

## **Environmental Monitoring Report**

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**Project No. 42180-018**  
**Annual Monitoring Report (January-December 2021)**  
**April 2022**

**Bangladesh: Third Public-Private Infrastructure Development Facility-  
Tranche 1**

**DBL Industrial Park Limited**

Prepared by Infrastructure Development Company Limited (IDCOL) for the Asian  
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**Loan No. 3554-BAN-OCR**  
**Public-Private Infrastructure Development Facility-3**

**ANNUAL ENVIRONMENTAL AND SOCIAL COMPLIANCE AUDIT REPORT**

**DBL Industrial Park, Sherpur, Maulvibazar Sadar, Maulvibazar, Sylhet,  
Bangladesh**

**167.6 Acres Land Filling and Infrastructure Facility Development Project**  
**DBL Industrial Park Limited**

**March, 2022**

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## List of Abbreviations

ADB	Asian Development Bank
BEZA	Bangladesh Economic Zone Authority
BOD	Biological Oxygen Demand
CO	Carbon Mono-Oxide
COD	Chemical Oxygen Demand
dB	Decibel
DIPL	DBL Industrial Park Limited
DO	Dissolved Oxygen
DOE	Department of Environment
ECR	Environment Conservation Rules
EHS	Environment and Health Safety
EMP	Environmental Management Plan
ERP	Emergency Response Plan
ESSF	Environmental and Social Safeguards Framework
EZ	Economic Zone
FGD	Focus Group Discussion
HCB	Hydrocarbons
IDCOL	Infrastructure Development Company Limited
IEE	Initial Environmental Examination
IP	Indigenous People
MOEFCC	Ministry of Environment, Forest, and Climate Change
MW	Mega Watt
NOC	No Objection Certificate
NOx	Nitrogen Oxides
NTU	Nephelometric Turbidity Units
PM	Particulate Matter
PPE	Personal Protective Equipment
PwC	PricewaterhouseCoopers Ltd
REB	Rural Electrical Board
SO2	Sulphur Di-Oxide

SPS	Safeguards Policy Statement
SS	Suspended Solid
STP	Sewage Treatment Plant
TDS	Total Dissolved Solid
TSS	Total Suspended Solid
UoM	Unit of Measurement

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## EXECUTIVE SUMMARY

### Background

DBL Industrial Park Limited is a private developer of Shreehatta Economic Zone and is envisioned to develop a portion of the Shreehatta Economic Zone complying infrastructural and community facilities aligning the prime objective of Bangladesh Economic Zone Authority (BEZA) to attract local and foreign investors for large manufacturing and service industry. The project site of DBL Industrial Park is located at Sherpur and Bamongaon Mouza, Maulvibazar Sadar Upazila, Maulvibazar District, Sylhet Division. The GPS coordinate of the project is 24°37'29.37" North and 91°39'58.22" East. For financial assistance DBL Industrial Park Ltd. has approached Infrastructure Development Company Limited (IDCOL), along with other lenders. Considering the importance of the project, IDCOL has sourced required fund as ordinary capital resources (OCR) under Public-Private Infrastructure Development Facility (PPIDF)-3 of Asian Development Bank (ADB).

According to the Environment Conservation Rules (ECR), 1997 of Bangladesh Government, Economic Zone (EZ) project has been classified as Red Category. Hence, development project of DBL Industrial Park Ltd has fallen into the **Red** category. Given the environmental impacts of the DBL Industrial project are mostly site specific, ADB has categorized the project as **B** as per ADB guidelines. Due to the absence of any indigenous habitat in the project area, the project has been categorized as **C** from indigenous peoples (IP) perspective. In addition, as there is no issue of involuntary resettlement or adversely affecting livelihood of any unauthorized entity, the project has been categorized as **C** from involuntary resettlement (IR) perspective. In addition, IDCOL has adopted an Environmental and Social Safeguards Framework (ESSF). According to this ESSF, the proposed project of DBL Industrial Park Ltd seems to be a **High-Risk** project requiring detail environmental impact assessment.

PwC has prepared the Initial Environmental Examination (IEE) Report based on the guidelines of Department of Environment (DOE), Government of Bangladesh (GOB) and Asian Development Bank's (ADB's) Safeguard Policy Statement (SPS), 2009. The project has started constructing its basic infrastructures in the project site. As financial intermediary, there is a requirement of IDCOL to submit an annual Environmental and Social Compliance Audit Report of this project to ADB to share the major findings. Accordingly, this audit report has been prepared by IDCOL.

### Audit overview and findings

The respective IDCOL official has visited the project during the audit period (*January 2021 to December 2021*) of this Environmental and Social Compliance. The available relevant documents and clearances has also been reviewed. The audit deals with the implementation of environmental and social safeguards during the operation phase in light of ADB approved Initial environmental Examination (IEE) report. During audit, the commitment of DBL Industrial Park Ltd to comply with environmental and social safeguards have been found as responsive.

## 1.0 INTRODUCTION

### 1.1 PROJECT PROPONENT

DBL Industrial Park Limited (DIPL) is acting as a private developer in Shreehatta Economic Zone with a view to develop a portion of the Economic Zone complying infrastructural and community facilities aligning the prime objective of Bangladesh Economic Zone Authority (BEZA) to attract local and foreign investors for large manufacturing and service industry. The zone will have access to utilities such as power, water and gas which are critical enablers for development of economic zone. There is adequate supply of unskilled labor from the rural areas in the vicinity, however skilled and semi-skilled labor needs to be procured from the nearby urban agglomerations since there is a dearth of quality educational infrastructure in the region.

The Economic Zone comprised of an area of 167.6 acres with state-of-the-art infrastructure facilities and professional management to attract and support local and foreign investments in industrial sectors. Table 1.1 shows key project information.

**Table 1.1: Key project information**

<b>Project Company</b>	DBL Industrial Park Limited.
<b>Project Location</b>	Sherpur and Bamongaon Mouza, Maulvibazar Sadar Upazila, Maulvibazar, Sylhet.
<b>Project Area</b>	6,78,253 Sq. m
<b>Cost for site development</b>	BDT 232.26 Crores
<b>Cost for Factory Construction</b>	BDT 4512.50 Crores
<b>Industry Type According to DoE</b>	Red
<b>Electricity Procurement</b>	Power will be sourced from Rural Electrical Board (REB). Also, one common captive power plant will be installed.
<b>Gas Requirements</b>	3,360 cft/hr for residential area and 1,363,237 cft/hr for industrial processing area; Will be supplied from Jalalabad Gas Company (located nearby)
<b>Water Requirements</b>	553 cubic meters for residential area and 37,810 cubic meter for industrial processing area.
<b>Source of Water</b>	Deep tube-well and nearby water body (called Gong) which are located close to EZ site.
<b>Power Requirements</b>	6.72 MW for residential area and 67.5 MW for industrial processing area.
<b>Treatment of Wastewater</b>	Common STP for the Economic Zone

## 1.2 AREA AND LOCATION OF THE PROJECT

The economic zone site is located in the Maulvibazar Sadar Upazila, Maulvibazar District of the Sylhet Division, at the intersection point where Dhaka – Sylhet Highway and Sylhet – Maulvibazar Highway converge at Sherpur. The site is 35 Km from Sylhet city and 23 Km from Maulvibazar Sadar. Sreemangal Railway Station is 43 Km away from the proposed site and Sylhet Rail Station is 35 km away. Dhaka lies at a distance of about 208 Km from this point. The Sherpur market is just 1 km away from the site. Nearest Airport is Osmani International Airport which is 55 km from the site, and nearest ports are Ashuganj River Terminal which is 108 km away in southwest direction and Chittagong Sea Port is 333 km away. Above all, Sylhet-Dhaka highway will be the access road for the site. The GPS coordinate of the project is 24°37'29.37" North and 91°39'58.22" East. Location map of the project has been shown in **Annex 04**.

## 1.3 BRIEF DESCRIPTION OF THE PROJECT

Site for the EZ has been selected for development of an economic zone. Scope of the proposed project is to develop EZ and on-site facilities for upcoming EZ zone. These EZ facilities will be developed by DIPL. The type of industries to be accommodated within EZ are as follows:

- |                             |                          |
|-----------------------------|--------------------------|
| 1. Spinning Mills           | 6. Ceramic Frit          |
| 2. Garments Accessories     | 7. Aluminum Ball         |
| 3. Glass Factory            | 8. Sanitary Ware         |
| 4. Glass Processing Factory | 9. Abrasive Tool Factory |
| 5. Ceramic Tiles Factory    | 10. Sports Wear Factory  |

The selected site is open land and a part of Surma – Kushiya flood plains as the distance of Kushiya River is only 900m from the site. The average natural ground level for the proposed EZ was +6.66 m AMSL level. To avoid inundation during monsoon season, an average depth of 9 feet to 13 feet of land filling has been envisaged for the proposed EZ area. An amount of 2.0 crores cubic feet materials has been procured through landfilling contract (**Annex 2**). Progress status of the proposed interventions at the selected site are given in below table:

**Table 1.2: Project progress status as of December 2021**

<b>Project Intervention</b>	<b>Implementation status</b>	<b>% of progress</b>	<b>Expected completion date</b>
Site development & Land Filling	Done	100%	
Boundary Wall Construction	Ongoing	96%	Sep-22
Road, Footpath and Master drainage line construction	Ongoing	70%	Sep-22
Construction of industrial Plots	Ready	100%	Sep-22
Administrative & residential building	Ongoing	40%	Sep-22
Development of water supply, electricity supply and gas supply network	Ongoing	50%	Sep-22
Development of sewer system network	Ongoing	45%	Sep-22
Development of STPs, RMS Gas station, Mini Fire Office, Water body	Ongoing	40%	Sep-22

Primary and secondary roads are planned to give access to the industries within EZ. These are looped and planned with the aim of providing smooth and dispersed traffic flow to reduce traffic congestion within EZ. A 230KV high voltage line passing through the site and a power line of 0.4 KV is also available in the site. Surface water is available from the Kushiya River within 1 Km. There is a large water body in the southern part of the site. An STP is proposed for sewage management for the whole economic zone. The entire sewer network is planned along the proposed roads of EZ.

## **1.4 OBJECTIVES OF THE ENVIRONMENTAL AND SOCIAL COMPLIANCE AUDIT**

The audit has been conducted with the aim to assess the project's compliance with-

- (i) Environment Conservation Rules (ECR) 1997 of GOB;
- (ii) Environmental and social safeguards according to the Environmental and Social Safeguards Framework (ESSF) of IDCOL;
- (iii) Environmental and social safeguards according to the Safeguards Policy Statement (SPS), 2009 and other relevant standards and guidelines of the ADB;
- (iv) Proposed mitigation measures and monitoring procedures according to the environmental management plan (EMP), resettlement action plan (RAP) as are applicable.

## **1.5 METHODOLOGY**

The audit includes the following steps:

- (i) Review the environmental and social safeguards documents including environmental impact assessment report;
- (ii) Assess actual implementation of the guidelines/action plan of the safeguard related documents (as available).

## **1.6 REPORTING PERIOD**

The reporting period of this Environmental and Social Compliance Audit Report is January 2021 to December 2021.

## **1.7 CHANGES IN PROJECT SCOPE**

There is no change in the technology and operational process as have been declared by the respective government and accepted by DIPL. So, it can be said that the Environmental Management Plan (EMP) of ADB approved Initial Environmental Examination (IEE) is fully applicable during the reporting period as well.

## **1.8 ENVIRONMENTAL MONITORING**

The parameter, frequency and methodology of environmental monitoring are in accordance with EMP of ADB approved IEE, as has been detailed in chapter 3 of this audit report.

## 2.0 REGULATORY REQUIREMENTS

### 2.1 ENVIRONMENT CONSERVATION RULES, 1997 OF BANGLADESH

The project has to comply with the Environment Conservation Rules (ECR), 1997. According to the categorization of ECR, 1997, the project has been categorised as **Red**<sup>1</sup> meaning that it has significant adverse environmental impacts, which are to be mitigated with proper mitigation measures.

