigation, and navigation. Visual observations reveal that many of the natural khals are now becoming more polluted due discharge of community and household wastes through the secondary and tertiary drains. There is no available surface water quality data for these natural drainages in the Pourashava, including the Bhairab river that is flowing adjacent the Pourashava. Bhairab river is a perennial river in Bangladesh crossing various towns as it flows down meeting, with other river systems and eventually to the Bay of Bengal.
Groundwater	Groundwater table in the inner coastal towns of Bangladesh (including Bagerhat) is shallowest during monsoon season in the range of $1-3$ m. During dry season, the depth does not vary as much in the range of $1-4$ m due to its proximity to the coastal zone. Ground water quality is influenced by salinity and iron. Water in most shallow aquifer has the presence of arsenic with elevated salinity, and contaminated with iron, which makes the water not suitable for drinking purposes. The deeper part of the aquifer at a depth of 80m to 100m is where the Pourashava sources its drinking water, though relatively small compared to the demand.
Natural hazards	Subproject area is in the coastal region fronting the Bay of Bengal in the south. Similar to most areas of Bangladesh, the subproject location has long been exposed to various climatological (e.g., drought), hydrometeorological (e.g., cyclones, storm surge, flood), and other geophysical (e.g., landslides and erosion) hazards. Being in the coastal area makes it susceptible to cyclones and storm surges, floods, medium to high levels of soil salinity, and sea level rise.
Socio-economic conditions	In 2011, the population of the Bagerhat Pourashava was 49,073 (BBS, 2011), with a population density is 3,088 persons per km2. The Pourashava has been experiencing lower annual average population growth than the national average urban population growth over a long period in the past (1981-2011). Employment is identical to the rest of the country where employed population is engaged in different occupations. According to BBS 2011, 88% of the populations are engaged in agriculture sector. Here agricultural sector includes farmer, agricultural labor, fishers, day labors, etc. About 5% population is engaged in salaried service sector such as in government and private sector jobs. Landownership pattern can be an indicator to understand the poverty incidence in a given area. Statistics shows that in Bagerhat region there are 76% smallholders, 19% medium and only 5% large landholders (BBS 2009). In the study area, arable land is mainly used for crop production. Generally small and medium holders cultivate variety of crops at those lands. They cannot produce crops or paddy due to drainage congestion.

Parameters	Description
Land use	There is dominance of agricultural land (about 44% of the total) followed by residential land use (about 32%). Basing on the percentage of land under different use categories the ranking is: Agriculture (40.23%), Residential (33.94%), Water bodies (9.51%), Transportation (8.01%), Administrative (3.55%), Recreational & Open Space (1.73%), Commercial (1.25%), Educational (0.77%), Community Facility (0.35%), Health (0.31%), mixed use (0.22%), Utility Service (0.10%) and Industrial (0.03%).
Physical cultural resources	The subproject components are in Bagerhat Pourashava, which is within the Bagerhat District that is rich in historical, cultural and archaeological sites. The world-renowned Historic Mosque City of Bagerhat is a UNESCO World Heritage Site that is on the western side of Bagerhat Pourashava. The core area of Bagerhat Pourashava is about 1.5 km away from the nearest structure of Historic Mosque City of Bagerhat (Zinda Pir Mosque). Furthermore, the UNESCO World Heritage site Sixty Dome Mosque (Shat Gombuj Masjid) is about 3 km away from the nearest road alignment and proposed works will not impact this heritage site.
Biological Environment	The Integrated Biodiversity Assessment Tool (IBAT) was used to determine the presence of protected or key biodiversity areas, and endangered species around the subproject site (default area of analysis of 50 km radius). Screening results show that there is no ecologically sensitive area (neither protected area nor key biodiversity area) within at least 10-km radius of the subproject location. Ninety-three (93) IUCN Red List species of concern are identified within 50-km of the area of interest. The subproject site is within a developed township area (Bagerhat Pourashava/Town) and surrounded by agricultural lands actively cultivated, communities and other urban infrastructures such as highways; hence the probability of these species being found at the site is very low. This is also confirmed in the IUCN Wildlife Distribution Map for Bangladesh and the Bangladesh Forest Department's map of protected areas.

Assessment of Potential Environmental Impacts and Mitigation Measures. Potential negative environmental impacts during the pre-construction, construction, and operation phases of the subproject were identified. The road subprojects will involve straightforward construction and is unlikely to cause significant adverse impact. Usual construction-related impacts such as noise, dust generation, vegetation clearing/tree felling, silt generation, soil and water 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 also incorporated in the EMP. Management including proper disposal of construction materials is included in the EMP. Detailed design will ensure that private and common properties, and local physical cultural resources will not be significantly impacted by the subproject through either re-alignment or institution of appropriate measures. All works will be confined in within existing rights-of-way (ROWs). 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 regional project management unit (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, Bagerhat Pourashava will serve as the PIU. The PMU, Divisional/Regional Office 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 EMP; 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 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 design period, to ensure that stakeholders are fully engaged in the project and could 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 Offices 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 project completion.

Conclusion and Recommendations. The Construction/Improvement of Roads in Bagerhat Pourashava will result in significant socio-economic benefits. 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 of the roads 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. Per Environmental Conservation Rules of Bangladesh (ECR, 2023), the subproject is not categorized but it is mentioned in ECR, 2023 that if the length of the road is 5 km to 10 km, it falls under Orange category and if the length of the road is more than 10 km it falls under Red category. None of the roads have length up to 5 km or more than 5km under the road subprojects of Bagerhat and Department of Environment (DOE) has issued letter that confirmed that road subprojects of CTCRP will not require obtaining Environmental Clearance

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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.

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."

Certificate (ECC). However, an initial environmental examination (IEE) and environmental management plan (EMP) has been prepared.

This IEE has been prepared based on final designs of the subproject, and submitted to ADB for review, clearance, and disclosure. Prior to award, and should there be any changes in the design, this IEE will be updated based on the changed design and submitted to ADB for clearance 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.

I. INTRODUCTION

A. Background

- 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 (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 knowledgebased 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, naturebased 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 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. The outcome of the project will be climate and disaster resilience of coastal towns strengthened including benefiting the poor and women. The project directly supports achieving project outcomes through three outputs.

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.

- 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; (vi) 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
- 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 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 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 paurashava 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).

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 (CTCRP) will be implemented

District	Town (Pourashava)	District	Town (Pourashava)
Barishal	Banairapra	Bhola	Charfasson
	Mehendiganj		Lalmohan
	Bakerganj		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 and improvement of roads at the proposed locations. Moreover, ADB TA Consultant (Environmental Specialist) also carried out four numbers of FGDs with different stakeholders. 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) **Analysis of Alternative**. Analyzes the environmental situation "With and Without project".
 - (v) **Description of the Subproject.** 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.
 - (vi) **Description of Baseline 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), and latest ECR, 2023 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 (Appendix 1) for road subproject and screening for Bagerhat roads as per road subproject selection criteria (Appendix 2) were conducted for the construction and upgradation of roads subproject in Bagerhat Pourashava, 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. Moreover, screening was carried out by subproject selection criteria screening checklist that confirmed

that subproject comply with the selection criteria (Please see Appendix 2). 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.
- 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
 - final IEE upon receipt; (i)
 - (ii) a new or updated IEE and corrective action plan prepared during subproject implementation, if any, upon receipt; and
 - environmental monitoring reports submitted during subproject implementation (iii) upon receipt.
- Consultation and Participation. The PMU and PIU shall carry out meaningful 21. 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.
- 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 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.

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;1 (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.

- 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 IEE 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.
- 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. PMU shall also adhere to necessary protocols in response to emerging infectious diseases such as the corona virus disease (COVID-19) consistent with

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.

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

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 EMP; 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 relevant provisions from the EMP are incorporated into the works contract; 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.

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;

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.

- (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), 2023 (superseded 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			
Category	Requirements		
Green	(i) Completed Application for Environmental Clearance Certificate (ECC);		
	(ii) Payment of the appropriate fee;		
	(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.		
Yellow	(i) Completed Application for ECC;		
	(ii) Payment of the appropriate fee;		
	(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	(i) Completed Application for ECC;		
	(ii) Payment of the appropriate fee;		
	(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;		
	(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;		
	(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;		

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.		

35. Schedule 1 of ECR, 2023 provides the classification for industrial projects and types of development that are common in Bangladesh. Table 3 indicates the categories for roads. Per ECR, 2023, the subproject is not categorized (considering the length) but it is mentioned in ECR, 2023 that if the length of the road is 5 km to 10 km it falls under Orange category and if the length of the road is more than 10 km it falls under Red category. None of the roads have length up to 5 km or more than 5km under the road subprojects of Bagerhat. However, DOE confirmed through a letter that CTCRP road subprojects will not require obtaining ECC.

Table 3: Government of Bangladesh Classification of the Subproject

Component	Equivalent in Schedule I of Environmental Conservation Rules	Department of Environment Classification
Roads	Road construction/extension up to 5 km to10 km- Orange	None of the roads under Bagerhat roads subproject have length from 5 km to 10 km so category for this roads subproject is not defined. DOE confirmed through a letter that CTCRP is not required to obtain ECC for its road subprojects (less than 5 kilometers).

- 36. Based on the ECR 2023, the ECC requirement of road subproject less than 5 kilometers is not defined. But based on the scope and nature of road subprojects works of CTCRP, DOE confirmed through a letter dated 04 April 2024 that CTCRP will not require to obtain ECC for such subprojects.
- 37. Application for Environmental Clearance. The application and requirement for issuance of ECC are described in the ECR, 2023 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 the ECR, 2023. Usually, the ECC is issued within 30 days from receipt of the application by DOE. Such ECC is required to be renewed every year for orange category and red category, every two years for yellow category and every five years for green category from the date of its effectivity.
- 38. Figure 1 shows the summary of review process and timelines set under ECR, 2023, leading to the issuance of environmental clearance certificate (ECC) by DOE.

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¹⁶ Government of Bangladesh. <u>Department of Environment</u>.

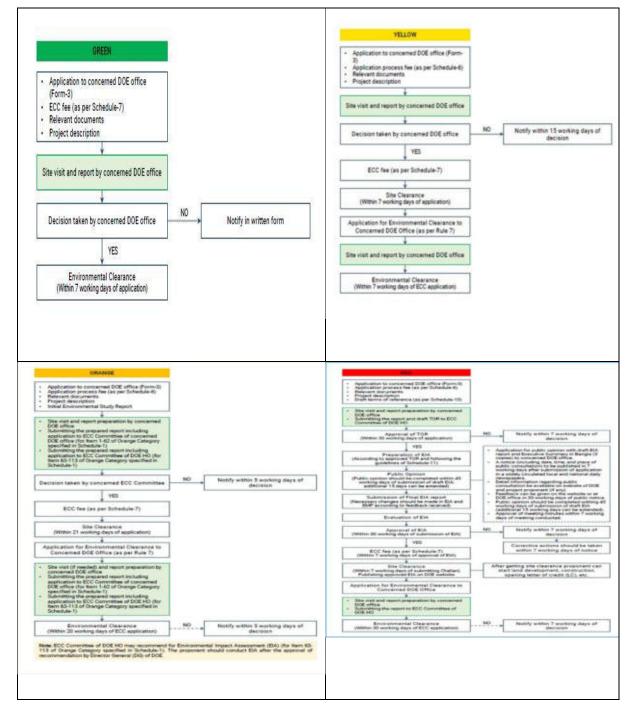


Figure 1: Government Environmental Clearance Process

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

39. 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

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	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. Pourashava shall be responsible for solid waste collection, disposal and their management		
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.	The subproject will implement measures (e.g. septage treatment) to ensure that water source pollution is avoided.		
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 environment. Prevents unplanned construction on riverbanks and indiscriminate clearance of vegetation on newly accreted land.	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.		
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	Compliance with land use and zoning regulations.		

Laws, Regulations, and Standards	Details	Relevance to the Project
- Otanida do	establishments, rail and highway and for tea and rubber gardens.	
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 Bangladesh Climate	Provides guidance for subproject integrated community and workers health and hygiene at the construction and operation and maintenance stages of the project Enhances the capacity of government	Coordinate with Pourashava committees on disaster management measures, water and sanitation and waste management Integrate adaptation measures for
Change Strategy and Action Plan of 2009	ministries, civil society and private sector to meet the challenges of climate change	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
National Disaster Management Act of 2012	Establishes a framework for managing disasters in a comprehensive way.	Setting-up emergency response procedures

Laws,		
Regulations, and Standards	Details	Relevance to the Project
Public Health (Emergency Provisions) Ordinance, 1994	The ordinance calls for special provisions regarding 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 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.	The subproject will generate solid wastes and will implement measures to comply with the IWM rules.
Wildlife (Conservation and Security) Act, 2012	This Act provides for the conservation and safety of biodiversity, forest and wildlife of the country by repealing the previous laws i.e., Wildlife (Preservation) Act of 1973. The Department of Forest (BFD) has the primary responsibility for implementing this Act. The key features of this Act are: i)Prohibition made in relation to wild animals and plants that no person can hunt any wild animal without a license or willfully pick, uproot, destroy or collect any plant; ii) Determination of vulnerable, endangered and critically endangered species of wild animals and plants; iii) Declaration of sanctuary for the conservation of forest and habitat of wildlife and prohibitions made on such sanctuary; iv) Requirement of license to cultivate, extract, manufacture, rear, export or import any wild animal or part of its body, meat, trophy, uncured trophy or any plant; and v) Restriction on import,	CTCRP must comply with this Act for ensuring wildlife conservation and their security.

Laws, Regulations, and Standards	Details	Relevance to the Project
	export and re-export of wild animals and plants. APCR, 2022 contains air quality	
Air Pollution Control Rules (APCR), 2022	APCR, 2022 contains air quality standards based on WHO Guidelines (Interim Goals); emissions limits and technical specifications for key sectors; mandates and coordination mechanisms among relevant line ministries to control both household and outdoor air pollution. The rules elevated the air quality management (AQM) dialogue and leadership beyond the environment sector, by establishing the National Committee on Air Pollution Control (NCAPC), a muti-sector decision-making body presided by the Cabinet Secretary to coordinate the APCR implementation and instruct relevant agencies on specific interventions to comply with the new rules. The NCAPC is mandated, for example, to impose emergency measures depending on the levels of air pollution, such as restricting activities of industries or projects, vehicles, or any source of air pollution in a certain area, and closure of educational institutions. APCR also envisage the objectives and minimum requirements of its implementation management tools, such as a National Air Quality Plan (also covering HAP interventions and targets); degraded airsheds declaration and management plan; publication of list of highly air polluting industries and activities; prevention plans; monitoring and control systems. Other relevant regulatory development for AQM refers to the 2019 Amendment of the Brick Manufacturing and Kiln Installation Act, 2013. The amendment set phased targets to reduce the use of clay-fired bricks in public works from 2019 to 2025, except for the construction of base/subbase of the high-ways. However, implementation of this phased reform is delayed. Preservation and protection of cultural	These rules are applicable to this project as it will involve emissions (primarily dust and exhaust emissions) during construction.
Antiquities Act, 1968	resources are within the Antiquities Act, 1968. As per this act, (1) No person shall transport an antiquity from one place in Bangladesh to another with the object of exporting it in contravention of section 22. (2) Whoever contravenes the provisions of sub-section (1) shall be punishable	the construction phase of the project. The core area of Bagerhat Pourashava is about 1.5 km away from the nearest structure of Historic Mosque City of Bagerhat (Zinda Pir Mosque). The UNESCO World Heritage site Sixty Dome Mosque (

Laws, Regulations, and Standards	Details	Relevance to the Project
	with imprisonment for a term which may extend to three months, or with fine, or with both.	Shat Gombuj Masjid) is about 3 km away from the nearest road alignment and proposed works will not impact this heritage site.
		However, the related works with the subproject may impact undiscovered cultural and natural heritage relics during construction phase.

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

C. International Environmental Agreements

40. 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		invironmental Agreements Kei	
Environmental	Signed/Year		
Agreement	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 core area of Bagerhat Pourashava is about 1.5 km away from the nearest structure of Historic Mosque City of Bagerhat (Zinda Pir Mosque). The UESCO World Heritage site Sixty Dome Mosque (Shat Gombuj Masjid) is about 3 km away from the neares road alignment and proposed works will not imact this heritage 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.

41. 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,2023.

- 42. Applicable Environmental Standards. The ECR, 2023, Air Pollution (Control) Rules, 2022 and Noise Pollution (Control) Rules, 2006 provides the environmental standards applicable to the project. Schedule 2 of the ECR, 2023 presents the national standards for water quality, Air Noise (Control) Rules, 2006 presents the national standards for ambient noise and Air Pollution (Control) Rules, 2022 presents the air quality standards. 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.
- 43. The tables 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: Ambient Air Quality Standards

	Table 6. Allibient All Q	.	
	Bangladesh Ambient Air	WHO Air Quality	Guidelines (µg/m³)
Parameter	Quality Standard (µg/m³)ª	Global Update ^b 2005	Global Update ^c 2021
TSP	200 (8-h)	-	-
PM ₁₀	50 (1-year) 150 (24-h)	15 (1-year) 45 (24-h)	15 (1-year) 45 (24-h)
PM _{2.5}	15 (1-year) 65 (24-h)	5 (1-year) 15 (24-h)	5 (1-year) 15 (24-h)
SO ₂	80 (1-year) 365 (24-h)	40 (24-h)	40 (24-h)
NO ₂	100 (1-year)	10 (1-year) 25 (24-h)	10 (1-year) 25 (24-h)
СО	10,000 (8-h) 40,000 (1-h)	4,000 (24-h)	4,000 (24-h)
Lead	0.5 (1-year)	-	-
Ozone (O ₃)	235 (1-h) 157 (8-h)	100 (8-h) 60 (peak season, average 6 months)	100 (8-h) 60 (peak season, average 6 months)

ADB = Asian Development Bank, CO = carbon oxide, h = hour, $\mu g/m^3$ = 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 Air Pollution Control Rules, 2022^b IFC World Bank Group. 2007. *Environmental, Health and Safety General Guidelines*. Washington, D.C.

WHO Global Air Quality Guidelines (Retrieved from https://www.who.int/publications/i/item/9789240034228)

Table 7: Ambient Noise Quality Standards

		Noise Standard lines, 1997 ^a (dB)	WHO Guidelines Value For Noise Levels Measured Out of Doors (One Hour LA _q in dBA)		
Receptor/ Source	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	

Table 8: Standards for Sound Originating from Motor Vehicles or Mechanized Vessels

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			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 engin	Diesel engine - maximum rotating speed.							
	Gasoline engine -at two thirds of its maximum rotating speed and without any load.							
thirds of the	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.							

(Source: Schedule 2 of Noise Pollution Control Rules of Bangladesh, 2006)

Noise pollution control rules, 2006 (Schedule 1) WHO. 1999. Guidelines for Community Noise; World Bank Group. 2007. Environmental, Health and Safety General

Table 9: Water Quality Standards A. Drinking Water Quality Standards (Selected Parameters Only)

	- Table 1	•			
SI No	Parameter			WHO Guidelines for Drinking Water Quality 4th Edition incorporating the first addendum, 2017	
1.	Fecal Coliform	NFU/100ml	0	0	
2.	Total Coliform	NFU/100ml	0	0	
3.	Free Residual Chlorine	mg/L	0.20	0.2ª	
4.	Boron	mg/L	1.0	2.4	
5.	Nitrate (NO ₃ -)	mg/L	45	50	
6.	Arsenic (As)	mg/L	0.05	0.01	
7.	Cadmium (Cd)	mg/L	0.003	0.003	
8.	Total Chromium (Total Cr)	mg/L	0.05	0.05	
9.	Hardness as CaCO ₃	mg/L	500	-	
10.	Iron (Fe)	mg/L	0.3-1.0	-	
11.	Lead (Pb)	mg/L	0.01	0.01	
12.	Manganese (Mn)	mg/L	0.4	-	
13.	Oil and Grease	mg/L	0.01	-	
14.	рН		6.5-8.5	-	
15.	Total Dissolved Solids (TDS)	mg/L	1000	-	

 $[^]a$ 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.

B. Standard for Inland Surface Water (ECR, 2023, Schedule 2, Rules- 31, A (1))

SL	Way of Usage	Parameter											
No		pH	DO mg/L	BOD mg/L	NO ₃ N mg/L	NH. N mg/L	PO, P mg/L	Total Cr mg/L	Pb mg/L	Hg mg/L	Total Coliform CFU/100ml	TDS mg/L	mg/L
1.	Sources of Drinking Water for Supply only after Disinfecting	6.5-8.5	≥6	s 2	7.0	0.1	0,1	0.02	0.03	0.001	≤100	1000	10
2.	Water Usable for Recreational Activity	6.5-8.5	≥5	≤3	7.0	0.3	0.5	0.2	0.05	0.001	≤50	1000	10
3.	Sources of Drinking Water for Supply after Conventional Treatment	6-9	25	≤3	7.0	0.3	0.5	0.02	0.03	0.001	≤5000	1000	25
4.	Water Usable by Fisheries	6-9	25	≤6	7.0	0.3	0.5	0.05	0.1	0.004	≤5000	1000	50
5.	Water usable by various Process and Cooling Industries	6.5-8.5	≥1	12	1/2	2.7	-	0.1	0.1	0.05		1000	100
6.	Water Usable for Irrigation	6.5-8.5		≤12	5.0	1.5	2.0	0.1	0.1	0.002	≤50000	1000	100

Note: Electrical Conductivity for Irrigation Water-2250 µS/cm (at a temperature of 25°C: Sodium less than 26%: Boron less than 0.2%

Source: ECR 2023, Schedule 2, Rules-31, A (1)-Standard for inland Surface Water

III. DESCRIPTION OF THE SUBPROJECT

A. Subproject Location and Area

- 44. The proposed construction and improvement of Bagerhat Road subprojects will be in all nine wards of Bagerhat Pourashava which is also a coastal town. It is 278 km (through Maowa) away from Dhaka city and well connected through road. Bagerhat municipality was established in 1958, which is located at 22°39′20.56″N 89°47′41.01″ E. It is bounded by Gopalganj District on the north, by Pirojpur and Barguna district on the east, Khulna District on the west, and by the Bay of Bengal on the south. It occupies an area of 15.888 km² and consists of 9 wards. The subprojects are in all nine wards of the Bagerhat Paurashava.
- 45. Bagerhat Pourashava area has almost a flat topography and characterized by a fairly plain land except the water bodies such as rivers, ponds, depressions and canals etc. which is located on the southern part of Bengal Basin. The construction and improvement work of the road subprojects falls under the residential and commercial areas of the Bagerhat Pourashava. Infrastructure like electric and telephone poles may be affected due to construction activity. Screening with Integrated Biodiversity Assessment Tool (IBAT) confirms that there is no ecologically sensitive area within or adjacent the proposed subproject location. There is no natural habitat left at this site. There are, as well, no protected areas, wetlands, mangroves, or estuaries in or near the subproject location. There are no forest areas either, within or near the locations. However, few trees may be cut down due to subproject activity.

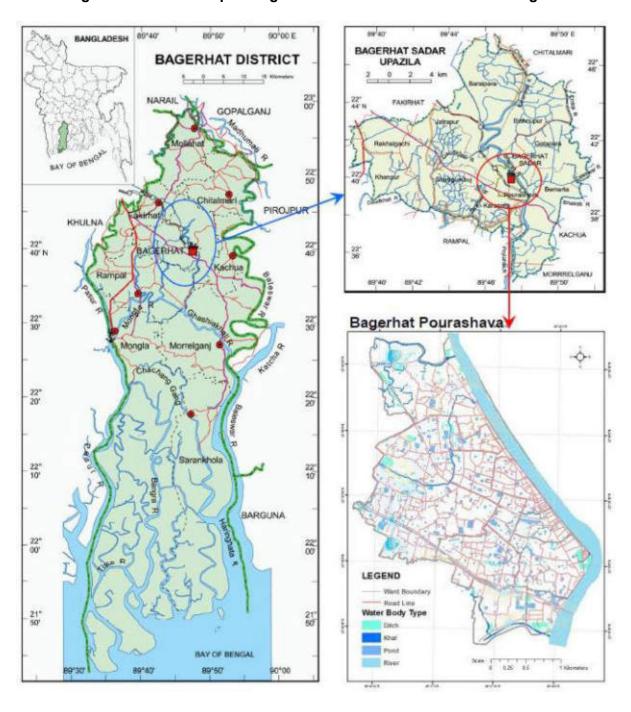
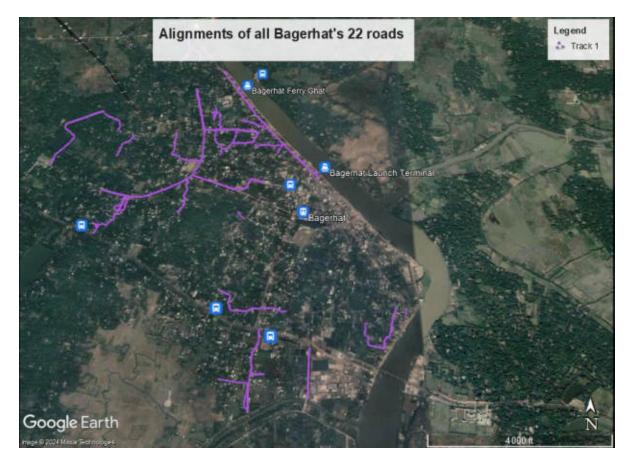


Figure 2: Location Map of Bagerhat Pourashava and all 22 road alignments



Source: Walkover of ADB TA Consultant (Environment Specialist) though start to end point of all 22 proposed roads of the project.

B. Existing Condition of Roads

- 46. The construction and improvement of 22 roads (per DPP 25 but three were cancelled from the project as done by another project) subproject will be implemented in Bagerhat Pourashava with total length of 14.930 km of road works in all of the 9 wards. Existing condition of selected roads in the Bagerhat are either BC or RCC or brick soling or earthen road and mostly damaged. At present the width of these roads vary from 2.00 m to 6.50 m.
- 47. Figure 3 shows on-ground photographs (numbers as per table 10) of the existing conditions of roads likely to be affected in the Pourashava.

Figure 3: Photographs of Existing Condition of the Selected Roads of Bagerhat Pourashava





Road-1 Road-2



Road-7 Road-8



Road-13 Road-14







Road-21 Road-22

C. Subproject Scope and Components

- 48. The Construction and Improvement of road subproject will be implemented in Bagerhat Pourashava to provide more accessible, reliable, and climate-resilient roads. The subprojects Contract Packages (Package No.: e-GP/CTCRP/BAGE/RD-01 and Package No.: e-GP/CTCRP/BAGE/RD-02) will cover roads with total length of 14.930 km in all of the 9 wards of Bagerhat Pourashava. The existing condition of selected roads in the Bagerhat are BC or RCC road or brick soling and earthen and mostly damaged. At present the width of these roads vary from 2.00 m to 6.50 m. All two packages have been designed without major resettlement issues and land acquisition. Typical cross section and topographic of the road improvement is given in Figure 5 and 6.
- 49. The subproject activities of roads under Bagerhat Pourashava will be the upgrading, re/construction of roads. Specifically, the works will include the following: (i) Earth filling works with excavation, ii) Roadway reinforcement with CC and RCC works iv) Sand filling. These have been further utilized in assessing the environmental impact due to development of roads. A summary of the road packages under the subproject is in Table 10.

