

Reference: ISPMC JV NHC-EMM
ISPMC- FRERMIP- soniafrermip@gmail.com
294

31 January 2017

To
Mr. A M Aminul Haque,
Project Director,
Flood and River Bank Erosion Risk Management Investment Program
152/3/B Bir Uttam, Kazi Nuruzzaman Road, Panthopath,
Firoz Tower, (12th Floor) Dhaka-1205, Bangladesh.

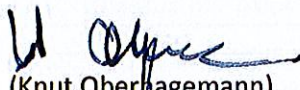
Subject: Draft EMP compliance report for PMO completion

Dear Sir,

Kindly find below the draft EMP Compliance reports for riverbank protection works at Zafarganj and Chowhali for completion and onwards processing.

Sincerely Yours,

JV Northwest Hydraulic Consultants – Euroconsult Mott MacDonald


(Knut Obernagemann)
Team Leader



**FRERMIP – Monitoring of EMP Implementation
Chauhali bank protection site**

This monitoring form includes three parts, i.e.:

- PART 1: General Project information, findings and recommendations
PART 2: Monitoring Contractor's EMP and Safety at Site Compliance
PART 3: Pictures taken during the monitoring visit

Two Environmental Management Plans (EMP) are distinguished in implementing the ADB-financed Flood and Riverbank Erosion Risk Management Investment Project (2014-2023), i.e. the:

- (i) *EMP included as Chapter 10 in the EIA (of May 2014) as enclosed in Volume IV – 'Social Development and Safeguards' of the PPTA report for FRERMIP – this EMP distinguished three phases: Pre-Construction, Construction and Post-Construction and is meant to manage and mitigate all identified adverse impacts of the project).*
- (ii) *EMP as included in the Contractor's Contract, i.e. as Section 2 – 'EMP and Safety at the Site' of Chapter 6 – this EMP spells out all environmental management obligations of the Contractor on working sites and in worker's camps (the focus of PART 2).*

PART 1 – General Project Information, Findings and Recommendations

1-A Location, key contacts and report

Sub-Project	JLB-2		
Location:	Chauhali	Monitoring report:	Nr 1
Date of visit:	5 January 2017	Date:	15 January 2017
Contract:	W-06, W-07, W-07-Extension	By:	Md. Amir Faisal
Contractor:	IJ (JV)		
Contractor's contact:	Mr Atiqul Islam / Mr Zahed Iqbal Mr Zakaria Mohammed Nasim – Contact Manager		
BWDB's contact:	PMO: Mr Md. Jahangir Alam – Executive Engineer, Dhaka SMO: Mr. Md. Motiur Rahman – Sub-Divisional Engineer, Chauhali		
On-site ISPMC Consultant's contact:	Mr Mirza Harunar Rashid – Supervising Engineer Mirza_harunarrashid@yahoo.com Mr Faridul Alam – Site Engineer 1 faridnao@yahoo.com		

1-B Main Contract features

Current Contract	Protection of the left (east) bank of Jamuna River over 7.2 km by dumping sandbags on the river bank and placing concrete blocks on slopes of eroding riverbanks at Chauhali. Main contract activities are clearance and establishment of work sites and worker's camps, sand mining, transport of sand to filling areas and cement block manufacturing sites; filling and dumping of sand bags on/from barges; laying of concrete blocks. In total some 350 labourers have been employed reside at 10 numbers shed in two worker's camps; nearly all of these are men; few women have been employed for cooking/cleaning.
Start of the works	November/2016
End of the works	June/2017

1C Persons met during this visit – initially with the Contractor only, later SMO and others joined; the meeting in the Contractor's site office which lasted about 1 hour.