### 2.2 ENVIRONMENTAL AND SOCIAL COMPLIANCE RELATED STANDARDS AND GUIDELINES OF ASIAN DEVELOPMENT BANK

The project has to be complied with Safeguards Policy Statement (SPS), 2009 of ADB in regard of environmental and social (E&S) compliances. Considering the adversity of environmental impacts, it has been categorized as **B** from environmental safeguard point of view. As no record of any indigenous habitat has been found at Sherpur and Bamongaon Mouza of Maulvibazar Sadar, the project has been categorized as **C** in respect of Indigenous People (IP). Also, the land of the economic zone has been acquired through a “willing buyer willing seller” basis, as no physical and economic displacement in terms of involuntary acquisition of land and involuntary restrictions on land use is triggered, the project has been identified as category **C** in respect of Involuntary Resettlement.

### 2.3 ENVIRONMENTAL AND SOCIAL SAFEGUARDS FRAMEWORK OF IDCOL

IDCOL has adopted an Environmental and Social Safeguards Framework (ESSF) in 2011, which is to be complied with all infrastructure projects as are to be funded IDCOL. According to the environmental categorization of ESSF, the project has been categorised as **High-Risk** project requiring significant compliance safeguards including comprehensive environmental impact assessment and regular monitoring. In consideration of social categorization, the project has been categorised as **Low Risk** as no involuntary resettlement of livelihood or economic impact has been experienced as well as no existence of Indigenous People in the project area.

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<sup>1</sup> Schedule-1 of ECR (project no. 6 of Red category), 1997

### 3.0 IMPLEMENTATION OF ENVIRONMENTAL SAFEGUARDS

#### 3.1 COMPLIANCE WITH ENVIRONMENT CONSERVATION RULES, 1997

DIPL has to comply with the requirement of ECR, 1997 of the DOE. As the site is designated by the BEZA, DoE does not require any site/location clearance certificate according to section 6 of MOEFCC circular published on 19.02.2019 (**Annex 03**). The project site, which is under Shreehatta Economic Zone, has obtained EIA approval from DOE on 11 August 2016. The No Objection Certificate (NOC) for locational clearance from local Union Parishad has been acquired by the project proponent and the NOC has been added in **Annex 01**. In the following Table 3.1, the compliance status of DIPL, in regard of major milestones of ECR, 1997 is depicted.

**Table 3.1: Compliance with the requirement of ECR, 1997**

Basic Requirement	Compliance Status
Award Site/Location Clearance Certificate	Complied
Award EIA approval	Complied
Award Environmental Clearance Certificate	Ongoing

#### 3.2 COMPLIANCE WITH ENVIRONMENTAL MANAGEMENT PLAN

##### *a. Institutional arrangement*

The environmental and social compliances are dealt by DIPL project team. DIPL has communicated that a Project Implementation Unit (PIU) is under development and the unit will have an environmental sub-team which will regularly monitor different environmental aspects and take necessary actions to mitigate adverse impacts. An organizational structure of implementation arrangement is given in **Annex 18**. DIPL has also mentioned that an HSE Unit has been proposed under Internal Control and Monitoring Department (ICMD) of the construction management organogram. At present, a single person has been employed in the unit. However, in compliance with the EMP, eventually 2 persons will be hired in the position of Environmental Engineer/Scientist and Social Analyst. ICMD will report to DGM of Project Implementation Team, who will report to head of construction. Currently, Md. Rafiqul Islam is appointed as Manager-Environment and Md. Ariful Haque is Assistant Project Manager responsible for H&S issues in the construction site (**Annex 17**).

##### *b. Compliance status*

In the IEE, a number of activities having potential adverse environment impacts and occupational health safety aspects during construction and operation phases have been identified. DIPL has also communicated that the site specific EMP has been adopted in March 2021. In the following Table 3.2, suitable mitigation measures to address these impacts according to the EMP and actual responses by DIPL has been discussed.

**Table 3.2: Response of DIPL on project activities and mitigation measures during construction phase**

<b>Project Activity</b>	<b>Potential Impacts</b>	<b>Proposed mitigation measures in EMP</b>	<b>Actual implementation</b>	<b>Compliance status</b>
<b>Setting up of construction camps/labor camps</b>	Disturbance on surrounding locality and pollution of environmental elements	<ul style="list-style-type: none"> <li>• Camps should be at least 500 m distance from habitations from the nearest settlements.</li> <li>• Location for stockyards for construction materials will be identified at least 1 km from water sources.</li> <li>• Construction camps shall be provided with sanitary latrines (1 per 25 pax), bathing facility and urinals</li> <li>• Drains and ditches will be treated with bleaching powder on a regular basis.</li> <li>• The sewage system for the camp will be properly designed, built and operated so that no health hazard occurs and no pollution to the air, ground or adjacent watercourses takes place</li> <li>• First aid facilities should be made available at construction camp. A person trained in first-aid treatment should be made in charge who will always be readily available during emergency.</li> </ul>	<ul style="list-style-type: none"> <li>• Construction camps and residential accommodation for the workers are established.</li> <li>• Precautions for health safety hazard related matters are arranged.</li> </ul>	Complied
<b>Excavation, disposal, cut &amp; fill and land clearing activities for site levelling and internal roads, disposal</b>	Soil contamination and negative impact on surrounding natural resources	<ul style="list-style-type: none"> <li>• Residential facility or sensitive facilities like hospitals, schools etc. shall not be located in downwind direction of the identified sites for getting landfilling material.</li> <li>• The soil used for landfilling should have similar characteristics to the native soil and free of any type of contamination.</li> <li>• In case of dredging activity for landfilling purposes: <ul style="list-style-type: none"> <li>➤ Dredging should not impact natural drainage courses</li> <li>➤ Dredging sites should be located away from sensitive locations</li> <li>➤ Permission from concerned local body should be taken before finalizing the location</li> <li>➤ Magnitude and frequency of dredging activity should be monitored to avoid impacts on the natural drainage.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>▪ The landfilling materials are reported to collect from the river by sustainable manner (activities are specified in land filling contract (<b>Annex 2</b>)).</li> <li>▪ DIPL has also made arrangements for test the topsoil of the filling materials and will be shared the results.</li> </ul>	Complied
	Soil Erosion and Sedimentation control	<ul style="list-style-type: none"> <li>▪ Contractor should plan the activities so that no loose earth surface is left out before the onset of monsoon.</li> <li>▪ Top-soil along the road side should be stripped and kept under covered shed for plantation.</li> <li>▪ To avoid soil compaction along the transportation routes, only identified haul roads would be used for transportation.</li> </ul>	Contractors are reported to be worked on site preparation through sustainable manner.	Complied



<b>Project Activity</b>	<b>Potential Impacts</b>	<b>Proposed mitigation measures in EMP</b>	<b>Actual implementation</b>	<b>Compliance status</b>
		<ul style="list-style-type: none"> <li>Soil erosion checking measures as the formation of sediment basins, slope drains, etc., should be carried out.</li> </ul>		
	Dust Generation & Air Emission	<ul style="list-style-type: none"> <li>Vehicles delivering materials should be covered with tarpaulin to reduce spills and dust blowing off the load.</li> <li>Water should be sprayed in the cement and earth mixing sites as well as after compaction.</li> <li>In high dust areas, workers should be provided and encouraged to use masks.</li> <li>Regular maintenance, servicing of the vehicles and periodic emission check for equipment and machinery would be carried out in conformity with Schedule 6 – ‘Standards for Emission from Motor’ of The Environment Conservation Rules 1997 (Amended 2002);</li> <li>Water to be sprayed on the haul road.</li> <li>All the vehicles entering the project site will be checked for Pollution-Under-Control Certificates.</li> <li>Air quality monitoring to be carried out during construction phase to check the pollutants level in the air.</li> </ul>	<ul style="list-style-type: none"> <li>Vehicle conditions are reported to be checked on the project site.</li> <li>Water has been sprayed on the construction site where dust is generated <b>(Annex 24)</b></li> </ul>	Complied
<b>Disposal of Debris and any waste generated</b>	Pollution of soil and water sources	<ul style="list-style-type: none"> <li>Waste from construction camp should be segregated at site.</li> <li>Dustbins should be provided at the site and construction camps to prevent littering of waste.</li> <li>Construction debris should be stored under covered sheds on paved surfaces to prevent Leaching.</li> <li>Utmost care shall be taken to ensure safe collection, transport and disposal of construction waste and debris.</li> </ul>	<ul style="list-style-type: none"> <li>Construction wastes are being managed in an environment friendly manner.</li> <li>Waste disposal SOP has been prepared <b>(Annex 25)</b>.</li> </ul>	Complied
<b>Disposal of solid and liquid wastes</b>	Contamination of soil	<ul style="list-style-type: none"> <li>Impervious platform and oil and grease trap for collection of spillages from construction equipment vehicle maintenance platform will be appropriately provided at construction camp, servicing area and liquid fuel and lubes at storage areas.</li> <li>Proper management of waste from labor camps and construction site.</li> <li>Proper disposal of wastewater generated from labor camp and construction site.</li> </ul>	Probable oil leakage instruments and vehicles are reported to monitor.	Complied

<b>Project Activity</b>	<b>Potential Impacts</b>	<b>Proposed mitigation measures in EMP</b>	<b>Actual implementation</b>	<b>Compliance status</b>
	Contamination of surface & ground water	<ul style="list-style-type: none"> <li>▪ Avoid excavation during monsoon season.</li> <li>▪ Loosened soil will be stabilized by Contractor through landscaping and developing vegetation, wherever possible.</li> <li>▪ Sanitation facility with septic tank followed by soak pit to be developed.</li> <li>▪ Provision of oil &amp; grease traps upstream of storm water drains should be kept.</li> <li>▪ Surface run off due to construction activity should not be discharged in open without treatment.</li> </ul>	No contaminating mediums were reported to found in construction stage.	Complied
<b>Drainage and runoff</b>	Water logging of natural channels	<ul style="list-style-type: none"> <li>▪ The Contractor would always clear all the cross-drainage structures and natural drainage before onset of monsoon to keep all drainage unblocked Earth, stones, wastes and spoils will be properly disposed off, to avoid blockage of any drainage channel.</li> <li>▪ All necessary precautions should be taken to construct temporary or permanent devices to prevent inundation or ponding.</li> </ul>	Required measures have been reported to practice.	Complied
<b>Noise from Vehicles, Plants and Equipment</b>	Generation of noise construction machineries which could exceed 70 dB(A) at site boundary	<ul style="list-style-type: none"> <li>▪ Construction activities would be carried out in the daytime only.</li> <li>▪ The construction equipment would be provided with adequate noise control measures and should comply with the noise standards as prescribed by DoE</li> <li>▪ Regular maintenance of vehicles and equipment would be carried out and corrective action taken in case of any deviation.</li> <li>▪ Earmuff/ear plug should be given to the workers working around or operating plant and machinery emitting high noise levels.</li> <li>▪ Labor working in noise prone area should be provided with ear plugs and job rotation should be practiced preventing the prolonged exposure of any workers to high noise levels</li> </ul>	The generator has been reported to set up in a suitable place.	Complied
<b>Accidents</b>	Health hazards and probable non-curable injuries	<ul style="list-style-type: none"> <li>▪ Safety officer should be appointed at site to ensure all the safety guidelines are being followed at site.</li> <li>▪ Cautionary guidance should be provided at site to aware people about the associated risk with the area.</li> <li>▪ All Accidents should be reported immediately and incident analysis, preventive measures shall be implemented.</li> </ul>	<ul style="list-style-type: none"> <li>• Project team is responsive for environmental and health safety issues.</li> <li>• There were no accidents or incidence during the period and accidents/incidents register, PPE register were maintained during the reporting period.</li> </ul>	Complied

<b>Project Activity</b>	<b>Potential Impacts</b>	<b>Proposed mitigation measures in EMP</b>	<b>Actual implementation</b>	<b>Compliance status</b>
<b>Occupational Health &amp; Safety Plan</b>		<ul style="list-style-type: none"> <li>▪ All construction workers should wear PPEs including safety jacket, helmet, gloves, gum boots, ear plugs, mask while working at the site</li> <li>▪ Workers should be made aware about the health issues related with open defecation</li> <li>▪ Training to workers should be provided for handling the construction equipment and machinery as well as the emergency situations like fire, floods etc.</li> <li>▪ First aid facility and sufficient nos. of trained personnel should be available at all the time at construction camp</li> <li>▪ Cautionary signage and notice should be displayed in local language and English at the required places like fuel storage area so that hazards can be avoided</li> </ul>	<ul style="list-style-type: none"> <li>• Safety gears and awareness have been reported to disseminate.</li> <li>• Adequate PPE were being used by the construction workers.</li> <li>• During the reporting period, COVID 19 related safety measures such as workers wearing masks and social distancing on site were adhered to.</li> <li>• DIPL has prepared a Health Safety Manual for the construction site (<b>Annex 26</b>)</li> </ul>	Complied

**c. Environmental monitoring**

**i. Technical approach of environmental monitoring**

In the EMP of the IEE, environmental monitoring has been required during both construction and operation phase. The air, water and noise quality monitoring schedule are depicted in Table 3.3.