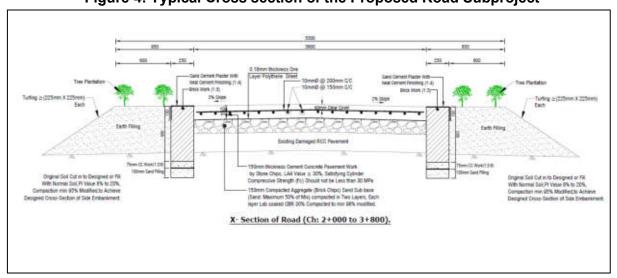
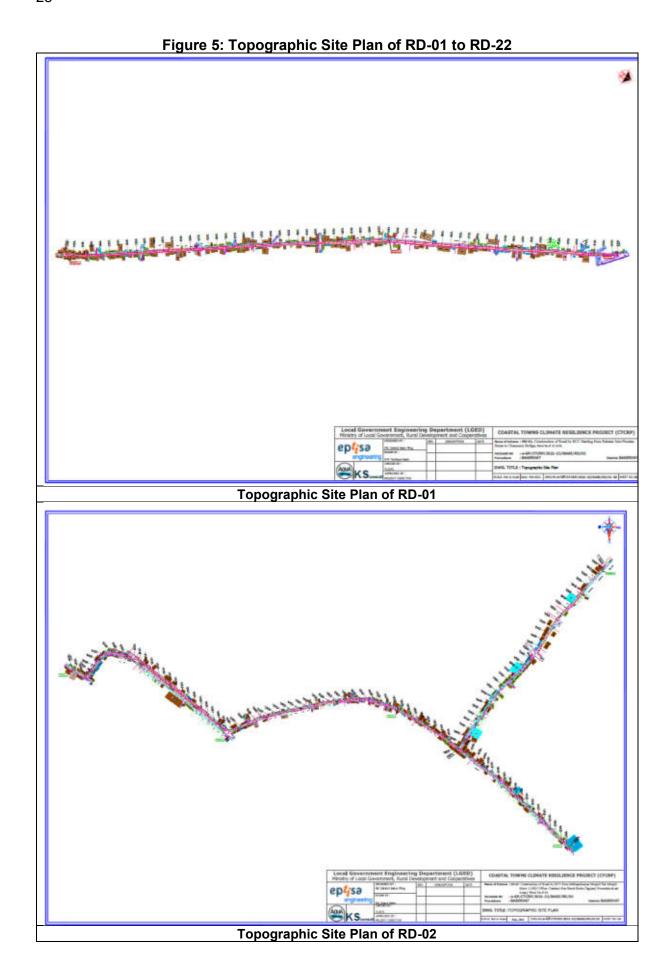
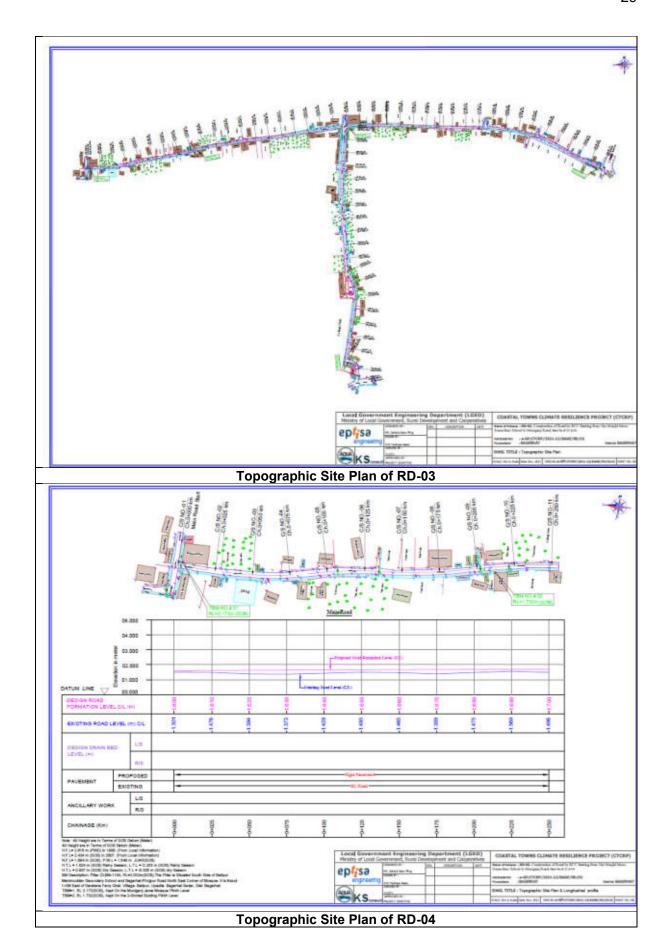
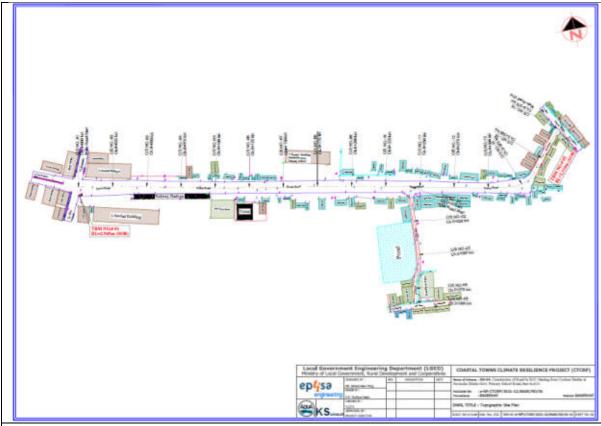
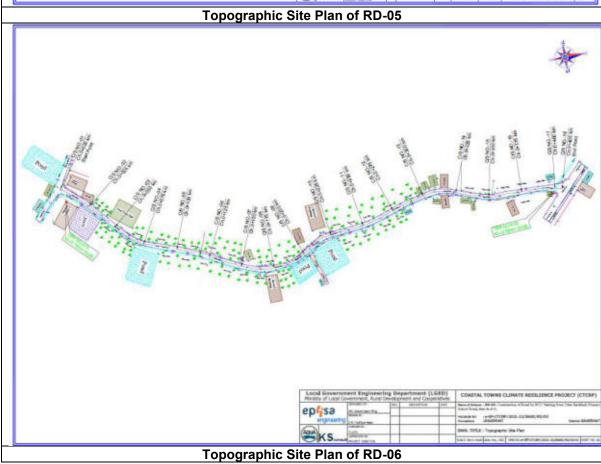


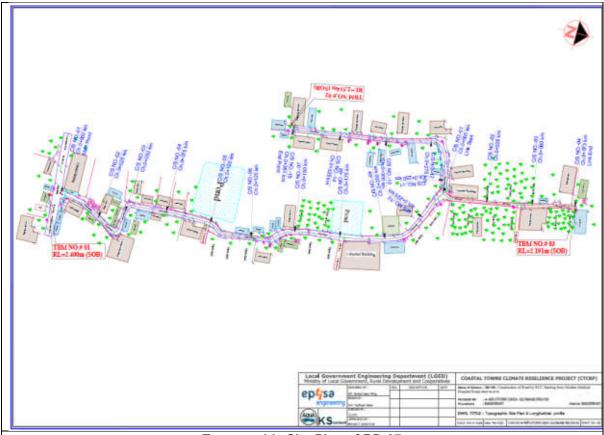
Figure 4: Typical Cross section of the Proposed Road Subproject



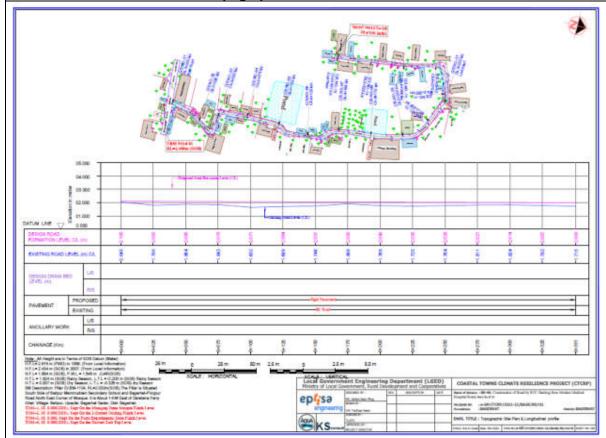




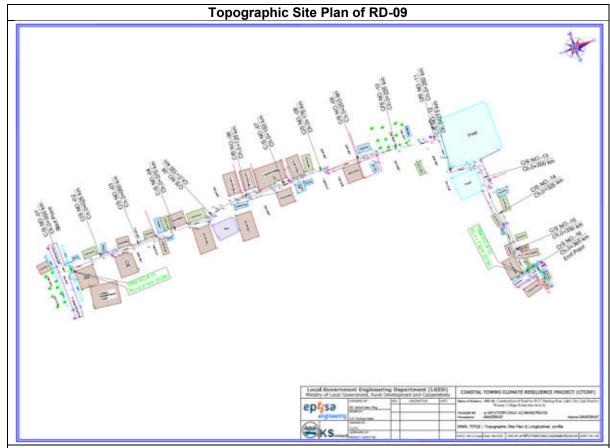


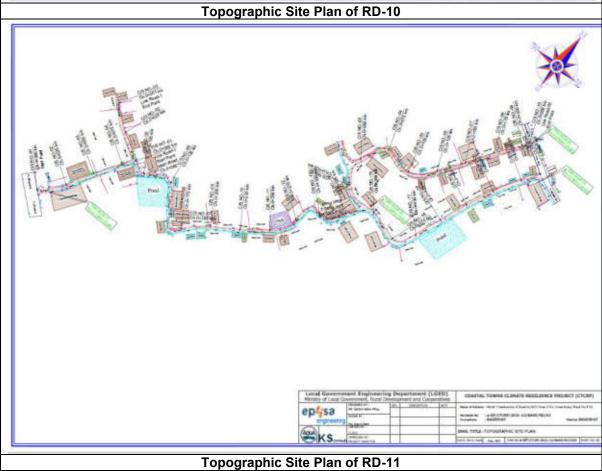


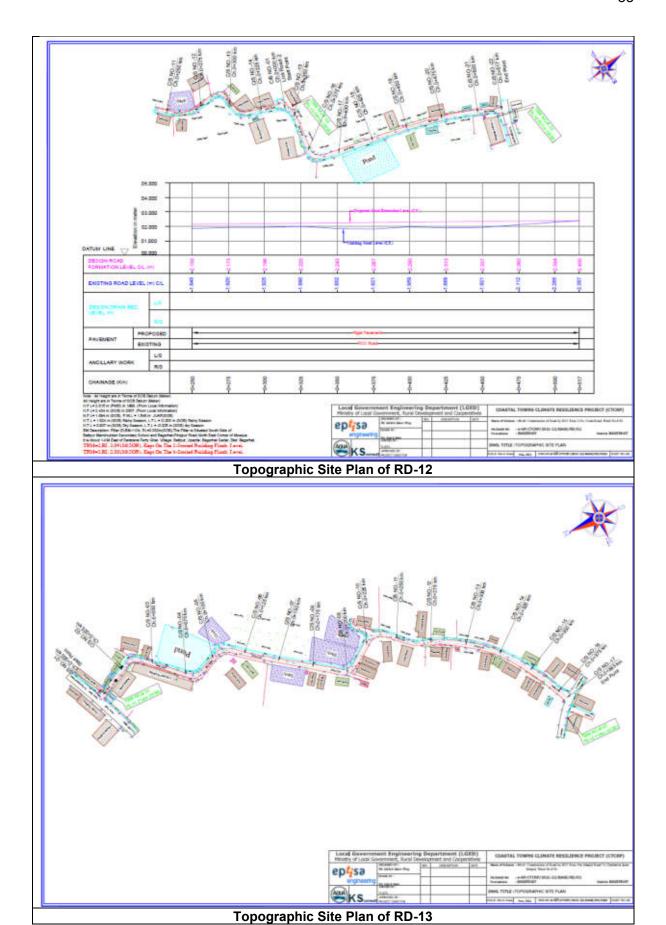
Topographic Site Plan of RD-07

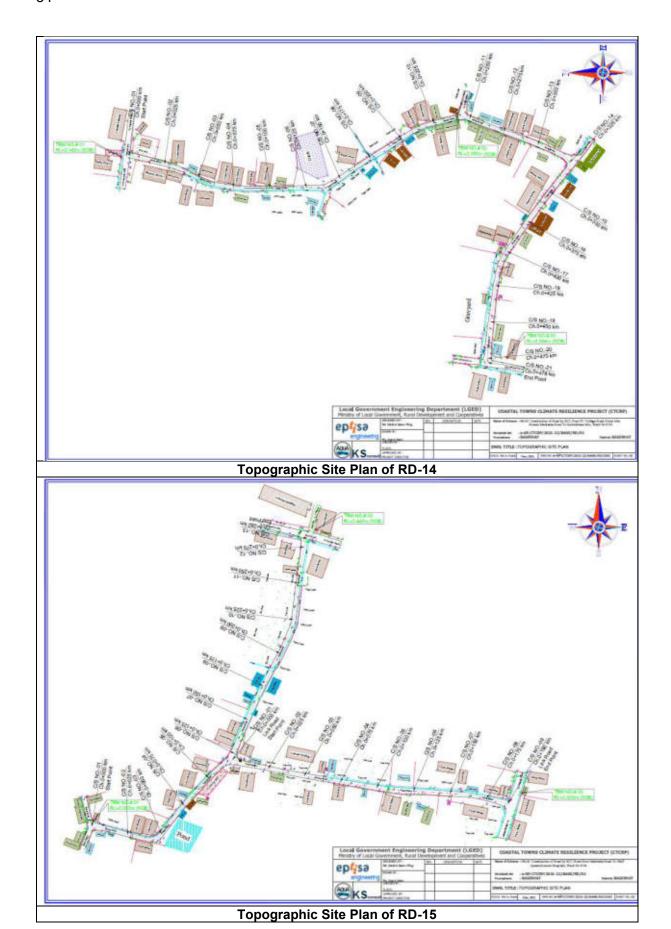


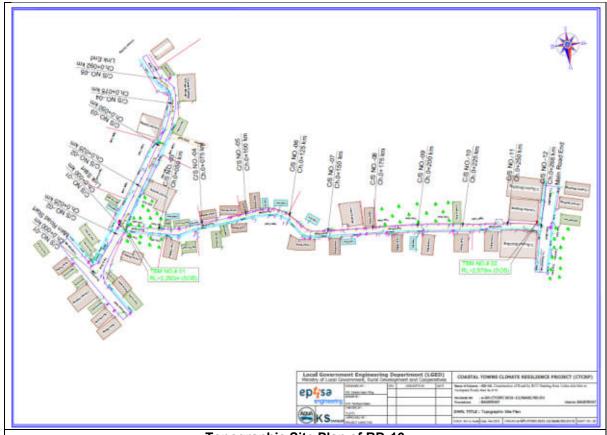
Topographic Site Plan of RD-08

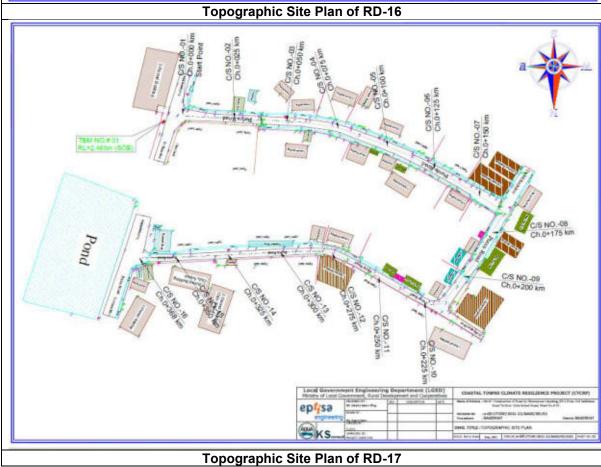


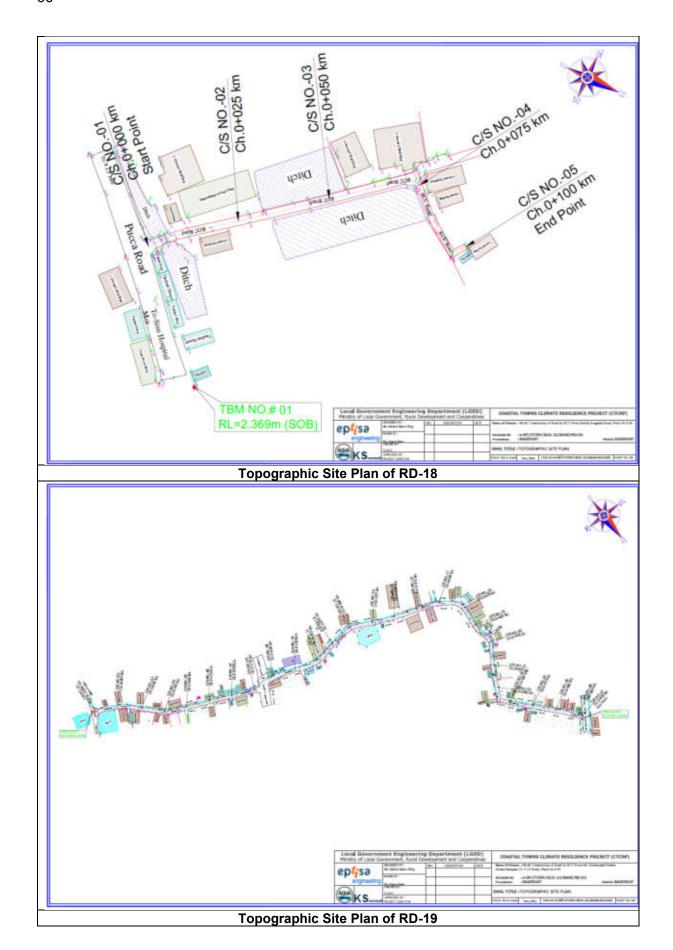


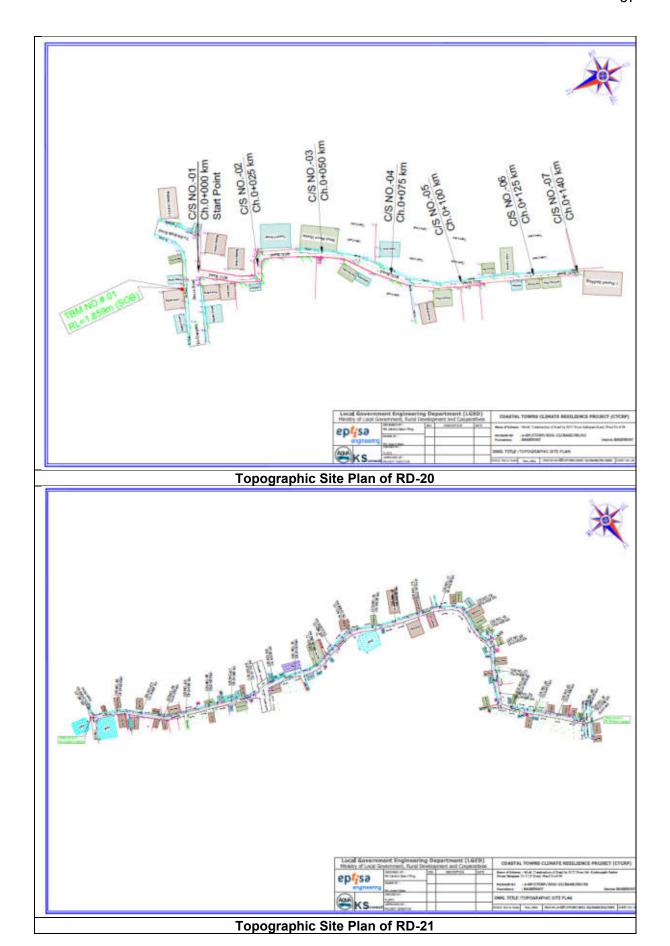












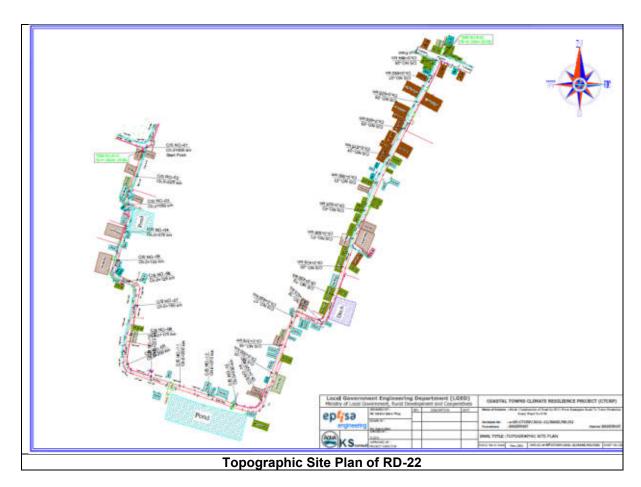


Table 10: Summary Description of Subproject Components

	l able 10: Summary Description of Subproject Components						
SL.No	Road	Existing Road Length (km)	Propo sed Road Lengt h (km)	Wid	th (m)	Туре	Proposed road type
				Existi ng	Propos ed		
e-GP/	e-GP/CTCRP/BAGR/RD-01: Construction/ Improvement of ten roads under Bagerhat Pourashava, District- Bagerhat						
1	Construction of Road by BC Starting from Rahater Mor- Puratan Bazar to Chanmary Bridge,(Ch 0+ 000 to 1+ 540), Ward No- 01 & 5.(Road Length = 1540 m)	1.54	1.54	3.75 to 6.50	3.75 to 6.50	Damaged RCC	BC Road
2	Construction of Road by BC From Mithapukurpar Mosjid -Nur Mosjid More-LGED Office- Dashani Bus Stand- Pacha Digipar (Pourashava Last Aria)(Ch 0+ 000 to1+ 909) & Link road (Ch 0+ 000 to 0+756) starting at Ch.	2.67	2.67	4.25 to 7.25	4.25 to 7.25	Damaged BC	BC Road

SL.No	Road	Existing Road Length (km)	Propo sed Road Lengt h (km)	Width (m)		Туре	Proposed road type
				Existi ng	Propos ed		
	1+431 @ main road at Word No-3.(Road Length = 2665 m)						
3	Construction of Road by BC Starting from Nur Mosjid more- Sommiluni School to Moniganj Road,(Ch 0+ 000 to 1+ 000) & Link road (Ch 0+ 000 to 0+ 495) starting at Ch. 0+494 @ main road at Word No - 01 & 04.(Road Length = 1495 m)	1.50	1.50	4.25 to 7.25	4.25 to 7.25	Damaged BC	BC Road
	Construction of Road by BC Starting from Cyclone Shelter at Suvechha Shisu Gosvt Primary School Road,(Ch.0+ 000 to 0+ 375) & Link road (Ch.0+ 000 to 0+ 085)starting at Ch. 0+245 @main road at Ward No-07.(Road Length =460 m)						This road is cancelled from this project as it's already done by other project
4	Construction of Road by BC Starting from Basabati Amtola School – Tole office- Putimari Bridge, (Ch 00+000 to 0+590) at Ward no. – 08 (Road Length = 590 m)	0.59	0.59	4.25 to 7.25	4.25 to 7.25	Damaged BC and Earthen	BC Road
5	Construction of Road by BC Starting from Bus Stand to Beribadh road, (Ch 00+000 to 0+700) at Ward no. – 09 (Road Length = 700 m)	0.70	0.70	2.75 to 3.75	2.75 to 3.75	Damaged RCC	BC Road
6	Construction of Road by BC of Monendo Babu road, (Ch 00+000 to 0+380) at Ward no. – 02 (Road Length = 380 m)	0.38	0.38	3.40	3.40	Damaged BC	RCC Road
7	Construction of Road by BC from Akter Kha Dighi (H/O. Mr. Narayan) - Slab er more to Hazi Bari, (Ch 00+000 to 1+230) at Ward	1.23	1.23	3.75	3.75	Damaged BC	BC Road

SL.No	Road	Existing Road Length (km)	Propo sed Road Lengt h (km)	Width (m)		Туре	Proposed road type
				Existi ng	Propos ed		
	no. – 02 (Road Length = 1230 m)						
8	Construction of Road by BC from Govt. School to P.C. College Shahid Minar (Dr. Mozammel Hossain Road) Horinkhana, (Ch 00+000 to 0+550) at Ward no. – 02 (Road Length = 550 m)	0.55	0.55	3.150 to 3.825	3.150 to 3.825	Damaged BC	BC Road
9	Construction of Road by BC from H/O. Mr. Sakam Khondoker to H/O. Mr. Moni (Councilor) Road, (Ch 00+000 to 0+300) at Ward no. – 02 (Road Length = 300 m)	0.30	0.30	2.85 to 4.25	2.85 to 4.25	Damaged BC	BC Road
	Construction of Road by BC from Alia Madrasha road to Sk. Helal Uddin Stadium Road, (Ch 00+000 to 0+430) at Ward no. – 06 (Road Length = 430 m)					Damaged BC	This road is cancelled from this project as it's already done by other project
10	Construction of Road by BC from Harihkali Bottola to Mr. Moloy House road, (Ch 00+000 to 0+290) at Ward no. – 06 (Road Length = 290 m)	0.29	0.29	2.40 to 4.00	2.40 to 4.00	Damaged BC	BC Road
Total Ro	ad Length	9.740	9.740				
e-GP/CTCRP/BAGR/RD-02: Construction/ Improvement of twelve roads under Bagerhat Pourashav District- Bagerhat							Pourashava,
11	Construction of Road by RCC Starting from Uttar Harikhali Primary School road,(Ch.0+ 000 to 0+405).Ward No-1. (Road Length = 405 m)	0.41	0.41	2.70	3.25	Damaged BC	RCC Road
12	Construction of Road by RCC Starting From of Adu nikh Hospital road,(Ch 0+000 to 0+351) & Link road (Ch 0+000 to 0+073) starting at Ch. 0+242 @	0.42	0.42	2.40 to 3.40	2.40 to 3.40	Damaged BC	RCC Road

SL.No	Road	Existing Road Length (km)	Propo sed Road Lengt h (km)	Width (m)		Width (m)		Туре	Proposed road type
				Existi ng	Propos ed				
	main road at Word No-2. (Road Length = 424 m)								
13	Construction of Road by RCC Starting from Lake City Link Road to Women College Road,(Ch.0+ 000 to 0+365). Ward No-2. (Road Length = 365 m)	0.37	0.37	2.40 to 3.00	2.40 to 3.00	Earthen	RCC Road		
14	Construction of Road by RCC From 2 No.Cross Road,(Ch.0+ 000 to 0+ 517) & Link road-01 (Ch.0+ 000 to 0+ 051) starting at Ch. 0+085, Link road-02 (Ch.0+ 000 to 0+ 206) starting at Ch. 0+342 @ main road at Ward No-3.(Road Length = 774 m)	0.77	0.77	2.75 to 4.00	2.75 to 4.00	Damaged RCC	RCC Road		
15	Construction of Road by RCC From Nur Masjid Road To Chaltetola Jame Mosjid,(Ch.0+ 000 to 0+ 383).Ward No-3.(Road Length = 383 m)	0.38	0.38	3.5	3.5	Damaged RCC	RCC Road		
16	Construction of Road by RCC from PC College Road (Gurai Mia House)-Madrasha Road To Kaborkhana Mor, (Ch.0+000 to 0+478).Ward No-4.(Road Length = 478 m)	0.48	0.48	3.25	3.25	Damaged BC	BC Road		
17	Construction of Road by RCC from Madrasha Road To Staff Quater (Animal Hospital),(Ch.0+000 to 0+282) & Link road (Ch.0+000 to 0+190) at Ch.0+121 @ main road at Ward No-4.(Road Length = 472 m)	0.47	0.47	3.5	3.5	Damaged BC	BC Road		
18	Construction of Road by RCC Starting from Lichu tola Mor To Amlapara Road,(Ch.0+ 000 to 0+ 268) & Link road (Ch.0+ 000 to 0+ 092) starting at Ch. 0+030 @ main road at	0.36	0.36	3.25 to 3.50	3.25 to 3.50	Damaged BC	RCC Road		

SL.No	Road	Existing Road Length (km)	Propo sed Road Lengt h (km)	Width (m)		Туре	Proposed road type
				Existi ng	Propos ed		
	Ward No-5.(Road Length = 360 m)						
	Construction of Road by RCC from Old Jeelkhana Road To Govt. Girls School Road,(Ch.0+ 000 to 0+ 368).Ward No-5.(Road Length = 368 m)	0.37	0.37				This road is cancelled from this project as it's already done by other project
19	Construction of Road by RCC from Mohila Songstha Road,(Ch.0+000 to 0+100).Ward No-6.(Road Length = 100 m)	0.10	0.10	2.4	2.4	Damaged CC	RCC Road
20	Construction of Road by RCC from Mr.Krishnopath Sarker House-Sahapara to V.I.P. Road, (Ch.0+000 to 0+629). Ward No-9. (Road Length = 629m)	0.63	0.63	4.0	4.0	Damaged BC	RCC Road
21	Construction of Road by RCC from Malopara road,(Ch.0+ 000 to 0+ 140),Ward No-8.(Road Length =140 m)	0.14	0.14	2.50	2.50	Damaged BC	RCC Road
22	Construction of Road by RCC from Kasaipara Road to Town Protection Road,(Ch.0+ 000 to 0+ 664),Ward No-8. (Road Length = 664 m)	0.66	0.66	2.5 to 3.5	2.5 to 3.5	Damaged BC	RCC Road
Total Roa	d Length	5.190	5.190				
Grand To	Grand Total		14.93 0				

D. Resource Utilization

50. Gravel, sand, and aggregate will be required for civil construction part of this project, most of which are available in Bangladesh, which 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.