	Party	Name	Position
1	BWDB/SMO	Mr Md. Jahangir Hossain	Sub-Assistant Engineer
2	Contractor	Mr Zakaria Mohammed Nasim Mr Md. Robiul Islam	Contact Manager Environmental Inspector
3	Supervising Consultant	Mr Faridul Alam	Site Engineer 1

Persons met during previous visit (4 June 2016)

	Party	Name	Position
1	Contractor	Mr Zakaria Mohammed Nasim	Contact Manager
2	Supervising Consultant	Mr Mirza Harunar Rashid Mr Faridul Alam	Supervising Engineer Site Engineer 1

1D Summary of observations

Manufacturing of concrete blocks was found major work at the site during visit. There are 10 nos. of concrete mixture machine operating in two manufacturing field. About 350 labours were working and 10 numbers of labor shed for staying at sites and a tube well for each labor shed. Total 16 nos. of sanitary toilets have been constructed for the labors. Concrete blocks have been made and will be laid and dumped as from mid-January. Necessary slope from the low water level is being prepared with mechanical equipment. This work will be completed before monsoon when the water level attends maximum. As there was no geo-bags dumping, the sand mining was not being done at site during visit.

Significant adverse impacts of the physical construction works were not noted during the visit. The geo-bags placed on the slopes in the previous season are facilitating the villagers to use river water for domestic purposes. The concrete block will take place in place of geo-bags. Temporarily chase away fish and dolphins (*susuk*) that return later, as was confirmed by local fishermen, earlier. The main

adverse impact of the works is therefore in and around worker's camps (water supply and sanitation facilities), and from moving vehicles through noise and dust generated by these.

Copies of the previous EMP compliance monitoring report (June 2016) have not been sent to the concerned on-site as yet, contributing to why no proper follow up action has been taken as yet.

Repeated reminder from the ISPMC's environmental team during the previous visits there is no significant improvement visible in and around the worker's camps: water pumps remain unprotected, dirty water accumulates around the pumps and near the kitchens, solid waste (paper, plastic) abounds. A few waste bins are noticed at worker's camp. Basically there is still no waste management system in place.

Senior staff of PMO/SMO and Contractor have been trained by ISPMC in EMP implementation on 26/4/2016.

An Environmental Inspector has been appointed by the Contractor, has not been fully instructed on his roles and responsibilities. He was provided with a ToR and the contractor's Contact Manager promised to start the monthly reporting from now on.

A Grievance Redress Mechanism have been formed by PMO but it's activities was not noticed as yet.

The next monitoring round is currently planned for March 2017.

1E Summary of recommendations

<p>For BWDB (PMO / SMO):</p> <ol style="list-style-type: none"> 1. A formal Grievance Redress Mechanism (GRM) has formed by PMO. But no activity of GRM was observed. Assist, through SMO and Supervising Consultants, the Contractor for functioning and operating the Grievance Redress Mechanism. 2. Distribute the ISPMC EMP compliance monitoring reports to the concerned office in charge and assure proper follow up is being taken. 	<p>To be achieved by:</p> <ol style="list-style-type: none"> 1. With immediate effect. 2. With immediate effect.
<p>For On-site Supervising Consultant:</p> <ol style="list-style-type: none"> 3. Follow-up on EMP compliance monitoring reports timely and effectively. 	<p>To be achieved by:</p> <ol style="list-style-type: none"> 3. With immediate effect.
<p>For Contractor:</p> <ol style="list-style-type: none"> 4. Further instruct and assist the full-time Environmental Inspector for supervising EMP compliance 5. Prepare and submit monthly environmental reports and establish a proper filing system for these. 6. Install proper noise silencer on boat, dredger engines and concrete mixture machine. 7. Improve on waste disposal in worker's camps, e.g. by installing waste bins, and depositing waste, and instructing workers through health awareness training. 8. Improve waste water management around water points. 9. Improve sanitation facilities and increase number of toilets. 	<p>To be achieved by:</p> <ol style="list-style-type: none"> 4. With immediate effect 5. As from January 2017. 6. As needed. 7. With immediate effect. 8. Asap. 9. With immediate effect.