**Table 3.3: Monitoring parameters and frequency of monitoring**

<b>Key parameters to be monitored: (1) Ambient Air Quality</b>		
<b>location</b>	<b>frequency</b>	<b>parameter</b>
Four corners of plant boundary and center point of the plant	Quarterly (routine) analysis	SPM, PM10, PM2.5, SO2, NOX, CO, Pb, O3, Hydrocarbons (HCB) etc.
<b>Key parameters to be monitored: (2a) Surface Water</b>		
<b>location</b>	<b>frequency</b>	<b>parameter</b>
Project site at Sherpur and Bamongaon Mouza	Quarterly (routine) analysis	Temperature, pH, DO, BOD, COD, EC, TDS, TSS, Total Hardness, ammonia, alkalinity, Sulphate, Iron, Chromium
<b>Key parameters to be monitored: (2b) Ground Water</b>		
<b>location</b>	<b>frequency</b>	<b>parameter</b>
Project site at Sherpur and Bamongaon Mouza	Monthly (routine) analysis	Temperature, pH, TDS, Total Hardness, Coliform, Iron, Arsenic, Manganese, Chloride, Zinc.
<b>Key parameters to be monitored: (3) Noise</b>		
<b>location</b>	<b>frequency</b>	<b>parameter</b>
At four corners of Project boundary	Quarterly (routine)	Limits in dBA

**Procedure of Ambient Air Quality Monitoring**

The air quality samples were collected from four corners of the project for 24 hours using high volume sampler for SPM and PM10, fine particulate sampler for PM2.5, and Impinger attachment with high volume sampler for gaseous samples. The GPS coordinates of the sampling locations are:

<b>Sample Location</b>	<b>GPS Coordinate</b>
South-West Corner	24°37'26.72"N, 91°39'58.84"E
South-East Corner	24°37'29.47"N, 91°40'18.33"E
North-East Corner	24°37'41.45"N, 91°40'14.70"E
North-West Corner	24°37'41.63"N, 91°39'55.68"E

SPM, PM10, PM2.5, were measured using gravimetric method, Gaseous pollutants SO2, NOx, Pb, CO, O3, were measured using spectroscopic and photometric method, Hydrocarbons (Methane and VOC) were measured using Gas Chromatographic- Mass Spectroscopic method.

**Table 3.4: Ambient air quality at project site**

Location	8 March 2021									9 September 2021								
	SPM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	Pb	O <sub>3</sub>	HCB	SPM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	Pb	O <sub>3</sub>	HCB
South-West Corner	154	84	28	19	8	84	<0.01	11	<0.01	143	63	17	15	7	62	<0.01	9	<0.01
South-East Corner	147	72	31	17	11	53	<0.01	13	<0.01	135	57	23	13	11	39	<0.01	11	<0.01
North-East Corner	163	93	35	21	10	73	<0.01	10	<0.01	140	76	28	16	13	54	<0.01	7	<0.01
North-West Corner	172	97	42	23	12	65	<0.01	12	<0.01	164	82	34	19	12	43	<0.01	9	<0.01
UoM	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>	µg/m <sup>3</sup>
Sampling Duration	24 hrs	24 hrs	24 hrs	24 hrs	24 hrs	8 hrs	24 hrs	8 hrs	24 hrs	24 hrs	24 hrs	24 hrs	24 hrs	24 hrs	8 hrs	24 hrs	8 hrs	24 hrs
National Standard	200	150	65	365	100	10000	-	157	-	200	150	65	365	100	10000	-	157	-

Source: Monitoring Test conducted by DIPL (Annex 21)

National Ambient Air Quality Standard of Bangladesh (NAAQS, 2005-SRO no 220- law/2005).

The spatial grouping of ambient air quality monitoring result yielded four air quality sampling sites and the temporal grouping also yielded two clusters of seasonal sampling in March and September. Major locational differences have been found in the four sampling locations for Suspended Particulate Matters, PM<sub>10</sub>, PM<sub>2.5</sub>, Sulfur di-oxide and Carbon Mono-oxide for both seasons. It can be seen from the Table 3.4 that the concentration of Suspended Particulate Matters, PM<sub>10</sub>, PM<sub>2.5</sub>, Sulfur di-oxide and Carbon Mono-oxide has been decreased during the month of September than March.

### Procedure of Noise Level Monitoring

To determine the existing workplace sound level at the project, data logger noise meters were used in four corners for 24 hours considering day and night period as per DoE. The GPS coordinates of the sampling locations are:

Sample Location	GPS Coordinate
South-West Corner	24°37'26.72"N, 91°39'58.84"E
South-East Corner	24°37'29.47"N, 91°40'18.33"E
North-East Corner	24°37'41.45"N, 91°40'14.70"E
North-West Corner	24°37'41.63"N, 91°39'55.68"E

The 10 minutes average noise level were monitored and the average logarithmic noise level per hour is presented in the table 3.5 for two test result of the reporting period. A weighted average day and night noise level of the sample locations of DBL Industrial Park Limited has been calculated and compared with the standard guideline values of DoE, Bangladesh as per ECR 1997.

**Table 3.5: Ambient noise level at project site**

Sample Location	8 March 2021		9 September 2021	
	Day (6.00 am to 9.00 pm)	Night (9.00 pm to 6.00 am)	Day (6.00 am to 9.00 pm)	Night (9.00 pm to 6.00 am)
South-West Corner	56	49	59	52
South-East Corner	55	47	58	56
North-East Corner	55	47	59	52
North-West Corner	57	49	59	54
<b>DoE Standard</b>	<b>75</b>	<b>70</b>	<b>75</b>	<b>70</b>

Source: Monitoring conducted by DIPL (Annex 21)  
ECR 1997, Standard of DOE (Schedule - 04).

The spatial grouping of noise level monitoring result yielded four noise level sampling sites and the temporal grouping also yielded two clusters of seasonal sampling in March and September. No significant locational differences have been found in the four sampling locations for day and nighttime noise level monitoring results for both seasons. It can be seen from the Table 3.5 that the noise level of four sampling locations have increased during the month of September than these were in March.

### Procedure of Surface Water Quality Monitoring

The surface water sample was collected from Kushiara River. Water samples were collected from two locations (e.g., Upstream, and downstream) of the river on March 08, 2021, for analysis of water quality. The GPS coordinates of the sampling locations are:

Sample Location	GPS Coordinate
Upstream	24°37'38.90" N, 91°40'51.42" E
Downstream	24°37'52.64" N, 91°40'45.16" E

**Sampling Methodology:** Samples were collected in separate plastic container rinsed with concentrated nitric acid and distilled water and finally rinsed with the sample water to be collected. The water samples were preserved in pre-rinsed 1-L polypropylene, acid-washed sampling bottles at 4°C in darkness and analyzed within 24 hours. A saturated mercuric chloride solution was used at a final concentration of 0.2 ml/L to stop all microbiological activities in the water samples. The parameters i.e., temperature and pH were determined on spot while the rest of the parameters were determined in the laboratory.

**Analysis Methods:** A glass thermometer was used for the measurement of temperature. pH, TDS, and TSS were measured at the sampling site by Hanna Combo meter, Model: HI 98129. Oil and Grease was measured by Solvent extraction followed by UV visible spectrophotometer, Dissolved Oxygen (DO) was measured by Azide Modification, Biochemical Oxygen Demand (BOD<sub>5</sub>) was measured by dilution method, Chemical Oxygen Demand (COD) was measured by COD Reflection, EC and Fluoride were measured by Ion

selective electrode, TC was measured by Agar membrane method, Coliform was measured by MPN method, Chromium, Iron and Lead were measured using AAS, Sulphate was measured by UV method, Ammonia was measured by Nessler's method, Total hardness was measured by E. Black T Titrimetric method, Chloride was measured by AgCl Titrimetric, Alkalinity was measured by Titrimetric method and Turbidity was measured by using a Turbidity Meter.

**Table 3.6: Surface water quality at project site**

Parameter	UoM	8 March 2021		9 September 2021		DOE Standard
		Upstream	Downstream	Upstream	Downstream	
Temp.	°C	30.2	30	31.1	31.2	40
pH	-	6.9	6.7	7.2	7.2	6.0-9.0
BOD	mg/l	17	16	27	26	50
COD	mg/l	48	52	62	59	200
DO	mg/l	5.9	5.7	5.0	4.9	4.5-8.0
EC	µmhos/cm	110	119	174	192	1200
TDS	mg/l	53	57	105	117	2100
Total Carbon	mg/l	6.4	7.2	5.9	6.1	<10
TSS	mg/l	12.3	11.9	21.3	25.8	150
Chromium	mg/l	0.007	0.008	0.01	0.009	0.5
Chloride	mg/l	11.4	10.5	16.4	11.8	600
Iron	mg/l	0.1	0.15	0.06	0.03	2
Sulphate	mg/l	19	28	37	26	400
Total Hardness	mg/l	54	59	52	48	200-500
Alkalinity	mg/l	85	93	75	83	100-250
Ammonia	mg/l	0.2	0.24	0.23	0.27	5.0
Turbidity	NTU	2.4	2.7	7.5	7.3	0.01

Source: Monitoring conducted by DIPL (Annex 21)

ECR 1997, Standard of DOE (Schedule – 10, rule – 13).

The spatial grouping of surface water quality monitoring result yielded two sampling sites – upstream and downstream and the temporal grouping also yielded two clusters of seasonal sampling in March and September. Major locational differences have been found in the two sampling locations for COD, TDS, Sulphate, Total Hardness and Alkalinity for both seasons. It can be seen from the Table 3.6 that the Temperature, pH level, BOD, COD, EC, TDS, TSS, Chromium, Chloride, Sulphate, Ammonia, Turbidity have increased in September than March. On the other hand, DO, Carbon, Iron, and Hardness concentration have decreased in the surface water sample of September.

### Procedure of Ground Water Quality Monitoring

To determine quality of ground water, water sample was collected from the existing ground water source of BEZA and from a tube-well of nearby village. The GPS coordinates of the sampling locations are:

Sample ID	Sample Location	GPS Coordinate
Sample 1	Existing ground water source of BEZA	24°37'27.32" N, 91°40'15.78" E
Sample 2	Tube-well of nearby village	24°37'46.28" N, 91°40'18.63" E

**Sampling Methodology:** Samples were collected in separate plastic container rinsed with concentrated nitric acid and distilled water and finally rinsed with the sample water to be collected. Groundwater samples were collected from tube well after discarding water for the first 2 minutes. The samples of 1.0-1.5 L were transferred to an amber colored clean plastic bottle for analysis in the laboratory. Samples were preserved using suitable preservation techniques.