Table 11: Quantity of Construction Material

SI.No	Description Description	Unit	Quantity			
e-GP	e-GP/CTCRP/BAGE/RD-01: Construction/ Improvement of 10 roads under Bagerhat Pourashava, District- Bagerhat					
1	Earthworks					
i)	Earth filling works, Earth work in excavation	m ³	8,870			
2	Roadway					
i)	CC & RCC works	m ³	32,050			
ii)	Reinforcement	Kg	220,520			
iii)	Geo-textile	m ²	920			
iv)	Blocks (size 400mm X 400mm X 100mm)	each	5,275			
v)	Sand filling, Aggregate sand sub-base, polythene sheet, WBM, Brick	m ³	7,110			
е	-GP/CTCRP/BAGE/RD-02: Construction/ Improvement of 12 roa Pourashava		er Bagerhat ct- Bagerhat			
1	Earthworks					
i)	Earth filling works, Earth work in excavation	m ³	5,230			
2	Roadway					
i)	CC & RCC works	m^3	21,124			
ii)	Reinforcement	Kg	170,320			
iii)	Geo-textile	m ²	587			
iv)	Blocks (size 400mm X 400mm X 100mm)	each	3,120			
v)	Sand filling, Aggregate sand sub-base, polythene sheet, WBM, Brick	m ³	4,520			

Source: DDS Computation Based on Designs

E. Construction Schedule

51. The construction and re-excavation of schedule of the road packages including road protection works depends on the methodology adopted for construction. In general, the time period will also depend on the resources put in place by the contractor. The package for the construction and improvement of the Bagerhat roads is proposed to be implemented by post-qualified contractors under a single envelope single stage bidding process through National Competitive Bidding (NCB) procedures. The subproject may take 18 months for construction. The post construction will also include defect liability period of 12 months.

IV. ANALYSIS OF ALTERNATIVES

- 52. 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.
- 53. "With Project" alternative. 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. Specifically, the alternative of pursuing the subproject ("with project" alternative) have that following advantages:
 - There will be improved and assured road transport facilities for the residents of Pourashava/District;

- Transport development will stimulate socio-economic development of the area. The
 proposed roads with existing damaged conditions comprise major deterrent to
 commercial growth in the area, the project scenario will catalyse commercial growth in
 various centres of the respective locality and will facilitate better business opportunities
 for local people;
- Roads improved through the project will also result in savings in the vehicle operation cost (fuel, operation, and maintenance) due to better road condition;
- Less emission from road vehicles due to better roads will result in better environmental conditions along the influence area.

Table 12: Negative impact of current proposal on environment and society

Sector	Impact
Land (Government-owned land are to be given priority)	No, construction and improvement of roads will be within existing ROWs in government-owned lands.
Presence Agricultural/crop land	Close by, no significant impact will occur if EMP is followed
Village affected	Close by, no significant impact will occur if EMP is followed
Families affected	Close by, no significant impact will occur if EMP is followed
Local Business affected	Close by, no significant impact will occur if EMP is followed
Loss of structures	Close by, no significant impact will occur if EMP is followed
Impact on Common properties	Close by, no significant impact will occur if EMP is followed
Trees to be chopped down	However, no impact is anticipated as no trees will need to be removed.
Presence of sensitive ecosystem	No
Presence of waterbody	Close by, no significant impact will occur if EMP is followed
Tribal population affected	No

- 54. **No-project Alternative and Implications.** The "no-project" option means that no road improvement/reconstruction will be implemented in the Pourashava. The "do nothing" or "without the project" option is not viable due to the following factors:
 - (i) The socio-economic-physical status of the Bagerhat residents would remain unchanged;
 - (ii) The local skills would remain underutilized as no employment opportunities will be created for local population who would have otherwise worked at the project area:
 - (iii) Reduced business development due to current poor bad condition of the road network; and
 - (iv) No project scenario case will also result in environmental and social impacts due to potential pollution, increase of accidents, and increase of diseases brought by poor road condition.

V. DESCRIPTION OF BASELINE ENVIRONMENT

A. Baseline Information

55. The primary objective in this chapter is to provide an environmental baseline of the proposed road construction and improvement sites. 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 was 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 on the protected areas or critical habitat that may exist around the project sites.

B. Project Influence Area

- 56. Impacts and risks were analyzed in the context of the project's area of influence, which encompasses the area where the roads will be constructed, immediate vicinity and the location of construction phase facilities such as the worker's camp, storage and disposal areas.
- 57. The primary impact will be confined mostly within the location of road construction areas. Delivery of construction materials to the site would extend the PIA. This means that during transport of construction materials, the impact area is extended along the roads being traversed by the transporting equipment.

C. Physical Environment

- 58. **Topography**. The topography of Bagerhat Pourashava which covers the subproject road alignments is mostly flat, with differences in elevation not exceeding 1m. The subproject area is located in the Ganges tidal flood plain at about 0-3 masl.
- 59. Geology: Bagerhat is located at the Lower Ganges Delta. 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 McIntire1959; 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).
- 60. **Soil:** Based on the general soil map and soil texture map of Bangladesh, Bagerhat District has grey floodplain soils with silty loam texture. The soils are non-saline throughout the year over substantial areas in the north and the east, but they become saline to varying degrees in the dry season in the southwest.
- 61. **Seismicity.** Twenty-six, 38 and 36 percent of Bangladesh falls 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 majority of them are at shallow depth. Based on the Geological Survey of Bangladesh (GSB, undated), Bagerhat falls in low intensity seismic zone (Zone-III, Basic Seismic Coefficient 0.04g).

- 62. **Climate:** Bagerhat has a tropical climate. The average annual temperature in Bagerhat is 26°C, while the average annual rainfall is 1934 mm. The driest month is December with 8 mm. Most precipitation falls in July, with an average of 404 mm. The average temperatures vary during the year by 10.7 °C.
- 63. **Ground water:** 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 3-8×103 m/d. The aquifers are mostly mediumto fine and medium-to-coarse sands, with 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). Based on the groundwater zoning map of 2010 of the Bangladesh Agricultural Research Council, Bagerhat District has groundwater depth of 0-5.3 meters. Ground water quality in the Bagerhat area is influenced by salinity and iron. Water in most shallow aquifer is somewhere saline and contaminated with arsenic and iron, which is not suitable for drinking purposes. The lower deep aquifer is found at a depth of 80 m to 100 m. Deep aquifers with fresh water in the Pourashava are exploited to meet the demand of water for inhabitants. There is no secondary groundwater quality data available for Bagerhat yet.
- 64. **Surface water:** Panguchi, Daratana, Madhumati, Pasur, Haringhata, Mongla, Baleswar, Bangra and Goshairkhali are the biggest and notable rivers of Bagerhat district. The relatively smaller Bhairab river is the main water body nearest and bordering the eastern side of the subproject area. These rivers carry fresh water throughout the year in the northeast and east, but saltwater penetrates increasingly further inland towards the west, mainly in the dry season, but for most or the entire monsoon in the southwest. Bhairab river is being utilized as a navigational corridor for many of the municipalities or cities of Bangladesh. Secondary water quality data for Bhairab river at the stretch adjacent thesubproject area is not available. Baseline surface water quality sampling and analysis will be conducted before the start of construction activities.
- 65. **Natural Hazards**. 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. A flood season in Bangladesh may start as early as May and can continue until November. Five floods during the last fifty years were extensive and devastating and these are the floods of 1955, 1974, 1987, 1988, and 1998. The project area falls in the "moderate to severe tidal surge" flood zone. Shallow flooding occurs in the Pourashava during high tides, either throughout the year, or only in the monsoon, except in the extensive areas where tidal flooding is prevented by BWDB embankments. Within embankments, there is seasonal flooding with accumulated rainwater.

- 66. **Air Quality.** Baseline data on air quality for the subproject area is not available. There is no major source of air pollution at the proposed site. The contractor will be required to establish the baseline air quality before the start of construction.
- 67. **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 (motorcycles, pick-up, mini-trucks, auto-rickshaws, Nochimon/Tomtom), playing of loud-speaker, mass people gathering and people chatting. The contractor will be required to establish the baseline noise levels before the start of construction.

D. Biological Environment

- 68. **Terrestrial Fauna and Flora Species.** There are no forest areas within and in the immediate vicinities of Bagerhat Pourashava. Fauna species found in the subproject area are domestic animals and other species commonly found in the lowlands of Bangladesh.
- 69. Aquatic Species. The fish habitats are primarily classified under two broad categories, capture fishery and culture fishery. Internal *khals* as well as floodplains are considered as capture fish habitats. The culture fish habitats are of two types: Homestead fishponds and commercial fishponds. The main fish species reported in fish farming ponds are mainly major carps and exotic carps. At present major carps such as ruhu (*Labeorohita*) ,catla (*Catlacatla*) and mrigal (*Chirrhinuscirrhosus*) along with exotic carps such as silver carp (*Hypophthalmichthys molitrix*), grass carp (*Ctenopharyngodonidella*), bighead carp (*Aristichthysnobilis*) and common carp (*Cyprinuscarpio*) are cultured in ponds and gained much popularity because of its easy culture system, rapid growth, disease resistance and high market price. During field visit in March 2018, the consultant observed that culture fisheries (80%) dominate Bagerhat fish market. The rest is capture fisheries (20%). As observed during the site visit, no ponds or khals are used for aquaculture within the subproject area.
- 70. **Floral Species.** Flora species in various ecosystems and the aquatic floral species at subproject are summarized below.
- (i) Homesteads and Orchards: Betel nut (areca catechu), kadam (anthocephalus chinensis), coconut (cocos nucifera), date palm (phoenix dactylifera), sofeda (achras sapota), mango (magnifera indica), jackfruit (artocarpus heterophyllus), fig, pome granade, guava (Psidium guajava), grapefruit (Citrus grandis), lemon (Citrus spp.), blackberries (Eugenia jambolana), plum, toddy palm, koroi (Albizia sp.), shisoo (Dalbergia shishu), shirish, rain tree (Samanea saman), eucalyptus (Eucalyptus spp.), bamboo (Bambusa spp.), babla (Acacia nilotica), jeol, neem (Azadirachta indica), jamrul (Syzygium javanicum), chalta (Dillenia indica), bel (Aegle marmelos), amra (Spondiaspinnata), amloki (Phyllanthus embelica), segun (Tectona grandis), etc.
- (ii) **Roadside Plantation:** Date palm (*Phoenix dactylifera*), road chambol, koroi (*Albizia spp.*), krishnachura (*Delonix regia*), rain tree (*Samanea saman*), shisoo (*Dalbergia shishu*), babla (*Acacia nilotica*), akashmoni (*Acacia moniliformis*), banyan (*Ficus bengalensis*), mango (*Magnifera indica*), blackberries (*Eugenia jambolana*), raj koroi (*Samanea saman*), etc.
 - (iv) Aquatic Flora: The site vegetation is typically dominated by annuals or herbaceous perennials such as water-purslane (*Ludwigiapalustris*), smartweeds (*Persicaria spp.*), rice cut-grass (*Leersiaoryzoides*), swamp-candles (*Lysimachiaterrestris*), ditch-stonecrop (*Penthorumsedoides*), or little spike-rush (*Eleocharisacicularis*).

- 71. **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 6).
- 72. 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 3km, 5 km and 10 km radius). Screening results show there is no Protected Area within the 10-km radius of the site. Results also show that there is also no key biodiversity area (KBA) within the 10-km radius of the site. From the same IBAT screening, 93 IUCN Red List species of concern are identified within 50-km of the area of interest (see Appendix 3 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 6: Protected Areas of Bangladesh

Sources: Forest Department, 2021;

- 73. **Demography**. In 2011, the population of the Pourashava was 49,073 (BBS, 2011) with population density at 3,088 persons per km2. Bagerhat Pourashava has been experiencing lower annual average population growth than the national average urban population growth over a long period in the past (1981-2011). The annual population growth rate varies significantly between various inter-census periods. The Pourashava has experienced 1.73 percent annual average population growth rate during the period of 1981-1991, which is higher than other inter-census periods over a 30-year period between 1981 and 2011. Infrastructure improvements will help sustain a reasonably higher growth of population in the Pourashava in the future.
- 74. **Land use pattern**. For land, 31.35% land is agriculture land, 25.37% land is residential, 25.79% is waterbody, 2.28% circulation network, 1.20% land is used in commercial purpose and 1.01% is used on education and research purposes. There is no forest area in this district and the land cover categories are generally basically settlements with few patches of agricultural lands.
- 75. **Livelihood and Employment.** According to BBS 2011, 88% of the population are engaged in the agriculture sector. Agricultural sector for the region includes farmer, agricultural labor, fishers, day labors, etc. About 5% population is engaged in salaried service sector, which includes population who are working in the government and private sector.
- 76. **Physical Cultural Resources**. Common property resources/community facilities in the subproject area include mosques, graveyards, temples, cremation ground, playground, open water bodies, and Eidgahs (place for offering Eid prayers). The local people use these for the purposes of religious, social and cultural gathering.
- 77. Bagerhat is a heritage-rich district in Bangladesh. The Historic Mosque City of Bagerhat is a world-renowned heritage site in the district that was inscribed in the UNESCO World Heritage List in 1985. It is located near the northwestern and western boundary of Bagerhat Pourashava. This area has become a local and international tourist destination in Bangladesh.
- The Historic Mosque City of Bagerhat is an important evidence of medieval city in the southwest part of present Bagerhat district which is located in the southwest part of Bangladesh, at the meeting-point of the Ganges and Brahmaputra rivers. This ancient city was formerly known as Khalifatabad, which sprawls over on the southern bank of the old river Bhairab and flourished in the 15th century BC. It hosted some of the most significant buildings of the initial period of the development of Muslim architecture of Bengal, which include mosques, public buildings, mausoleums, bridges, roads, water tanks and other public buildings constructed from baked brick, and are spread over a 50-square kilometer area encompassing Bagerhat town. Remains of some of these structures still stand overground today, and some structural ruins are already buried underground. These overground structures include the ruins of Shaitgumbad Mosque, Singar Mosque, Bibi Begni's Mosque, Chuna Khola Mosque, Naygumbad Mosque, Ranavijaypur Mosque, Rezakhoda Mosque, Zindapir Mosque, Sabekdanga Monument and Khan Jahan's Tomb. The underground structural ruins are found in various parts of the district and a few of them are in the form of low mounds while some others are almost levelled down to the surrounding land surface. Examples of these underground ruins are Khan Jahaner Vasatbati, Bara Azina Masjid, Jahajghata, and Kotwali Chawtara.

E. Site-Specific Environmental Features

79. The table below shows the site-specific environmental features along the proposed road construction and improvements.

Table 13: Site-Specific Environmental Features

			ific Environmental Features
SI	Road	Environmental Features	Photograph
1	Construction of Road by BC Starting from Rahater Mor- Puratan Bazar to Chanmary Bridge,(Ch 0+ 000 to 1+ 540), Ward No- 01 & 5.(Road Length = 1540 m)	Nearby the road alignment there are trees, pond graveyards, madrasha, electric poles and residential houses.	Pond
2	Construction of Road by BC From Mithapukurpar Mosjid -Nur Mosjid More- LGED Office-Dashani Bus Stand-Pacha Digipar (Pourashava Last Aria)(Ch 0+ 000 to 1+ 909) & Link road (Ch 0+ 000 to 0+756) starting at Ch. 1+431 @ main road at Word No-3.(Road Length = 2665 m)	Nearby the road alignment there are trees, nursing college, school, technical school and college, central water tank, fire service office, ponds, mosques, Hindus temples, SP house, fisheries office, shops, electric poles, , and residential houses.	Hindus temple
3	Construction of Road by BC Starting from Nur Mosjid more- Sommiluni School to Moniganj Road,(Ch 0+ 000 to 1+ 000) & Link road (Ch 0+ 000 to 0+ 495) starting at Ch. 0+494 @ main road at Word No - 01 & 04.(Road Length = 1495 m)	Nearby the road alignment there are trees, district public library, mosque, school, women college, electric poles, shops, and residential houses.	District public library
	Construction of Road by BC Starting from Cyclone Shelter at Suvechha Shisu Gosvt Primary School Road,(Ch.0+		This road is cancelled from this project as it's already done by other project

4	000 to 0+ 375) & Link road (Ch.0+ 000 to 0+ 085)starting at Ch. 0+245 @main road at Ward No- 07.(Road Length =460 m) Construction of Road by BC Starting from		
4	Construction of Road		
	Basabati Amtola School – Tole office- Putimari Bridge, (Ch 00+000 to 0+590) at Ward no. – 08 (Road Length = 590 m)	Nearby the road alignment there are trees, river, bridge, overhead electric poles and shops.	Bridge over river
5	Construction of Road by BC Starting from Bus Stand to Beribadh road, (Ch 00+000 to 0+700) at Ward no. – 09 (Road Length = 700 m)	Nearby the road alignment there are trees, boundary wall, residential houses, mosque, madrasha, ditch, pond, open field and overhead electric poles.	Open field
6	Construction of Road by BC of Monendo Babu road, (Ch 00+000 to 0+380) at Ward no. – 02 (Road Length = 380 m)	Nearby the road alignment there are electric poles, shops, trees, boundary wall and residential houses.	Residential house

SI	Road	Environmental Features	Photograph
7	Construction of Road by BC from Akter Kha Dighi (H/O. Mr. Narayan) - Slab er more to Hazi Bari, (Ch 00+000 to 1+230) at Ward no. – 02 (Road Length = 1230 m)	Nearby the road alignment there are electric poles, mosque, graveyards, trees, ponds, culvert, canal, school, school playground, garden, and residential houses.	
8	Construction of Road by BC from Govt. School to P.C. College Shahid Minar (Dr. Mozammel Hossain Road) Horinkhana, (Ch 00+000 to 0+550) at Ward no. – 02 (Road Length = 550 m)	Nearby the road alignment there are trees, pond, shop, tube well, mosque, graveyard, electric poles, boundary wall and residential houses.	Culvert over canal
9	Construction of Road by BC from H/O. Mr. Sakam Khondoker to H/O. Mr. Moni (Councilor) Road, (Ch 00+000 to 0+300) at Ward no. – 02 (Road Length = 300 m)	Nearby the road alignment there are trees, Hindus temple, shops, residential buildings and electric poles.	Tube well Shop
	Construction of Road by BC from Alia Madrasha road to Sk. Helal Uddin Stadium Road, (Ch 00+000 to 0+430) at Ward no. – 06 (Road Length = 430 m)		This road is cancelled from this project as it's already done by other project

SI	Road	Environmental Features	Photograph
10	Construction of Road by BC from Harihkali Bottola to Mr. Moloy House road, (Ch 00+000 to 0+290) at Ward no. – 06 (Road Length = 290 m)	Nearby the road alignment there are trees, pond, electric poles and residential houses.	
11	Construction of Road by RCC Starting from Uttar Harikhali Primary School road,(Ch.0+ 000 to 0+405).Ward No-1. (Road Length = 405 m)	Nearby the road alignment there are trees, government primary school, boundary walls, residential houses, ditch and electric poles.	Pond
12	Construction of Road by RCC Starting From of Adu nikh Hospital road,(Ch 0+000 to 0+351) & Link road (Ch 0+000 to 0+073) starting at Ch. 0+242 @ main road at Word No-2. (Road Length = 424 m)	Nearby the road alignment there are trees, ditch mosque and madrasha cum orphanage, boundary wall, residential houses and electric poles.	Government primary school Mosque and madrasha cum orphanage

SI	Road	Environmental Features	Photograph
13	Construction of Road by RCC Starting from Lake City Link Road to Women College Road,(Ch.0+ 000 to 0+365). Ward No-2. (Road Length = 365 m)	Nearby the road alignment there are trees, orchards, ponds, market, boundary wall, residential houses and electric poles.	Orchard
14	Construction of Road by RCC From 2 No.Cross Road,(Ch.0+ 000 to 0+ 517) & Link road- 01 (Ch.0+ 000 to 0+ 051) starting at Ch. 0+085, Link road-02 (Ch.0+ 000 to 0+ 206) starting at Ch. 0+342 @ main road at Ward No-3.(Road Length = 774 m)	Nearby the road alignment there are trees, mosque, graveyard, pond, ditch, residential houses, market and overhead electric poles.	
15	Construction of Road by RCC From Nur Masjid Road To Chaltetola Jame Mosjid,(Ch.0+ 000 to 0+ 383).Ward No- 3.(Road Length = 383 m)	Nearby the road alignment there are trees, boundary wall, residential house, shop, mosque, graveyard, orphanage and overhead electric poles.	Graveyard Boundary wall and trees

SI	Road	Environmental Features	Photograph
16	Construction of Road by RCC from PC College Road (Gurai Mia House)-Madrasha Road To Kaborkhana Mor, (Ch.0+ 000 to 0+ 478).Ward No-4.(Road Length = 478 m)	Nearby the road alignment there are residential house, shops, and overhead electric poles.	Shop
17	Construction of Road by RCC from Madrasha Road To Staff Quater (Animal Hospital),(Ch.0+ 000 to 0+ 282) & Link road (Ch.0+ 000 to 0+ 190) at Ch. 0+121 @ main road at Ward No- 4.(Road Length = 472 m)	Nearby the road alignment there are trees, Department of Public Health Engineering (DPHE) office, boundary wall, residential houses, shops, carpenter shops, mosque, and overhead electric poles.	DPHE office
18	Construction of Road by RCC Starting from Lichu tola Mor To Amlapara Road,(Ch.0+ 000 to 0+ 268) & Link road (Ch.0+ 000 to 0+ 092) starting at Ch. 0+030 @ main road at Ward No-5.(Road Length = 360 m)	Nearby the road alignment there are trees, boundary wall, residential house, shops and overhead electric poles.	Residential house
	Construction of Road by RCC from Old Jeelkhana Road To Govt. Girls School Road,(Ch.0+ 000 to 0+ 368).Ward No-5.(Road Length = 368 m)		This road is cancelled from this project as it's already done by other project

SI	Road	Environmental Features	Photograph
19	Construction of Road by RCC from Mohila Songstha Road,(Ch.0+ 000 to 0+ 100).Ward No-6.(Road Length = 100 m)	Nearby the road alignment there are trees, boundary wall, residential houses, office of Mohila Sangstha (women's organization), ditch and overhead electric poles.	Ditch
20	Construction of Road by RCC from Mr.Krishnopath Sarker House- Sahapara to V.I.P. Road, (Ch.0+ 000 to 0+ 629). Ward No-9. (Road Length = 629m)	Nearby the road alignment there are trees, boundary wall, residential houses, graveyard, pond and overhead electric poles.	
21	Construction of Road by RCC from Malopara road,(Ch.0+ 000 to 0+ 140),Ward No- 8.(Road Length =140 m)	Nearby the road alignment there are trees, boundary wall, residential houses, mosque, pond, ditch and overhead electric poles.	Tress and electric poles Pond

SI	Road	Environmental Features	Photograph
22	Construction of Road by RCC from Kasaipara Road to Town Protection Road,(Ch.0+ 000 to 0+ 664),Ward No-8. (Road Length = 664 m)	road alignment there are trees, boundary wall, residential houses, shops,	
			Ditch

VI. ANTICIPATED ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

80. 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 Phase Impacts and Mitigation Measures

- 81. **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.
- 82. 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; and
 - (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.
- 83. **Provisions for connection to service infrastructure**. Unplanned construction activity may be necessary in case of absence of service infrastructure at the site.
- 84. 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.
- 85. **Integration of climate change considerations in design**. The impact of climate change is significant for the road construction and improvement rehabilitation subproject. The detailed design of the road network should 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. More particularly for the subproject, the design of the subproject should consider:
 - (i) Likely changes in the climatic conditions with respect to temperature, flooding, salinity, and acidity, including drainage aspects; and
 - (ii) Likely impacts on surface runoff due to climate change-induced heavier and more erratic rainfall.
- 86. The impacts of climate change will be mitigated during the design and planning stage for the road construction and improvement subproject. Among these measures are the following:
 - (i) Due to climate change, the river water level will rise and as a result may overflow causing flooding of roads and establishments. Therefore, appropriate measures would be raising of road levels to an optimum heights;
 - (ii) Increase thickness of road through bitumen carpeting;

- (iii) The proper compaction of soil beneath carpeted layers would be required;
- (iv) preference to cement concrete (CC) pavement with appropriate temperature reinforcement and guide wall to protect erosion and sliding where there are threats of inundation; and
- (v) Turf and tree plantation along the road shoulders and roadside slopes.
- 87. **Impacts on local hydrology.** Failure to consider the local hydrology in the siting and design planning may lead to local waterlogging problems and obstruction of water flows in the vicinity.
- 88. To address these impacts, the design will consider the following:
 - (i) Detailed assessment of the micro hydrology and topography of the project site;
 - (ii) Design the roads according to the slope and elevation relative to the water bodies that may exist in the area; and
 - (iii) Provide the appropriate design of drains for road stretches that do not have existing drainage or where persistent flooding has been recorded.

B. Pre-Construction Phase Impacts and Mitigation Measures

- 89. **Updating of IEE**. The PMU shall update the IEE in case of any change in design and submit the same for review and clearance of ADB.
- 90. **Disruption of Existing Utilities**. Construction activities may disrupt existing utilities.
- 91. 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 cost of the subproject.
- 92. **Disturbance of private and common properties and physical cultural resources.** Subproject components will be within the existing roads' ROW. The subproject road improvement will cross few important government infrastructure (Zila Parishad, PWD Office, TV relay center, RAB camp), water bodies; residential area; educational institution; commercial areas, mosque. As per design, the construction/improvement of roads will not adversely impact any structures and common properties within the vicinity of the road.
- 93. The following mitigation measures shall be implemented to address the above impacts:
 - (i) Conduct investigation at site to determine if any existing private or common properties/structures will be disturbed during construction phase;
 - (ii) Consultations with relevant authorities, local people/stakeholders living near common property resources that are likely to be affected, and owners of private property resources that are also likely to be affected. These consultations will be conducted prior to finalizing the options. Required permits, if any, for the

- construction activity near any monument or establishments such as mosques will also be obtained.
- (iii) Ensure that all works will be confined within existing alignments, and within existing rights-of-way (ROWs).
- (iv) Avoid disturbance or damage of physical cultural resources (mosque, graveyards) and common physical resources through proper design of road construction and improvement works and demarcating construction area; and
- (v) Ensure the implementation of measures according to the resettlement plan for the subproject, as necessary
- 94. **Material sourcing**. Erosion and sedimentation may be caused by illegal quarries in the region. Materials for the construction should not be sourced from these facilities.
- 95. 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 governmentapproved 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.
- 96. **Drinking water quality.** Drinking water supply for workers will be likely sourced from tube wells. However, there is a possibility that underground sources have arsenic levels that could be detrimental to health.
- 97. To avoid any health risks from the drinking water supply:
 - (i) the bid documents should include a requirement that Contractor will ensure that drinking water supply shows compliance with the drinking water quality standards, particularly for arsenic parameter; and
 - (ii) the Contractor will undertake groundwater quality sampling and analysis to ensure that water from tube wells follows the drinking water quality standards. If the groundwater quality does not comply with the standards, the contractor will source potable water from alternative source or provide onsite treatment facility at its own cost and approval from PIU/PMU.
- 98. **Consents, Permits and Clearances**. Failure to obtain necessary consents, permits, and other appropriate regulatory clearances can result in design revisions and work stoppage.
- 99. 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.