1F. Circulation (recommended)

<p>BWDB / PMO office – Dhaka BWDB / SMO office – Chauhali Contractor's Resident Engineer – Chauhali Consultant's Supervising Engineer – Manikganj Consultant's Site Engineer – Chauhali</p>	<p>The previous monitoring report was sent to the PMO office but it had not been received as yet by on-site officers, reportedly.</p>
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PART 2 – Monitoring Contractor’s EMP and Safety at Site Compliance

Scoring key: 4 = excellent; 3 = good; 2 = fair; 1 = poor; 0 = non-compliant

EMP Clause	Item	Score	Comment
2.1.1	Inspector		
	Employing one full-time EMP inspector.	2	The Environmental Inspector has been appointed and was met; he has other responsibility at the project site. He seemed to reluctant on environmental issues and his role and responsibilities in the program.
	Set of environmental standards at site.	2	A Contractor Contract, including the EMP is available in the office.
	Monthly EMP reporting.	0	Monthly EMP report is not being submitting as yet. The SMO and Contractor were provided with a proposed ToR for the Environmental Inspector. It was agreed that the Environmental Inspector will prepare a monthly EMP report, as per the provided template, for January 17, and onwards. The monthly report will be handed over to PMO and ISPMC on or before 7 th day of the next month.
2.1.2	Air & noise		
	Spraying water on dry surfaces (roads and work sites)	2	During the visit 10 nos. concrete mixture machine was operating -which was rather noisy. Nevertheless, according to the Contractor and public discussion there are no complaints about (too) high noise levels.
	Noise cancellation at work sites.		The nearby settler is not disturbed as the machine do not work after sunset.
2.1.3	Land use		
	Topsoil removal/preservation and replacement at work sites.	3	As Contractor’s site office/stock yard/cc block yard and labour camps are constructed on non-fertile agricultural land this issue is not relevant here. According to the Contractor there are no objections from the local residents; in general are happy with the bank protection works and do not complain.
	Restoring surface vegetation at work sites.		The working site is very near to river and sandy. So no vegetation removal took place at work sites and their surroundings this issue is not relevant here.
2.1.4	Pollution		
	Preventing spills of lubricants and fuel.	2	According to the Contractor there are fuel or lubricant spills occasionally but these are then removed and dumped somewhere inland. Used lubricants are collected in a container and periodically sold in the market, reportedly.
	Waste disposal at work sites.	2	Contractor reported the waste is collected at a place and carried away and dumped in a safe place.
	Waste disposal at worker camps.	1	A few waste bin was found during the visit. But organic solid waste is not putting in the bins properly. Waste were seen lying around the worker’s camp.
2.1.5	Disruption of agricultural activities		
	Minimizing disturbance.	3	No complaints have been received by the Contractor thus far.
	Compensation arrangements.	3	Contractors paid for compensation.
2.2.1	Navigation		
	Preventing navigation routes of riverine traffic.	3	No accidents have occurred thus far according to the Contractor.
	Clearance permits for protection works.	3	Protection works require ECC from DoE and PMO has received clearance for 2017 already.

EMP Clause	Item	Score	Comment
	Compliance to GoB navigation and safety standards.		Not discussed.
	Coordination with BWDB & BIWTA on dredging operations.		Not discussed.
2.2.2	Roads		
	Road inspections.	3	No problems have been reported to the Contractor.
	Road use & maintenance.	3	Contractor is maintaining the road. People and construction carrying vehicle using the road
2.2.3	Excavation of earth in slope protection		
	Excavation is accordance with approvals.	3	Excavations are done as per the design; no problems have been recorded.
2.2.4	Sand mining		
	Mining in accordance with approvals.	3	As geo-bags is not dumping at site, no sand mining is being done.
2.3.1	Safety equipment to prevent accidents / injuries		
	Helmets & life jackets.	2	Helmets and life jackets was seen stored in the store, but are not used; according to the Contractor there are no serious incidents have happened thus far.
	Traffic control signboards.	2	No signboards but a mark with bamboo with flag for traffic passage.
	Guards / walkways / etc.		Not noted.
2.3.2	First aid		
	First-aid nurse.	3	A first aid kit was seen in the work sites.
	Qualified medical doctor.	3	It was reported a doctor is on call available.
	Health inspection & vaccination to workers.		Not discussed.
2.3.3	Accidents		
	Reporting of accidents within 24 h.		No serious accidents have occurred thus far according to the Contractor.
2.3.4	Full-time Safety Inspector		
	Employed / on-site.		Assigned – see 2.1.1
	Monthly safety report.		Not being made yet – see also 2.1.1
2.4.1	Site management		
	Clearing obstructions, grading, working / storage sites.		No problems occurred thus far according to the Contractor.
	Protection of existing structures.	2	Fencing constructed, however accessible
	Maintenance of temporary roads.	3	Temporary roads are being maintained
	Building maintenance.	2	Building is maintained
	Site fencing.	2	Fencing constructed, however accessible to public
	Equipment management.		Not assessed.
2.4.2	Lay-out drawings		
	Submission on demand.		Not discussed.
2.4.3	Sanitation conditions & waste management		
	Water supply.	1	No improvement was noted in the existing tube wells; there is no protection and so are still defunct.
	Sanitation (toilets etc).	2	Number of sanitary toilet increased found; About 1 person per 25 workers was estimated.
	Waste management.	1	A few waste bins are found near kitchen. Still no proper management system in place.

