

Reference: ISPMC JV NHC-EMM  
ISPMC- FRERMIP- [soniafrermip@gmail.com](mailto:soniafrermip@gmail.com)  
380

17 July 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, (12<sup>th</sup> Floor) Dhaka-1205, Bangladesh.

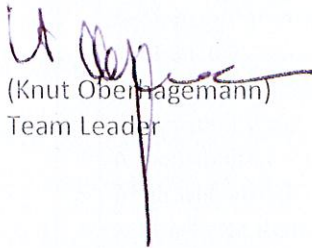
Subject: 3<sup>rd</sup> EMP Compliance Monitoring Report.

Dear Sir,

Please find the attached 3<sup>rd</sup> EMP compliance monitoring report for Chauhali and Zaforgonj site for your kind disposal.

Sincerely Yours,

**JV Northwest Hydraulic Consultants – Euroconsult Mott MacDonald**

  
(Knut Oberhagemann)  
Team Leader

Attachment: 3<sup>rd</sup> EMP compliance monitoring



Cc: Office file;  
Deputy Team Leader, Sharif Al Kamal, FRERMIP.  
National Environmental Specialist, Md. Amir Faisal, FRERMIP.

**FRERMIP – Monitoring of EMP Implementation  
Zafargonj Bank protection site -3<sup>rd</sup> round**

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**

<b>Sub-Project</b>	JLB-2		
<b>Location:</b>	Zafarganj	<b>Monitoring report:</b>	R-3
<b>Date of visit:</b>	June 18, 2017	<b>Date:</b>	4 July 2017
<b>Contract:</b>	W-08 / 2014-2015	<b>By:</b>	Md. Amir Faisal
<b>Contractor:</b>	Western Engineering Ltd – Nuruzzman Khan – Parisha Trade System Ltd. (PTSL)		
<b>Contractor's contact:</b>	Md Shah Alam – Contract Manager Md Yousuf Islam – Environmental Inspector Md. Tuhin Miah – Safety Inspector		
<b>BWDB's contact:</b>	PMO: Mr Md. Jahangir Alam – Executive Engineer, Dhaka SMO: Md. Mamun Howlader, Sub-Divisional Engineer SMO: –Md. Salamat Fakir, Sub-Assistant Engineer		
<b>On-site ISPMC Consultant's contact:</b>	Mr Mirza Harunar Rashid – Supervising Engineer <a href="mailto:Mirza_harunarrashid@yahoo.com">Mirza_harunarrashid@yahoo.com</a> Mr Nurul Amin – Site Engineer <a href="mailto:nurulamin93@yahoo.com">nurulamin93@yahoo.com</a>		

**1-B Main Contract features**

<b>Current Contract</b>	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.
<b>Start of the works</b>	December 2016
<b>End of the works</b>	June 2017

**1C Persons met during this visit**

	<b>Party</b>	<b>Name</b>	<b>Position</b>
1	BWDB/SMO	Mr. Md. Salamat Fakir,	Sub-Assistant Engineer
2	Contractor	Md Yousuf Islam Mr. Md. Tuhin Miah	Environmental Inspector Safety Inspector

3	Supervising Consultant	-	-
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**Persons met during the previous visit (24-04-17))**

	Party	Name	Position
1	Contractor	Mr Md. Shah Alam Mr. Md. Tuhin Miah	Contact Manager Safety Inspector
2	Supervising Consultant	Mr Mirza Harunar Rashid	Construction Engineer

**1D Summary of observations**

The dumping of geo-bags completed but some of geo-bags were dumped in the launching apron in front of the partly eroded primary school. The contractor started manufacturing of concrete blocks in two fields during the last working season and completed the manufacturing of scheduled C.C block. One mixture machine was seen operating to fill up the gaps between the C.C blocks with concrete. About 45 working labours are staying at 1 site camps in 4 labour shed. There remained total 06 nos. of sanitary toilets and 04 nos. 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. As the work is on finishing stage, the labour force is reduced substantially.

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 who was entrusted with the same responsibility since last round of monitoring, has not been fully instructed on his roles and responsibilities. The safety inspector of the site has been engaged by the contractor, Mr. Md. Tuhin Miah who also performing the same duty during the last round of visit.

A Grievance Redress Mechanism have been formed by PMO. A village road was repaired by the contractor after the complain of the local people through GRC meeting with the contractor in late April 2017.