- 100. **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.
- 101. The PMU, Divisional/Regional Office, PIU and contractors will be required to undergo training/capacity building on EMP implementation. 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.
- 102. **Community awareness of project activities and impacts**. Lack of community awareness on project activities may result in potential community health and safety concerns and complaints.
- 103. 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, the community should be made aware of the upcoming project and project activities. Important information to be disseminated to the people are, among others, the following:
 - (i) Overview and objectives of the proposed project;
 - (ii) Preliminary and/or final detailed design of proposed project components;
 - (iii) Potential environmental and social impacts (positive and negative) of the project, and the proposed mitigation measures for the perceived negative impacts; and
 - (iv) Grievance redress mechanism and contact details of the project.

C. Construction Phase Impacts and Mitigation Measures

- 104. **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.
- 105. 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;

- 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.
- 106. **Excavation Works.** Excavations may affect local drainage patterns if surface and groundwater collect in voids as they are being dug.
- 107. To mitigate, the contractor will ensure the following:
 - (i) All excavations shall be done to the minimum dimension as required for safety and working facility.
 - (ii) The excavation shall be executed in such a manner that the contractor does not damage or interfere with existing services or structures. If damage or interference is so caused, the contractor shall plan with the supply and/or building owner to execute the repairs at the contractor's own cost.
 - (iii) All excavations and other work shall be carried out during nighttime at busy road section.
 - (iv) Road drains and channels shall be kept free from obstructions at all times.
- 108. **Removal of Trees.** The construction/ improvement roads will be within the existing road/RoW and tree cutting will not be required (**Appendix 13**).
- 109. While cutting of trees will be avoided as much as possible, there may be instances when cutting of trees may be necessary. In such case, the following actions are proposed to minimize the impact of tree removal:
 - (i) After the finalization of the designs and layout of the project components, the trees within proposed construction areas will be marked;
 - (ii) Trees within area required for construction will be felled after prior approval;
 - (iii) Replacement of the tree shall be undertaken by LGED at the replacement ratio of two trees for every tree that is cut (i.e., 2:1 ratio);
 - (iv) Only trees that will require removal within the proposed construction areas of the sites will be cut; and
 - (v) For trees that will not be cut, take all precautions to protect them from any damage from construction activities.
- 110. **Soil erosion and sediment mobilization**. Excavation during construction will generate loose soil which can be carried through surface run-off during a rainfall.
- 111. During construction phase, the Contractor shall always implement the measures 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;
- (ii) 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;
- (iii) The earthwork sites where exposed land surface is vulnerable to runoff shall be consolidated and/or covered;
- (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; and
- (vi) Monitor groundwater quality that could exist close to the working areas to ensure compliance.
- 112. **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 nearby receiving bodies of water. Untreated sewage from the pit latrines could enter surface water if not adequately designed and positioned to reflect the local hydrological and hydrogeological patterns. Periods of high rainfall could lead to the overflow of the pit and overland flow, or rapid through-flow of the effluent to surface water prior to its full digestion in the soil. Raw sewage can potentially impact surface water quality by promoting the growth of algae and delivering pathogens may be harmful to human and ecological receptors. Solvents and vehicle maintenance fluid (oil, coolant) and diesel fuel may contaminate surface and groundwater if these are disposed of directly into the ground or washed into the streams. Human waste from construction workers may also contaminate surface water and groundwater if there are no adequate sanitary facilities.
- 113. To mitigate these impacts, the contractor will comply with the following:
 - (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% by volume;
- (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; and
- (xiv) Monitor water quality according to the environmental monitoring plan.
- 114. 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.
- 115. **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.
- 116. 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% by volume;
 - (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.
- 117. **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.
- 118. 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.
- 119. **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.
- 120. 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.
- 121. 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.
- 122. 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;
 - (ii) Fit all heavy equipment and machinery with air pollution control devices that are operating correctly;
 - (iii) Vehicles travelling to and from the construction site must adhere to speed limits to avoid producing excessive dust;
 - (iv) Reduce dust by spraying stockpiled soil, excavated materials, and spoils;
 - (v) Cover with tarpaulin vehicles transporting soil and sand;
 - (vi) Cover stockpiled construction materials with tarpaulin or plastic sheets;
 - (vii) Heavy equipment and transport vehicles shall move only in designated areas and roads;

- (viii) Water spraying to access roads, camp sites and work sites to reduce dust emissions;
- (ix) Machines and vehicles must be regularly examined and maintained to comply with requirements of technical specifications;
- (x) 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;
- (xi) Repair and maintain access roads, as necessary;
- (xii) Monitor air quality according to the environmental monitoring plan;
- (xiii) Clean wheels and undercarriage of vehicles prior to leaving construction site;
- (xiv) Prohibit burning firewood in work and labor camps (promote liquified petroleum gas for cooking purposes and electric heater for heating purposes);
- (xv) Use vehicles that have government-issued permits and registrations; and
- (xvi) Prohibit open burning of solid waste.
- 123. **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 worshipers at church/mosque, students at schools and other educational institutes, patients at hospitals etc.).
- 124. The significance of noise impact will be higher at the immediate vicinity of the subproject site where noise-sensitive receptors are situated, such as for example schools and residential areas. 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.¹⁷
- 125. Mitigation measures to reduce the noise impacts off-site at the nearest sensitive receptors include the following:
 - (i) Provide prior information to the local public, including institutions such as schools and hospitals along alignments that may be affected, about the work schedule:
 - (ii) Use equipment that emits the least noise, well-maintained and with efficient mufflers. Install silencers if necessary and practical;
 - (iii) 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;
 - (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;

¹⁷ IFC World Bank Group. 2007. Environmental, Health and Safety (EHS) Guidelines – General EHS Guidelines: Environmental – Noise Management.

- (vii) Minimize drop heights when loading and unloading coarse aggregates and other construction materials;
- (viii) Avoid use of horns unless it is necessary to warn other road users or animals of a vehicle's approach; and
- (ix) Implement a complaints handling system.
- 126. 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) Ear muffs/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; and
 - (iv) Measure noise level according to the environmental monitoring plan.
- 127. **Construction wastes generation.** The construction work is likely to generate considerable quantities of waste soil and excavated solid wastes. Indiscriminate disposal of the soil and excavated solid wastes, 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.
- 128. 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 3;
 - (ii) Avoid stockpiling of excess excavated soils as far as possible;
 - (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) Waste auditing. The contractor will record the quantity in tons and types of waste and materials leaving site during the construction phase;
 - (xi) 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;

and

- (xii) Remove all wreckage, rubbish, or temporary structures which are no longer required.
- 129. In addition, and consistent with the Spoils Management Plan, all mixture of wastes generated from the road reconstruction or upgrading will be disposed to appropriate disposal site approved by the local government or Pourashava. For proper handling of mixed wastes, the following actions will be followed by the contractor:
 - (i) Recover or collect the non-biodegradable waste materials from the mixture of wastes. This includes broken glasses and any other hazardous materials found in the mixture of excavated materials, if any;
 - (ii) Handle and haul the non-biodegradable wastes and hazardous materials separately from the excavated soil;
 - (iii) Dispose spoils immediately and avoid stocking for longer period to prevent potential nuisance and complaints;
 - (iv) Haul all wastes using transport equipment such as dump trucks with proper cover (e.g. tarpaulin) to avoid accidental release along the route to the disposal site; and
 - (v) Utilize haulers that are authorized to handle and transport these kinds of wastes.
- 130. Disposal site for spoils and other excavated materials from road construction and improvement will be identified during the pre-construction phase. The use of the disposal site shall have to be approved by the Pourashava and/or by the DOE through a locational clearance certificate, if applicable. No disposal site shall be used without seeking prior approval or clearance from relevant local or national government agencies.
- 131. **Disturbance to terrestrial flora and fauna**. The subproject area is a built-up area, hence, the impacts to flora and fauna will be insignificant. It is found by field investigation that subproject activities will not require cutting of any trees. However, the design will ensure that these trees will not be cut, or if tree cutting is necessary, mitigation measure should be strictly followed.
- 132. To mitigate these impacts, contractor will be required to:
 - (i) avoid, or minimize when avoidance is not possible, tree cutting;
 - (ii) for any tree cut, conduct replacement planting at a ratio of 1(cut):2 (new planting) and consistent with the social forestry program of LGED (see Appendix 5 for LGED Tree Plantation Program);
 - (iii) protect giant trees and locally important trees (for religious reasons), if any is identified as the site during implementation;
 - (iv) prevent workers or any other person from removing and damaging any other flora and fauna found in the subproject site; and
 - (v) prohibit employees and workers from poaching animals and cutting of trees for firewood in the vicinity of the site.
- 133. **Impacts on aquatic ecology.** Some of the subproject alignments are near or adjacent to khals (canals) and ponds. The construction of the subproject may affect these ponds due

to siltation and chemical spills, and improper waste disposal, and therefore may impact the quality of the water and any thriving aquatic species. As observed during the site visit, no ponds or khals are used for aquaculture within the subproject area.

- 134. To mitigate, contractor will be required to:
 - (i) provide temporary protection at sections near any river or khal (canal) to avoid sliding of soils; and
 - (ii) store spoils away from the side of any river or khal in the area to avoid being washed down.
- 135. **Impacts to protected and areas and critical habitats.** Subproject area is located within the Pourashava which is a built-up area. No ecologically sensitive areas nearby, therefore, no impact is predicted. No mitigation measure is necessary.
- 136. **Impact to Traffic.** The road rehabilitation works will render some portions of the road impassable at periods of time. This scenario will create traffic congestion and disturbance to pedestrians and motorists in the vicinity of the affected area if not properly managed.
- 137. 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 4. Emergency response plan must be prepared for any traffic accident during construction.
- 138. **Disruption of Public Access.** Public access to establishments adjacent the road alignments may be disrupted during construction activities.
- 139. Mitigation measures to ensure safe access shall be implemented by the contractor. Among which are the following:
 - (i) Prior coordination with the 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 will be maintained with the use of walking boards.

 Wheelchair and disabled access shall be maintained: and
 - (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.
- 140. **Impacts on physical cultural resources (PCR) and chance finds.** The subproject area is not located near nationally or internationally protected historical, cultural, and archaeological sites. However, few alignments are adjacent locally recognized mosques. Detailed design will ensure these mosques will not be significantly impacted by the subproject through either re-alignment or institution of appropriate measures. The local people use these for the purposes of religious, social and cultural gathering. However, as a precautionary

approach, the contractor will be required to implement the following measures in the event of a chance finds:

- 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;
- (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.
- 141. Common property resources/community facilities in the subproject area include mosques, schools, madrashas, graveyards, temples, playground, open water bodies, and Eidgahs (place for offering Eid prayers). The mitigation measures are discussed in "Disturbance of private/common properties, physical cultural resources" under the design phase.
- 142. **Impacts on socio-economic activities.** The impacts will result from excavation works, stockpiling, the operation of construction vehicles and equipment, and accidental damage to utilities (e.g., power supply poles, open drains, and water taps or hoses). The potential impacts include disturbance to economic activities, particularly to the businesses operating along the alignments of construction works.
- 143. Contractor will be required to:
 - (i) Implement the traffic management plan in collaboration with local authorities;
 - (ii) Where traffic congestion will likely occur, place traffic flagmen during working hours;
 - (iii) Avoid full road closures by applying the construction method on section-wise and/or chainage-wise approach during excavation, concreting and/or curing periods;
 - (iv) If full road closure is not possible, especially on very narrow roads, ensure that alternate routes are identified and that affected residents and establishments are informed prior to conducting the construction activities;
 - (v) Provide convenient access to pedestrians when works occur in front of residential, commercial or institutional establishments. Examples are planks with handrails that should be provided to cross excavated areas.
 - (vi) Provide appropriate compensation to qualified affected people or businesses per approved resettlement plan for the subproject;
 - (vii) Manage stockpile;
 - (viii) Manage pumped water from excavations either to drains or drums for later use;
 - (ix) Relocate the affected power supply poles; and
 - (x) Advise the concerned authority during accidental damage to utilities.

- 144. **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.
- 145. 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;¹⁸
 - (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;

¹⁸ IFC World Bank Group. 2007. Environmental, Health, and Safety (EHS) Guidelines – General EHS Guidelines: Construction and Decommissioning.

- (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.
- 146. **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.
- 147. To mitigate these impacts, the contractor will be required to implement the following measures:
 - (i) 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;
 - (ii) 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;¹⁹
 - (iii) 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;
 - (iv) 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);
 - (vi) Schedule transportation activities by avoiding peak traffic periods;
 - (vii) Clean wheels and undercarriage of haul trucks prior to leaving construction site;
 - (viii) Educate drivers: limit speed not more than 30 km/h in settlements and avoid use of horn;
 - (ix) Earmark parking place for construction equipment and vehicles when idling; no parking shall be allowed on the roads, that may disturb the traffic movement;
 - (x) 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:

¹⁹ IFC World Bank Group. 2007. Environmental, Health, and Safety (EHS) Guidelines – General EHS Guidelines: Construction and Decommissioning.

- (xi) 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 of noise to these receptors;
- (xii) Provide adequate space and lighting, temporary fences, reflectorized barriers and signages at the work site; and
- (xiii) Ensure contractor has staff trained on emergency response.
- 148. **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.
- 149. 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 roads that are not part of/included in the rehabilitation works but damaged due to construction or subproject activities 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; and
 - (ix) Request PIU to report in writing that worksites and camps have been vacated and restored to pre-project conditions before acceptance of work.

D. Operation Phase Impacts and Mitigation Measures

- 150. Once completed, the road subproject will provide beneficial environmental impact to Bagerhat Pourashava and its population.
- 151. However, these beneficial impacts will not be sustained if no proper operation and maintenance is in place. Hence, Bagerhat Pourashava as PIU will need to undertake the following actions to ensure that the rehabilitated roads, protective walls, and blocks operate sustainably:
 - (i) Establish a program of regular visual inspection to identify problems early, before they become critical (e.g., breakage, cracks, potholes, etc.);

- (ii) Ensure that all remedial actions are implemented promptly, including clearing of materials that could damage the roads such as boulders, rocks, fallen trees, etc.; and
- (iii) Include in the Pourashava budget (or LGED budget) a permanent allocation for undertaking the above tasks, including budget for repairs for any damage on the roads.

E. Cumulative Impacts and Mitigation Measures

152. There are no similar construction or project activities in the area that would result in cumulative environmental impacts. Direct impacts during construction phase, 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.

F. Unanticipated Impacts during Construction and Operation

153. In the event unanticipated impacts 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.

VII. INFORMATION DISCLOSURE, CONSULTATION AND PARTICIPATION

A. Consultation and Participation

- 154. 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.
- 155. Consultations may be conducted through focus group discussions, interviews, and town meetings. During these activities, implementation health and safety measures (including CPVID-19 if situation evolved) as per local and national and international guidelines must be observed.
- 156. 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; and
 - (v) Residents, shopkeepers, businesspeople, and farmers who live and work near the subproject.

B. Public Consultations Conducted

- 157. Consultations were conducted with key stakeholders and community members in line with ADB's requirements pertaining to environmental and social considerations. These consultations helped in identifying the felt needs, concerns and apprehensions of the communities related to the project and their priorities.
- 158. Four FGDs, site visits as well as consultation were carried out by ADB TA consultant (Environment Safeguard Specialist) with the Pourashava officials, (XCN, Surveyor), Bagerhat Pourashava were held from April 27 to 28, 2024. Total 61 participants attended the FGDS out of them 10 were female and 51 male participants. During the FGDs the respective ward councilor, community people in wards. 1, 2, 4, 8 and 9 were present. In the FGDs and meetings, the existing roads of Bagerhat Pourashava and connecting culverts, bridges, the drainage system related problems were discussed. This consultation activity also included a field visit to understand the on-the-ground situation of the road network.
- 159. Based on visual observations during the field visit, the following were confirmed: (i) Condition of the existing roads are poor, broken, narrow, low-lying and flood prone, and inconvenient for smooth traffic flow. People are facing the following several problems in their daily life for long period because of the above-mentioned conditions of the roads: (ii) People do not feel easy to walk through roads and this problem is acute especially for the aged people. The problems become more acute for the residents especially the residents including students

to go to school/workplace/market during rainy season as the roads go under water, and become slippery and dirty; (iii) Roads are insufficiently wide for two vehicles to cross each other, for auto rickshaw/cart owners/pullers to bring vehicles to their own house, to accommodate space for water supply line, drainage etc. services; (iv) Roads become muddy, slippery and dirty during the rain which creates traffic accident and problem for traffic movement; (v) Vehicles especially ambulance and fire service vehicles, rickshaws and vans (three-wheeler), auto rickshaw etc. cannot easily run through the roads and for this reason they, generally, do not want to respond to emergency of the residents.

Figure 7: Participants in the Public Consultation for Road Subproject









160. Minutes, images, and attendance sheets of public consultation in Appendix 8.

C. Follow-up Consultations

161. Stakeholder consultations will continue throughout the subproject 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

- 162. 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:²⁰
 - (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.
- 163. 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.

²⁰ 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

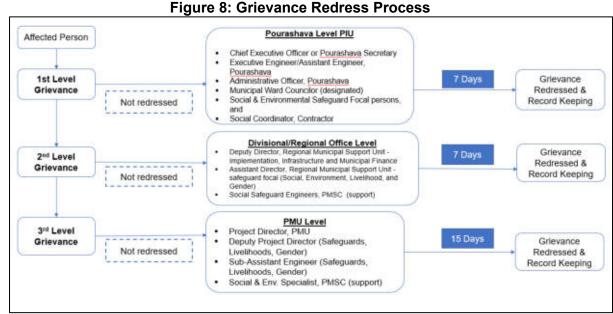
- 164. A common GRM is in place for social, environmental, or any other grievances related to the project; the resettlement plans (RPs), RSECPs and IEEs will follow the GRM described below, which is developed in consultation with key stakeholders. The GRM will provide an accessible and trusted platform 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.
- 165. 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.
- 166. 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 email, by post, WhatsApp or by writing in complaints register that will be kept in Pourashava offices. Appendix 9 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 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.
- 167. **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.
- 168. **First Level Grievance, Pourashava Level PIU**. The contractors, PIU Safeguard and Gender Focal person can immediately resolve issues on-site or at 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
- 169. The town-level grievance redress team shall have at least one-woman 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: Bagerhat), 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.

- 170. 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)
- 171. **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)
- 172. The grievance redress process is represented in Figure 8.
- 173. 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.
- 174. **ADB** Accountability Mechanism. If 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 compliant 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.
- 175. **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.

- 176. **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.
- 177. **Costs:** All costs involved in resolving the complaints (meetings, consultations, communication, and reporting/information dissemination) will be borne by the PMU.



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

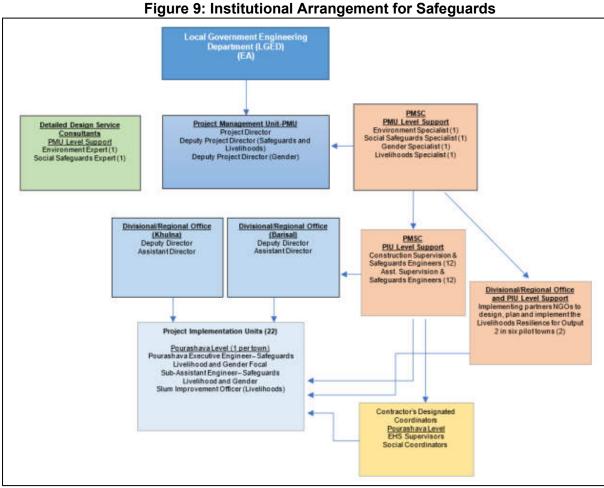
Note: In case of project towns where impacts to SEC are assessed, the PIU-level grievance redress committee/team will have representation of the affected SECs.

IX. **ENVIRONMENTAL MANAGEMENT PLAN**

178. 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.

Α. **Institutional Arrangement**

- 179. 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.
- 180. Figure 9 below shows the institutional arrangement for safeguards of the overall project.



DDSC = Detailed Design Service Consultant; EHS = Environment, Health, and Safety; PIU = Project

Implementation Unit; PMSC = project management supervision consultant; PMU = project management unit

Project Management Unit (PMU). 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 (PMSC). DDSC and PMSC 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.
- 182. Regional Project Management Units (DIVISIONAL/REGIONAL OFFICE), Division Level. The Divisional/Regional Office in Khulna 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.
- 183. 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.
- 184. 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.
- 185. **Project Implementation Unit (PIU), Pourashava/Town Level.** The Bagerhat PIU will be established and staffed with a safeguards and gender focal person (Executive Engineer/Assistant Engineer, Pourashava). The PIU will be assisted 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 PIUs will be responsible for implementation of the IEE/resettlement plan/RSECP/gender action plan. The Executive Engineer (safeguards and gender focal person) with the support of Assistant Directors (social, environment and gender), Divisional/Regional Office and the Construction Supervision and Safeguards Engineers, PMSC will support PMU safeguards Assistant Directors in subproject implementation. The Executive Engineer/ Assistant Engineer (safeguards and gender focal person) at PIU level will be assisted by Sub-Assistant Engineers (if available at the Pourashava level) with the safeguard and gender tasks. The Slum Improvement Officer at the Pourashava will be responsible for livelihood intervention tasks and responsibilities.
- 186. 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:
- 187. 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 area (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.
- 188. **Detailed Design Consultants (DDC).** 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 in 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;
- 189. **Project Management Supervision Consultant (PMSC).** The PMSC will provide project management and supervision services to support the PMU, including overall 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.
- 190. 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.
- 191. 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.
- 192. 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.
- (xi) 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.
- 193. A copy of the EMP/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/SEMP constitutes a failure in compliance and will require corrective actions.
- 194. 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)

- 195. 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 road construction and improvement subproject 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; and
 - (v) Identify the resources required to implement the EMP and outline corresponding financing arrangements; and Providing a cost estimate for all proposed EMP actions.
- 196. The Environmental Management Plan (EMP) matrix is presented in Table 14. This summarizes the potential environmental impacts, mitigation measures, responsible entity for implementation and monitoring, and cost of implementation.

Table 14: Environmental Management Plan Matrix

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility			
			Implementation	Monitoring/Supervision		
	Design Phase and Pre-Construction Phase					
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	 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 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	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		
Provisions for connection to service infrastructure	Potential for unplanned construction activity due to absence of service infrastructure	Confirm 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.	PIU, DDC	PMU, PMSC		
Integration of climate change considerations in design	Extreme weather events such as heavy rainfalls and tidal surges leading to flooding in the area	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: • Likely changes in the climatic conditions with respect to temperature, flooding, salinity, and acidity, including drainage aspects; and	PIU, DDC	PMU, Divisional/Regional Office, PMSC		

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
			Implementation	Monitoring/Supervision
		 Likely impacts on surface runoff due to climate change-induced heavier and more erratic rainfall. The impacts of climate change will be mitigated upfront during the design and planning stage for the infrastructures. Among these measures are the following: Due to climate change, the river water level will rise and as a result may overflow causing flooding of roads and establishments. Therefore, appropriate measures would be raising of road levels to an optimum heights; Increase thickness of road through bitumen carpeting; The proper compaction of soil beneath carpeted layers would be required; preference to cement concrete (CC) pavement with appropriate temperature reinforcement and guide wall to protect erosion and sliding where there are threats of inundation; and Turf and tree plantation along the road shoulders and roadside slopes. 		
Local hydrology	Local waterlogging problems and obstruction of natural water flows in the vicinity	 Detailed assessment of the microhydrology and topography of the project site; Design the roads according to the slope and elevation relative to the water bodies that may exist in the area; and Provide the appropriate design of drains for road stretches that do not have existing drainage or where persistent flooding has been recorded 	PIU, DDC	PMU, Divisional/Regional Office, PMSC
Disruption of Existing Utilities	Disruption of infrastructure and services	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	Institutio	onal Responsibility
			Implementation	Monitoring/Supervision
Physical Cultural	Physical cultural	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 cost of the subproject. The Heritage Expert of the DDSC shall.	PIU, DDC,	PMU, Divisional/Regional
Resources (PCRs), Private and common properties	resources such as locally protected or recognized cultural, archaeological or religious sites may be affected by the road construction/improvement activities. Disturbance to private and common properties (such as boundary walls, ramps, fences, telephone and electric poles/posts, roadside business structures, houses), and physical cultural resources such as graveyards and mosque will be avoided. Common property resources/community facilities in the subproject area include mosques, schools, madrashas, temples, playground, open water	 The Heritage Expert of the DDSC shall assess the potential impacts of subproject activities on archaeological/cultural sites and recommend measures to ensure that there will be no impact on such sites. Alignment of roads improvement/construction shall avoid locally protected or recognized PCRs. Conduct investigation at site to determine if any existing private or common properties/structures will be disturbed during construction phase; Consultations with relevant authorities, local people/stakeholders living near common property resources that are likely to be affected, and owners of private property resources that are also likely to be affected. These consultations will be conducted prior to finalizing the options. Required permits, if any, for the construction activity near any monument or establishments such as mosques will also be obtained. 	Contractor	Office, PMSC

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
			Implementation	Monitoring/Supervision
	bodies, and Eidgahs (place for offering Eid prayers).	 Ensure that all works will be confined within existing road and side drains alignments, and within existing rights-of-way (ROWs). Avoid disturbance or damage of physical cultural resources through proper design of road alignments and demarcating construction area; and Ensure the implementation of measures according to the resettlement plan for the subproject, as necessary. 		
Drinking water quality	Groundwater may likely be the source of drinking water. Ground water may have arsenic levels that could be detrimental to the health.	 The bid documents should include a requirement that Contractor will ensure that drinking water supply shows compliance with the drinking water quality standards, particularly for arsenic parameter. The Contractor will undertake groundwater quality sampling and analysis to ensure that water from tube wells is in compliance with the drinking water quality standards. If the groundwater quality does not comply with the standards, the contractor will source potable water from alternative source or provide onsite treatment facility at its own cost and approval from PIU/PMU. 	PMU, PMSC	EA, ADB
Material sourcing	Sourcing of aggregates from illegal quarries	 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. no new quarry sites shall be used for the subproject; verify suitability of all material sources and obtain approval of 	PMU, Divisional/Regio nal Office, PIU	EA, ADB

Parameter	Environmental Impacts	Mitigation Measures		onal Responsibility
		DMILIDINIIOIONAL /DEGIONAL CESTOS	Implementation	Monitoring/Supervision
		PMU/DIVISIONAL/REGIONAL OFFICE or PIU; and • document all sources of materials and include in the monthly reporting to the PIU.		
Consents, permits and clearances	Failure to obtain necessary consents, permits, and clearances can result in design revisions and/or stoppage of the Works.	 All necessary local clearances and no objection certificates will be obtained prior to award of contract. Environmental clearance will be obtained 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. 	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 with ADB and GoB environmental policies.	The PMU, Divisional/Regional Office, PIU and contractors will be required to undergo training/capacity building on EMP implementation. • 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.	PMU, Divisional/Regio nal Office, PIU, PMSC	EA, ADB
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.	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	Divisional/Regio nal Office, PIU, Contractor	PMU, PMSC