**Analysis Methods:** A glass thermometer was used for the measurement of temperature. Transparency was measured by Sacchi disc. PH and TDS were measured at the sampling site by Hanna Combo meter, Model ñ HI 98129. Dissolved hydrogen sulphide was measured by iodimetric method using standard iodine solution. Chloride was determined by argentometric method in a neutral or slightly alkaline solution using potassium chromate as indicator by standard silver nitrate as titer. Iron was determined by colorimetric method using 1, 10 - phenanthroline as chelating agent. Manganese was determined by colorimetric per-sulfate oxidation method. In colorimetric methods a Shimadzu, Model-1800 UV-Vis spectrophotometer was used. Zinc, copper, lead, cadmium, nickel and chromium were determined by Varian Model-AA240FS fast sequential atomic absorption spectrophotometer (AAS). For the analysis of metals by UV-Visible Spectrophotometry and atomic absorption spectrophotometry samples were digested according to the wet-digestion method. Coliform was measured by MPN method.

**Table 3.7: Ground water quality at project site**

Parameter	UoM	8 March 2021		9 September 2021		DOE Standard
		Sample 1	Sample 2	Sample 1	Sample 2	
Temp.	°C	26.7	26.9	29.4	29.6	20-30
pH		7.6	7.8	7.4	7.3	6.5 – 8.5
TDS	mg/l	173	195	252	265	1000
Manganese	mg/l	0.02	0.01	0.01	0.01	0.1
Iron	mg/l	0.1	0.15	0.02	0.1	0.3 – 1.0
Arsenic	mg/l	<0.01	<0.01	<0.01	<0.01	0.05
Chloride	mg/l	96	84	187	192	150-600
Zinc	mg/l	0.8	1.1	1.7	1.5	5
Total Hardness	mg/l	95	107	158	175	200-500
Coliform	/100ml	0	0	0	0	0

**Source: Monitoring conducted by DIPL (Annex 21)  
ECR 1997, Standard of DOE (Schedule - 03).**

The spatial grouping of ground water quality monitoring result yielded two sampling sites – existing ground water source on the site (Sample 1) and water from tube well of nearby village (Sample 2) and the temporal grouping also yielded two clusters of seasonal sampling in March and September. Major locational differences have been found in the two sampling locations for TDS, Iron, Chloride, Zinc and Total hardness for both seasons. It can be seen from the



Table 3.7 that the Temperature, TDS, Iron, Chloride, Zinc and Total hardness concentration have changed significantly in September than in March.

## **II. Result of environmental monitoring**

During construction phase, the ambient air quality has been found to comply with the acceptable limit of DOE. No significant noise has been observed which is being generated from the project activities. The quality of housekeeping has been found to be as satisfactory. Different types of wastes have been found to deposit and dispose in safe manner. While reviewing the monitoring report, the surface and ground water quality have been found to be within the limit of DOE. Through the spatial and temporal analysis of the monitoring test results of environmental parameters, it is found that most of the air, surface and ground water parameters have shown seasonal variations as well as locational variations among the respective sampling locations.

## **III. Disclosure of environmental monitoring**

As disclosure of environmental monitoring, DIPL has kept the copy monitoring result available at project site.

## **IV. Monitoring adjustment measure**

As the air, water and noise monitoring result have been found to be within the limit, no adjustment measure has been recommended.

### 3.3 COMPLIANCE WITH SAFEGUARDS POLICY STATEMENT, 2009 OF ADB

It is already said that the DIPL project has to comply with the requirement of SPS, 2009 of ADB. Accordingly, the compliance of this project in regard of major EHS related requirement are mentioned in Table 3.8.

**Table 3.8: Compliance with important EHS aspects during construction phase**

<b>ADB Requirements</b>	<b>Issue and Description of Observation</b>	<b>compliance Status</b>
<b><i>Environment Assessment requirements for various financing modalities</i></b>	PwC conducted the environmental impact assessment	Complied
<b><i>Occupational and Community Health and safety</i></b>	DIPL has been responsive on application of PPE. Trainings, safety measures have been deployed in the site. A dedicated HSE manager has been employed to oversee EHS issues of the project.	Complied
<b><i>Biodiversity conservation and sustainable natural resource management</i></b>	The activities in relevant to construction phase seems to be inadequate to adversely affect the biodiversity and natural resource management in the project area to a greater extent. But due to the long-term operation of the project, there could be limited/minimal impact to the local biodiversity.	Complied
<b><i>Pollution prevention and abatement</i></b>	The available monitoring result has been found to be within the acceptable limit.	Complied
<b><i>Physical Cultural resources</i></b>	Due to the unavailability of designated physical cultural resources within the range of close distance, the issue of adversely affecting the physical cultural property seems not to be relevant with the project.	Complied

## **4.0 IMPLEMENTATION OF SOCIAL SAFEGUARDS**

### **4.1 IMPACT ON RESETTLEMENT OF THE PROJECT AFFECTED PEOPLE AND LIVELIHOOD**

As the project site is a purchased land of DIPL through willing seller-willing buyer arrangement, there is no issue of resettlement. In addition, the project site was not being used for any income generating activities before acquiring for economic zone establishment, so the project is not associated with any adverse impact on the livelihood of any local household.

### **4.2 INSTITUTIONAL ARRANGEMENT ON SOCIAL SAFEGUARD**

#### **Institutional arrangement**

The environmental and social compliances are dealt by DIPL project team. DIPL has communicated that a Project Implementation Unit (PIU) is under development and the unit will have a social sub-team which will regularly monitor different social aspects and take necessary actions to resolve the social issues. An organizational structure of implementation arrangement is given in **Annex 18**. DIPL has also mentioned that an HSE Unit has been proposed under Internal Control and Monitoring Department (ICMD) of the construction management organogram. At present, a single person has been employed in the unit. However, in compliance with the EMP, eventually two persons will be hired in the position of Environmental Engineer/Scientist and Social Analyst. ICMD will report to DGM of Project Implementation Team, who will report to head of construction. Currently, Md. Rafiqul Islam is appointed as Manager-Environment and Md. Ariful Haque is Assistant Project Manager responsible for H&S issues as well as social issues of the construction site (**Annex 17**).

#### **Grievance Redress Mechanism**

For ensuring proper redressal of grievances, DIPL has introduced Grievance Box and Grievance Logbook. While reviewing the Grievance Logbook and consultation with local people, no significant grievance has been observed during the reporting period. Due to Covid – 19 induced lockdown, GRM system was not introduced to the community people by any other means, but during the baseline survey and public consultation, the GRM system, and its activities were introduced to the local people.

### **4.3 IMPACT ON INDIGENOUS PEOPLE**

Based on the primary observation during site visit and secondary sources, no habitat of any indigenous community has been reported at the surrounding areas of the project site. So, the project has been categorized as **C** for Indigenous Peoples (IP) safeguards concluding that there is no issue about adversely affecting IP neither in construction phase nor in operation phase.

DIPL is expected to be gender and caste neutral. So, any qualified person coming from the indigenous community will be equally treated during the recruitment process and will be given the same benefits as like as other personnel.

#### **4.4 CHILD LABOUR**

The Bangladesh Labour Act 2006 (Act XLII of 2006) also defines the “child” and the “adolescent” on the basis of age. As per section 2(8) of the Act, a person who has attained the age of 14 but below the age of 18 is considered to be an „adolescent” and as per section 2(63), a person not attaining the age of 14 is defined as a “child”.

According to The National Child Labour Elimination Policy 2010, following rights are to be complied with, in regard of addressing child labour Issue

- Employing children according to the age determined by the Acts and not to employ children below 14 years as a regular employee;
- Ensuring the children at domestic work not to perform any hazardous work and providing them with proper food and accommodation, education, recreation since they work full time; and
- Refraining child workers from physical, mental, sexual persecution and abuse.

DIPL has been reported to be careful about the child labour issue.

#### **4.5 PUBLIC CONSULTATION AND DISCLOSURE OF INFORMATION**

Respective IDCOL officials has physically visited the project site during the reporting period but due to COVID-19 situation, it was difficult to conduct public consultation during that project site visit. However, in future, IDCOL officials will try to conduct detail public consultation with adjacent neighborhoods. Consultation with local residents and relevant authorities has been conducted by the project proponent (**Annex 12**).

#### **4.6 ENHANCEMENT**

DIPL acknowledges the importance of satisfactory relationship to adjacent communities. DIPL has contributed generating employment for local day laborers.

#### **4.7 WORKSHOPS AND TRAININGS**

During the reporting period, only land development work and utility structure construction work was ongoing and a limited number of workers were employed from the land filling contractor. To ensure safety and security in the workplace, several workshops or training sessions were conducted on environmental compliance during the reporting period. Details on the trainings related to EHS measures has been attached in annex (**Annex 14**).

## **5.0 CORRECTIVE ACTION PLAN**

DIPL has been responsive to the EMP. They have been found to maintain the required mitigation measures to address the potential impacts. From social safeguard perspective, it has been reported that there is no significant grievance neither from any internal stakeholder nor from any external stakeholder.

## **6.0 CONCLUSION**

Based on the findings of environmental and social compliance audit, it can be concluded that DIPL is responsive on environmental and social safeguards.

## Annex 1: NOC from Local Authority



গণপ্রজাতন্ত্রী বাংলাদেশ সরকার  
চেয়ারম্যান কার্যালয়

### ১নং খলিলপুর ইউনিয়ন পরিষদ

ডাকঘর: সাধুহাটি, উপজেলা ও জেলা: মৌলভীবাজার।

ই-মেইল: khalilpurup@gmail.com



স্মারক নং: ৪৬৮/২০২০

তারিখ: ০৩/১২/২০২০খ্রি:

### অবস্থানরত/পরিবেশগত অনাপত্তি সনদপত্র

- ১। আবেদনকারীর নাম : মো: আব্দুল জব্বার  
২। পিতা/স্বামীর নাম : আব্দুল মতিন  
৩। আবেদনকারীর ঠিকানা : বাসা/হোল্ডিং: ৯, গ্রাম/রাস্তা- ০২, বারিধারা, বারিধারা, ডাকঘর- গুলশান মডেল  
টাউন-১২১২, গুলশান, ঢাকা উত্তর সিটি কর্পোরেশন, ঢাকা।  
৪। কারখানা/প্রকল্পের অবস্থানগত ঠিকানা : ইউনিয়ন: ১নং খলিলপুর, থানা ও জেলা: মৌলভীবাজার।  
৫। কারখানা/প্রকল্পের তপশীল :

জেলার নাম	থানা/উপজেলার নাম	মৌজার নাম	আর এস খতিয়ান নং	আর এস দাগ নং	জমির ধরণ	মোট জমির পরিমাণ
মৌলভীবাজার	মৌলভীবাজার সদর	ব্রাহ্মনগ্রাম, জেএল নং: ০১ শেরপুর, জেএল নং: ০২	-----	-----	অকৃষি	১৬৭.৬ একর

৬। কারখানা/প্রকল্পের উৎপাদিত/উৎপাদিতব্য পণ্য/ কার্যের বিবরণ: শিল্প নগরী

উপরোক্ত তথ্যাদির আলোকে ডিবিএল ইন্ডাস্ট্রিয়েল পার্ক লিমিটেড" কারখানা/প্রকল্পকে নিম্ন বর্ণিত শর্ত সাপেক্ষে  
অনাপত্তিপত্র প্রদান করা হলো।