Other matters:

ISPMC developed and provided a training to 13 Chauhali staff in EMP implementation on 26/4/2016 –and have a plan to conduct environment awareness training program around April.

There is a **Grievance Redress Mechanism** (GRM) formed by PMO. But not functioning.

Documents and template shared with the officers on site during the visit are:

- Proposed job description for the Contractor's Environmental Inspector
- Proposed template for monthly progress reporting by the Environmental Inspector on environmental matters
- Proposed template for environmental compliance reporting by the Supervising Consultant

- Proposed template for site identification and setting up of worker's camps for reporting by the Contractor
- Proposed template for restoration of construction sites and worker's camps for reporting by the Contractor
- Proposed template for a Summary of mitigation and enhancement measures for reporting by the Contractor

PART 3 – Pictures taken during the visit at Chauhali site



1. Meeting with representative of ISPMC & contractor



2. Concrete mixture machine is operating without safety instrument.



3. Cooing is done in open sky



4. Lubricants and fuel is used contaminating ground arround



5. Toilets with sock pit and cover



6. Tube well with no protection directly discharging in nature

FRERMIP – Monitoring of EMP Implementation Zafarganj Bank protection site

This monitoring form includes three parts, i.e.:

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PART 3: Pictures taken during the monitoring visit

Two Environmental Management Plans (EMP) are distinguished in implementing the ADB-financed Flood and Riverbank Erosion Risk Management Project (2014-2023), i.e. the:

- (iii) EMP included as Chapter 10 in the EIA (of May 2014) as enclosed in Volume IV – ‘Social Development and Safeguards’ of the PPTA report for FRERMIP – this EMP distinguished three phases: Pre-Construction, Construction and Post-Construction and is meant to manage and mitigate all identified adverse impacts of the project).
- (iv) EMP as included in the Contractor's Contract, i.e. as Section 2 – ‘EMP and Safety at the Site’ of Chapter 6 – this EMP spells out all environmental management obligations of the Contractor on working sites and in worker's camps (the focus of PART 2).

PART 1 – General Project Information, Findings and Recommendations

1-A Location, key contacts and report

Sub-Project	JLB-2		
Location:	Zafarganj	Monitoring report:	R-1
Date of visit:	10 January 2017	Date:	15 January 2016
Contract:	W-08 / 2014-2015	By:	Md. Amir Faisal
Contractor:	Western Engineering Ltd – Nuruzzman Khan – Parisha Trade System Ltd. (PTSL)		
Contractor's contact:	Md Shah Alam – Site Engineer (1) Md Yousuf – Site Engineer (2) Vacancy – Environmental Inspector		
BWDB's contact:	PMO: Mr Md. Jahangir Alam – Executive Engineer, Dhaka SMO: Mr Rohidul Islam– Sub- Assistant Engineer		
On-site ISPMC Consultant's contact:	Mr Mirza Harunar Rashid – Supervising Engineer Mirza_harunarrashid@yahoo.com Mr Nurul Amin – Site Engineer nurulamin93@yahoo.com		