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
		operations of these entities (due to noise, dust, movement of vehicles,) and also considering safety and security of users of	Implementation	Monitoring/Supervision
		 A meaningful consultation with the affected communities will be conducted. 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. 		
	Impacts and Mitigation Measure			
Construction Planning	Inadequate planning could lead to non-implementation of EMP during the construction phase and result in significant environmental impacts leading to noncompliance with ADB's environmental safeguard requirements.	 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 	Contractor	PMU, Division/Regional Office, PIU, PMSC

Parameter	Environmental Impacts	Mitigation Measures	Institutio	onal Responsibility
			Implementation	Monitoring/Supervision
		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: 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; viii. Dust Management Plan; viiii. Waste Management Plan; and 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.	 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 plan 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, Division/Regional Office, PIU, PMSC
Removal of Trees	Trees have been identified within the	After the finalization of the designs and layout of the project components, the trees	Contractor	PMU, Division/Regional Office, PIU, PMSC

Parameter	Environmental Impacts	Mitigation Measures	Institutio	onal Responsibility
			Implementation	Monitoring/Supervision
	vicinity of subproject alignments, which might be affected during the construction phase.	 within proposed construction areas will be marked; Trees within area required for construction will be felled after prior approval; Replacement of the tree shall be undertaken by LGED at the replacement ratio of two trees for every tree that is cut (i.e., 2:1 ratio); Only trees that will require removal within the proposed construction areas of the sites will be cut; and For trees that will not be cut, take all precautions to protect them from any damage from construction activities. 		
Soil erosion and sediment mobilization	Excavation during construction will generate loose soil which can be carried through surface run-off during a rainfall.	 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. 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. 	Contractor	PMU, Division/Regional Office, PIU, PMSC

Parameter	Environmental Impacts	Mitigation Measures	Institutio	onal Responsibility
			Implementation	Monitoring/Supervision
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	 Monitor groundwater quality that could exist close to the working areas to ensure compliance. 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 		
	contaminate or result in water pollution if disposed or discharged to nearby receiving bodies of water	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 the top; the material shall be refilled in layers and compacted properly layer by layer. • 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		

Parameter	Environmental Impacts	Mitigation Measures	Institutio	onal Responsibility
			Implementation	Monitoring/Supervision
Groundwater use and	Increased demand for	 and protected by impermeable lining and bunded 110% by volume; 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; 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. 	Contractor	PMU, Division/Regional
contamination	groundwater is anticipated during the construction phase for construction activities and	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	Contractor	Office, PIU, PMSC
	personal consumption by workers. Even a small	for judicious use of freshwater resources. The contractors will use water in consideration to its		

Parameter	Environmental Impacts	Mitigation Measures	Institutio	onal Responsibility
			Implementation	Monitoring/Supervision
	project can require 100 m3/day of water. 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.	 value as a resource. Mitigation measures will include: 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% by volume; Daily control of machinery and vehicles for leakages; Collection of waste during construction activities; Provide uncontaminated water for dust suppression; 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.	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	Contractor	PMU, Division/Regional Office, PIU, PMSC

Parameter	Environmental Impacts	Mitigation Measures	Institutio	onal Responsibility
			Implementation	Monitoring/Supervision
		shall be of a size and stability that will ensure the risk of mass movement during period of heavy rainfall is minimized		
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.	 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; 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; 	Contractor	PMU, Division/Regional Office, PIU, PMSC

Parameter	Environmental Impacts	Mitigation Measures		onal Responsibility
			Implementation	Monitoring/Supervision
Noise	Noise generation may	 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. Provide prior information to the local public, 	Contractor	PMU, Division/Regional
	disturb nearby sensitive receptors (e.g school, etc.)	 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 other construction materials; Avoid use of horns unless it is necessary to warn other road users or animals of a vehicle's approach; and Implement a complaints handling system. On-site construction noise shall be mitigated to ensure a safe work environment by implementing an on-site occupational health 		Office, PIU, PMSC

Parameter	Environmental Impacts	Mitigation Measures	Institutio	onal Responsibility
			Implementation	Monitoring/Supervision
		 and safety plan, which considers national and international requirements. The plan shall include the following measures: 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; Place visually clear instructions in areas where noise emissions are significant; and Measure noise level according to the environmental monitoring plan. 		
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.	 Dispose excess spoils per the Spoil Management Plan attached in Appendix 3; 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 	Contractor	PMU, Division/Regional Office PIU, PMSC

Parameter	Environmental Impacts	Mitigation Measures	Institutio	onal Responsibility
			Implementation	Monitoring/Supervision
		 contents should be disposed of in officially sanctioned local landfills. Construction waste should also be disposed of in legal local landfills. 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. 		
		For proper handling of mixed wastes, the following actions will be followed by the contractor: Recover or collect the non-biodegradable waste materials from the mixture of wastes. This includes broken glasses and any other hazardous materials found in the mixture of excavated materials, if any; Handle and haul the non-biodegradable wastes and hazardous materials separately from the excavated soil; Dispose spoils immediately and avoid stocking for longer period to prevent potential nuisance and complaints;		

Parameter	Environmental Impacts	Mitigation Measures	Institutio	onal Responsibility
			Implementation	Monitoring/Supervision
		 Haul all wastes using transport equipment such as dump trucks with proper cover (e.g. tarpaulin) to avoid accidental release along the route to the disposal site; and Utilize haulers that are authorized to handle and transport these kinds of wastes. 		
Disturbance to terrestrial flora and fauna	The subproject area is not within any forest, hence, the impacts to flora and fauna will be minimal to insignificant. Tree cutting will not be required.	 For any tree cut, conduct replacement planting at a ratio of 1(cut):2 (new planting) and consistent with the social forestry program of LGED (see Appendix 5 for LGED Tree Plantation Program); Protect giant trees and locally important trees (for religious reasons), if any is identified as the site during implementation; Prevent workers or any other person from removing and damaging any other flora and fauna found in the subproject site; and Prohibit employees and workers from poaching animals and cutting of trees for firewood in the vicinity of the site. 	Contractor	PMU, Division/Regional Office, PIU, PMSC
Impacts on aquatic ecology	The construction of the subproject may affect nearby khals and ponds and the aquatic species thriving therein due to siltation and pollutant spills.	 Provide temporary protection at sections near any river or khal (canal) to avoid sliding of soils; and Store spoils away from the side of any river or khal in the area to avoid being washed down. 	Contractor	PMU, Division/Regional Office, PIU, PMSC
Impact to Traffic	Rehabilitation works will render some portions of the road impassable at periods of time. This scenario will create traffic congestion and disturbance to pedestrians and motorists	A traffic management plan (TMP) will be developed prior to construction and approved by the PIU. The TMP shall include the following: • installation of clear signages; • barricades; • lightings at night; and • markers to direct traffic movement in sites, among others.	Contractor	PMU, Division/Regional Office PIU, PMSC

Parameter	Environmental Impacts	Mitigation Measures	Institutio	onal Responsibility
			Implementation	Monitoring/Supervision
	in the vicinity of the affected area if not properly managed.	Emergency response plan must be prepared for any traffic accident during construction.		
Disruption of Public Access.	Public access along the road/drainage alignments may be disrupted during construction activities.	 Prior coordination with the 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, Division/Regional Office, PIU, PMSC
Impacts on physical cultural resources (PCR) and chance finds	The Bagrhat Upazila has some protected archaeological sites which are located far outside the Pourashava. The subproject area has some locally recognized mosques. Final design will ensure that these will not be significantly impacted by the subproject through either re-alignment or	 Strictly follow the chance find 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 observe when excavation resumes for the identification of the potential chance finds, and comply with further instructions. 	Contractor	PMU, Division/Regional Office, PIU, PMSC

Parameter	Environmental Impacts	Mitigation Measures	Institution	onal Responsibility
	-	-	Implementation	Monitoring/Supervision
	institution of appropriate measures. Excavation activities might encounter chance finds.			
Impacts on socio-economic activities.	Disturbance to economic activities may result from excavation works, stockpiling, the operation of construction vehicles and equipment, and accidental damage to utilities (e.g., power supply poles, open drains, and water taps or hoses)	 Implement the traffic management plan in collaboration with local authorities; Where traffic congestion will likely occur, place traffic flagmen during working hours; Avoid full road closures by applying the construction method on section-wise and/or chainage-wise approach during excavation, concreting and/or curing periods; If full road closure is not possible, especially on very narrow roads, ensure that alternate routes are identified and that affected residents and establishments are informed prior to conducting the construction activities; Provide convenient access to pedestrians when works occur in front of residential, commercial, or institutional establishments. Examples are planks with handrails that should be provided to cross excavated areas. Provide appropriate compensation to qualified affected people or businesses per approved resettlement plan for the subproject; Manage stockpile; Manage pumped water from excavations either to drains or drums for later use; Relocate the affected power supply poles; and Advise the concerned authority during accidental damage to utilities. 	Contractor	PMU, Division/Regional Office, PIU, PMSC

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
			Implementation	Monitoring/Supervision
Occupational health and safety risks.	Construction activities could create health and safety risks to construction workers	 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, Division/Regional Office, PIU, PMSC

Parameter	Environmental Impacts	Mitigation Measures	Institutio	onal Responsibility
			Implementation	Monitoring/Supervision
Community health and safety risks	Construction activities could create health and safety risks to community people.	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; • 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. • 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;	Contractor	PMU, Division/Regional Office, PIU, PMSC

Parameter	Environmental Impacts	Mitigation Measures	Institutio	onal Responsibility
			Implementation	Monitoring/Supervision
		 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; 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; 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 of noise to these receptors; Provide adequate space and lighting, temporary fences, reflectorized barriers and signages at the work site; and 		

Post-construction cleanup and reinstatement Post-construction cleanup and 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: Post-construction cleanup and 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. Post-construction cleanup and 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. Post-construction construction and access routes as work proceeds during construction. All plant, equipment and access routes as work proceeds during construction. All plant, equipment and access routes as work proceeds during construction. Post-construction and access routes as work proceeds during construction. All plant, equipment and access routes as work proceeds during construction. Post-construction and access routes as work proceeds during a	itutional Responsibility
Post-construction cleanup and reinstatement Post-construction cleanup and reinstatement Post-construction cleanup and reinstatement Spoils, and excess construction materials may pose hazards to properties, community and environment if left unattended after construction. 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: Remove all spoils wreckage, rubbish, or temporary structures (such as buildings,	ion Monitoring/Supervision
Post-construction cleanup and reinstatement Construction debris, spoils, and excess construction materials may pose hazards to properties, community and environment if left unattended after construction. 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: Remove all spoils wreckage, rubbish, or temporary structures (such as buildings,	
up and reinstatement spoils, and excess construction materials may pose hazards to properties, community and environment if left unattended after construction. spoils, and excess contess 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: Remove all spoils wreckage, rubbish, or temporary structures (such as buildings,	
shelters, and latrines) which are no longer required; • All roads that are not part of/included in the rehabilitation works but damaged due to construction or subproject activities 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 spills of substances such as oil, paint, etc. and these shall be cleaned up; • 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; and	PMU, Division/Regional Office, PIU, PMSC

Parameter	Environmental Impacts	ental Impacts Mitigation Measures		Institutional Responsibility		
			Implementation	Monitoring/Supervision		
		 Request PIU to report in writing that worksites and camps have been vacated and restored to pre-project conditions before 				
Operation and management	nt phase					
Routine Maintenance	Traffic may be interrupted temporarily but this work will be very small in scale, infrequent, and short in duration, so there will be no economic or other implications. The infrastructure will need to be repaired from time to time, but environmental impacts will be much less than those of the construction period as the work will be infrequent, affecting small areas only.	 To maintain the safety of workers and road-users, such work should be coordinated with the local police department so that adequate warning signs and traffic diversions can be set up when necessary. Debris need to be collected and disposed at a designated site such as the landfill. Continue to encourage community participation in ensuring drainage canals are clog-free through information and behavior change campaigns and incentives, if possible. 	Bagerhat Pourashava	Bagerhat Pourashava		
Road Safety	Improved roads may give way to faster vehicle speeds which could endanger people and households along the road alignments. Damage in roads may also cause accidents for motorists.	 Conduct regular inspection of the roads to check for damages, and undertake rehabilitation measures for any damages found; Inspect and maintain the integrity of road barriers, especially at critical curves or locations that are prone to vehicular accidents; Inspect and maintain speed limiters such as humps installed on road sections near residential areas, schools, and religious establishments; Inspect and maintain all road signages, including appropriate warning signages 	Bagerhat Pourashava	Bagerhat Pourashava		

Parameter	Environmental Impacts	Mitigation Measures	Institutional Responsibility	
			Implementation	Monitoring/Supervision
		 at silent zones, and ensure that these are reflectorized and visible even during nighttime; and Ensure pedestrian crossings are maintained. 		

C. Environmental Monitoring Program

197. Monitoring of mitigation measures during construction is the responsibility of the Bagerhat PIU and PMU, supported by the PMSC Environmental Specialist, while monitoring of mitigation measures during operation phase is the responsibility of the Bagerhat Pourashava and LGED. Table 15 shows the proposed Environmental Monitoring Program for this subproject, which specifies the various monitoring activities, indicating location, frequency of monitoring and responsibility.

Table 15: Environmental Monitoring Program

Activities or Items to Monitor Location		Responsible for Activities	Monitoring Methods	Monitoring Frequency	Monitoring Responsibility					
Pre- construction										
Secure Environmental Clearance 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, Division/Regional Office, PMSC					
Site-specific EMP (SEMP) submitted by Contractor for approval by PIU/ Division/Regional Office	PIU office	Contractor, PIU	Copy of approved SEMP	Before commence construction activities	PMU, Division/Regional Office, PMSC					
Spoil management plan (SMP) submitted by Contractor for approval by PIU/Division/Regional Office	PIU Office	Contractor, PIU	Copy of approved SMP:	Before commence construction activities	PMU, Division/Regional Office, PMSC					
Traffic management plan (TMP) submitted by Contractor for approval by PIU/ Division/Regional Office	PIU Office	Contractor	Copy of approved TMP	Before commence construction activities	PMU, Division/Regional Office, PMSC					
Secure all other necessary permits and licenses from relevant government agencies		Contractor	Copies of permits and licenses	Before commence construction activities	PMU, PMSC					
Conduct of baseline ambient air quality and noise level monitoring	Subproject site	Contractor	Site visits and observations, Contractor records, Results of laboratory analysis (if necessary)	Before commence construction activities	PMU, Division/Regional Office, PIU, PMSC					

Activities or Items to Monitor	Location	Responsible for Activities	Monitoring Methods	Monitoring Frequency	Monitoring Responsibility
Conduct of baseline surface water quality monitoring	Subproject site	Contractor	Site visits and observations, Contractor records, Results of laboratory analysis (if necessary)	Before commence construction activities	PMU, Division/Regional Office, PIU, PMSC
Construction	<u> </u>				
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, Division/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
Tree Removal and Replacement	Subproject site and planting site	Contractor	Site visits, Contractor records,	Monthly or as needed	PMU, Division/Regional Office, PIU, PMSC
Conduct of ambient air quality and noise level monitoring	Subproject site	Contractor	Site visits and observations, Contractor records, Results of laboratory analysis (if necessary)	Quarterly or as needed	PMU, Division/Regional Office, PIU, PMSC
Conduct of surface water quality monitoring	Subproject site	Contractor	Site visits and observations, Contractor records,	At least semi annual or as needed	PMU, Division/Regional Office, PIU, PMSC

I OCATION I		Responsible for Activities	Monitoring Methods	Monitoring Frequency	Monitoring Responsibility
			Results of laboratory analysis (if necessary)		
Develop and apply archaeological protocol to protect chance finds	Subproject site	Contractor, PMU, PIU, PMSC	Contractor records,	Once until protocol is approved	PMU, Division/Regional Office, PIU, PMSC
Provide EHS training for all personnel	Subproject site	Contractor	Site visits, Contractor records, interviews to workers	Monthly	PIU, PMSC
Keep accident reports and records	Subproject site	Contractor	Site visits, Contractor records, interviews to workers and community people	Monthly	PIU, PMSC
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					
Drainage repair and maintenance	Subproject site	Drainage Management	Site observation	Monthly	LGED
Prevent run-off/deposit of foreign materials into drains and clean drain periodically; dispose of materials removed from drains	Subproject site	Drainage Management	Site observation	Monthly	LGED

D. Capacity Development Training

198. The PMSC Environment Specialist and Social Safeguard Specialist will be responsible for training the PMU, Division/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

- 1. sensitization on ADB's safeguard policy on environment;
- 2. introduction to environment and environmental considerations in urban infrastructures;
- 3. review of IEEs and integration into the project detailed design;
- 4. improved coordination within nodal departments; and
- 5. 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

- 1. sensitization on ADB's policies on Involuntary Resettlement and Indigenous People;
- 2. introduction to social safeguards assessment and document requirements;
- 3. Consultation and participations requirements:
- 4. Project GRM and ADB's Accountability Mechanism; and
- 5. monitoring and reporting system.
- 199. **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.
- 200. 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.

Table 16: 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	Experience and best practice sharing		
Purpose	To make the participants aware of the environmental safeguard requirements of ADB and Government of Bangladesh and how the project will meet these requirements	To build the capacity of the staff for effective implementation of the designed EMPs aimed at meeting the environmental safeguard compliance of ADB and Government of Bangladesh	To share the experiences and best practices aimed at learning lessons and improving implementation of EMP		
Contents	Module 1: Orientation ADB Safeguards Policy Statement Government of Bangladesh Environmental Laws and Regulations 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	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	Experiences on EMP implementation – issues and challenges Best practices followed		
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, Contractor	PMU, Divisional/Regional Office, PIU, Contractor		

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

201. 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 the 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

Table 17: Tentative Environmental Management Plan Budget for Bill of Quantities (The BOQ and/or Provisional Sum sections of the contract of this subproject):

No.	Impact Description	Unit	Quantity	Frequen cy	Rate	Total (Tk.)
1	Environmental Safeguards Capacity Development/GRM Implementation Training	Module	2	2	150,000.00	300,000.00
2	EMP Implementation and Monitoring					
A-Miti	gation Measures: e-GP/ CTCRP/BAGE/RD			, ,		
	Dust suppression measures (excluding watering for compaction) to the entire satisfaction of the engineer-in-charge, site safety plan	Lumpsu m	1	-	150,000	150,000
	Establishment of composite, waste treatment and disposal, spillage and spoil management and leakage of water	Lumpsu m	1		114,000	114,000
	Providing and maintaining a Portable hand wash station including wash basin, plastic water tank, plastic tab (Bibcock), hand wash liquid soap/soap etc., first aid	Lumpsu m	1		50,000	50,000
	Environmental monitoring: Air quality (PM10, PM2.5, Sox, NOx and CO) during construction	Each	8	Sample: 2 locations x 4 times in project duration ^a	25000.00	200,000.00
	Environmental monitoring: Water quality monitoring during construction. Ground Water Quality (pH, Turbidity ,Total Coliform (TC), Fecal Coliform (FC), Arsenic (As), Salinity, Chloride, Dissolve Oxygen (DO)	Each	8	Sample: 2 locations x 4 times in project duration ^b	10000.00	80,000.00
	Environmental monitoring: Noise Levels (Day and Night during construction)	Each	8	Sample: 2 locations x 4 times in project duration ^a	5000.00	40,000.00

No.	Impact Description	Unit	Quantity	Frequen cy	Rate	Total (Tk.)
	Other environmental mitigation measures not included above, including measures and monitoring for unanticipated impacts during construction phase. ^a	LS	1	1	200,000.00	200,000.00
B-Miti	gation Measures: e-GP/ CTCRP/BAGE/RD	-02				
	Dust suppression measures (excluding watering for compaction) to the entire satisfaction of the engineer-in-charge, site safety plan	Lumpsu m	1	-	495,000	495,000
	Establishment of composite, waste treatment and disposal, spillage and spoil management and leakage of water	Lumpsu m	1		390,000	390,000
	Providing and maintaining a Portable hand wash station including wash basin, plastic water tank, plastic tab (Bibcock), hand wash liquid soap/soap etc., first aid kits,	Lumpsu m	1		120,000	120,000
	Environmental monitoring: Air quality (PM10, PM2.5, Sox, NOx and CO) during construction	Each	12	Sample: 3 locations x 4 times in project duration ^a	25000.00	300,000.00
	Environmental monitoring: Water quality monitoring during construction. Ground Water Quality (pH, Turbidity ,Total Coliform (TC), Fecal Coliform (FC), Arsenic (As), Salinity, Chloride, Dissolve Oxygen (DO)	Each	12	Sample: 3 locations x 4 times in project duration ^b	10000.00	120,000.00
	Environmental monitoring: Noise Levels (Day and Night during construction)	Each	12	Sample: 3 locations x 4 times in project durationa	5000.00	60,000.00
	Other environmental mitigation measures not included above, including measures	LS	1	1	94,000.00	834,000.00

No.	Impact Description	Unit	Quantity	Frequen cy	Rate	Total (Tk.)
	and monitoring for unanticipated impacts during construction phase. ^a					
	Total (1+2) =		Thirty-four lakh fifty three	thousand tal	ka only	34,53,000.00

^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. Locations of sampling points for linear works shift as construction activities progress. Exact sampling locations will be selected during the works.

^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

- 202. PMU will monitor the overall progress of EMP implementation of the entire CTCRP through the different subproject jurisdictions, including the road construction and improvement in Bagerhat 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.
- 203. 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 10. This monitoring sheet is indicative which can be further enhanced depending on the actual situations at subproject construction site.
- 204. 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 11. This checklist is indicative which can be further enhanced depending on the actual situations at subproject construction site.
- 205. PMU shall consolidate quarterly reports from the PIUs including PIU in Bagerhat, 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 12. 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

- 206. The construction and improvement Bagerhat road subprojects will result in significant socio-economic benefits due to the improved road facilities in Bagerhat Pourashava.
- 207. Potential environmental impacts were assessed based on secondary data, stakeholder consultations, and field visits at the subproject sites. The subproject sites are in a built-up area, and there are no sensitive ecological area (protected area or critical habitats) within at least 10-km radius of the subproject location. Ninety-three 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.
- 208. Impacts were assessed based on the location and project activities during the preconstruction, construction, and operation phases. The subproject component 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 can be mitigated upfront through incorporation of environmental requirements in the detailed engineering design, including climate change adaptation measures.
- 209. Public consultation was conducted as part of the environmental assessment process. The stakeholders expressed support for the road construction and improvement 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.
- 210. 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.
- 211. This IEE has been prepared based on final designs of the subproject. If the design is revised or modified, the PMU, with support from PMSC, shall update this IEE 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:

- 1. 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.
- 2. 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;²¹ (b) poverty reduction handbook; (c) staff guide to consultation and participation; and (d) gender checklists.
- 3. 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:

Sector Division:

Coastal Towns Climate Resilience Project (CTCRP) CTCRP/construction/Improvement of Roads in Bagerhat Pourashava

Screening Questions	Yes	No	Remarks
A. Subproject Siting Is the subproject area			
1. Densely populated	√		The proposed road alignments are located within the Pourashava area which is densely populated.
2. Heavy with development activities?		√	There are no heavy development activities in the area.
Adjacent to or within any environmentally sensitive areas?			
Cultural heritage site		√	The core area of Bagerhat Pourashava is about 1.5 km away from the nearest structure of Historic Mosque City of Bagerhat (Zinda Pir Mosque). UNESCO World Heritage site Sixty Dome Mosque (Shat Gombuj Masjid) is about 3 km away from hte nearest road alignment and proposed works will not impact this heritage site.
Protected Area		√	Based on desk review of locations and field visit, there is no protected area encompassing or near any of the subproject locations/alignments.
Wetland		√	Based on desk review of locations and field visit, there is no protected wetland near any of the subproject locations/alignments.
Mangrove		√	Based on desk review of locations and field visit, there is no mangrove near any of the subproject locations/alignments.
• Estuarine		√	Based on desk review of locations and field visit, there is no estuarine near any of the subproject locations/alignments.

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
Buffer zone of protected area		√	Based on desk review of locations and field visit, there is no buffer zone of protected
		√	encompassing or near any of the subproject locations/alignments. Based on desk review of locations and field
Special area for protecting biodiversity		·	visit, there is no special area for protecting biodiversity encompassing or near any of the subproject locations/alignments.
• Bay		√	Based on desk review of locations and field visit, there is no bay near any of the subproject locations/alignments.
B. Potential Environmental Impacts Will the Subproject cause			
 encroachment on historical/cultural areas; disfiguration of landscape by road embankments, cuts, fills, and quarries? 		√	There are no historical/cultural area except local mosques, graveyards, temples along the proposed roads. Project activities will be confined to road right of way and will not encroach on these mosques/graveyards/temples. No notable cuts or fills proposed that may disfigure these areas.
 encroachment on precious ecology (e.g. sensitive or protected areas)? 		√	Proposed roads are urban roads, located in urban areas converted long ago for human use. There are no sensitive or protected areas in or near the roads.
 alteration of surface water hydrology of waterways crossed by roads, resulting in increased sediment in streams affected by increased soil erosion at construction site? 	√		Construction/improvement of roads will potentially increase siltation of surface waters near or adjacent to the alignments. However, this impact will be mitigated through implementation of measures suggested in the EMP.
deterioration of surface water quality due to silt runoff and sanitary wastes from worker-based camps and chemicals used in construction?	√		Construction/improvement of roads, use of chemicals such as fuels, and operation of construction worker camps will potentially increase occurrence of siltation and/or cause pollution of surface waters near or adjacent the sites. However, this impact will be mitigated through implementation of measures suggested in the EMP.
 increased local air pollution due to rock crushing, cutting and filling works, and chemicals from asphalt processing? 	~		Air pollution / dust is anticipated from earthwork and other construction activities. Proposed roads are of cement concrete. Construction materials like aggregate will be sourced from existing quarries with valid licenses and permits including environmental clearance certificate. No activities such as rock crushing will be carried out. No asphalt processing will be carried out on site.
risks and vulnerabilities related to occupational health and safety due to physical, chemical, biological, and radiological hazards during subproject construction and operation 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.
noise and vibration due to blasting and other civil works?	√		Project will not involve blasting activities. Construction activities will elevate noise levels. Vibration levels will not be significant considering the small-scale nature of work. However, impacts can be mitigated through the implementation of related measures suggested in the EMP.