**1E Summary of recommendations**

<p><b>For BWDB (PMO / SMO):</b></p> <ol style="list-style-type: none"> <li>1. A formal Grievance Redress Mechanism (GRM) has formed by PMO. Some activity of GRM is reported during the visit. Assist, through SMO and Supervising Consultants, the Contractor for functioning and operating the Grievance Redress Mechanism</li> <li>2. Distribute the ISPMC EMP compliance monitoring reports to the concerned office in charge and assure proper follow up is being taken.</li> </ol>	<p>To be achieved by:</p> <ol style="list-style-type: none"> <li>1. With immediate effect.</li> <li>2. With immediate effect.</li> </ol>
<p><b>For On-site Supervising Consultant:</b></p> <ol style="list-style-type: none"> <li>3. Follow-up on EMP compliance monitoring reports timely and effectively.</li> </ol>	<p>To be achieved by:</p> <ol style="list-style-type: none"> <li>3. With immediate effect.</li> </ol>

<p><b>For Contractor:</b></p> <ol style="list-style-type: none"> <li>4. Further instruct and assist the full-time Environmental Inspector for supervising EMP compliance</li> <li>5. Prepare and submit monthly environmental reports and establish a proper filing system for these.</li> <li>6. Install proper noise silencer on boat and concrete mixture machine.</li> <li>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.</li> <li>8. Improve waste water management around water point</li> </ol>	<p>To be achieved by:</p> <ol style="list-style-type: none"> <li>4. With immediate effect</li> <li>5. As from next working season.</li> <li>6. As from next working season.</li> <li>7. As from next working season.</li> <li>8. As from next working season.</li> </ol>
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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
<b>2.1.1</b>	<b>Inspector</b>		
	Employing one full-time EMP inspector.	2	The Environmental Inspector has been appointed but 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 partial EMP report has been submitted. The Environmental Inspector will prepare a monthly EMP report, as per the provided template, from next working season and onwards. It was agreed that monthly report will be handed over to PMO and ISPMC on or before 7 <sup>th</sup> day of the next month.
<b>2.1.2</b>	<b>Air &amp; noise</b>		
	Spraying water on dry surfaces (roads and work sites).		As rainy season started no need of water 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.
<b>2.1.3</b>	<b>Land use</b>		

EMP Clause	Item	Score	Comment
	Topsoil removal and replacement at work sites.	3	A land lease has been contracted 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.		The contractor has restored some grass at a high land near the site. The contractor was instructed to restore surface vegetation before leaving the site.
<b>2.1.4</b>	<b>Pollution</b>		
	Preventing spills of lubricants and fuel.	3	As the work in the site has reduced substantially and vehicle movement has been limited, the use of fuel and lubricant is very limited. Very few quantity of fuel and lubricant is now stored in contractors site office godown. No spills of lubricant and fuel were seen 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.
<b>2.1.5</b>	<b>Disruption of agricultural activities</b>		
	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
<b>2.2.1</b>	<b>Navigation</b>		
	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 2018 which will expire on October/2018.
	Compliance to GoB navigation and safety standards.		Not assessed.
	Coordination with BWDB & BIWTA on dredging operations.		Not assessed.
<b>2.2.2</b>	<b>Roads</b>		
	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.
<b>2.2.3</b>	<b>Excavation of earth in slope protection</b>		
	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
<b>2.2.4</b>	<b>Sand mining</b>		
	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. No legal permits for sand mining have been issued, reportedly.
<b>2.3.1</b>	<b>Safety equipment to prevent accidents / injuries</b>		

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.
<b>2.3.2</b>	<b>First aid</b>		
	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.
<b>2.3.3</b>	<b>Accidents</b>		
	Reporting of accidents within 24 h.		No serious accidents have occurred thus far according to the Contractor.
<b>2.3.4</b>	<b>Full-time Safety Inspector</b>		
	Employed / on-site.		A safety inspector has been emgaged.
	Monthly safety report.		Partially submitted– advice to submit from next working season
<b>2.4.1</b>	<b>Site management</b>		
	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.
<b>2.4.2</b>	<b>Lay-out drawings</b>		
	Submission on demand.		Not assessed.
<b>2.4.3</b>	<b>Sanitation conditions &amp; waste management</b>		
	Water supply.	3	Tube wells are seen protected. The used water are not discharged properly
	Sanitation (toilets etc).	2	06 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. Limited function of GRM was reported during the visit.