1-B Main Contract features

Current Contract	Protection of the left (east) bank of Jamuna River over 2 km by dumping sandbags (2016) and concrete blocks (2017) on eroding riverbanks near Zafarganj. Main contract activities are clearance and establishment of work sites and worker's camps, sand mining, transport of sand to filling areas and cement block making sites; filling and depositing sand bags on/from barges; laying of concrete blocks. In total some 500 labourers have been employed, nearly all of these are men; few women have been employed for cooking/cleaning.
Start of the works	December 2016
End of the works	2017

1C Persons met during this visit

	Party	Name	Position
1	BWDB/SMO	Mr Md. Rahidul Islam	Sub-Assistant Engineer
2	Contractor	Mr Md. Shah Alam Mr. Yusuf Islam Mr. Abdur Rahman	Contact Manager Site Engineer cum Env. Inspector Safety Inspector
3	Supervising Consultant	Mr Mirza Harunar Rashid	Construction Engineer

Persons met during the previous visit (22 March 2016)

	Party	Name	Position
1	Contractor	Mr Md. Shah Alam Mr Md. Yousuf	Contact Manager Site Engineer
2	Supervising Consultant	Mr Mirza Harunar Rashid	Construction Engineer

1D Summary of observations

The targeted dumping of geo-bags could not be completed in last working season. The contractor started dumping work from mid-December, 16. They also started manufacturing of concrete blocks in two fields. Schedule to complete the work by June 17. There are 07 nos. of concrete mixture machines are operating in two manufacturing field. About 500 labours were working and 17 numbers of labor shed for staying at sites. Total 06 nos. of sanitary toilets have been constructed for the labors. Concrete blocks have been made and will be laid and dumped as from mid-February as reported.

Significant adverse impacts of the physical construction works were not noted during the visit. The geo-bags placed on the slopes in the previous season are facilitating the villagers to use river water for domestic purposes. The concrete block will take place in place of geo-bags. Temporarily chase away fish and dolphins (*susuk*) that return later, as was confirmed by local fishermen, earlier. The main adverse impact of the works is therefore in and around worker's camps (water supply and sanitation facilities), and from moving vehicles through noise and dust generated by these.

Copies of the previous EMP compliance monitoring report (June 2016) have not been sent to the concerned on-site as yet, contributing to why no proper follow up action has been taken as yet.

Repeated reminder from the ISPMC's environmental team during the previous visits there is no significant improvement visible in and around the worker's camps: water pumps remain unprotected, dirty water accumulates around the pumps and near the kitchens, solid waste (paper, plastic) abounds. No waste bins are noticed at worker's camp. Basically there is still no waste management system in place.

Senior staff of PMO/SMO and Contractor have been trained by ISPMC in EMP implementation on 26/4/2016 and have a plan to conduct another round of environmental awareness training program.

An Environmental Inspector has been appointed by the Contractor, has not been fully instructed on his roles and responsibilities. He was provided with a ToR and the contractor's Contact Manager promised to start the monthly reporting from now on.

A Grievance Redress Mechanism have been formed by PMO but it's activities was not noticed as yet.

The next monitoring round is currently planned for March 2017.

1E Summary of recommendations

<p>For BWDB (PMO / SMO):</p> <p>10. A formal Grievance Redress Mechanism (GRM) has formed by PMO. But no activity of GRM was observed. Assist, through SMO and Supervising Consultants, the Contractor for functioning and operating the Grievance Redress Mechanism</p>	<p>To be achieved by:</p> <p>10. With immediate effect.</p>
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11. Distribute the ISPMC EMP compliance monitoring reports to the concerned office in charge and assure proper follow up is being taken.	11. With immediate effect.
For On-site Supervising Consultant:	To be achieved by:
12. Follow-up on EMP compliance monitoring reports timely and effectively.	12. With immediate effect.
For Contractor:	To be achieved by:
13. Further instruct and assist the full-time Environmental Inspector for supervising EMP compliance	13. With immediate effect
14. Prepare and submit monthly environmental reports and establish a proper filing system for these.	14. As from Jan 2017.
15. Install proper noise silencer on boat and concrete mixture machine.	15. As needed.
16. Improve on waste disposal in worker's camps, e.g. by installing waste bins, and deposing waste, and instructing workers through health awareness training.	16. With immediate effect.
17. Improve waste water management around water points.	17. Asap
18. Improve sanitation facilities and increase number of toilets.	18. With immediate effect.