Screening Questions	Yes	No	Remarks
dislocation or involuntary resettlement of people?		\	Not anticipated. All works will be confined on existing road alignments, and within existing rights-of-way (ROWs).
 dislocation and compulsory resettlement of people living in right-of-way? 		√	Not anticipated. Proposed right-of-way is free of any encroachment.
 disproportionate impacts on the poor, women and children, Indigenous Peoples, or other vulnerable groups? 		√	During construction phase, all mitigation measures are developed to protect all receptors regardless of status or affiliation. During operation phase (once subproject is completed), the roads under the subproject will benefit all sectors of the society, including the disadvantaged and vulnerable groups.
 other social concerns relating to inconveniences in living conditions in the subproject areas that may trigger cases of upper respiratory problems and stress? 	✓		Construction activities will potentially increase pollutant concentration, such as particulate matter, in ambient air. However, this can be mitigated through the implementation of community and occupational health and safety measures suggested in the EMP.
hazardous driving conditions where construction interferes with pre-existing roads?	✓		Construction activities may pose hazardous driving conditions at the sites. However, the implementation of effective traffic management as indicated in the EMPs will mitigate this impact.
poor sanitation and solid waste disposal in construction camps and work sites, and possible transmission of communicable diseases (such as STI's and HIV/AIDS) from workers to local populations?	~		Construction activities may result to poor sanitation and improper solid waste handling and disposal. However, this can be mitigated through the implementation of related measures in suggested the EMP, including awareness campaigns on communicable diseases such as COVID-19 and sexually transmitted diseases.
creation of temporary breeding habitats for diseases such as those transmitted by mosquitoes and rodents?	<		The EMP provides measures to avoid proliferation of disease vectors, both the work sites and worker camps.
 accident risks associated with increased vehicular traffic, leading to accidental spills of toxic materials? 		√	Not anticipated. These are urban roads, and will mostly facilitate movement of residents, and not anticipated to increase vehicular traffic because of road improvement.
 increased noise and air pollution resulting from traffic volume? 	√		Construction activities will elevate noise levels and air pollution due to traffic. However, the traffic management as per EMP will provide measures to avoid traffic congestion at subproject sites.
increased risk of water pollution from oil, grease and fuel spills, and other materials from vehicles using the road?	√		This may occur during the construction phase. Measures are provided in the EMP to ensure that risks of water pollution from spills is avoided.
social conflicts if workers from other regions or countries are hired?		<	Not anticipated. Labor requirements will be sourced mostly locally.
 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 mostly locally. The roads are existing infrastructures that will only be rehabilitated, and no population influx due to the operation of these infrastructures is expected.
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 construction and operation?	√		Use of explosives not anticipated. Use of fuel and construction chemicals will be minimal, and transport, storage and application will follow the procedures specified in respective Material Safety Data Sheet (MSDS).

Screening Questions	Yes	No	Remarks
community safety risks due to both accidental and natural causes, 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 suggested in the EMP.

A Checklist for Preliminary Climate Risk Screening Country/Project Title: BAN: Coastal Towns Climate Resilience Project (CTCRP) CTCRP/construction/Improvement of Roads in Bagerhat Pourashava

	Screening Questions					
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?	0				
	Would the project design (e.g., the clearance for bridges) need to consider any hydro-meteorological parameters (e.g., sealevel, 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?	0				

Options for answers and corresponding score are provided below:

Response	Score	
Not Likely	0	
Likely	1	
Very Likely	2	

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

Responses when added that provide a score of 0 will be considered <u>low risk</u> 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 <u>medium risk</u> 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 <u>high-risk</u> project.

Other comments:			

Prepared by: PMU

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²² 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: Screening for Bagerhat roads as per road subproject selection criteria

Issues/ concerns	Subproject compliance status (C, NC, NA ²³)	Remarks
Exclusion Criteria	(C, NC, NA)	
No Category A projects per ADB SPS will be considered for implementation under CTCRP. Subprojects that would directly affect environmentally protected areas, and highly valued cultural property and fall under Category A shall be strictly avoided or the subproject component(s) causing potential impacts relocated or suitable alternatives derived. CTCRP will not include and/or involve any activities listed in ADB's Prohibited Investment Activities List. The following criteria will be used for excluding sites which might have significant negative environmental impacts:	С	No A project or Prohibited Investment Activities done
(i) Projects located in ecologically sensitive areas such as protected areas (national parks, wildlife sanctuaries), notified wetlands or wetlands of significant value, critical habitats	С	No ecological sensitivity of this subproject
(ii) Project with potentially significant impacts on mangroves, wetlands, estuaries, buffer zones of protected areas etc.,	С	No such impacts are assessed for the subproject
(iii) Projects with potential for disrupting the life and property of the indigenous or tribal population	С	Not affecting indigenous people anyhow
(iv) Projects that need for significant amount of land acquisition and compensation	С	No land acquisition is required
(v) Projects located in world heritage sites, and/or within 1 km from the outer boundary of the world heritage area	C	Not located in world heritage sites, and/or within 1 km from the outer boundary of the world heritage area. The core area of Bagerhat Pourashava is about 1.5 km away from the nearest structure of Historic Mosque City of Bagerhat (Zinda Pir Mosque). However, UNESCO World Heritage site Sixty Dome Mosque (Shat Gombuj Masjid) is about 3 km away from the nearest road alignment and propsoed works will not impact this heritage site.
(vi) Projects located within monuments/sites protected by Department of Archeology	С	Not located within monument or protected site by Archeology Department

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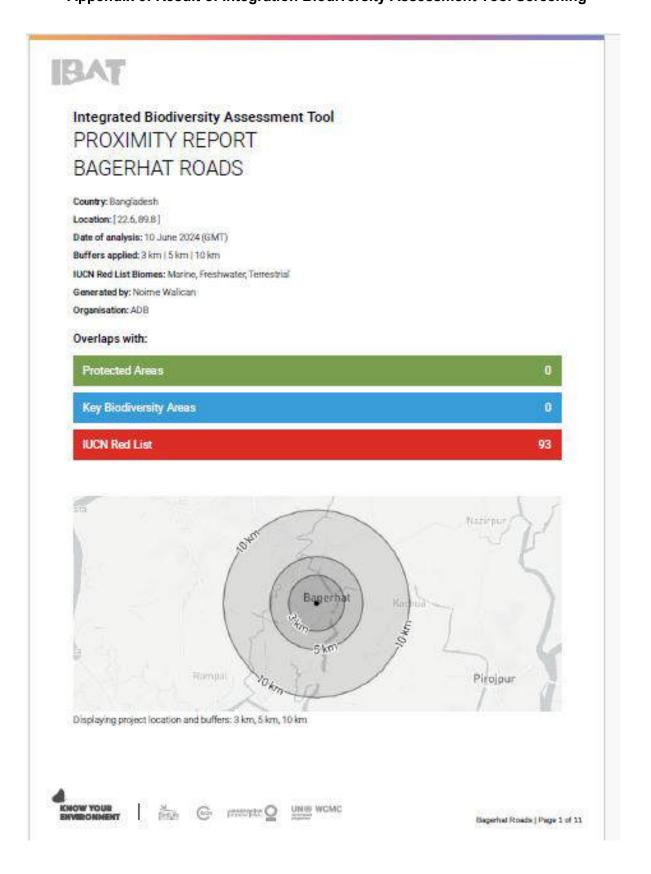
²³ C= Complied, NC= Non-complied, NA= Not applicable

Issues/ concerns	Subproject compliance status (C, NC, NA ²³)	Remarks
		The core area of Bagerhat Pourashava is about 1.5 km away from the nearest structure of Historic Mosque City of Bagerhat (Zinda Pir Mosque).
(vii) Projects which may potentially lead to encroachment/damage of physical cultural resources with significant value and/or places recognized by government agencies (e.g., Department of Archeology), which may include places of worship, cultural heritage sites, graves/cemeteries, historical monuments, etc.	С	No such damage is foreseen.
Subproject Selection Criteria		
Overall selection guidelines - applicable to all subprojects		
(i) Comply with all requirements of relevant national and local laws, rules, and guidelines, including obtaining environmental clearance certificate (ECC) from DOE for all subprojects classified as red / orange / green per Bangladesh Environmental Conservation Act, 1995	С	As per DOE, ECC is not required per letter dated 04 April 2024.
(ii) Comply with all requirements of ADB SPS 2009 and follow procedures set in environmental assessment and review framework (EARF)	С	EARF is followed
(iii) Subproject design should reflect inputs from public consultation	С	Opinions from public consultations were gathered.
(iv) Avoid locations in forests, mangrove areas, estuaries, buffer zones of protected areas. If unavoidable: - Approval from concerned authority -Alternative site analysis to justify site selection -confirm via detailed baseline and impact assessment that the project will not lead to significant impacts on respective areas -EMP to include measures to avoid, minimize, mitigate impacts, and monitoring actions to confirm mitigation	С	Complied with all this items
(v) Avoid locations within 100 m of protected monuments/sites protected by department of archeology, government of Bangladesh	С	No such locations are seen within subproject location.

Issues/ concerns	Subproject compliance status	Remarks
	(C, NC, NA ²³)	
(vi) Avoid locations within 1.5-2 km of UNESCO notified protected monuments / world heritage sites. If unavoidable - conduct heritage assessment study by engaging a competent expert, and integrate recommendations into design, construction, and operation -ensure that no damage / disruption to such places/monuments - obtain necessary clearance and permissions - EMP to include measures to avoid destruction / disturbance of such places - Provide "chance find" procedures in the EMP that include a pre-approved management and conservation approach for materials that may be discovered during project implementation. (vii) Avoid tree-cutting where possible. Retain mature roadside trees which are important/valuable or historically significant. If any trees will have to be removed, plant two new trees for every one that is lost. (viii) Preference shall be given to planting indigenous or local tree species. For any tree to be cut, consider replacement of 2:1. See Appendix 4 of this EARF (Local Government Engineering Department of Bangladesh's Tree Plantation and Conservation and Tree Resources Distribution Activities Implementation Manual dated April 2003). ix) Ensure all planning and design interventions and decisions are made in consultation with local communities and include women. Reflect inputs from public consultation and disclosure for site selection. (x) Synchronize all road improvement and pipe laying works (to extent possible) to minimize disturbance and optimize use of resources (e.g., water pipes laid prior to road improvements). (xi) If subproject includes existing facilities to be rehabilitated or expanded and/or associated Facilities, conduct environmental audit and/or environmental	C C	UNESCO guidelines and EMP of the project will be followed as included with this IEE. The core area of Bagerhat Pourashava is about 1.5 km away from the nearest structure of Historic Mosque City of Bagerhat (Zinda Pir Mosque). UNESCO Heritage site Sixty Dome Mosque (Shat Gombuj Masjid) is about 3 km away from the nearest road alignment and proposed works will not impact his heritage site. No tree cutting will be required for this subproject
due diligence per ADB SPS part of IEE. Specifically for roads		
(i) Include the provision of new or improved storm water drainage to remove the increased runoff caused by increasing the road surface area	С	Drainage issues/ proper flowing of runoff water are included in design.
(ii) Shall not lead to alteration of surface water hydrology of waterways crossed by roads; ensure appropriate cross drainage structures	С	No surface water hydrology of waterways will be altered.

Issues/ concerns	Subproject compliance status (C, NC, NA ²³)	
(iii) Ensure that drainage system including	С	Proper raising of roads
cross drainage works are designed		is consider with
adequately considering the raised road levels that may create barrier effect		design.
(iv) Include tree planting preferably with	С	No tree cutting will be
indigenous or local tree species and duly		required but Tree
considering road safety issues, alongside		plantation will be done
roads to provide a natural barrier to noise		as enhancement
and visual impacts and include additional		measure following this
physical barriers where required		suggestion.

Appendix 3: Result of Integration Biodiversity Assessment Tool Screening





About this report

This report presents the results of [6274-65135] proximity analysis to identify the biodiversity features and species which are located within the following buffers: 3 km, 5 km, 10 km.

This report is one part of a package generated by IBAT on 10 June 2024 (GMT) that includes full list of all species, protected areas, Key Biodiversity Areas in CSV format, maps showing the area of interest in relation to these features, and a 'How to read IBAT reports' document.

WARNING: BAT 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. 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.

Data used to generate this report

- UNEP-WCMC and IUCN, 2024. Protected Planet: The World Database on Protected Areas (WDPA)[On-line]. Cambridge, UK: UNEP-WCMC and IUCN. Available at: www.protectedplanet.net - May 2024.
- BirdLife International (on behalf of the KBA Partnership), 2023. Key Biodiversity Areas October 2023.
- IUCN, 2024. IUCN Red List of Threatened Species January 2024.
- IUCN. The IUCN Red List of Threatened Species. Version 2019-3. (2019). https://www.iucnredlist.org
- IUCN: Threats Classification Scheme (Version 3.2). (2019)
- Strassburg, B.B.N., Inbarrem, A., Beyer, H.L. et al. Global priority areas for ecosystem restoration. Nature 586, 724–729 (2020), https://doi.org/10.1038/s41586-020-2784-9













Protected Areas

The following protected areas are found within 3 km, 5 km, 10 km of the area of interest. For further details please refer to the associated csv file in the report folder.

No protected areas within buffer distance

Key Biodiversity Areas

The following key biodiversity areas are found within 3 km, 5 km, 10 km of the area of interest. For further details please refer to the associated csv file in the report folder.

No KBAs within buffer distance

IUCN Red List of Threatened Species

The following threatened 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	Taxonomio Group	IUCN Category	Population Trend	Blome
Eretmochelys Imbricata	Hawksbill Turtle	REPTILIA	CR	Decreasing	Tenestrial, Marine
Batagur kachuga	Red-crowned Roofed Turtle	REPTLIA	CR	Decreasing	Terrestrial, Freshwater
Batagur dhongoka	Three-striped Roofed Turtle	REPTILIA	CR	Decreasing	Tenestrial, Freshwater
Carcharhinus longimanus	Oceanic Whitetip Shark	CHONDRIGHTHYES	CR	Decreasing	Marine
Sphyma lewini	Scalloped Hammerhead	CHONDRICHTHYES	CR	Decreasing	Marine
Sphyma mokarran	Great Hammerhead	CHONDRIGHTHYES	CR	Decreasing	Marine













Species Name	Common Name	Texonomic Group	SUCN Category	Population Trend	Biome
Ancoypristis cuspidata	Nanow Sawfish	CHONDRICHTHYES	CR	Decreasing	Marine
Pristis zijsron	Green Sawfish	CHONDRICHTHYES	CR	Decreasing	Marine
Glaucostegus granulatus	Sharpnose Guitarfish	CHONDRIGHTHYES	CR	Decreasing	Marine
Sonneratia griffithii		MAGNOLIOPSIDA	CR	Decreasing	Terrestrial, Marine
Pristis pristis	Largetooth Sawfish	CHONDRIGHTHYES	CR	Decreasing	Marine, Freshwater
Heliopais personatus	Masked Finfoot	AVES	CR	Decreasing	Terrestrial, Freshwater
Calidris pygmaea	Spoon-billed Sandpiper	AVES	CR	Decreasing	Terrestrial, Marine, Freshwater
Gyps bengalensis	White-rumped Vulture	AVES	CR	Decreasing	Terrestrial
Sarcogyps calvus	Red-headed Vulture	AVES	CR	Decreasing	Terrestrial
Batagur baska	Northern River Terrapin	REPTILIA	CR	Decreasing	Terrestrial, Marine, Freshwater
Pelochelys cantorii	Asian Glant Softshell Turtle	REPTILIA	CR	Decreasing	Terrestrial, Marine, Freshwater
Balaenoptera musculus	Blue Whale	MAMMALIA	EN	Increasing	Marine
Chelonia mydas	Green Turtle	REPTILIA	EN	Decreasing	Terrestrial, Marine













Species Name	Common Name	Taxonamic Group	IUCN Category	Population Trend	Blome
Geoclemys hamiltonii	Spotted Pond Turtle	REPTILIA	EN	Decreasing	Terrestrial, Freshwater
Hardella thurjii	Crowned River Turde	REPTILIA	EN	Decreasing	Terrestrial, Freshwater
Morenia petersi	Indian Eyed Turtle	REPTILIA	EN	Decreasing	Tenestrial, Freshwater
Orcaella brevirostris	Irrawaddy Dolphin	MAMMALIA	EN	Decreasing	Marine, Freshwater
Parithera tigris	Tiger	MAMMALIA	EN	Decreasing	Terrestrial
Rhincodon typus	Whale Shark	CHONDRICHTHYES	EN	Decreasing	Marine
Varanus flavescens	Yellow Manitor	REPTILIA	EN	Decreasing	Terrestrial
Isurus oxyrinchus	Shortfin Mako	CHONDRICHTHYES	EN	Decreasing	Marine
Nilssonia gangetica	Indian Softshell Turtle	REPTLIA	EN	Decreasing	Terrestrial, Freshwater
Nissonia hurum	Indian Peacock Softshell Turtle	REPTILIA	EN	Decreasing	Terrestrial, Freshwater
Platanista gangetica	Ganges River Dolphin	MAMMALIA	EN	Decreasing	Freshwater
Eusphyra blochii	Winghead Shark	CHONDRICHTHYES	EN	Decreasing	Marine
Mobula eregoodoo	Longhomed Pygmy Devil Ray	CHONORICHTHYES	EN	Decreasing	Marine
Stegostoma tignnum	Indo-Pacific Leopard Shark	CHONORICHTHYES	EN	Decreasing	Marine













Species Name	Common Name	Taxonomio Group	IUCN Category	Population Trend	Blome
Mobula terapacana	Sicklefin Devil Ray	CHONDRICHTHYES	EN	Decreasing	Marine
Mobula thurstoni	Bentfin Devil Ray	CHONDRICHTHYES	EN	Decreasing	Marine
Isurus paucus	Longfin Mako	CHONORICHTHYES	EN	Decreasing	Marine
Acropora rudis		ANTHOZGA	EN	Decreasing	Marine
Alopias pelagious	Pelagic Thresher	CHONDRICHTHYES	EN	Decreasing	Marine
Heritiera fornes		MAGNOLIOPSIDA	EN	Decreasing	Terrestrial, Marine, Freshwater
Holothuria scabra		HOLOTHUROIDEA	ΕN	Decreasing	Marine
Holothuria Jessoni		HOLOTHUROIDEA	EN	Decreasing	Marine
Thelenota ananas	Pineapple Sea Guoumber	HOLOTHUROIDEA	EN	Decreasing	Marine
Urogymnus polylepis	Giant Freshwater Whipray	CHONDRICHTHYES	EN	Decreasing	Marine, Freshwater
Mobula birostris	Oceanic Manta Ray	CHONDRICHTHYES	EN	Decreasing	Marine
Tringa guttifer	Spotted Greenshank	AVES	EN	Decreasing	Terrestrial, Marine, Freshwater
Rynchops albicollis	Indian Skimmer	AVES	EN	Decreasing	Tenestrial, Freshwater













Species Name	Common Name	Taxonomic Group	EUCN Category	Population Trend	Blome
Haliaeetus leucoryphus	Palas's Fish- eagle	AVES	EN	Decreasing	Terrestrial, Freshwater
Aquila nipalensis	Steppe Eagle	AVES	EN	Decreasing	Terrestrial
Mobula mobular	Spinetail Devil Ray	CHONDRICHTHYES	EN	Decreasing	Marine
Carcharodon carcharias	White Shark	CHONDRICHTHYES	VU	Decreasing	Marine
Caretta caretta	Loggerhead Turtle	REPTILIA	VU	Decreasing	Terrestrial, Marine
Crocodylus palustris	Mugger	REPTILIA	VU	Stable	Terrestrial, Freshwater
Dermochelys coriacea	Leatherback Turtle	REPTILIA	VU	Decreasing	Tenestrial, Marine
Hippocampus histrix	Thorny Seahorse	ACTINOPTERYGII	Vu	Decreasing	Marine
Hippocampus trimaculatus	Three-spot Seahorse	ACTINOPTERYGE	VU	Decreasing	Marine
Lepidochelys olivaces	Olive Ridley Turde	REPTILIA	VU	Decreasing	Tenestrial, Marine
Lutrogale perspicillata	Smooth-coated Otter	MAMMALIA	VU	Decreasing	Terrestrial, Marine, Freshwater
Prionallurus viverrinus	Fishing Cat	MAMMALIA	Vu	Decreasing	Terrestrial, Freshwate
Carcharhinus falciformis	Silky Shark	CHONDRICHTHYES	VU	Decreasing	Marine













Species Name	Common Name	Taxonomio Group	IUCN Category	Population Trend	Blome
Urogymnus asperimus	Porcupine Ray	CHONDRICHTHYES	VU	Decreasing	Marine
Hippocampus kelloggi	Great Seahorse	ACTINOPTERYGII	VU	Decreasing	Marine
Physeter macrocephalius	Sperm Whale	MAMMALIA	VU	Unknown	Marine
Rusa unicolor	Samber	MAMMALIA	VU	Decreasing	Terrestrial
Hemipristis elongata	Snaggletooth Shark	CHONDRICHTHYES	VU	Decreasing	Marine
Pangshura tecta	Indian Roofed Turde	REPTILIA	VU	Decreasing	Tenestrial, Freshwater
Heliopora coerulea	Blue Coral	ANTHOZOA	VU	Decreasing	Marine
Alopias superciliosus	Bigeye Thresher	CHONDRICHTHYES	VU	Decreasing	Marine
Wallago attu		ACTINOPTERYGI	VU	Decreasing	Freshwate
Rastreliger faughni	Island Mackerel	ACTINOPTERYGE	VU	Decreasing	Marine
stiophorus platypterus	Sailfish	ACTINOPTERYGII	VU	Decreasing	Marine
Halophila beccarii	Ocean Turf Grass	LILIOPSIDA	Vu	Decreasing	Marine
Ophiophagus hannah	King Cobra	REPTILIA	VU	Decreasing	Terrestrial
Stichopus hermanni		HOLOTHUROIDEA	VU	Decreasing	Marine













Species Name	Common Name	Taxonomic Group	IUCN Category	Population Trend	Blome
Mola mola	Ocean Sunfish	ACTINOPTERYGII	VU	Decreasing	Marine
Python bivittatus	Burnese Python	REPTILIA	VU	Decreasing	Terrestrial
Mobula alfredi	Reef Manta Ray	CHONDRICHTHYES	VU	Decreasing	Marine
Neophocaena phocaenoides	Indo-Pacific Finless Porpoise	MAMMALIA	VU	Decreasing	Marine
Holothuria fuscogliva		HOLOTHUROIDEA	VU	Decreasing	Marine
Aythya ferina	Common Pochard	AVES	VU	Decreasing	Terrestrial, Marine, Freshwater
Halcyon pileata	Black-capped Kingfisher	AVES	VU	Decreasing	Terrestrial, Marine, Freshwate
Stema aurantia	River Tem	AVES	VU	Decreasing	Terrestrial, Marine, Freshwate
Danga clanga	Greater Spotted Eagle	AVES	VU	Decreasing	Terrestrial, Freshwate
Aquila heliaca	Eastern Imperial Eagle	AVES	VU	Decreasing	Terrestrial, Freshwate
Schoenicola striatus	Bristled Grassbird	AVES	VU	Decreasing	Terrestrial, Freshwater
Danga hastata	Indian Spotted Eagle	AVES	VU	Decreasing	Terrestrial
Aetobatus ocellatus	Spotted Eagle Ray	CHONDRICHTHYES	VU	Decreasing	Marine













Species Name	Common Name	Yexonomic Group	IUCN Category	Population Trend	Blome
Omobranchus smithi		ACTINOPTERYGII	VU	Unknown	Marine
Sousa chinensis	Indo-Pacific Humpback Dolphin	MAMMALIA	VU	Decreasing	Marine, Freshwater
Actomylaeus nichofii	Banded Eagle Ray	CHONORICHTHYES	VU	Decreasing	Marine
Hippocampus spinosissimus	Hedgehog Seshorse	ACTINOPTERYGII	VU	Decreasing	Marine
Lissemys punctata	Indian Flapshell Turde	REPTILIA	VU	Decreasing	Terrestrial, Freshwater
Xenochrophis cerasogaster	Painted Keelback	REPTILIA	VU	Decreasing	Freshwater
Bagarius bagarius		ACTINOPTERYGI	VU	Decreasing	Freshwater













Recommended citation

BAT Proximity Report. Generated under licence 6274-65135 from the Integrated Biodiversity Assessment Tool on 10 June 2024 (GMT). www.bat-alliance.org

How to use this report

This report provides an indication of the potential biodiversity-related features - protected areas, key biodiversity areas and species - close to the specified location. It provides an early indication of potential biodiversity concerns, and can provide valuable guidance in making decisions. For example, this information can be helpful when assessing the potential environmental risk and impact of a site, categorising investments/projects, preparing the terms of reference for an impact assessment, focusing attention on key species of conservation concern and sites of known conservation value, and reviewing the results of an impact assessment.

The report does not provide details of potential indirect, downstream or cumulative impacts. Furthermore, the report should be regarded as a "first-step", providing a set of conservation values sourced from global data sets, and is not a substitute for further investigation and due diligence, especially concerning national and/or local conservation priorities.











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:

- 1. widen embankments where possible;
- 2. land contouring;
- 3. landscaping mounds;
- 4. landscape treatments; and
- 5. 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.
- 2. <u>Classify the spoil generated using recognized guidelines and its geotechnical characteristics:</u>
 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.
- 3. <u>Maximize the beneficial reuse of spoil on site based on its classification (both contamination category and geotechnical characteristics)</u>: 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.

- 4. <u>Maximize the beneficial reuse of spoil off site based on its classification (both contamination category and geotechnical characteristics):</u> 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.
- 5. <u>Dispose of spoil off site based on its contamination classification</u>: 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.
- 6. 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:

- 1. Clearing of vegetation;
- 2. Selection of material;
- Clearing of topsoil;
- 4. Excavation of earthen material;
- 5. Blasting of earthen material (if required);
- 6. Transport of earthen material;
- 7. Storage/stockpiling of spoil, topsoil and mulch; and
- 8. 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:

- 1. the safety of pedestrians, bicyclists, and motorists travelling through the construction zone;
- 2. protection of work crews from hazards associated with moving traffic;
- 3. mitigation of the adverse impact on road capacity and delays to the road users;
- 4. maintenance of access to adjoining properties; and
- 5. 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:

- 1. Approval from the ULB/CMC/Public Works Department (PWD) to use the local streets as detours:
- 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;
- 3. Determining of the maximum number of days allowed for road closure, and incorporation of such provisions into the contract documents;
- 4. Determining if additional traffic control or temporary improvements are needed along the detour route;
- 5. Considering how access will be provided to the worksite;
- 6. Contacting emergency service, school officials, and transit authorities to determine if there are impacts to their operations; and
- 7. 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:

- 1. Review construction schedule and methods:
- 2. Identify initial traffic recirculation and control policy;
- 3. Identify routes for traffic diversions;
- 4. Analyze adverse impact & mitigation at the detours:
- 5. Begin community consultation for consensus;
- 6. Finalize or determine alternate detours;
- 7. Identify temporary parking (on and off -street);
- 8. Discuss with CMC, owner, community for use;
- 9. Coordinate with the Traffic Police to enforce traffic and diversions;
- 10. Install traffic control devices (traffic cones, signs, lightings, etc);
- 11. Conduct campaigns, publicity, and notify public about street closure; and
- 12. 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:

- 1. Traffic control devices in place at the work zones (signs, traffic cones, barriers, etc.);
- 2. defensive driving behavior along the work zones; and
- 3. 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:

- 1. Explain why the brochure was prepared, along with a brief description of the project;
- 2. Advise the public to expect the unexpected;
- 3. Educate the public about the various traffic control devices and safety measures adopted at the work zones;
- 4. Educate the public about the safe road user behavior to emulate at the work zones;
- 5. 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
- 6. 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:

- 1. Signs
- 2. Pavement Markings
- 3. Channelizing Devices
- 4. Arrow Panels
- 5. 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 A1to Figure A6illustrate 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.

- 1. Work on Shoulder or Parking Area;
- 2. Work with Land Closure: Low Traffic;
- 3. Work on Lane Closure With Yield Sign on Two Lane: Low Volume;
- 4. Work on Lane Closure With Single Flag Operator on Two Lane: Low Volume;
- 5. Lane Closure: Two Flag Operators on Two Lane Road; and
- 6. 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.