#### শর্তাবলী

- ১। প্রকল্প/কারখানা স্থাপন ও পরিচালনার ক্ষেত্রে পরিবেশ সংরক্ষণ আইন ও বিধি যথাযতভাবে অনুসরণ করতে হবে।  
২। পরিবেশ অধিদপ্তর হতে বিধি দ্বারা নির্ধারিত পদ্ধতিতে ছাড়পত্র গ্রহণ করতে হবে।  
৩। কর্মরত শ্রমিকদের পেশাগত স্বাস্থ্য ও নিরাপত্তা নিশ্চিত করতে হবে।  
৪। উপযুক্ত অগ্নি নির্বাপক ব্যবস্থা রাখতে হবে এবং অগ্নিকাণ্ড কিংবা অন্য কোন দুর্ঘটনার সময় জরুরী নির্গমন  
ব্যবস্থা থাকতে হবে।  
৫। বায়ু ও শব্দ দূষণ করা যাবে না।  
৬। কারখানা/প্রকল্প সৃষ্ট তরল বর্জ্য অপারিশোধিত অবস্থায় বাইরে নির্গমন করা যাবে না।

উল্লেখিত যে কোন শর্ত লঙ্ঘন করলে যথোপযুক্ত কর্তৃপক্ষ কর্তৃক কারখানা/প্রকল্পের বিরুদ্ধে আইনানুগ ব্যবস্থা  
নেওয়া যাবে।

০৩/১২/২০২০  
(অরবিন্দ পোদ্দার বাচ্চু)

চেয়ারম্যান

১নং খলিলপুর ইউপি

সদর, মৌলভীবাজার

অরবিন্দ পোদ্দার (বাচ্চু)

চেয়ারম্যান

১নং খলিলপুর ইউ.পি

মৌলভীবাজার সদর।

## Annex 2: Contract Agreement for Land Filling



ক্রমিক ৩৫৩২৭৯৯

১৫/০৬/১৯  
৩৫৩২৭৯৯৯

বিসমিল্লাহির রাহমানির রাহীম  
শ্রীহট্ট অর্থনৈতিক অঞ্চল এ ড্রেজার ঘারা  
বালি ভরাট কাজের চুক্তিনামা

১ম পক্ষ: মেসার্স মুকুল এন্টারপ্রাইজ, প্লোঃ মোঃ আমান উল্লাহ, টংগাবাড়ী, আতলিয়া, সাভার, ঢাকা, মোবাইল : ০১৭১৭-৪৭২৭২৯।

২য় পক্ষ : ১। মেসার্স কালনী এন্টারপ্রাইজ এর পক্ষে-মোঃ অলিউর রহমান, শেরপুর, মৌলভীবাজার, মোবাইল : ০১৭১৫-৮৫৯৬৬৫।

পরম করণাময় মহান আল্লাহর নামে অত্র চুক্তিপত্র শুরু করিলাম। শ্রীহট্ট অর্থনৈতিক অঞ্চল, শেরপুর, মৌলভীবাজারে অবস্থিত ডিবিএল কোম্পানীর নিচু জমি ড্রেজার ঘারা বালু ভরাট কাজ নিম্নের শর্তাবলীতে সম্পাদিত হইল।

শর্তাবলী

০১। বালুর পরিমাণ ২,০০,০০,০০০ (দুই কোটি) ঘনফুট।

০২। প্রতি ঘনফুট বালুর দ্বারা ২.৯৫/- (দুই টাকা পঁচাত্তরই পয়সা) বলচেট মেজারমেন্ট।

(চলমান পাতা)



(বিধি-১০(৬) দ্রষ্টব্য)

**নদীর তলদেশ হইতে ড্রেজিং পদ্ধতিতে বালু বা মাটি উত্তোলনের ইজারা চুক্তি ফরম।**

মনুদীনী আর্শিক-১৬ (চানপুর) বালুমহালের ড্রেজিং ইজারার চুক্তিপত্র জুনি মন্ত্রণালয়ের পক্ষে জেলা প্রশাসক/কলেজ, জেলা-মৌলভীবাজার(অতঃপর ইজারাদাতা বলিয়া অভিহিত হইবে)।

জেলা প্রশাসক, মৌলভীবাজার।

প্রথম পৃষ্ঠা

এবং

জনাব মোঃ হায়দার আলী, পিতা-মৃত মোঃ ইয়াতুর মিয়া, সাং-হামরকোনা, ডাকঘর-আফরোজগঞ্জ, উপজেলা-মৌলভীবাজার সদর, জেলা-মৌলভীবাজার, পেশা-ব্যবসা (অতঃপর ইজারা গ্রহীতা বলিয়া অভিহিত হইবে)।

দ্বিতীয় পৃষ্ঠা

এর মধ্যে ১৪২৬ বাংলা সনের জ্যৈষ্ঠ ২৬ তারিখ সম্পাদিত হইলঃ

মেহেতু ইজারাদাতা মৌলভীবাজার জেলায় অবস্থিত নিম্ন তপশিলভুক্ত বালুমহাল ও মাটি ব্যবস্থাপনা বিধিমালা, ২০১১ মোতাবেক হাইড্রোগ্রাফিক জরীপে চিহ্নিত স্থানের মালিক।

মেহেতু মৌলভীবাজার জেলার জেলা প্রশাসক (কালেক্টর) উক্ত প্রস্তাব গ্রহণ করিয়া ১৪২৬ বাংলা সনের দশম দানের তারিখ হইতে ৩০শে চৈত্র ১৪২৬ পর্যন্ত সময়ের জন্য-১৪,০০,০০০/- (চৌদ্দলক্ষ) টাকায় ইজারা প্রদানে সন্মত হইয়াছেন।

সেহেতু এখন ইজারাগ্রহীতা কর্তৃক তফসিলে বর্ণিত এবং হাইড্রোগ্রাফিক জরীপে চিহ্নিত বালুমহাল ২৬ জ্যৈষ্ঠ ১৪২৬ বাংলা তারিখ হইতে ৩০শে চৈত্র ১৪২৬ পর্যন্ত সময়ের জন্য নিম্ন বর্ণিত শর্তে ইজারা গ্রহণে স্বীকৃত হওয়ায় এবং ইজারামূল্য বাবদ সর্বমোট ১৪,০০,০০০/- (চৌদ্দলক্ষ) টাকা পরিশোধ করায় ইজারাদাতা ইজারা গ্রহীতার সহিত নিম্নোক্ত মর্মে ও শর্তে অঙ্গীকারবদ্ধ হইলেনঃ

১. নৌপথের অবকাঠামোগত পরিবর্তন করা যাইবে না।
২. মাটি কাটিবার পর LLW হইতে পার্শ্ব সর্বোচ্চ গভীরতা ১২.০০ ফুটের বেশী হইবে না।
৩. নদীর বাতাবিক বৈশিষ্ট্য অক্ষুণ্ণ রাখিমা ১:৩ ঢাল সংরক্ষণ করিয়া বালু বা মাটি উত্তোলন করিতে হইবে এবং কোন স্থানে অস্বাভাবিক গভীরতায় নদী খনন করা যাইবে না।
৪. প্যাস গ্রাইন, ওয়াসার লাইন, ড্রাইভিং লাইন ক্ষতিগ্রস্ত হলে উত্তোলনকারী নিজ দায়িত্বে ও ব্যয়ে উহা মেরামত করিতে বাধ্য থাকিবেন।
৫. বালু ও মাটি উত্তোলনকালে নৌ-চলাচলের কোন বিঘ্ন সৃষ্টি করা যাইবে না এবং রাত্রিকালে বালু বা মাটি খনন করা যাইবে না।
৬. বালু বা মাটি খননের সময় সড়ক-তাম্রাচল ব্যবস্থা হিসাবে লাল পতাকা প্রদর্শন করিতে হইবে এবং সেখানে নোংরা নির্দিষ্ট লাইন বোর্ড আছে সেই স্থানে খনন করা যাইবে না।

স্বাঃ হায়দার আলী

৭. বালু বা মাটি উত্তোলনের সময় স্থানীয় জনগণের জায়গা জমি ক্ষতিগ্রস্ত করা যাইবে না এবং ক্ষতির সম্মুখীন হইলে ইজারা গ্রহীতা নিজ উদ্যোগে তা সমাধান করিবেন। তাহাতে ইজারাদাতা কোনরূপ হস্তক্ষেপ করিবে না বা দায়ী থাকিবে না।
৮. বালু বা মাটি উত্তোলনকালে কোন প্রকার দুর্ঘটনার জন্য ইজারাদাতা দায়ী থাকিবে না। যে কোন প্রকার ক্ষয়ক্ষতির জন্য ইজারা গ্রহীতা দায়ী থাকিবেন এবং কোন প্রকার ক্ষতিপূরণের দাবী আসিলে ইজারা গ্রহীতাকে তা বহন করিতে হইবে।
৯. বালু উত্তোলন কালে নদীর তীর সংলগ্ন ফসলি জমি বা গ্রামের পরিবেশের কোন রূপ ক্ষতি সাধন করা যাইবে না।
১০. নদীর তীর জমির ঢাল (Slope) ক্ষয়খণ্ডভাবে সংরক্ষণ করিয়া বালু উত্তোলন করিতে হইবে।
১১. জীব বৈচিত্র্য সংরক্ষণ ও পরিবেশ দূষণরূক রাখিতে হইবে।
১২. বালু উত্তোলনের বিষয়ে সরকার কর্তৃক জারীকৃত সকল সার্কুলার, বিধি বিধান ও আইন সমূহ মানিয়া চলিতে হইবে। বর্ষিত কোন শর্ত ভঙ্গ করিলে জেলা প্রশাসক তাৎক্ষনিকভাবে উত্তোলন বন্ধ করিয়া দিবেন এবং ইজারা বাতিল বলিয়া গণ্য হইবে।
১৩. উত্তোলনকৃত বালু বা মাটি কোন অবস্থাতেই নদীর তীরে বা নদীতে ফেলা যাইবে না।
১৪. বালু বা মাটি উত্তোলনের সময় সরকারী, আধাসরকারী, স্বায়ত্বশাসিত ও ব্যক্তি মালিকানাধীন কোন প্রতিষ্ঠান স্থাপন বা অবকাঠামোর কোন ক্ষতি করা যাইবে না। কোন ক্ষতি পূরণের দাবী আসিলে ইজারা গ্রহীতা তা বহন করিবেন।
১৫. ড্রেজারের মাধ্যমে বালু বা মাটি উত্তোলন শেষে ড্রেজিং সংক্রান্ত যাবতীয় মালামাল (যেমন-ড্রেজার, পাইপ ইত্যাদি) ইজারা গ্রহীতা দ্রুত সইট হইতে সরাইয়া নিতে বাধ্য থাকিবেন।
১৬. প্রস্তাবিত এলাকা হইতে মাটি কাটিবার সময় নৌ-চলাচলের কোন প্রতিবন্ধকতা সৃষ্টি করিতে পারিবে না।
১৭. বালু বা মাটি উত্তোলনের ফলে নদীর তীর যাহাতে ভাংগিয়া না যায় সে দিকে লক্ষ্য রাখিতে হইবে।
১৮. মামলাজানিত বাতুমহালগুলো মামলা নিষ্পত্তি হওয়ার পর ইজারা গ্রহীতার অনুকূলে ইজারা কার্যক্রম গ্রহণ করা হইবে। এজন্য দেবীতে দখল বুকে পাওয়ার অজুহাত দেখিয়ে পরবর্তীতে মেয়াদ বৃদ্ধির আবেদন সর্বআদালতে আইনত অগ্রাহ্য হইবে।
১৯. দরপত্র যে পর্যায়ে বা সময়ে আহবান করা হোক না কেন দখল গ্রহণের পর হইতে ১৪২৬ সনের ৩০শে চৈত্র পর্যন্ত ইজারা বলবত থাকবে। দখল গ্রহণে বা গ্রহণে বিলম্ব হইয়াছে, বৃষ্টি না হওয়ায় উজান হইতে বালু আসেনি, ঘড়া, পানি প্রবাহে বাধা দেয়ার কারণে বা বাধা না ছাড়ার কারণে বাতুমহালে বালু জমা হয়নি এরূপ অজুহাতে ইজারার মেয়াদ বর্ধিত করার আবেদন দাখিল করা যাইবে না। এরূপ আবেদন সর্ব আদালতে অগ্রাহ্য হইবে।
২০. বাতুমহালের কোন অংশ পার্শ্ববর্তী দেশের সীমান্তের সন্নিহিত হলে সেখান হতে বালু উত্তোলন করা যাইবে না। সেখান হইতে বালু উত্তোলন করিতে হইলে সীমান্তরক্ষী বাহিনী (বিজিবি) কর্তৃপক্ষের অনুমতি গ্রহণ করিতে হইবে।
২১. চুক্তি শর্তের সাথে সংযুক্ত স্থায়ীভৌগোলিক অধীশ চার্টের চিহ্নিত স্থানের বাহিরে মাটি উত্তোলন করা যাইবে না।
২২. বর্ষিত কোন শর্ত ভংগ করা হইলে ইজারাদাতা তাৎক্ষনিক ভাবে উত্তোলন কার্য বন্ধ করিয়া দিতে পারিবেন এবং তাতে ইজারা বাতিল বলিয়া গণ্য হইবে।