1F. Circulation (recommended)

BWDB / PMO office – Dhaka Contractor's Resident Engineer – Manikgonj Consultant's Supervising Engineer – Manikganj Consultant's Site Engineer – Jaforgonj	The previous monitoring report was sent to the PMO office but it had not been received as yet by on-site officers, reportedly.
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PART 2 – Monitoring Contractor's EMP and Safety at Site Compliance

Scoring key: 4 = excellent; 3 = good; 2 = fair; 1 = poor; 0 = non-compliant

EMP Clause	Item	Score	Comment
2.1.1	Inspector		
	Employing one full-time EMP inspector.	2	The Environmental Inspector has been appointed and was met; he has other responsibility at the project site.
	Set of environmental standards at site.	1	A Contractor Contract (including the EMP) is available on site, however the Contractor seemed not to have seen the EMP enclosed in it yet.
	Monthly EMP reporting.	0	Is not taking place as yet –promised to submit from January 17
2.1.2	Air & noise		
	Spraying water on dry surfaces (roads and work sites).	0	Access road to the site office is some 100 m through a low-laying area, spraying water was not executed to suppress dust.
	Noise cancellation at work sites.	2	Noise silencers provided in concrete mixture machine. Nevertheless,

EMP Clause	Item	Score	Comment
			according to the Contractor and public discussion there are no complaints about (too) high noise levels.
2.1.3	Land use		
	Topsoil removal and replacement at work sites.	3	A land lease has been concluded with a land owner; the Contractor has constructed the site office here. As Contractor's site office/stock yard/cc block yard and labour camps are constructed on non-fertile agricultural land this issue is not relevant here.
	Restoring surface vegetation at work sites.		This issue is not relevant here.
2.1.4	Pollution		
	Preventing spills of lubricants and fuel.	3	The lubricants and fuel drum is stored in a store in two sites where the manufacturing of blocks is being done. The lubricants and fuel are carrying in a container to the machine where it is being used. It is reported used oil and lubricants are collected in a container which is then collected by someone and disposed of. No significant spills of lubricants and fuel was not found during the visit.
	Waste disposal at work sites.	1	Contractor reported the waste is collected at a place and carried away and dumped in a safe place.
	Waste disposal at worker camps.	1	No wastebins available; wastewater in worker's camp is drained in open pit.
2.1.5	Disruption of agricultural activities		
	Minimizing disturbance.		No complaints have been received by the Contractor thus far.
	Compensation arrangements.		Contractors paid for compensation for site office and block manufacturing field
2.2.1	Navigation		
	Preventing navigation routes of riverine traffic.		No constraints noted or recorded.
	Clearance permits for protection works and sand mining.	3	Protection works require ECC from DoE and PMO has received clearance already. For sand mining, contractor has sub-contracted. Sub-contractor has received clearance from the district authority concerned, reportedly. See also 2.2.4.
	Compliance to GoB navigation and safety standards.		Not assessed.
	Coordination with BWDB & BIWTA on dredging operations.		Not assessed.
2.2.2	Roads		
	Road inspections.	3	Access road to the site office is only some 100 m; this road is being maintained, no issues noted. See also 2.1.2
	Road use & maintenance.	3	Vehicle movement is limited anyway.
2.2.3	Excavation of earth in slope protection		
	Excavation is accordance with approvals.		The contractor yet to start excavation of earth for slope preparation
2.2.4	Sand mining		
	Mining in accordance with approvals.	3	See 2.2.1 – approval of sand mining is not the concern of the contractor since he is sub-contracting it to a dredging firm.