**PART 3 – Pictures taken at Zaforgonj site during the visit**



1. One labour shed remaining for saying a few number of labours



2. Kitchen with enclosure and roof



2.. Tube well with protection



4. The remaining sanitary toilets



5. The internal road



6. The slope building work

### FRERMIP – Monitoring of EMP Implementation, Round-3 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:

(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

<b>Sub-Project</b>	JLB-2		
<b>Location:</b>	Chauhali	<b>Monitoring report:</b>	R- 3
<b>Date of visit:</b>	20 June 2017	<b>Date:</b>	4 July 2017
<b>Contract:</b>	W-06, W-07, W-07-Extension	<b>By:</b>	Md. Amir Faisal
<b>Contractor:</b>	IJ (JV)		
<b>Contractor's contact:</b>	Mr Atiqul Islam / Mr Zahed Iqbal Mr Zakaria Mahammed Nasim – Contact Manager		
<b>BWDB's contact:</b>	PMO: Mr Md. Jahangir Alam – Executive Engineer, Dhaka SMO: Mr. Md. Shahajahan Siraj– Executive Engineer, Tangail		
<b>On-site ISPMC Consultant's contact:</b>	Mr Mirza Harunar Rashid – Supervising Engineer <a href="mailto:Mirza_harunarrashid@yahoo.com">Mirza_harunarrashid@yahoo.com</a> Mr Faridul Alam – Site Engineer 1 <a href="mailto:faridnao@yahoo.com">faridnao@yahoo.com</a>		

##### 1-B Main Contract features

<b>Current Contract</b>	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.
<b>Start of the works</b>	November/2016
<b>End of the works</b>	April/2018

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. Jahangir Hossain	Sub Assistant Engineer
2	Contractor	Mr Zakaria Mahammed Nasim Mr Md. Rubel	Contact Manager Safety Inspector
3	Supervising Consultant	Mr Faridul Alam	Site Engineer

Persons met during previous visit (11 April 2017)

	Party	Name	Position
1	BWDB/SMO	Mr. Md. Jahangir Hossain	Sub-Assistant Engineer
1	Contractor	Mr Zakaria Mahammed Nasim	Contact Manager



		Mr. Md. Robiul Islam	Environmental Inspector & safety Inspector
2	Supervising Consultant	Mr Faridul Alam	Site Engineer

#### 1D Summary of observations

During the visit it was observed that the 7.2 km bank protection work have been completed on mid June, 2017. But it is noticed that the recently completed work specially the buildup slope portion of the protective work have been eroded in different locations. The contractor engaged local labours to repair these eroded slopes. The hired labours from Rangpur have left the site in mid June, 17 as the major work have been completed. So the labour camps have been removed and as such there was no scope to monitor the environmental issues in and around labour camps area. The toilets and tube wells were not removed properly. The contractor was instructed to demolish the toilets and tube well properly. Some local labours were seen to engage for dumping the sand filled geo-bags from barge. During Ramadan they stop the work at 4:00 pm and leave the site to their house nearby.

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. The concerned person was requested to submit EMO compliance report from the next working season.

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

During last visit in April, 17 Mr. Sojol was Environmental and Safety Inspector but during this visit he has been replaced by some Mr. Rubel by the Contractor. During discussion it seemed the new Environmental and Safety Inspector have not minimum knowledge about environment and safety issues. It is reported he is not engaged in the relevant the service, the Contract Manager placed a man as an Environmental & Safety Inspector to show visiting ISPMC's Environment Specialist. PMO and SMO should take action of such activity by the contractor through proper investigation.

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

The next monitoring round will be on the start of next working season.

#### 1E Summary of recommendations

<p><b>For BWDB (PMO / SMO):</b></p> <p>9. 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>10. 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>9. With immediate effect.</p> <p>10. With immediate effect.</p>
<p><b>For On-site Supervising Consultant:</b></p> <p>11. Follow-up on EMP compliance monitoring reports timely and effectively.</p>	<p>To be achieved by:</p> <p>11. With immediate effect.</p>
<p><b>For Contractor:</b></p> <p>12. Further instruct and assist the full-time Environmental Inspector for supervising EMP compliance</p> <p>13. Prepare and submit monthly environmental reports and establish a proper filing system for these.</p> <p>14. Install proper noise silencer on boat, dredger</p> <p>15. Improve on waste disposal in worker's camps, e.g. by installing waste bins, and deposing waste, and instructing workers through health awareness training.</p>	<p>To be achieved by:</p> <p>12. As from December 2017.</p> <p>13. As from December 2017.</p> <p>14. As needed.</p>