স্বাক্ষর: হুমায়ুন কবীর

### Annex 3: MOEFCC Circular on Exemption of Economic Zones from Site Clearance

২০৫৫  
২২/৩/১৯

শেখ হাসিনার নির্দেশ  
জলবায়ুসহিষ্ণু বাংলাদেশ

শেখ হাসিনার বাংলাদেশ  
পরিচ্ছন্ন পরিবেশ

২২/৩/১৯

Government of the People's Republic of Bangladesh  
Ministry of Environment, Forest and Climate Change  
Environment Section-3  
www.moef.gov.bd

No.22.00.0000.074.18.001.17.44 Date: 19.02.2019

**Circular**

**Subject:** Standard Operational Procedure for issuing Environmental Clearance Certificate by the Department of Environment with a view to providing One Stop Service(OSS)of Bangladesh Economic Zone Authority (BEZA).

1. The Government proclaimed The Bangladesh Environment Conservation Act, in 1995 to save the environment, environmental quality improvement and control & mitigation of environmental pollution. This law is termed as The Bangladesh Environment Conservation Act, 1995 which was reformed later in 2010.

2. For fulfilling the objectives of the Bangladesh Environment Conservation Act, 1995, the Government proclaimed Environment Conservation Rules, 1997 in 1997 being empowered by Section 20 of this Act.

3. According to Section 12(1) of Bangladesh Environment Conservation Act, 1995 (Reformed 2010), as per the system of rule from the Director General, no Industrial Organization will be allowed to establish or no project will be allowed to take in any area without environmental clearance certificate.

4. In order to provide environmental clearance in Rule 7 of the Environment Protection Rules 1997, according to the impact on the environment and the location, industrial companies and projects have been divided into the following 04 (four) categories-

1. Green
2. Orange-A
3. Orange-B
4. Red

List of the industrial organizations and projects under the above-mentioned categories has been provided in schedule-1 of Environment Conservation Rules, 1997.

5. There is the rule of providing environmental clearance certificate in case of all types of existing industrial organizations and projects and Green Classes recommended industries and projects.

6. Through the SRO, published in the gazette on 20.05.2008 by the Ministry of Environment and Forests, notification was issued that no Site Clearance will be required in case of proposed industries and projects in the Export Processing Zone (Government/Private) and BSCIC industrial area. So industries/projects of category Green, Orange-A and Orange-B situated within Economic Zone, issuance of only Environmental Clearance Certificate (ECC) will be applicable.

11

In this matter for the establishment of Projects/Industries within EZ's of Green, Orange-A and Orange-B categories- the investors have to apply first with all necessary papers to DoE without going into any kind of construction works. After completion of the required procedures, the DoE will issue the ECC within the stipulated time. After expiration of the ECC, the investor has to apply for renewal to DoE.

7. In case of Red Category proposed industries and projects within Economic Zone, without the site clearance proposed Environmental Impact Assessment-EIA, ToR has been approved outright. Thereafter, EIA report has been approved if the report has been prepared following the approved ToR. After that on the basis of the stages of implementation of mitigation measures as mentioned in the EIA report Environmental Clearance Certificate (ECC) will be issued.

8. Power has been given to all district offices by the Director General to issue site/environmental clearance certificate outright in case of Green and Orange-A categories of industries and projects. Besides, in case of Orange-B cases industries and projects, power has been given to all Divisional/Regional/Metropolitan offices to issue site/environmental clearance certificate outright.

9. For the approval of clearance certificate for the Orange-B Category industries and projects, Environmental Clearance Committee has been formed in each Divisional/Regional/Metropolitan office according to the power given in Section 12(4) of Bangladesh Environment Conservation Act, 1995 (Revised 2010). As per TOR of the committee, in each meeting of Environmental Clearance Committee formed for Orange-B category, after reviewing the opinions from the district offices, application received for Site/Environmental clearance certificate of Orange-B Category of industries/projects with, approval has been given in applicable cases or if there are any lacks of information that will be highlighted in the minutes of the meeting.

#### 10. Red Category Projects/Industries

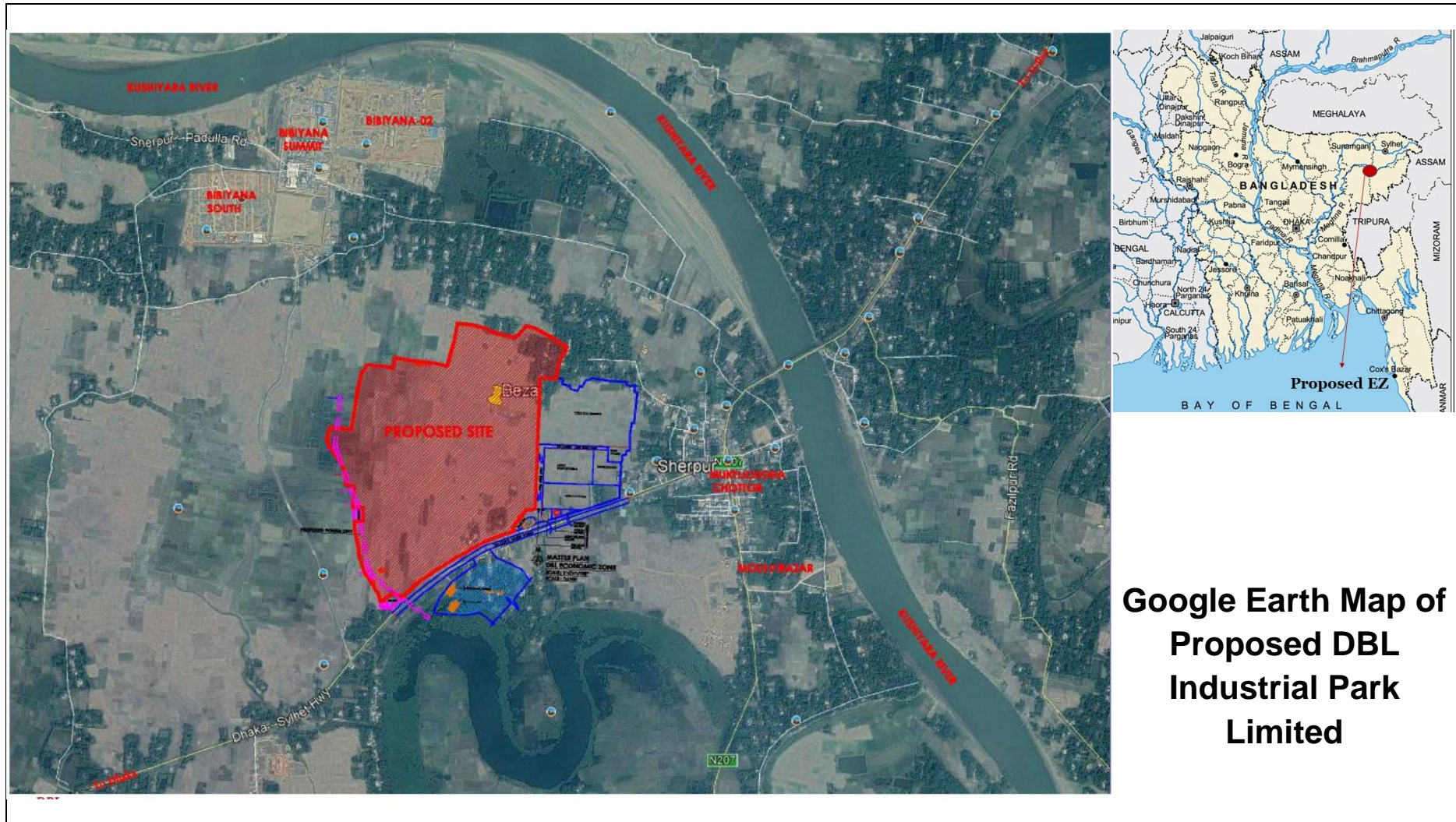
10.1. In case of Red Category of industries and projects, the ToR of the proposed EIA has been approved directly by outright by the Director General. After submitting the EIA report prepared as per the approved ToR to the respective office, that has been sent to Head Office. After that the submitted EIA report is reviewed in the meeting of Environmental Clearance committee of Head Office and in applicable cases approval is given or comments has been added to the minutes of the meeting. According to the decision of the meeting the district/divisional/regional/metropolitan office in case of red category of industries/projects has issued Letter of Approval of EIA/issue environmental clearance or issue letter if there is any lack of information. But in case of Nationally Important priority Project (e.g. Natural Gas Extraction, Gas transmission Pipeline installation, Big Power Plant etc.) after approval from Director General, EIA approval/Issuing Environmental Clearance Certificate has been done directly from the Head Office.

10.2. The primary data generated for the preparation of EIA's of EZ's which are already got an EIA Approval and ECC, can be used by the Red categories of proposed projects/industries which will be set up later on within the same EZ's. But the **'Validity Period for the use of Primary Data generation and used for the preparation of the EIA of EZs, for the use in the preparation of EIA of the Individual Projects/Industries will 5 (Five) years'**. Also, the regular monitoring data of the other industries can be used as primary data for the preparation of the EIA's of other proposed red category of industries within the same EZ's.

10.3. For the 'Red Category' of Projects/Industries after approval of the ToR and before approval of the EIA – the investor can go for some temporary work like – construction of temporary office shed, labor shed, preliminary construction of storage depot for the construction materials, temporary roads etc. But investor cannot build any permanent structure of the project.