EMP Clause	Item	Score	Comment
			No legal permits for sand mining have been issued, reportedly.
2.3.1	Safety equipment to prevent accidents / injuries		
	Helmets & life jackets / buoys.		Some equipment available (life jackets) in Contractor's office but not (yet) used
	Traffic control signboards.		A Signboard containing site information was seen in front of site office during visit.
	Guards / walkways / etc.		Guards are deployed at the sites.
2.3.2	First aid		
	First-aid nurse.		Not appointed. A first aid kit is available in the site office.
	Qualified medical doctor.		A doctor is available on call from the nearby bazar.
	Health inspection & vaccination to workers.		Not discussed.
2.3.3	Accidents		
	Reporting of accidents within 24 h.		No serious accidents have occurred thus far according to the Contractor.
2.3.4	Full-time Safety Inspector		
	Employed / on-site.		A safety inspector has been employed
	Monthly safety report.		Not prepared as yet – promised to submit from January 17
2.4.1	Site management		
	Clearing obstructions, grading, working / storage sites.		Not noted.
	Protection of existing structures.	3	
	Maintenance of temporary roads.	2	Dust generation on temporary road to worker's camp.
	Building maintenance.	3	Building is being maintained
	Site fencing.	3	Most sites have been fenced.
	Equipment management.		Not assessed.
2.4.2	Lay-out drawings		
	Submission on demand.		Not assessed.
2.4.3	Sanitation conditions & waste management		
	Water supply.	2	Tube wells are not protected. Contractor reported the work just started, could not complete protection work-promised to complete the protection very soon
	Sanitation (toilets etc).	2	14 toilets are available
	Waste management.	1	No wastebins are available; wastewater is drained in an open pit.

Other matters:

ISPMC developed and provided a training to 10 Zafarganj staff in EMP implementation on 28/4/2016- have a plan to conduct environment awareness training program around April.

There is a **Grievance Redress Mechanism (GRM)** formed by PMO. But not functioning.

Documents and template shared with the officers on site during the visit are:

- Proposed job description for the Contractor's Environmental Inspector
- Proposed template for monthly progress reporting by the Environmental Inspector on environmental matters
- Proposed template for environmental compliance reporting by the Supervising Consultant
- Proposed template for site identification and setting up of worker's camps for reporting by the Contractor
- Proposed template for restoration of construction sites and worker's camps for reporting by the Contractor
- Proposed template for a Summary of mitigation and enhancement measures for reporting by the Contractor

PART 3 – Pictures taken at Zaforgonj site during the visit



1 Meeting at site with representatives of PMO, ISPMC and Contractor



2. Concrete mixture machine is driven without safety equipment



3. Lubricants and fuel stored in go down



4. Kitchen without rooftop



5. Broken protection of tube well



6. Public consultation

FRERMIP – Monitoring of EMP Implementation – Round 1
5 and 10 January 17: Chauhali and Zafarganj

The EIA for FRERMIP (May 2014) contains the elaborate Environmental Management Plan (EMP; 68 pages) for the Project in its Chapter 10, and is for all three phases of the Project (pre-construction, construction and post-construction). As the pre-construction phase for the current two pilot areas has already been completed whereas post-construction starts after completion of the works, the focus for EMP compliance monitoring is currently on the construction phase only.

The Contractor's Contracts include an EMP as well, which although based on the PPTA/EIA report, is much shorter than the latter. In fact the Contractor's EMP is basically a listing of clauses (Section 2 of Chapter 6 of the Contractor's Contract) covering 2 pages only. The current monitoring focuses on whether the Contractor implements the works in compliance with its EMP obligations.

The present monitoring of EMP implementation form is compiled on the basis of the 'Monitoring Plan' as enclosed in Section 10.5 of the PPTA/EIA but it has been amended for specifically the present phase of Project implementation. This means that it focuses on the work of the present contractors, and it is presented in a format targeting both the PMO and SMO units and individuals that are expected to follow up on the observations and recommendations.

