

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

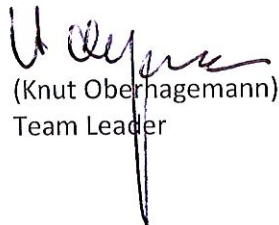
Subject: **Draft EMP compliance monitoring report – 2nd round.**

Dear Sir,

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

Sincerely Yours,

JV Northwest Hydraulic Consultants – Euroconsult Mott MacDonald


(Knut Oberhagemann)
Team Leader

Attachments:

- EMP Compliance Monitoring Report Nr 2 2017 – Chauhali
- EMP Compliance Monitoring Report Nr 2 – Zafarganj

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



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:	R- 2
Date of visit:	11 April 2017	Date:	20 April 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 Mahammed Nasim – Contact Manager		
BWDB's contact:	PMO: Mr Md. Jahangir Alam – Executive Engineer, Dhaka SMO: Mr. Md. Shahajahan Siraj– Executive Engineer, Tangail		
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.
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.

	Party	Name	Position
1	BWDB/SMO	Mr Md. Shahajahan Siraj Mr. Jalal Uddin Ahmed	Executive Engineer Sectional Officer
2	Contractor	Mr Zakaria Mahammed Nasim Mr Md. Sajol	Contact Manager Safety Inspector
3	Supervising Consultant	Mr Faridul Alam	Site Engineer

Persons met during previous visit (5 January 2017)

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

1D Summary of observations

Placing of concrete blocks on the slope of the bank protection work over geo-textile and khoa filter was found major work at the site during the visit. It was reported that the manufacturing of C. C blocks have been completed during last month. So mixture machine is not operating now prevailing a less sound free atmosphere in the site. Small truck is moving along the river bank to bring the concrete blocks near the placing zone. About 200 labours were working in the site of which 100 numbers are residing at 03 numbers of labor shed in three camps. Total 05 nos. of sanitary toilets and 05 nos. of tube well was seen for the labors. Skilled labour from Rangpur expert for concrete blocks placing work were seen working at the site. 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 concrete blocks placed over slopes looks good and the stairs provided on the slope is being used by local people safely. The main adverse impact of the works is in and around worker’s camps (water supply and sanitation facilities), and from moving vehicles through noise and dust generated by these.

No monthly EMP compliance report yet to submit from the contractor though they promised to submit the same during each monitoring visit by ISPMC’s environment team.

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. It was reported that waste generated from cooking has been taken away by the local people for their cattle food.

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

An Environmental Inspector has been changed 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 June 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 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 Site Engineer – Chauhali</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 was on leave during visit
	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. After repeated reminder it is not complied.
2.1.2	Air & noise		
	Spraying water on dry surfaces (roads and work sites)	3	During the no concrete mixture machine was operating as manufacturing of CC block is completed- so no sound generating from it.. Nevertheless, according to the Contractor and public discussion there are no complaints about (too) high noise levels. Water was found spraying on the internal roads and around site office for dust suppression during visit.
	Noise cancellation at work sites.	3	The nearby settler is not disturbed as the machines and vehicles 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.	2	A few waste bin was found during the visit. But organic solid waste is not putting in the bins properly. It was reported the organic waste is used to taken away by the villagers for their cattle food.

EMP Clause	Item	Score	Comment
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 which will expire on May/2017. Necessary steps should be taken from PMO for extending the same.
	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; 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.

EMP Clause	Item	Score	Comment
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. The used water are discharging in the open field.
	Sanitation (toilets etc.).	2	Number of sanitary toilet found decreased; About 1person 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 May/17 if necessary fund is available for this purpose.

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

Documents and template shared with the officers on site 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. Vehicle is carrying C.C. block for placing on slope of protection work



2. Labour shed



3. Cooing is done in with side covering tin roof top



4. Tube well with no protection directly discharge in field



5. C.C block is placing with risk



6. Completed bank protection work with stair.

FRERMIP – Monitoring of EMP Implementation Zafarganj 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 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:	Zafarganj	Monitoring report:	R-1
Date of visit:	17 April 24, 2017	Date:	24 April 2017
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 – Contract Manager Md Yousuf Islam – Environmental Inspector Md. Tuhin Miah – Safety Inspector		
BWDB’s contact:	PMO: Mr Md. Jahangir Alam – Executive Engineer, Dhaka SMO: Md. Mamun Howlader, Sub-Divisional Engineer SMO: –Md. Salamat Fakir, 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 C. C block making sites; filling and depositing sand bags on/from barges; laying of concrete blocks.
Start of the works	December 2016
End of the works	June 2017

1C Persons met during this visit

	Party	Name	Position
1	BWDB/SMO	Mr. Md. Jahangir Alam Mr.Md.Mamun Howlader, Mr. Md. Salamat Fakir,	Executive Engineer Sub-Divisional Engineer Sub-Assistant Engineer
2	Contractor	Mr Md. Shah Alam Mr. Md. Tuhin Miah	Contact Manager Safety Inspector
3	Supervising Consultant	Mr Mirza Harunar Rashid Mr Nurul Amin	Construction Engineer Site Engineer

Persons met during the previous visit (10-01-17))

	Party	Name	Position
1	Contractor	Mr Md. Shah Alam Mr Md. Yousuf Islam Mr. Abdur Rahman	Contact Manager Site Engineer cum Env. Inspector Safety Inspector
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. During this visit there are 06 nos. of concrete mixture machines are operating in two manufacturing field. About 480 labours were working and 16 numbers of labor shed for staying at 4 site camps. Total 24 nos. of sanitary toilets and 7nos. of tube well for the labors. Concrete blocks are being placed on the slopes of the protection work, it will complete on June 17 as reported.