#### Annex 4: Location of the project site



**Google Earth Map of  
Proposed DBL  
Industrial Park  
Limited**

## Annex 5: PPE arrangement



Photograph: PPE arrangements for workers



Photograph: PPE Instruments

## Annex 6: Fire-fighting arrangement



Photograph: Firefighting Arrangements on the site



## Annex 7: Application of signage



Photograph: Safety Signage on the site



## Annex 8: Current status of project



Photograph: Transformer Shed



Photograph: Fuel Store

### **Annex 9: Workers' shed with sanitary facilities**



Photograph: Accommodation for Workers



Photograph: Toilet and Cleaning Facilities

## Annex 10: Waste Inventory Sheet

WASTE INVENTORY SHEET (Process Waste)																						
																				Version 1		
Name of Company: DBL Industrial Park																						
Updated on:		30.12.2021																				
Responsible Person		Designation: Assistant Manager EHS																				
S.I.No	WASTE NAME	SOURCE OF WASTE	WASTE CLASSIFICATION (Non-Hazardous/Hazardous)	WASTE QUANTITY	UNIT	Weight (Kg)	WASTE HANDLING REQUIREMENT			WASTE STORAGE REQUIREMENT	LOCATION OF STORAGE	WASTE DISPOSAL ROUTE	APPLICABLE LEGAL PERMIT/REQUIREMENT (IF ANY)	ON-SITE TREATMENT METHOD (IF ANY)	QUANTITY OF RECYCLED WASTE (IF ANY)	APPROVED WASTE CONTRACTOR (Name, Company name, Registration no)	DATE OF LAST WASTE HANDOVER	CHALLAN NO	EMERGENCY CONTACT PERSON(NAME, DESIGNATION & CONTACT NO.)	CHECKED BY(NAME & DESIGNATION)	CHECKED ON(DATE - FORMAT DD/MM/YYYY)	REMARKS
							Labeling	Identification	PPE													
1	Wastage of Cut pic road	Construction area	Non-hazardous	2500	Kg	2500	Yes	Yes	Yes	Yes	Waste Room	Reused	ECA-95 & ECR-97	N/A	N/A				Ponkoj Ghosh Project Head 01701219536	Ariful Haque, Asst. Manager-EHS, 01322891191	30.12.2021	
2	Empty Cement Bag	Construction area	Non-hazardous	1000	Kg	1000	Yes	Yes	Yes	Yes	Waste Room	Handover to waste contractor	ECA-95 & ECR-97	N/A	N/A				Ponkoj Ghosh Project Head 01701219536	Ariful Haque, Asst. Manager-EHS, 01322891191	30.12.2021	
3																						
4																						
5																						
6																						
7																						

## Annex 11: Grievance Redress Mechanism

অভিযোগ ও পরামর্শ রেজিস্টার (Complain & Suggestion Register)														
ক্রমিক নং	কম্প্লেক্সের নাম ও বসতি	সংসদ সদস্য	কম্প্লেক্স বসতি স্থাপনকারী/স্বত্বাধীকারী	বিষয়	অভিযোগ ও পরামর্শের প্রকৃতি	অভিযোগ/পরামর্শের স্থিতি			স্থপতি	সংসদ	কম্প্লেক্স বসতি স্থাপন	সিদ্ধি/অসিদ্ধি	সংসদ	
						প্রাপ্তি	অগ্রগতি	সমাপ্তি						
১														
২														
৩														
৪														
৫														
৬														
৭														
৮														
৯														
১০														
১১														
১২														

Figure: Grievance Log Book



Photograph: Grievance box for internal and external stakeholders



## Annex 12: Public Consultation with community peoples







### Annex 13: Consultation with local authority



## Annex 14: EHS Training

DBL Industrial Park Ltd BEZA, Sylhet	
	<b>Training on Environment, Health &amp; Safety</b> <b>(Compliance with ADB/IFC/WBG/National Law &amp; Regulation)</b>
<b>Day &amp; Date</b> Sunday 28.2.2021	<b>Venue</b> 2nd Floor Conference Room, Corporate Office, DBL Group
<b>Starting Time</b> : 11:00AM <b>Closing Time</b> : 12:00 PM	
Image of Training Class:	
	
<b>Trainer:</b> Md. Rafiqul Islam, Manager-EMS	<b>Target Group</b> Management & Staff
<b>Topic:</b> Scope of the EHS Guidelines General Environmental, Health and Safety Guideline (EHSG) Details Requirements of IFC/WBG/ADB/National Law and Regulation for EHS Guidelines of IFC/WBG EHS ADB SPS Understand for EHS Standard	<b>Coordinator</b> Ms. Rubiya Kabir Asst. Manager, DBL Group
	<b>Reporting Date</b> 28.2.2021
	<b>Number of Participants</b> 11



# EHS & OHS Training

Date :25:12:2021 Time : 8:00 to 8:30

Today we arrange an awareness training about EHS & OHS training with 50 Construction worker.

Our Dream...- Safe Working place, Clean water, Fresh air, Fertile soil, Healthy people.

## The Topic of The Training



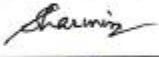


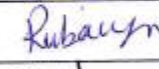
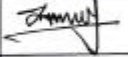
- **General health & safety**
- **Work place safety**
- **Personal protective equipment (PPE)**
  - Head protection
  - Hearing protection
  - Eye protection
  - Hand protection
  - Foot protection
- **What is environment and its importance**
- **Cement and concrete**
- **Housekeeping and general considerations**
- **Fuel & chemical management**
- **Pollution of water courses**
- **Use of electricity**
- **Waste disposal**
- **First aid**
- **Fire safety**
- **Preventive measures**

Photograph: EHS Training



## Attendance Sheet of Meeting

DBL Industrial Park Ltd

Date:	22/02/2021			
Day:	Sunday			
Time:	11:00 am			
Venue:	2nd floor conference room, DBL corporate office			
Subject:	Training on Environment, Health & Safety (EHS)			
Sl.No.	Name	Designation	Factory Name	Signature
01.	Syed khaleduzzaman	Engineer	Group Common	
02.	Ranjoy Kumar Ghosh	D.B.M. Construction	Group Common	
03.	Shahida Sharmin	Asst. Manager	"	
04.	Sharmin Sultana	Manager	"	
05.	MOHAMMED ZAHIDULLAH	CHIEF SUSTAINABILITY OFFICER	GROUP COMMON	
06.	Rubaiya Kabir	Asst. Manager	GROUP COMMON	
07.	Md. Nur-E-Atom	S. Executive	CH.O	
08.	Md. Abdul Malek	Dy. Project Manager	DBL Group	Online
09.	Md. Belal Mia	Project Engineer	DBL Group	Online
10.	Md. Ariful Islam	Asst. Project Manager	DBL Group	Online
11.	Md. Dipu Sardar	Store officer	DBL Group	Online

Photograph: Participant List/Attendance Sheet



ডিবিএল ইন্ডাস্ট্রিয়াল পার্ক  
শ্রীহট্ট অর্থনৈতিক অঞ্চল, মৌলভীবাজার, সিলেট।

তারিখ: 25.12.2021

অংশগ্রহণকারীদের নামের তালিকাঃ

ক্রঃনং	নাম	আইডি	পদবী	স্বাক্ষর	মন্তব্য
০১	আফ্রোজা জাহান্না		নেতাব	আফ্রোজা	
০২	সোনিয়া		৭	Sabana	
০৩	সোনিয়া		৭	Sabana	
০৪	জাহান্না		৭	জাহান্না	
০৫	সুহিত		৭	সুহিত	
০৬	সুহিত		৭	সুহিত	
০৭	লিটন		৭	Liton	
০৮	ফারুক		৭	Fayuk	
০৯	পারভেজ		৭	পারভেজ	
১০	সাজু		৭	সাজু	
১১	জোহন		৭	জোহন	
১২	হেলাল		৭	Habib	
১৩	মিলন		৭	মিলন	
১৪	নারায়ণ		৭	নারায়ণ	
১৫	সুহিত		৭	সুহিত	
১৬	সোনিয়া		৭	Sabana	

ইএইচএস

Pankoj Kumar Ghosh  
JGM (Construction)  
DBL Group

কার্তৃপক্ষ



ডিবিএল ইন্ডাস্ট্রিয়াল পার্ক  
শ্রীহট্ট অর্থনৈতিক অঞ্চল, মৌলভীবাজার, সিলেট।

তারিখঃ 25.12.2021

অংশগ্রহণকারীদের নামের তালিকাঃ

ক্রঃনং	নাম	আইডি	পদবী	স্বাক্ষর	মন্তব্য
০১	জিল্লু মিয়া		এমবায়	Ethru	
০২	আলিম		৫	Alim	
০৩	জালাল		৫	জালাল	
০৪	আবদুল		৫	আবদুল	
০৫	বিল্লাল		৫	Bellal	
০৬	রহমান		৫	রহমান	
০৭	লুৎফ		৫	লুৎফ	
০৮	হাবিবুল		৫	হাবিবুল	
০৯	আবদুল		৫	আবদুল	
১০	মন্ডল		৫	Mondal	
১১	জাতিয়াহন		৫	জাতিয়াহন	
১২	জুবায়ের		৫	জুবায়ের	
১৩	আলী		৫	Ali	
১৪	আবদুল		৫	আবদুল	
১৫	রিসন		৫	Rison	
১৬	আবদুল		৫	আবদুল	

ইএইচএস

Bankoj Kumar Ghosh  
DGM (Construction)  
DBL Group  
কর্তৃপক্ষ

Photograph: Participant List/Attendance Sheet



Photograph: EHS/OHS Training Assembly



## Annex 15: COVID – 19 Measures and PPE Distribution

### Checklist: Covid-19 Prevention and Safety Guidelines

DBL Industrial Park

Shreehatta Economic Zone, Moulvibazar, Sylhet

	<b>Covid-19 Preventive Measure / Action</b>	<b>Status</b>
1	Provide transportation to employees to and from the factory whereby safe distancing can be maintained in the vehicle	Yes
2	Provide protective nose and mouth face mask to each employee and each person in the chain of activity with your factory	Yes
3	Have trained persons check workers and entrants to the factory premises temperature with forehead style scanner thermometers	Yes
4	Have all persons who are allowed entry to the factory premises thoroughly wash hands with soap and water or sanitize hands with alcohol based hand sanitizer. Hand washing and hand sanitizing should be done regularly during the day	Yes
5	Do not allow workers with fever to return to factory facilities until s/he is free of fever for at least 24 hours	Yes
6	Post signs / poster prominently throughout the factory premises with information on preventing Covid-19 (hand sanitizing, frequent handwashing with soap, social distancing, wearing protective mask, avoid touching eyes, nose, mouth)	Yes
7	Establish departmental level teams to work with the safety committee on the day-to-day implementation of safety and preventative measures	Yes
8	Restrict non-essential visitors from visiting the factory facilities	Yes
9	Utilize the EHS committee to communicate, motivate, and apply the safety and preventive measures. Conduct start-to-the-day brief meetings of the safety committee each day for these purposes. Conduct a weekly meeting of the safety committee to more fully assess implementation	Yes

## PPE Distribution List

### ডিবিএল ইন্ডাস্ট্রিয়াল পার্ক

শ্রীহট্ট অর্থনৈতিক অঞ্চল, মৌলভীবাজার, সিলেট।

চলমান যন্ত্রপাতিতে বা উহার সল্লিকটে কর্মরত শ্রমিক এবং ব্যক্তিগত নিরাপত্তা উপকরণ প্রদানের রেজিস্টার

[ধারা ৬৪(১), ৭৮(১)(ক) ও ৭৯(ঘ) এবং বিধি ৫৭(১), ৬৭(৩) ও ৬৮(৯) দ্রষ্টব্য]

ফর্ম-২৩

- ১। কারখানা / প্রতিষ্ঠানের নামঃ ডিবিএল ইন্ডাস্ট্রিয়াল পার্ক  
 ২। কারখানা / প্রতিষ্ঠানের ঠিকানাঃ শ্রীহট্ট অর্থনৈতিক অঞ্চল, মৌলভীবাজার, সিলেট।