General Observations:

1. Little adverse environmental impacts are believed to result from the main works at each of the two sites, i.e. the collection of sand through dredgers, transport of sand by barge to bag filling sites, bag filling and dumping, and the making and placing of cement concrete (cc) blocks.
2. Adverse environmental impacts of the works are therefore mainly noted in and around the worker's camps: in all of these there is a lack of or inadequate waste management (paper and plastic littering is widespread), sanitary conditions are poor (wastewater drainage from cooking and washing areas in open pits), and toilet facilities are limited, generally of poor quality, and cause hindrance (smell, eyesore) not only to the workers themselves but also to surrounding villagers.
3. In general the Contractors, as well as the Supervising Consultant, give the impression that they do not take environmental management seriously. The Contractors do not know well what their responsibilities are for environmental management under their contract. On several occasions we had to point out to the Contractor where the EMP section is in their contract.
4. Although some site-specific EMP requirements have been achieved, Contractors do not comply with all of their contractual EMP obligations. However they engaged Environmental Inspector, but not full time-he has other responsibilities.
5. As required by the Project design, the PMO office informed on 25 May 2016 that their Executive Engineer, Mr Md. Jahangir Alam, has been nominated as focal point officer for smooth operation of especially the EMP of the FRERMIP.
6. Involved supervising BWDB officers, Supervising Consultants and Contractors have been trained in environmental management i.e. during brief training courses conducted by ISPMC on 26-28/4/2016. A Training Report of April 2016 has been prepared and issued. Each of the site offices has received a copy of the report. A second round of Environmental awareness training program have been planned on April 17
7. The EARF (Environmental Review and Assessment Framework) for FRERMIP includes the responsibility of the PMO to establish and operate a Grievance Redress Mechanism (GRM) in each of the project sites. In at least one site there is strong complain from the villagers who reside near the site that some laborers instead of using toilets they are used to pass night soil in open fields. A

Grievance Redress Committee has been formed with resettlement work by PMO which is also applicable for environmental issues. But the GRC is not functioning at sites even the PMO and contractor is not aware of formation of this committee.

8. It is noted that the previous EMP compliance monitoring report of ISPMC's of June 2016 had not been received by any of the consulted officers in the three sites.

General Recommendations:

1. Contractors must step up their performance on EMP implementation, first and foremost by (i) formally assigning and/or properly instructing and supervising a full-time Environmental Inspector, (ii) by improving water supply and waste management, (iii) by monthly reporting on their on-site environmental management.
2. The Supervising Consultant is to improve on supervising the Contractor in his obligations with respect to environmental management.
3. Adequate and immediate measures are required in Jaforgonj to minimize the complaint by residents passing night soil in the open field. Given the obvious improper siting of these toilets, and the end of the works in end-June, these toilets should be dismantled and, in case works are to continue during the next work season(s), rebuilt elsewhere with sufficient distance to settlement (at least 100 m, and considering prevail winds).
4. The GRM formed by PMO is to be well aware to contractor and supervising consultant's representative so that it could be functioning. It is required to take care of any complaints that may result from land acquisition activities, and therefore needs close cooperation with other ISPMC specialists for example resettlement and institutional development.
5. PMO is to adopt a system for sharing and following up on ISPMC's EMP compliance monitoring reports.
6. For future Contractor's contracts the EMP section should be revisited and amended, based on experience gained in implementing the pilot area works.

ISPMC – Dhaka; 11 January 2017
 Md. Amir Faisal
 National Environmental Specialist

Circulation (recommended)

BWDB / PMO office – Dhaka BWDB / SMO Engineer – Chauhali BWDB / SMO Engineer – Zafarganj Consultant's Supervising Engineer – Manikganj Consultant's Supervising Engineer – Chauha Consultant's Supervising Engineer – Zafarganj	
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Attachments:

- EMP Compliance Monitoring Report Nr 1 2017 – Chauha
- EMP Compliance Monitoring Report Nr 1 – Zafarganj

Cc: Office file;
 Deputy Team Leader, Sharif Al Kamal; FRERMIP.