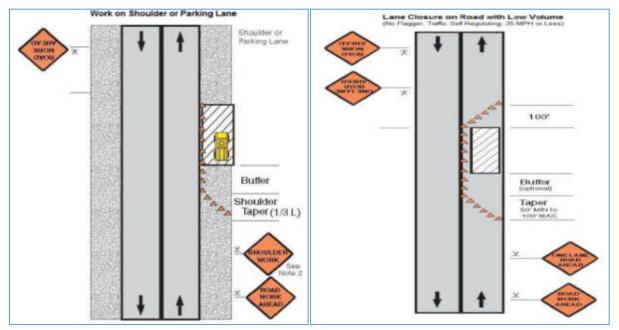


Figure A1 Work with shoulder or Parking area

Figure A2Work with land closure: low traffic

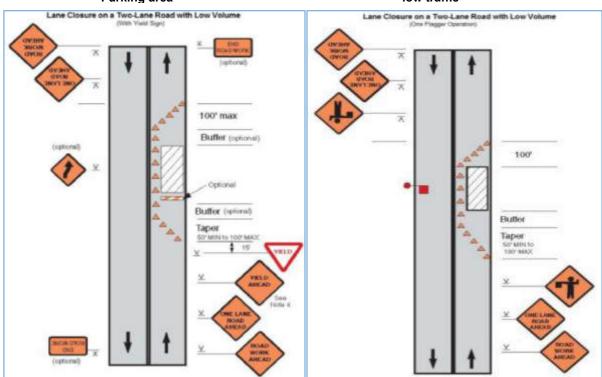


Figure A3 Work on Lane Closure with Yield Sign on Two Lane: Low

Figure A4 Work on Lane Closure
With Single Flag Operator on Two

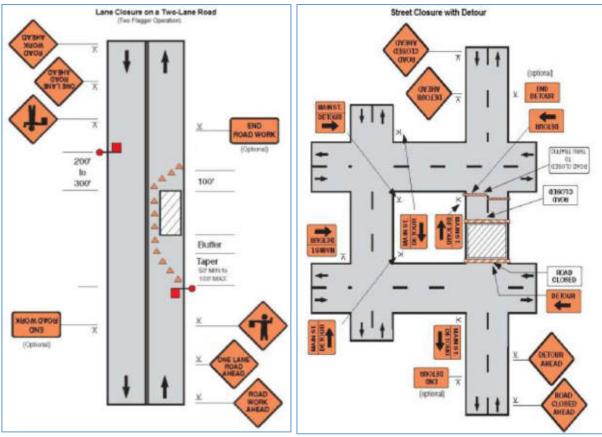
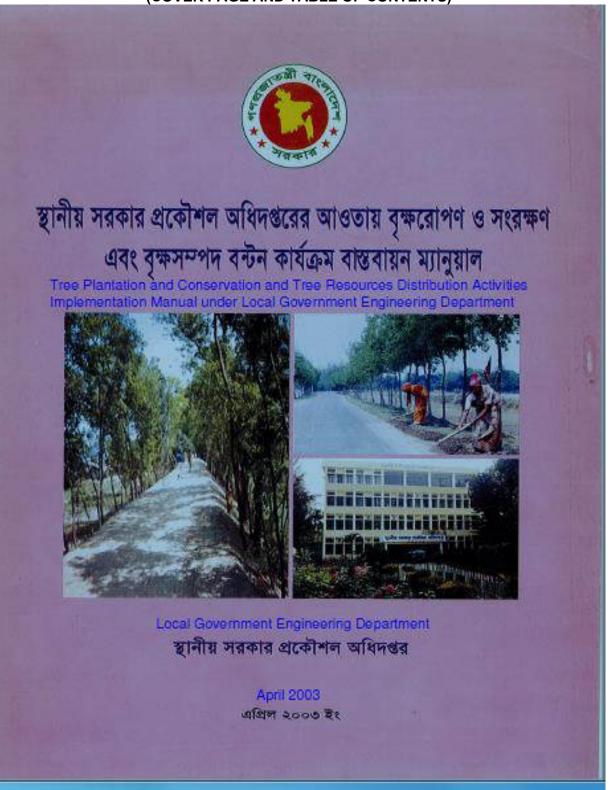


Figure A5 Lane Closure: Two Flag Operators on Two Lane Road

Figure A6Street Closure with Detour





Note: Copy of the full manual is available upon request at the LGED or PMU Office.

Tree Plantation and Conservation and Tree Resources Distribution Activities Implementation Manual under Local Government Engineering Department

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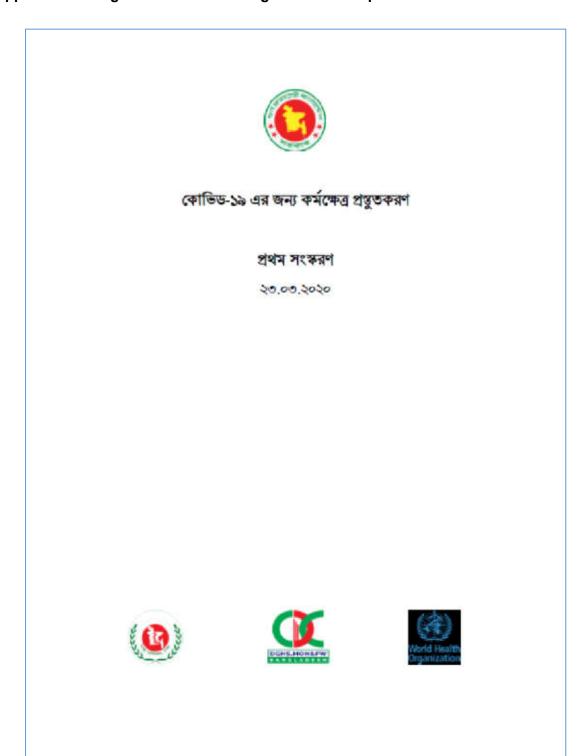
Embankment/Annex- 6: Template of Monthly Proress Report

Tree plantation and management plan

Steps	Management initiatives	Records	Reporting	Responsibilit y
Preparation of the Plantation Area	The open areas near the subproject site will be identified and selected. During the selection of the block plantation sites, the availability of the water in nearby areas will be taken into consideration as the survival of the tree saplings depends on the availability of water or watering facilities.	Demark tree plantation area, record of drawing for proposed tree plantation		Prime Responsibil ity: Contractor Supervising responsibili ty: CSE/PIU/PM SC
Preparation of Pits and Sapling Transplantation	distance of the plantation. The size of the plantation pit varies depending upon the species of the plants, height of the saplings. Selection of native fruit bearing plants will be chosen for plantation. Trees will be planted on the alternate rows in a straight line for the prevention of the horizontal dispersion of the pollutants. Hence the pit will be dig accordingly. During the time of placing the tree saplings the roots will be freed from plastic or any type of cover which is normally use for the transplantation of the tree saplings from the seed bed to the tree plantation pits. This exercise will help the root hairs to reach the soil.	Demark tree plantation area, record of drawing for proposed tree plantation		Do
Spacing Time of	For the survivability of the tree species planted spacing between the saplings should be maintained. Spacing which are usually used for teak planting are 2 x 2 m2, 3 x 1m2, 3 x 3 m2, 4 x 2 m2 and 4 x 4 m2, depending on site condition. For the construction site, wider spacing for native fruit bearing plants are suggested for large canopy and ample sunlight. As per the normal practices followed	Tree plantation	Do Do	Do
Plantation	under the silvicultural guidelines plantation of the tree sapling to be done only after the first shower during the rainy season. The best time for plantation is after 15 days from the day of first shower during rainy season.			
Protection of Tree saplings	Circular tree guard should be placed after the plantation of the saplings for the protection of these young plants from the ravages of cattle, sheep and goat and other animals.	Do	Do	Do

Coloation of	If tree saplings died or damage occur after placing the circular tree guard, timely replacements of damaged plant and thereafter care is important.		D	D
	The contractor will choose the local and Vulnerable, endemic species.	Do	Do	Do
Maintenance (include thinning) : Weeding	Low pruning at 6 months; Thinning: Thinning will start after the stand	Record of Survivability rate	Do	Do

Appendix 7: Bangladesh Government guideline in response to COVID-19 in worksites



কোভিড-১৯ এর জন্য কর্মক্ষেত্র প্রস্তুতকরণ

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

বিশ্ব স্বাস্থ্য সংস্থা (WHO) এবং জনস্বাস্থ্য কর্তৃপক্ষ বিশ্ববাপী কোভিড-১৯ এর প্রাদুর্ভাব নিয়ন্ত্রণের জন্য কাজ করছে। তবে দীর্ঘমেয়াদী সাকল্য এখন পর্যন্ত অর্জিত হয়নি। এই রোগের বিজ্ঞার রোধ করতে হলে ব্যবসায়ী, চাকুরীজীবীসহ সমাজের সর্বস্তরের মানুষকে অবশাই কার্যকরি ভূমিকা পালন করতে হবে।

কোডিড-১৯ যেতাবে হড়ায়

কোভিড-১৯ আক্রান্ত রোগীর হাঁচি, কাঁশির সাধ্যমে রোগটি সংক্রমিত হয়ে থাকে। হাঁচি, কাঁশির সাধ্যমে রোগটির জীবাণু নিকটবর্তী বন্ধুর পৃষ্ঠতল - যেমন ডেঙ্ক, টেবিল বা টেলিকোন/ মোবাইল ইত্যাদির উপর পড়ে যা সহজেই মানুষের হাতের সংস্পর্শে আসে, পরবর্তীতে এই জীবাণু যুক্ত হাত দ্বারা চোঝ, নাক বা মুখ স্পর্শ করার মাধ্যমে তারা আক্রান্ত হতে পারে। আবার যারা কোভিড-১৯ আক্রান্ত বাক্তির এক মিটারের মধ্যে অবস্থান করে, তারাও ইটি-কাশি হতে হিটকে আসা ক্ষুদ্ধ কনার সাথে মিশ্রিত জীবাণু দ্বারা আক্রান্ত হতে পারে। কোভিড-১৯ এ সংক্রমিত হলে বেশিরভাগ ব্যক্তি হালকা/সাধারণ লক্ষণগুলি অনুভব করে এবং নিজ থেকেই সুদ্ধ হয়ে যায়। কিছু রোগীর ক্ষেত্রে গুরুতর অসুস্থতা লক্ষ্য করা যায় এবং হাসপাতালে নেওয়ার প্রয়োজন হতে পারে। সাধারণত ৪০ বা তলার্থ্ব বয়সী রোগী, রোগ প্রতিরোধ ক্ষমতা কম এমন ব্যক্তির (যেমন- ক্যাপার, ডায়াবেটিস, হদরোগ এবং কুসকুসের রোগে আক্রান্ত ব্যক্তি) ক্ষেত্র ঝুঁকির মাত্রা বেশী।

আমরা এখানে যা জানব-

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

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

যে সকল কর্মক্ষেত্রে কোভিড-১৯ এর সংক্রমণ ছড়িয়ে পড়েনি সেখানকার দায়িবপ্লাপ্ত কর্মকর্তাগণ তাদের নিজ কর্মক্ষেত্রে নিল্লোক্ত বিষয়পুলো নিশ্চিত করবেন-

- কর্মস্থল পরিষ্কার-পরিক্ষয় এবং স্বাস্থ্যকর কিনা তা নিশ্চিতকরণঃ
 জীবাগুনাশক দিয়ে ডেয় ও টেবিলের পৃষ্টতল এবং নিতা ব্যবহার্য বস্তু (যেমন- টেলিকোন, কীবোর্ড) নিয়মিত
 মুহতে হবে। কারন পৃষ্ঠতলে থাকা জীবাগু দ্বারা সহজে সংক্রমনের সম্ভাবনা থাকে।
- কর্মচারী, ঠিকাদার এবং গ্রাহকদের নিয়মিত এবং যথাযথভাবে হাত ধোয়ার অভ্যাস করানোঃ
 সাবান-পানি দিয়ে হাত ধোয়া, কেননা সাবান দিয়ে হাত পরিষ্কার করলে ভাইরাস ঋংস হয় এবং কোভিড১৯ এর বিজারে বাধা সৃষ্টি হয়।

- কর্মক্ষেত্রের প্রবেশপথে বা আশেপাশে সহকে দৃষ্টিগোচর হয় এমন স্থানে হাাত স্যানিটাইজার রাখার ব্যবস্থা করা।
- সঠিকভাবে হাত ধোয়ার নির্দেশনা সম্বলিত পোন্টার দৃষ্ঠিগোচর স্থানে প্রদর্শন করা এবং স্থানীয় জনস্বাস্থ্য কর্তৃপক্ষের সাহায্য নিন।
- হাত ধোয়ার বাপারে উৎসাহিত করার জন্য পেশাদার জনস্বাস্থ্য কর্মকর্তার দিকনির্দেশনা, বিভিন্ন সভায় প্রদত্ত সচেতনতামূলক বার্তা এবং ইন্টারনেটে ব্যবহৃত গ্রহনবোগ্য এবং বিশাসবোগ্য তথাাদি ব্যবহার করা।
- কর্মী, ঠিকাদার এবং গ্রাহকদের সাবান ও পানি দিয়ে হাত ধোয়ার বাবাস্থা নিশ্চিত করা।
- কর্মক্ষেত্রে শ্বাস-প্রশ্বাস জনিত স্বাস্থ্যবিধি প্রচার করা-
 - ✓ খাস প্রখাসজনিত পরিজ্য়তার ব্যাপারে পোন্টার প্রদর্শন। কেননা, খাস প্রখাসের পরিজ্য়তা কোডিড১৯ সংক্রমণ রোধ করে।
 - ✓ শাস প্রশাসক্ষরিত পরিক্ষরতায় উৎসাহিত করার জন্য কর্মক্ষেত্রে পেশাদার জনস্বাস্থ্য কর্মকর্তার

 দিক্ষিদেশনা, বিভিন্ন সভায় প্রদত্ত সচেতনতামূলক বার্তা এবং ইন্টারনেটে ব্যবহৃত প্রহন্যোগ্য এবং

 বিশ্বাসযোগ্য তথাাদি ব্যবহার করা।
 - ✓ কর্মগুলে কর্মচারীদের বিশেষ করে যাদের সর্দি বা কাশি আছে তাদের জন্য কেস মাঞ্চ/কাগজের
 টিস্যু/বুমাল সহজলতা করা ও তাদের ব্যবহৃত কেস মাঞ্চ/কাগজের টিস্যু/বুমালের যথায়থ ব্যবস্থাপনা
 এবং ঋংস করা নিশ্চিত করা।
- জরুরী পেশাদারী কাজে শ্রমণে যাওয়ার আগে কর্মচারী এবং ঠিকাদারদের "শ্রমণ সম্পর্কিত জাতীয় নির্দেশনা" জেনে নেওয়ার পরামর্শ দেয়া।
- কর্মচারী, ঠিকাদার এবং সেবা প্রহণকারীদের এই মর্মে অবহিত করা যে, যদি কোনভাবে কোভিড-১৯ তাদের
 নিজ নিজ এলাকায় হড়িয়ে পড়তে শুরু করে (হালকা কাশি বা স্বয়্র জ্বর ৯৯ ডিপ্লি কারেনহাইট বা তার
 লামান্য বেশি হয়) তাহলে তাদেরকে বাড়িতেই থাকতে হবে বা বাড়িতে থেকেই কাজ করতে হবে। এসময়
 চিকিৎসকের পরামর্শ অনুমায়ী সাধারণ ঔষধ যেমন প্যারাসিটামল, আইবুপ্লোকেন বা আসপিরিন ইত্যাদি
 ঔষধপুলি প্রহণ করা যেতে পারে।
- মদি কারো কোভিড-১৯ এর খুব সাধারণ লক্ষণও দেখা দেয় তাহলে তাকে অবশাই সার্বক্ষণিক ঘরের মধ্যে
 থাকতে হবে। একথা দৃঢ়ভাবে প্রচার করতে হবে।
- কর্মস্থলে উপরোক্ত বার্তা সম্বলিত পোশ্টার প্রদর্শন করুন এবং অন্যান্য মাধ্যমে যেমন স্থানীয় যোগাযোগের চ্যানেলগুলিতে (ক্যাবল অপারেটর/কমিউনিটি রেডিও) প্রচার করুন।
- স্থানীয় জনস্বাস্থ্য কর্তৃপক্ষ কর্তৃক অনুমোদিত এবং প্রতুতকৃত বার্তা প্রচারের সামগ্রীসমূহের ব্যবহার নিশ্চিত করুন।
- সংবেদনশীল এই সময়ে, কর্মীদের অসুস্থতাজনিত ছুটির অনুমোদন নিশ্চিত করতে হবে।

উপরে উল্লেখিত বাবস্থা প্রহনের মাধ্যমে কোভিড-১৯ এর বিস্তার রোধ করা সম্ভব।

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

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

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

কোভিড-১৯ বুঁকি প্রতিরোধ বা হাস করার জন্য বিবেচিত মূল বিষয়গুলি নিমর্পঃ

ক) সভা বা অনুষ্ঠানের পূর্বে-

- কোন সভা করার পূর্বে সভা স্থানের যথায়থ কর্তৃপক্ষের পরামর্শ মোতাবেক ব্যবস্থা প্রহণ করা।
- সভা বা অনুষ্ঠানে সংক্রমণ প্রতিরোধের জন্য একটি প্রতুতি পরিকল্পনা প্রহণ করা।
- সকলের উপস্থিতেতে সভা বা অনুষ্ঠান আয়োজনের প্রয়োজন কিনা তা বিবেচনা করা। টেলিকনফারেন্স বা
 ইন্টারনেটের মাধামে 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 স্বাস্থ্যদেবা 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 বাবস্থাপনার নিমিতে সকলের জন্যে টিসা, সাবান এবং হ্যান্ড স্যানিটাইজারসহ সকল প্রয়োজনীয় সামগ্রীর পর্যাপ্ত সরবরাহ নিশিচত করা। প্রয়োজনে উপকরণপুলোর প্রি-অর্তার করা।
- শাসতদ্রের সমস্যার উপসর্গ কারো মাঝে দেখা দিলে তার জন্য মেডিক্যাল/সার্জিক্যাল মাজ সরবরাহের ব্যবস্থা রাখতে হবে।
- ষেখানে কোভিড-১৯ ভাইরাস বিতার লাভ করছে সেখানে সক্রিয় পর্যবেশ্বণ নিশ্চিত করতে হবে। সভায়
 অংশপ্রহণকারীদের আগাম পরামর্শ দিতে হবে যে, যদি তাদের কারো মধ্যে কোভিড-১৯ সংক্রমনের এর
 কোন লক্ষণ দেখা যায় বা কেউ যদি অসুস্থতা বোধ করেন তাহলে সভায় তাদের উপস্থিত হওয়া কায়্য নয়।
- সহা/ অনুষ্ঠানের আয়েজক অবশাই অংশগ্রহণকারী, বাবার পরিবাশনকারী এবং দর্শকদের মোবাইল/
 টেলিফোন নম্বর, ই-মেইল ও তাদের বাসয়্থানের বিভারিত ঠিকানা সংগ্রহ করবেন। যদি কোন
 অংশগ্রহণকারী সন্দেহজনক সংক্রামক ব্যামিতে আক্রান্ত হয়ে থাকেন তাহলে তার সকল তথা স্থানীয়
 জনস্বাস্থ্য কর্তৃপক্ষকে সরবরাহ করতে হবে এবং তথা প্রদান নিশ্চিত করবেন। কোন অংশগ্রহণকারী তার
 কোন তথা স্থানীয় জনস্বাস্থ্য কর্তৃপক্ষকে প্রদানে অমীকৃতি জানালে তিনি ঐ অনুষ্ঠান বা সভায় অংশগ্রহণ
 করতে পারবে না।
- সভায় অংশগ্রহণকারী কারো মধ্যে কোভিড-১৯ সংক্রান্ত যে কোন ধরনের উপসর্গ (শুকনো কাশি, জর,
 অসুস্থতা) দেখা দিলে নিয়োক্ত ব্যবস্থা গ্রহণ করতে হবে-
 - অসুস্থ বোধ করছে বা লক্ষণ রয়েছে এমন ব্যক্তিকে জনসমাগম হতে বিভিন্ন করে নিরাপদে রাখার জন্য একটি কক্ষ বা অঞ্চল চিহ্নিত করতে হবে।
 - সেখান থেকে অসুস্থ ব্যক্তিকে কিডাবে নিরাপদে স্বাস্থ্যকন্দ্রে/হাসপাতালে স্থানান্তরিত করা যায় তার পরিকল্পনা থাকতে হবে।
 - যদি সভায় বা অনুষ্ঠানে অংশগ্রহণকারী কোন সদস্য, কর্মী বা পরিসেবা প্রদানকারীর কোভিড-১৯
 টেন্টের ফল পজিটিভ হয় সেক্ষেত্রে কি করণীয় তা পূর্বেই ঠিক করে রাখতে হবে।

কর্মক্ষেত্রের স্বাছ্যাসেরা প্রদানকারী অথবা জনস্বাছ্য কর্তৃপক্ষ অথবা স্বাস্থ্য বিভাগকে গৃহীত সকল
পরিকল্পনাগুলো সম্পর্কে পূর্বেই অবহিত করতে হবে।

ৰ) সভা বা অনুষ্ঠান চলাকালীন সময়ে -

- আয়োজিত সভা বা অনুষ্ঠানে অংশগ্রহণকারীদেরকে মৌষিক বা নিখিত ভাবে কোভিড-১৯ সংক্রান্ত সকল
 তথ্য প্রদান করতে হবে। অনুষ্ঠানের নিরাপত্তার স্বার্থে আয়োজক কর্তৃক গৃহীত পদক্ষেপ সম্পর্কে
 অংশগ্রহনকারীদের অবহিত করতে হবে।
- স্পর্শহীন সম্বোধনের উপায়গুলি প্রচার ও অনুশীলন করতে হবে এবং অন্যের সংস্পর্শ যথাসম্ভব পরিহার করতে হবে।
- সভায় অংশগ্রহণকারীদের নিয়মিত হাত ধোয়া বা হ্যাত রাব বা আলকোহল সমৃদ্ধ হ্যাত-স্যানিটাইজার ব্যবহারে উৎসাহিত করতে হবে।
- অংশগ্রহণকারীরা যেন হাঁচি বা কাঁশি দেয়ার সময় টিস্মা ব্যবহার করে অথবা কনুইয়ের ভাঁজে হাঁচি-কাশি
 দেয় সে বিষয়ে বারবার অবহিত করতে হবে এবং পরবর্তীতে সেই টিস্মা বা কাপড় যেন ঢাকনা যুক্ত পাত্রে
 কেলে দিতে পারে সেই ব্যবস্থা করতে হবে।
- জরুরি অবস্থায় মোগায়োপের জন্য অংশগ্রহণকারীদের একটি ঠিকানা অথবা হটলাইন নম্বর সরবরাহ করতে হবে যাতে তারা পরামর্শের জন্য যোগায়োগ করতে পারে বা কোন তথা দিতে পারে।
- অনুষ্ঠানের চেন্যুটিতে সহজে দৃশামান হয় এমন একাধিক জায়গায় আলকোহল সমৃদ্ধ স্যানিটাইজার বা হাাত রাব রাখার ব্যবস্থা করতে হবে।
- আসনগুলো এমনভাবে সাজাতে হবে যাতে অংশগ্রহণকারীরা পরস্পারের থেকে কমপক্ষে এক মিটার দূরে অবস্থান করতে পারে।
- পর্যাপ্ত বাতাস চলাচলের সুব্যবস্থা নিশ্চিত করার জন্য যখনই সম্ভব তেনুার জানালা এবং দয়জা খুলে রাখতে হবে।
- যদি কেউ অসুস্থতা অনুভব করে তবে পূর্বপরিক্লিত প্রস্তুতি অনুসরণ করুন বা অরুরি নাখারে যোগাযোগ করন।
- সভাস্থলের আঞ্চলিক পরিস্থিতি বা অংশগ্রহণকারীদের সাম্প্রতিক শ্রমণের উপর নির্ভর করে অসুস্থতাবোধ
 করা বান্তিকে একটি সম্পূর্ণ বিচ্ছিন্ন কক্ষে রাখতে হবে। তাকে একটি মাস্ক সরবরাহ করুন বাতে বাড়ি ফিরার
 পথের অন্য কাউকে সংক্রমিত না করে। অন্যথায় পূর্বনির্ধারিত সনাক্তকরণ কেন্দ্রে নিয়ে যান।
- সকল অংশপ্রহনকারীকে তাদের সহযোগিতার জন্য ধন্যবাদ আপন করতে হবে।

গ) সভা বা অনুষ্ঠান পরবর্তী করনীয় -

- কমপক্ষে এক মালের জন্য সমত অংশগ্রহণকারীদের নাম এবং যোগাযোগের ঠিকানা সংগ্রহে রাখুন। যাতে
 অনুষ্ঠান পরবর্তীতে অসুস্থ হয়ে পড়া যে কোন অংশগ্রহনকারীকে জনস্বাস্থ্য কর্তৃপক্ষ সহজেই খুঁজে বের করতে
 পারে।
- যদি সভা বা অনুষ্ঠানে কোন সন্দেহভাজন কোভিড-১৯ রোগীকে পাওয়া যায় তবে তাকে আলাদা কয়ত
 হবে। জন্যান্য অংশপ্রহণকারীদের এ বিষয়ে জানাতে হবে এবং তাদেয়কে পরবর্তী ১৪ দিন পর্যন্ত কোন
 ধরনের লক্ষণ দেখা য়য় কিনা তা প্রতিদিন পর্যবেক্ষণ করায় ও দিনে দুঁ'বায় কয়ে দেহের তাপমাত্রা
 পরিমাপের পরামর্শ দিতে হবে।

- যদি তাদের কারো হালকা কাশি বা ছর (ফেমন ৩৭.৩ ডিপ্রি সেন্টিপ্রেড) ৯৯.২ ডিপ্রী ফারেনহাইট বা তার
 বেশি) হয় তবে তাদেরকে বাড়িতে থাকা এবং পরিবার হতে সাময়িকভাবে বিচ্ছিন্ন থাকার পরামশকরতে
 হবে । এর অর্থ হল পরিবারের সদস্যসহ অন্যান্য ব্যক্তিবর্গের সাথে খনিষ্ঠ যোগাযোগ (কমপক্ষে ১ মিটার
 দূরত) এড়িয়ে চলতে হবে।
- স্বানীয় জনস্বায়্য কর্তৃপক্ষকে সভায় অংশগ্রহনকারীদের সাম্প্রতিক প্রয়ণ এবং উপসর্গের বিশদ তথ্য প্রদান করতে সবে।
- সকল অংশগ্রহনকারীকে তাদের সহযোগিতার জন্য ধনাবাদ আপন করতে হবে।

৩. কর্তৃপক্ষ ও কর্মীগণের ভ্রমণকালীন সময়ে সাবধানতাঃ

ক) দ্রমণের আগে-

- কোডিড-১৯ সংক্রমিত এলাকার সর্বশেষ পরিস্থিত সম্পর্কে সংশ্লিষ্ট সংস্থার কর্মকর্তা এবং কর্মচারীদের অবশাই জেনে নিতে হবে।
- সর্বশেষ তথাের ভিত্তিতে সংস্থার কর্মকর্তা-কর্মচারীদের আসল্ল প্রমণ পরিকল্পনা সম্পর্কিত সুযোগ সুবিধা
 এবং বুঁকিগুলাে মৃল্যায়ন করতে হবে।
- কোডিড-১৯ ছড়িয়ে পড়া এলাকায় অসুস্থ এবং ঝুঁকিতে থাকা কর্মচারীদের প্রেরণ করা যথাসম্ভব এড়িয়ে
 চলতে হবে।
- কোভিড-১৯ আক্রান্ত এলাকায় শ্রমণের পূর্বে সংশ্লিষ্ট কর্মচারীদেরকে কোভিড-১৯ সম্পর্কে বিল্প এবং উপযুক্ত কোন ব্যক্তি (বেমন- সংস্থার স্বাস্থ্যসেবা প্রদানকারী, স্থানীয় জনস্বাস্থ্য কর্তৃপক্ষ) দারা ঐ স্থানের সুযোগ সুবিধা সম্পর্কে অবহিত করতে হবে।
- ভ্রমণ করতে যাওয়া কর্মচারীদের হ্যান্ড রাব / হ্যান্ড স্মানিটাইজার এব ছোট বোতল (১০০ মিলি এর নীচে)
 সরবরাহ করতে হবে যাতে তারা নিয়মিত হাত পরিষ্কার রাখতে পারে।