Significant adverse impacts of the physical construction works were not noted during the visit. Temporarily chase away fish and dolphins (*susuk*) that return later, as was confirmed by local fishermen. 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.

There some improvement visible in and around the worker's camps. The tube wells have been protected with semi-pucca enclosure and some waste bins were seen to collect organic waste. 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. The safety inspector of the site has been changed by the contractor, Mr. Md. Tuhin Miah has been appointed as safety inspector

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 June 2017.

1E Summary of recommendations

<p>For BWDB (PMO / SMO):</p> <p>(i) 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>(ii) Distribute the ISPMC EMP compliance monitoring reports to the concerned office in charge and assure proper follow up is being taken.</p>	<p>To be achieved by:</p> <p>10. With immediate effect.</p> <p>11. With immediate effect.</p>
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<p>For On-site Supervising Consultant:</p> <p>(iii) Follow-up on EMP compliance monitoring reports timely and effectively.</p>	<p>To be achieved by:</p> <p>12. With immediate effect.</p>
<p>For Contractor:</p> <p>(iv) Further instruct and assist the full-time Environmental Inspector for supervising EMP compliance</p> <p>(v) Prepare and submit monthly environmental reports and establish a proper filing system for these.</p> <p>(vi) Install proper noise silencer on boat and concrete mixture machine.</p> <p>(vii) Improve on waste disposal in worker's camps, e.g. by installing waste bins, and depositing waste, and instructing workers through health awareness training.</p> <p>(viii) Improve waste water management around water point</p>	<p>To be achieved by:</p> <p>13. With immediate effect</p> <p>14. As from March 2017.</p> <p>15. As needed.</p> <p>16. With immediate effect.</p> <p>17. Asap</p>

1F. Circulation (recommended)

<p>BWDB / PMO office – Dhaka Contractor's Resident Engineer – Manikgonj Consultant's Supervising Engineer – Manikganj Consultant's Site Engineer – Zafarganj</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 but he was on leave during visit; 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	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, from January 17, and onwards. It was agreed that monthly report will be handed over to PMO and ISPMC on or before 7 th day of the next month. After repeated reminder it is not complied.
2.1.2	Air & noise		
	Spraying water on dry surfaces (roads and work sites).	2	Water was found spraying on the internal roads and around site office for dust suppression during visit.
	Noise cancellation at work sites.	2	Noise silencers provided in concrete mixture machine. Nevertheless, 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.

EMP Clause	Item	Score	Comment
			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.		The contractor has restored some grass at a high land near the site
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	Some waste bins are 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 for 2017 which will expire on May/2017. Necessary steps should be taken from PMO for extending the same.
	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.	3	Excavations are done as per the design; no problems have been recorded. The EPs have been assessed and compensation of properties and resettlement benefits are being paid to EPs
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		

EMP Clause	Item	Score	Comment
	Helmets & life jackets / buoys.	3	Some equipment available (life jackets) in Contractor's office
	Traffic control signboards.	2	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 changed.
	Monthly safety report.		Not prepared as yet – promised to submit from March 17
2.4.1	Site management		
	Clearing obstructions, grading, working / storage sites.		No problems occurred thus far according to the Contractor.
	Protection of existing structures.	3	Fencing constructed, however accessible
	Maintenance of temporary roads.	2	Temporary roads are being maintained
	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.	3	Tube wells are seen protected. The used water are not discharged properly
	Sanitation (toilets etc).	2	24 nos. sanitary toilets are available
	Waste management.	1	Waste bins 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. There is a **Grievance Redress Mechanism (GRM)** formed by PMO. But not functioning. Documents and template shared with the officers on site 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 Zafarganj site during the visit



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



2. Slope is being built as per design



1. Cooking is being done with enclosure



2. Water is being spraying on road for dust suppression



3. Sanitary toilets



4. Tube well with protection

FRERMIP – Monitoring of EMP Implementation – Round 2 11 and 17 April 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. It was noted some environment compliance in the site such as some waste bins are kept at places, some tube wells have been protected with enclosure, the internal roads are maintained and cooking areas have been enclosed with tin and c. c blocks the etc.
4. 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.
5. 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 and Safety Inspector but not full time basis- they have other responsibilities.
6. 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.
7. 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.

8. 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. 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.
9. The contractor yet to submit the monthly environment report in prescribe format though several request and reminders were made. During this visit the promise to submit the report timely.
10. It is noted that the previous EMP compliance monitoring reports of ISPMC’s of January 2017 have been distributed to SMO, ISPMC supervising site Engineer and contractor.

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. Additional safety measure should be taken to the laborers who are engaged in placing the heavy C. C block.
3. The Supervising Consultant is to improve on supervising the Contractor in his obligations with respect to environmental management.
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 – Chauhali Consultant’s Supervising Engineer – Zafarganj	
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