16. Improve waste water management around water points.	15. As from next working season
17. Improve sanitation facilities and increase number of toilets.	16. Asap.
	17. As from next working season

**1F. Circulation (recommended)**

BWDB / PMO office – Dhaka BWDB / SMO office – Chauhali Contractor's Resident Engineer – Chauhali Consultant's Site Engineer – Chauhali	
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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
<b>2.1.1</b>	<b>Inspector</b>		
	Employing one full-time EMP inspector.	0	The Environmental Inspector has been changed. It is apprehended during discussion that the new Inspector have no knowledge about environment. PMO/SMO may look into it.
	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 <sup>th</sup> day of the next month. After repeated reminder it is not complied.
<b>2.1.2</b>	<b>Air &amp; noise</b>		
	Spraying water on dry surfaces (roads and work sites)		As rainy season started no need of water spraying on the internal roads and around site office for dust suppression during visit.
	Noise cancellation at work sites.		
<b>2.1.3</b>	<b>Land use</b>		
	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

EMP Clause	Item	Score	Comment
			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.
<b>2.1.4</b>	<b>Pollution</b>		
	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.		As major work completed this issue is not relevant
	Waste disposal at worker camps.		As the workers shed has been removed this issue is not relevant.
<b>2.1.5</b>	<b>Disruption of agricultural activities</b>		
	Minimizing disturbance.	3	No complaints have been received by the Contractor thus far.
	Compensation arrangements.	3	Contractors paid for compensation.
<b>2.2.1</b>	<b>Navigation</b>		
	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 2018 which will expire on October/2018.
	Compliance to GoB navigation and safety standards.		Not discussed.
	Coordination with BWDB & BIWTA on dredging operations.		Not discussed.
<b>2.2.2</b>	<b>Roads</b>		
	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
<b>2.2.3</b>	<b>Excavation of earth in slope protection</b>		
	Excavation in accordance with approvals.		As the work is completed this issue is not relevant
<b>2.2.4</b>	<b>Sand mining</b>		
	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. No legal permits for sand mining have been issued, reportedly.
<b>2.3.1</b>	<b>Safety equipment to prevent accidents / injuries</b>		
	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.
<b>2.3.2</b>	<b>First aid</b>		
	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.
<b>2.3.3</b>	<b>Accidents</b>		
	Reporting of accidents within 24 h.		No serious accidents have occurred thus far according to the Contractor.
<b>2.3.4</b>	<b>Full-time Safety Inspector</b>		
	Employed / on-site.		Assigned – see 2.1.1
	Monthly safety report.		Not being made yet – see also 2.1.1
<b>2.4.1</b>	<b>Site management</b>		

EMP Clause	Item	Score	Comment
	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.
<b>2.4.2</b>	<b>Lay-out drawings</b>		
	Submission on demand.		Not discussed.
<b>2.4.3</b>	<b>Sanitation conditions &amp; waste management</b>		
	Water supply.		As the labour sheds have been removed this issue is not relevant
	Sanitation (toilets etc.).		As the labour sheds have been removed this issue is not relevant
	Waste management.		As the labour sheds have been removed this issue is not relevant

**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. Meeting with site people



2. Forma of C.C block is being collecting in a place-a part of site clearance work.



3. Receiving of Geo-textile bags



4. Geo-textile bags are being dumped to check erosion



5 C.C block is placing with risk



6 Geo-textile bags are being placed to fight with Erosion

## FRERMIP – Monitoring of EMP Implementation – Round 3

18 and 20 June 2017: Zafarganj and Chauhali

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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.

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### 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 at Jaforgonj site the contractor engaged Environmental Inspector and Safety Inspector but not full time basis- they have other responsibilities. It is noticed that at Chauhali site the contractor withdraw their Environment Inspector and safety Inspector.
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.
8. The ERAF (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. Limited function was observed at Jaforgonj site and no function observed in Chauhali site.
9. 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 at the start of next working season i.e November, 17
2. The Supervising Consultant is to improve on supervising the Contractor in his obligations with respect to environmental management from the next working season.
3. 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.
4. PMO is to adopt a system for sharing and following up on ISPMC's EMP compliance monitoring reports.
5. For future Contractor's contracts the EMP section should be revised and amended, based on experience gained in implementing the pilot area works.
6. The contractor should restore the top soil in and around the site office and working place where applicable
7. The contractor should clear the in all respect so that no adverse impact on environment arise.

ISPMC – Dhaka; 4 July 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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