ব) শ্রমণের সময়:

- বারবার হাত ধোয়ার বিষয়ে উৎসাহিত করতে হবে এবং হীচি-কাশি আছে এমন লোকদের কাছ থেকে
 কমপকে এক মিটার/তিন ফুটের অধিক দ্রে থাকতে সংশ্লিষ্ট কর্মকর্তা-কর্মচারীদের নির্দেশ দিতে হবে।
- শ্রমণের সময় কর্মচারীদের কেউ অসুস্থ বোধ করলে তার জন্য করনীয় এবং কার সাথে যোগাযোগ করবেন
 তা জানিয়ে দিতে হবে।
- কর্মকর্তা-কর্মচারীরা যেখানে শ্রমণ 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 শ্রমণ, চলাচল বা বড় সমাবেশ সম্পর্কিত
 বিধিনিয়েধ মেনে চলতে হবে।

গ) ভ্রমণ থেকে ফিরে আসলে:

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

- যদি তাদের হালকা কাশি বা সামান্য ছব হয়ে থাকে (য়য়য়ন- তাপমাত্রা ৯৯.২ ডিপ্রি ফারেনহাইট বা তার বেশি) তবে তাদের বাড়িতে থাকা পরিবারের সদস্যসহ অন্যান্য লোক হতে বিভিন্ন হতে হবে। এর অর্থ পরিবারসহ অন্যান্য লোকের সংস্পর্শ এডিয়ে চলতে হবে (কমপক্ষে এক মিটার দুরত্ব বজায় রাষতে হবে)
- টেলিফোনের মাধ্যমে স্বাস্থ্যসেবা প্রদানকারী বা স্থানীয় জনস্বাস্থ্য বিভাগকে তাদের সাম্প্রতিক শ্রমণ এবং রোগের লক্ষণগুলি সম্পর্কে বিশদ তথা প্রদান করতে হবে।

৪. কোভিড-১৯ হড়িয়ে পড়লে কর্মক্ষেত্র প্রভূতকরণঃ

কর্মক্ষেত্রে কোন কোভিড-১৯ এ আক্রান্ত সন্দেহভাজন ব্যক্তি অসুস্থ হয়ে পড়লে কি করণীয় তার একটি পরিকল্পনা তৈরি করতে হবে।

কর্মস্থলে-

- ✓ অসুত্ব ব্যক্তিকে এমন কোন স্থানে রাখতে হবে যেখানে তারা অন্যদের থেকে বিভিন্ন (Isolated)
 থাকবে। সেই সাথে অসুত্ব ব্যক্তির সাথে যথাসম্ভব কম সংখ্যক মানুষ যেন যোগাযোগ করে নিশ্চিত
 করতে হবে এবং স্থানীয় স্বাস্থ্যসেবা প্রদানকারী কর্তৃপক্ষের সাথে যোগাযোগ করতে হবে।
- ✓ কর্মস্থলে অন্যান্য কুঁকিপূর্ণ ব্যক্তিদের কীভাবে চিহ্নিত করা যায় তা বিকেনা করতে হবে। লক্ষ্য রাষতে
 হবে যেন কেউ নিপ্তাহ বা বৈষম্যের শিকার না হয়। সম্প্রতি কোভিড-১৯ আক্রান্ত অঞ্চল শ্রমণ করেছেন
 এমন কর্মীদের মধ্যে যারা অন্যান্য গুরুতর অসুস্থ হওয়ার কুঁকিতে রয়েছে (যেমন-ভায়াবেটিস, হদরোগ,
 কুসকুসের রোগ এবং বেশি বয়স) তাদেরকে উচ্চকুঁকিপূর্ণ হিসেবে অপ্রাধিকার দিতে হবে।
- কোভিড-১৯ প্রতিরোধে আপনার করা পরিকল্পনাটি সম্পর্কে স্থানীয় জনস্বাস্থ্য কর্তৃপক্ষকে জানাতে হবে
 এবং প্রয়োজনে তাদের মতামত প্রহণ করতে হবে।
- দপ্তর বা সংস্থায় নিয়মিত টেলিযোগাযোগের মাধামে কর্ম সম্পাদনের বাবস্থা করতে হবে। কোভিড১৯ এর প্রাদুর্তাব ঘটলে স্বাস্থ্য কর্তৃপক্ষ গণপরিবহন এবং জনসমাগম এড়াতে জনগণকে পরামর্শ দিতে
 পারে; সেক্ষেত্রে টেলিযোগাযোগ কর্মীদের নিরাপত্তা নিশ্চিত করার পাশাপাশি ব্যবসা বা কর্মক্ষেত্রকে
 সচল রাখতে সহায়তা করবে।
- কোন সংস্থা বা প্রতিষ্ঠান যে এলাকায় অবস্থিত সেখানে কোভিড-১৯ এর প্রাদুর্ভাব ঘটলে তার জন্য একটি দুর্যোগকালীন ব্যবস্থাপনার পরিকল্পনা তৈরি করতে হবে যা-
 - ✓ প্রনয়নকৃত দুর্যোগকালীন ব্যবস্থাপনার পরিকল্পনা সংশ্লিষ্ট সংস্থাকে সমাজ বা কর্মক্ষেত্র ছড়িয়ে
 পড়া কোভিড-১৯ মোকাবেলার সামর্থ্য করবে। অন্যান্য জরুরী স্বাস্থ্যসেবা প্রদানকারী সংস্থার
 ক্ষেত্রেও এই পরিকল্পনা প্রযোজ্য।
 - ✓ পরিকয়নাটি এমন হতে হবে যেন অসুস্থতা বা স্থানীয় চলাচলে প্রতিবন্ধকতার জন্য উল্লেখযোগ্য
 সংখ্যক কমী, ঠিকাদার এবং সরবরাহকারীর অনুপৃত্যিতিতেও প্রতিষ্ঠানটি সচল থাকে।
 - ✓ পরিকল্পনাটির বিষয়ে আপনার কর্মকর্তা-কর্মচারী ও ঠিকাদারদের জানাতে হবে এবং
 দুর্যোগকালে তারা কি করবে আর কি করবে না তা তাদেরকে অবহিত করতে হবে। এক্ষেত্রে
 মূল বিষয়পুলোর উপরে অধিক গুরুত্ব আরোপ করতে হবে।
 - ✓ পরিকয়নাটিতে যেন কোভিড-১৯ অক্রান্তের মানসিক স্বাস্থ্য ও সামাজর উপর কি প্রভাব পরে
 সে বিষয়ট আলোচিত হয় তা লক্ষ্য রাষতে হবে। কোভিড-১৯ সম্পর্কিত সঠিক তথ্য প্রাপ্তি
 এবং সহায়তা প্রদান নিশ্চিত করতে হবে।

- ✓ বেসব কুদ্র ও মাঝারী ব্যবসা প্রতিষ্ঠানগুলো জরুরীক্ষেত্রে নিজম্ব কর্মীদের স্বাস্থ্য ও কল্যানের
 বিষয় নিশ্চিত করতে সমর্থ নয় তাদেরকে অপ্রিম স্থানীয় স্বাস্থ্যসেবা প্রদানকারীদের সাথে
 বৌথ পারস্পরিক সহযোগীতার পরিকল্পনা করতে হবে।
- ✓ এই পরিকয়না তৈরির জন্য স্থানীয় ও জাতীয় পর্যায়ের জনস্বাস্থ্য কর্তৃপক্ষ সহযোগীতা
 প্রদানেরও প্রজাব দিতে পারে।

মনে রাখা জরুরী:

কোডিড-১৯ এর জন্য প্রস্তুত হওয়ার সময় এখনই। একেতে সাধারণ সতর্কতা এবং সঠিক পরিকল্পনা প্রহণ কোভিড-১৯ প্রতিরোধে বড় ভূমিকা রাখতে পারে। অবিলমে 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 constriction 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
- 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/ parttime).



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°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 alcoholbased wipe to clean tools, equipment, vehicle before and after use.



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

Camp Management

- Provide soap, sanitizer, washing facility and safe water at the workers' dwelling. Encourage frequent hand washing.
- Ensure separate covered bin for disposal of used PPEs
- Protect against heat, cold, damp, noise, fire, and disease-carrying animals.
- Maintain good housekeeping and social distancing in kitchens, meal rooms, canteens.
- 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.
- 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 polices 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 que 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 incharge.
- 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 CODIV-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)

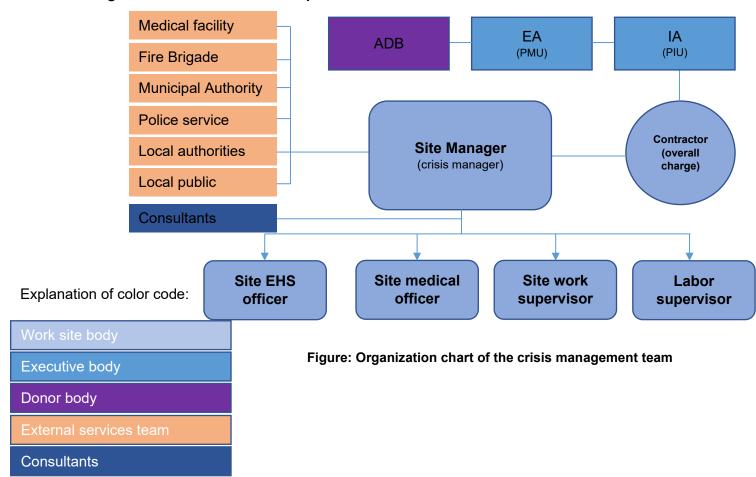
EMERGENCY/CRISIS RESPOSE TEAM

(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



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 8: Summary of public consultation

As part of the impact assessment, the consultants conducted a focus group discussion with selected group. Focus groups are useful in obtaining a particular kind of information that would be difficult to obtain using other methodologies. Further Public consultations and Focus Group Discussions (FGD) were conducted for the Bagerhat Pourasava Road network on April 27-28, 2024 at the wards 1, 2, 4, 8 and 9 with 51 local people (Male-51 and Female-10). The objective of the FGD's was to further appraise the stakeholders about the current progress of the subproject and to reiterate environmental and social impacts of the proposed subproject and safeguards to mitigate the same. Comments or questions raised by the group were discussed until they were satisfied with the level of information provided.

Key issues discussed were similar to those already voiced during the community consultation meetings and included:

- Community benefits realized as a result of the road schemes;
- Resettlement and social issues and mitigation measures according to Resettlement Framework prepared and approved by ADB and government Bangladesh for this project;
- Generation of construction spoils like debris, gravel, sand, brick cause problem in environment;
- Participation of local community during the construction phase;
- Roles and responsibilities of different stakeholders for realizing desired outcome;
- Potential social and economic impacts of the proposed road construction/ improvement;
- Awareness of the local community about the proposed road subproject;
- Opinion of the local people about its need;
- Disseminate information about project implementation.
- Community support and participation;
- Construction and maintenance of the roads;
- Participation of local people for construction and maintenance
- Benefits from these infrastructures establishments by the community Workers Health & Safety
- Emergency response

Summary of discussion:

Condition of the road network is poor, broken, narrow, low-lying and flood prone, and inconvenient for smooth traffic flow. Local people expressed their deep interest for development of the selected road under the Project. The people appreciated ADB's Resettlement Policy for eligibility criteria, entitlement for compensation and resettlement assistance, as well as the provisions of the approved Resettlement Framework for the project.

Proper improvement/development of the road infrastructures for smooth transport network is their critical needs and also long cherished desire. That is why; local people expressed their deepest interest for development of the selected roads under the sub-project.

The road schemes will improve socio-economic-physical conditions of the local people through creating more opportunity of income, employment, environmental improvement, smooth transportation system as well as exploiting local resources for boosting local productions.

Concern was raised about jobs. Priority for jobs should also be given to those who will have any negative impact due to the project. Both men and women shall be considered with equal opportunity

It was communicated by the project consultants to the participants that any damages caused to the secondary structures eg. boundary wall, stairs, ramps will be reconstructed and repaired by the contractors.

During construction, construction spoils including debris, gravel, sand, bricks and cement shall be disposed of properly. Vigilance against undue water logging and/or water pooling within the area for the purpose, or as a result of, the construction methods, shall be made by the Contractor in avoiding places of mosquito breeding.

Regular removal of trash and general waste generated during the course of the construction and operational stage.

Attached Attendance Sheet of FGD

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Coastal Towns Climate Resilience Project (CTCRP)

Local Government Engineering Department (LGED)

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Coastal Towns Climate Resilience Project (CTCRP)

Local Government Engineering Department (LGED)

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Coastal Towns Climate Resilience Project (CTCRP) Local Government Engineering Department (LGED)

Name of the Pourashava: Bagerhat .

Ward: 8-9

Date: 20.04.2024 .

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Appendix 9: 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.

Place of registration

Contact Information/Personal Details

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E-mail								
		stion/Comment/						
Please provide	e deta	ails of the grievar	nce (who, wha	at, where, a	and how):			
*Not	e: Yo	ou may attach a	document, le	etter, or no	te in the	grievance	form.	
How do you v	vant	us to reach you	for feedback	or updates	s on your	comment/	grievar	ıce?
OFFICIAL US								
Registered by	y: (N	ame of official re	egistering gr	ievance)				
If – then mode	e :							
1. Note/L	etter							
2. E-mail								
Verbal	/Tele	phonic						
Reviewed by	: (Na	me, Signature, Po	osition)					
Action Taken	:(Dat	te, Venue of Mee	ting, Other de	etails)				
					14 34			
Whether Acti	on T	aken Disclosed:			4. Y	es		
					5. N	0		
Means of Dis	clos	ure:						
		GRIEVANCES	S RECORD A	ND ACTIC	N TAKEN	1		
Sr. No. Dat	e	Name and Co		ofPla aint		tatus of edress	Remark	(S

Appendix 10: Sample Daily Inspection/Monitoring Checklist of Contractor Monitoring and Reporting Template Environmental Health and Safety Monitoring

Α. **Environmental Health and Safety Checklist**

SI. no.	Item	Exist worksit	in the te?	Recommendation And/ or Remarks	Time frame to
110.		Yes □	No □	And of Nemarks	comply
	Site readiness (e.g. is worksite fenced and can be				
	distinguished from general establishment? Is an				
1	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				
2	accessible?)				
	Signboard with safety warnings (e.g. with general				
3	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				
7	lit?)				
	Appropriate PPEs (Helmet, Safety Shoe, Vest, Ear				
5	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?				
_	Fire extinguishers (e.g. are they at site? How many?				
7	Are they placed at vulnerable/most accessible				
	places?)				
	Housekeeping (e.g., are all workers health records				
0	kept? Is the EMP and EHS manual at site? Has the				
8	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				
9	bins? Are the bins well places?				
	Drinking water supply (e.g. safe drinking water for				
10	worksite been supplied? Is drinking water				
	adequate?				
	Sanitation facilities (e.g. is there separate male and				
	female toilets established? Are they adequate?				
11	Hand wash materials and water being provided at				
	toilets? Are those toilets sanitary?				
	Dust protection measures (e.g. is mask provided for				
12	worksite personnel? Is water sprayed frequently as				
12	needed to suppress dust? Are sand class materials				
	covered with plastic sheets?				
	Noise barrier and reduction equipment (e.g. how				
	much noise is generated by site? Does it exceed				
13	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				1
	enough to take shelter during rain or storm event?)				
	First aid box (e.g. is there a first aid box at site? Are				1
15	the contents of the first aid box adequate for primary treatment? Is the first aid box handled by at				
	EHS/medical professional				1
	Toolbox meetings (e.g. are toolbox meeting				1
16	regularly arranged? Are records kept?)				1
	Others (many other checklists can be formulated by				†
	Carono (many caron checking can be formulated by	l	Ī	İ	
17	the EHS professional on board)				

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	Name	Name
Designation	Designation	Designation
Signature	Signature	Signature
Date	Date	Date
Received and agreed to comply by the representative of the contractor	Name Designation Signature Date	

B. Accident/ Incident Investigation Report

	Class	of Incident	E.			R	eported	
⊔ Injure	U Pro	perty/ Plant I	Jamaga		Yes 🗆	No □ Detai	ls:	
□ injure	u Proj	perty/ Plant t	Jamage	İ	Further Action Required			
□ Near M	liss 🗆 Env	ironmental			□ Report to Authorities □ Other			
Details o	f Incident							
Date of In	ncident				Time o	f Incident	am □ pr	n 🗆
Witness N	Vame				Witnes	s Contact		
Nature of	Incident							
Location	of Incident							
Description	on of Incident							
	of damage to nt/property	o						
Injured P	erson/s (if app	plicable)						
Name								
Address								
Date of B	irth							
Occupation	on				Employer			
Referred/	transferred to			,				
Recomm	ended Preven	tive Action						
Details								
Complete	ed by							
Name					Positio	n		
Signature	1				Date			
C. Sa	nfety patrol/ir	nspection r	eport form	1				
	Ţ							
Date								T
Inspector				1				
No	Location	Comment/ii	nstruction	Photo		Corrective action	Deadline	Responsibl e person
Reporte	d by (ESC)		hecked by	/ (TL)		Appro	ved by (E/	A/IA)

Name	Name	Name
Designation	Designation	Designation
Signature	Signature	Signature
Date	Date	Date
Received and agreed to	Name	
comply by the	Designation	
comply by the representative of the	Designation Signature	

Appendix 11: 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:
	

N	MONITORING/INSPECTION QUESTIONS			SS	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	
	 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	
	a. Are excavated materials placed				
	sufficiently away from water courses?				

N	MONITORING/INSPECTION QUESTIONS	FI	NDING	GS	COMMENTS / CLARIFICATIONS
	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		Voc	No	NA	
7.	Dust Control a. Is the construction site watered to	Yes	No	INA	
	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	
	a) Are traffic signages available around the construction sites and nearby roads?				
	b) Are re-routing signages sufficient to guide motorists?				

N	MONITORING/INSPECTION QUESTIONS			NDING	GS	COMMENTS / CLARIFICATIONS
	c)	Are the excavation sites along roads provided with barricades with reflectors?				
	d)	Are the excavation sites provided with sufficient lighting at night?				
10.	Re	cording 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 12: 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

Packag	Components/List	Type	Status of Implementation	Contract	If On-going	Construction
e Number	of Works	of Contra ct (specif y if DBO, DB or civil works)	(specify if Preliminary Design, Detailed Design, On-going Construction, Completed Works, or O&M phase) [∐]	Status (specify if under bidding or contract awarded)	%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 per package.

Package-wise Implementation Status

Package	F	inal IEE based o	n Detailed Desig	n	Site-specific	Remarks
Number	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)	EMP (or Construction EMP) approved by Project Director?[3] (Yes/No)	
					,	

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

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

6. Compliance status with environmental loan covenants

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

- 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 <u>signed</u> 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:
 - o Confirm if any dust was noted to escape the site boundaries and identify dust suppression techniques followed for site/s.
 - o 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;
 - o Identify designated areas for concrete works, chemical storage, construction materials, and refueling. Attach photographs of each area.
 - o Confirm spill kits on site and site procedure for handling emergencies.
 - o 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.
 - o Provide information on barricades, signages, and on-site boards. Provide photographs.
 - o Provide information on workers labor camp(s). Provide photographs.
 - o Provide information on work-related accidents and incidents. Describe actions implemented.
 - o 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

	<u>_ </u>				
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)

<u> </u>	y o. =	iniontal monitoring	7 10 ti 7 i ti 00 (i	or the riop	orting rom	-	
Impacts	Mitigation	Parameters Monitored	Method of	Location of	Date of	Person Who	
(List from	Measures	(As identified in the	Monitoring	Monitoring	Monitoring	Conducted	
SEMP/CEM	(List from	SEMP/CEMP)	(Visual,	(Provide	Conducted	the	
P)	SEMP/CEMP		Actual	GPS		Monitoring	
,)		Sampling,	Coordinate			
			etc)	s) ^[8]			
Design Phase							
D 0 / "							
Pre-Constructi	on Phase			T			
Construction Phase							
Constituction F	liase						

Impacts	Mitigation	Parameters Monitored	Method of	Location of	Date of	Person Who
(List from	Measures	(As identified in the	Monitoring	Monitoring	Monitoring	Conducted
SEMP/CEM	(List from	SEMP/CEMP)	(Visual,	(Provide	Conducted	the
P)	SEMP/CEMP		Actual	GPS		Monitoring
)		Sampling,	Coordinate		
			etc)	s)[8]		
Operational Ph	nase					

- 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

7 m Quanty membering recounts								
Site No.	Date of Testing	Site Location (Provide GPS Coordinates) ^[10]	Parameters (as required by statutory clearances or as mentioned in the IEE)		ances or	Remarks		
			PM10 µg/m3	SO2 µg/m3	NO2 µg/m3			

Water Quality Monitoring Results

Date of	Site		Parameters (a	s requ	ired by	statuto	ry	Remarks
Sampling	Location	С	learances or a	s men	tioned i	n the II	Ξ <i>Ε</i>)	
		р	Conductivit	ВО	TS	TN	TP	
		Н	y μS/cm	D	S	mg/	mg/	
				mg/	mg/	L	L	
				<u>'</u> _	L			
			Sampling Location p	Sampling Location clearances or a p Conductivit	Sampling Location clearances or as mention p Conductivit BO H y µS/cm D mg/	Sampling Location clearances or as mentioned in p Conductivit BO TS H y µS/cm D S mg/ mg/ mg/	Sampling Location clearances or as mentioned in the III p Conductivit BO TS TN H y µS/cm D S mg/ mg/ mg/ L	Sampling Location clearances or as mentioned in the IEE) p Conductivit BO TS TN TP H y µS/cm D S mg/ mg/ mg/ mg/ L L

Noise Quality Monitoring Results

	Site No.	Date of Testing	Site Location	LA _{eq} (dBA) (a statutory clear mentioned in th	rances or as	Remarks
ı				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.
- 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	Issues/Concerns Raised	Response to issues/concerns
		female)		

10. Grievance Redress Mechanism

- Grievance Redress Mechanism. Provide information on establishment of grievance redress mechanism and capacity of grievance redress committee to address projectrelated 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

¹¹ 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.
- Works will not be allowed until SEMP/CEMP is approved by project implementation unit or project management unit.
- 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.
- Specify statutory requirements: environmental clearance? Permit/consent to establish? Forest clearance? Workers/Labor permit, etc.
- Example: Environmental Clearance requires ambient air quality monitoring, Forest Clearance/Tree-cutting Permit requires 2 trees for every tree, etc.
- 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.
- 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.

Appendix 13: Letter from Pourashava to PD on Tree Cutting (no cutting)



Subject: Regarding to Send Information on Cutting trees for thet implementation of 2(two) Packages adopted by Bagerhat Municipality under the Coast Towns Climate Resilience Project (CTCRP)*

In view the above Nobject it is informed the under the Local Government Engineering Department (LGED), "Costal Towns Climate Resilience Proje (CTCRP)" a total of 22 (twenty two) roads develoment activates have been Undertaken in 2(two) packages of Bagerhat Municipality Which is give

SI	Package	Name of Work	Rema
No	no	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	ks
01	CTCRP23- 24BAGR RD-01	1(Construction of Road by BC Starting from Rahafer More Purstan Bazaer to Chanmary Bridge, (Ch 0+000 to 1+540), Ward No-01 & 5 (Road Length + 1430 m) (Construction of Road by BC From Mithapokurpar Mosjid -Nur Mosjid More LGRD Office (Pouradawa Last Aria)(Ch 0+000 to 1+909) & Link road (th 0+000 to 0+755) starting at Ch 1+431 (@ main road at Word No-3 (Road Length = 2655 m) (Construction of Road by BC Sarting from Nur Mosjid more Sommiliumi School to Moniganj Road, (Ch 0+000 to 1+000) & Link road (Ch 0+000 to 1+000) & Link road (Ch 0+000 to 1+000) & Link road (Ch 0+000 to 1+000) & Link road (Ch 0+000 to 1+000) & Link road (Ch 0+000 to 1+000) & Link road (Ch 0+000 to 1+000) & Link road (Ch 0+000 to 1+000) & Link road (Ch 0+000 to 1+000) & Link road (Ch 0+000 to 1+000) & Link road (Ch 0+000 to 1+000) & Link road (Ch 0+000 to 1+000) & Link road (Ch 0+000 to 1+000) & Link road (Ch 0+000 to 1+000) & Link road (Ch 0+000 to 1+000) & Link road (Ch 0+000 to 1+000) & Link road (Ch 0+000 to 1+000) & Link road (Ch 0+000 to 1+000) & Link road (Ch 0+000)	
02	CTCRP23- 24-BAGR/ RD-02	11 RD-05 Construction of Road by RCC Starting from Uttar Harikhali Primary School road, (Ch.0+000 to 0+405). Ward No-1. (Road Length = 405 m), Destrict Bagerhat, Pouraduxa: BagerhatSadar. 12 RD-05 Construction of Road by Un-1-block Starting From Medera Medical Hospital road, (Ch.0+000 to 0+351). & (Link Road Start Point Ch. 0+242 iii Nam Road). Link Road. Ch.0+000 to 0+073). Word No-2 (Road Length = 424 m)(District Bagerhat, Pourashava: BagerhatSadar. 18D-10 Construction of Road by RCC Starting from Lake City Link Road to Winner College Road, (Ch.0+000 to 0+365). Ward No-2 (Road Length = 1405 m) District Bagerhat, Pourashava: BagerhatSadar. 18D-10 Construction of Road by RCC From 12 Na, Cross Road, (Ch.0+000 to 0+517), Link Road-01 Start Point Ch. 0+385 @ Main Road) (Link Road to Ch.0+000 to 0+051), Link Road-02 Marin Road) (Link Road to Ch.0+000 to 0+051), Link Road-03 (Road Length = 774 m), District Bagerhat, Pourashava: BagerhatSadar. 18D-21 Construction of Road by RCC From Nur Masjid Road To Chaltettal Jame Mosjid, (Ch.0+000 to 0+383) Ward No-3 (Road Length = 383 m), Estart Bagerhat, Pourashasa. BagerhatSadar. 18D-23 Construction of Road by RCC from PC College Road (Gursi Min House)-Madrasha Road To Kaberkhana Mor. (Ch.0+000 to 0+478) Ward No-4 (Road Length = 784 m), District Bagerhat, Pourashava: BagerhatSadar. 18D-24 Construction of Road by RCC from Madrasha Road To Staff Quater (Animal Hospital), (Ch.0+000 to 0+282 & Ch.0+000 to 0+190). Ward No-4 (Road Length = 724 m), District Bagerhat, Pourashava: BagerhatSadar. 18D-34 Construction of Road by RCC from MohilaSongstha Road, (Ch.0+000 to 0+140). Ward No-6 (Road Length = 140 m) District Bagerhat, Pourashava: BagerhatSadar. 18D-34 Construction of Road by RCC from MohilaSongstha Road, (Ch.0+000 to 0+140). Ward No-6 (Road Length = 140 m) District Bagerhat, Pourashava: BagerhatSadar. 18D-34 Construction of Road by RCC from MohilaSongstha Road, (Ch.0+000 to 0+140). Ward No-6 (Road Length = 140 m) District Bagerhat, Pourashava: BagerhatSadar. 18D-34 Co	

the 22 roads described in the The 02 (two) Packages Mentioned on the ground have on trees within the crest width on the roads Trees that a on the road outside the crest width on the road Will not need to be felled for road development Moreover the estimates for environment improvement on each road in the th two packages include plantation of trees which will be of great help in environmental improvement this situation it was specifically requested to take the necessary initiatives to implement the two road packages adopted by Bagerl Municipality under the CTCRP Project

To Project Director Coastal Towns Climate Resilience Project (CTCRP) Local Government Engineering Department (LGED) Sher-E-Babgla nagor Agargaon Dhaka

2000

Khan Habibur Rahman Mayor Bagerhat Pourashava