ক্রমিক নং	শ্রমিক রেজিস্টারের ক্রমিক নং	শ্রমিকের নাম	বয়স	কাজের প্রকৃতি	আটসাঁট পোশাক ও ব্যক্তিগত নিরাপত্তা উপকরণ প্রদানের বিবরণ ও তারিখ	উক্ত কাজের জন্য শ্রমিককে প্রদানকৃত উপকরণের বিবরণ	শ্রমিকের স্বাক্ষর বা টিপসহি	মন্তব্য
১	২	৩	৪	৫	৬	৭	৮	৯
		রুমজান আলী	৩২	বন্দর প্রকল্প	জেনারেল, বুট, গ্লোব, হ্যাণ্ডস	হ্যাট	৭৪৬৭৭	
		জিগ্মা মিয়া	২৬	৫	বুট, গ্লোব, হ্যাণ্ডস	৫	জিগ্মা	
		রুফাত জাহিদ	২৬	৫	জেনারেল, বুট, গ্লোব, হ্যাণ্ডস	৫	রুফাত	
		জুমায়েন জাহিদ	২৮	৫	জেনারেল, বুট, গ্লোব, হ্যাণ্ডস	৫	জুমায়েন	
		জামিম উদ্দিন	২৩	৫	৫	৫	Gasim	
		সুনজার মিয়া	২৭	৫	৫	৫	সুনজার	
		রুকন মিয়া	২৬	৫	৫	৫	Rokon	
		জামিম মিয়া	২৬	৫	বুট	৫	জামিম	
		জামিম মিয়া	২৬	৫	হ্যাণ্ডস	৫	জামিম	
		সুজন	৩২	৫	বুট, হ্যাণ্ডস, গ্লোব	৫	সুজন	
		রিসন	৩০	৫	বুট, হ্যাণ্ডস, গ্লোব, জেনারেল	৫	রিসন	

## Annex 16: EHS Committee

### ডিবিএল ইন্ডাস্ট্রিয়াল পার্ক

শ্রীহট্ট অর্থনৈতিক অঞ্চল, মৌলভীবাজার, সিলেট।

### পরিবেশ, স্বাস্থ্য এবং নিরাপত্তা কমিটি

### Environmental Health & Safety Committee -2021

#### কমিটি গঠনের লক্ষ্য ও উদ্দেশ্য :

১. শ্রম আইনের যাবতীয় নিয়ম-কানুন মেনে অত্র কারখানার অভ্যন্তরীণ নিয়মাদি কর্মপরিবেশ নিশ্চিত করা
২. সুন্দর কর্ম পরিবেশ নিশ্চিত করার জন্য সুন্দর পরিবেশ, সুস্বাস্থ্য এবং নিরাপত্তা নিশ্চিত করা।
৩. পরিবেশগত রোগব্যাধি, অগ্নি দুর্ঘটনা সম্পর্কিত বিপদ হতে শ্রমিকদের রক্ষা করা এবং পরিবেশকে দূষণ হতে রক্ষা করা।
৪. উচ্চিষ্ট দ্রব্যাদিকে সঠিকভাবে আলাদা করা, এবং এগুলো যথাযথ সংরক্ষণ করে এর যথাযথ বহন এবং বিন্যাস ব্যবস্থাপন নিশ্চিত করা।
৫. শ্রমিকদেরকে আত্মরক্ষামূলক সরঞ্জামাদি ব্যবহারকরনের মাধ্যমে তাদেরকে দুর্ঘটনা, ধূলাবালি, ধোয়া, গ্যাস ইত্যাদি এবং অন্যান্য দূষিত পরিবেশ হতে রক্ষা করা।
৬. শ্রমিকদেরকে আত্মরক্ষামূলক সরঞ্জামাদি ব্যবহার ও ব্যবহারের গুরুত্ব সম্পর্কে প্রশিক্ষণ প্রদানকরা।
৭. শ্রমিকদেরকে পরিবেশ, স্বাস্থ্য ও নিরাপত্তা সম্পর্কে জ্ঞান দান করতে হবে এবং তাদেরকে এর নীতি অনুযায়ী পরিচালনা করতে হবে।

এই উদ্দেশ্যে ম্যানেজমেন্ট নিম্নলিখিত ব্যক্তিবর্গকে এই কমিটির সদস্য হিসেবে নির্বাচন করেছেনঃ

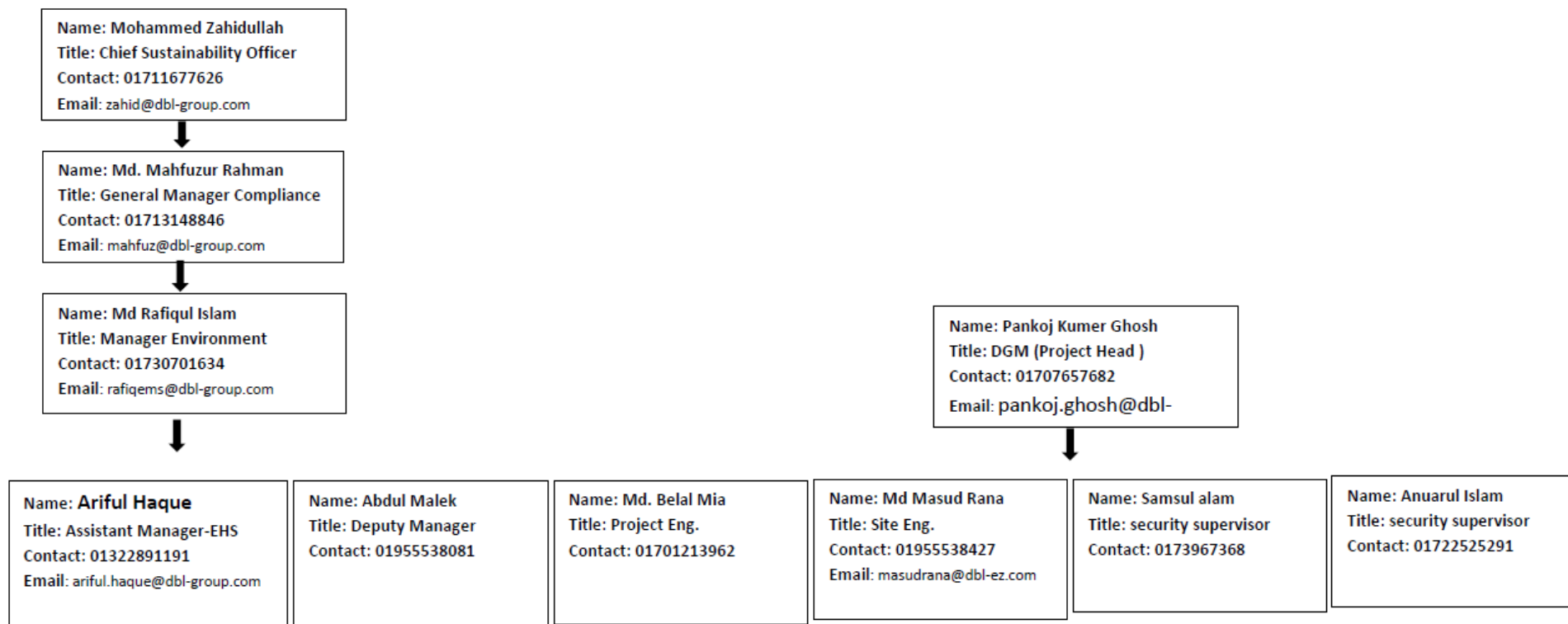
নাম	পদবী	
মোহাম্মদ জাহিদুল্লাহ	চিফ সাস্টেনিবিলিটি অফিসার	সভাপতি
মোঃ মাহফুজুর রহমান	জি.এম গ্রুপ কমপ্রায়েল	সহ - সভাপতি
আরিফুল হক	অ্যাসিস্ট্যান্ট ম্যানেজার ই.এইচ.এস	সেক্রেটারী
মোঃ রফিকুল ইসলাম	ম্যানেজার এনভায়রনমেন্ট	মেম্বর
পঙ্কজ কুমার ঘোষ	ডি.জি.এম প্রজেক্ট হেড	মেম্বর
আব্দুল মালেক	ডেপুটি ম্যানেজার কনস্ট্রাকশন	মেম্বর
মোঃ বেলাল মিয়া	প্রজেক্ট ইঞ্জিনিয়ার	মেম্বর
মোঃ মাসুদ রানা	প্রজেক্ট ইঞ্জিনিয়ার	মেম্বর
সামসুল আলম	সিকিউরিটি সুপারভাইজার	মেম্বর
আনুয়ারুল ইসলাম	সিকিউরিটি সুপারভাইজার	মেম্বর

## Annex 17: Environmental Safeguard Personnel in EHS Organogram

### DBL Industrial Park

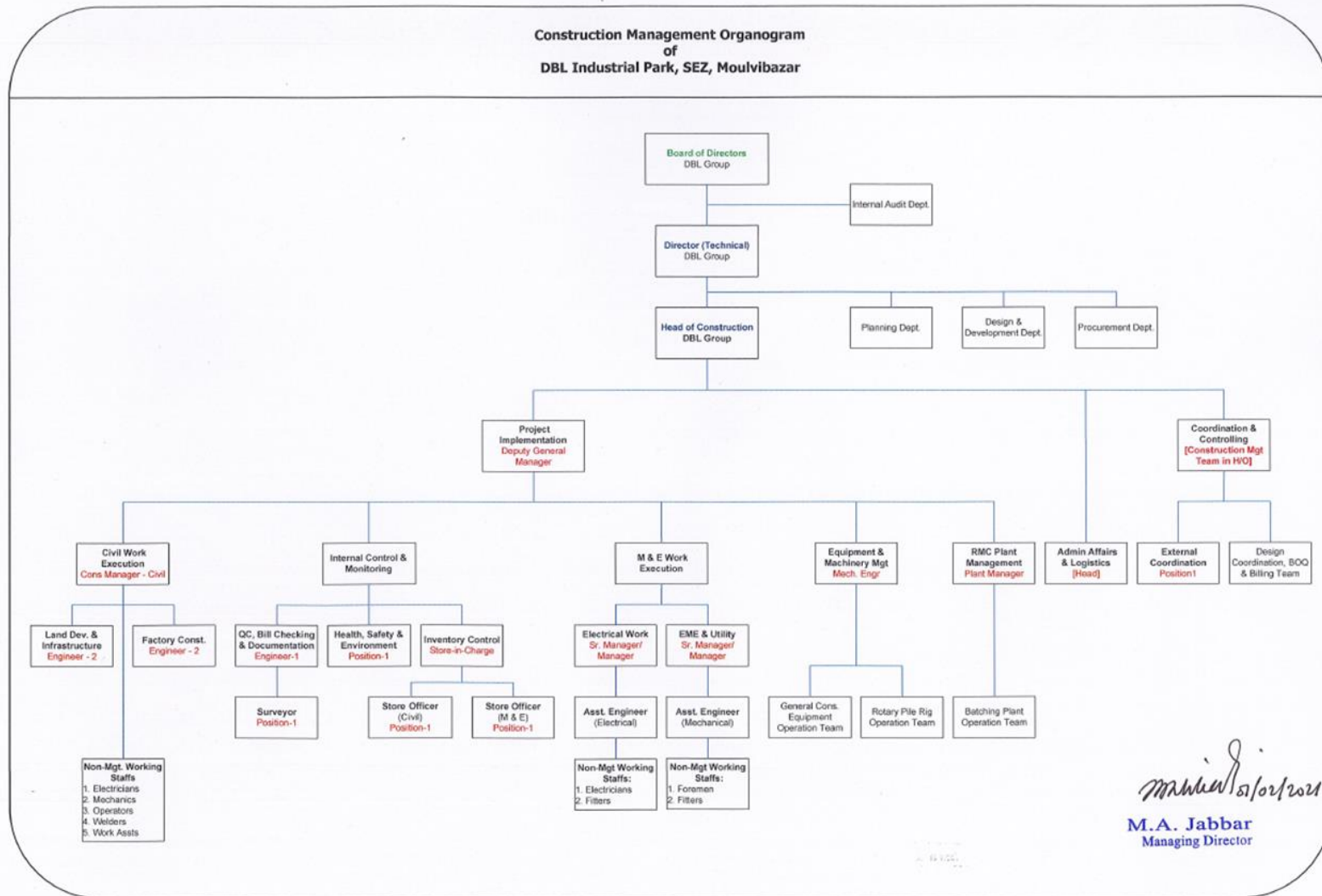
Shreehatta Economic Zone, Moulvibazar, Sylhet

#### EHS Team Organogram





## Annex 18: Implementation Arrangement



## Annex 19: Environmental Sampling Location Map

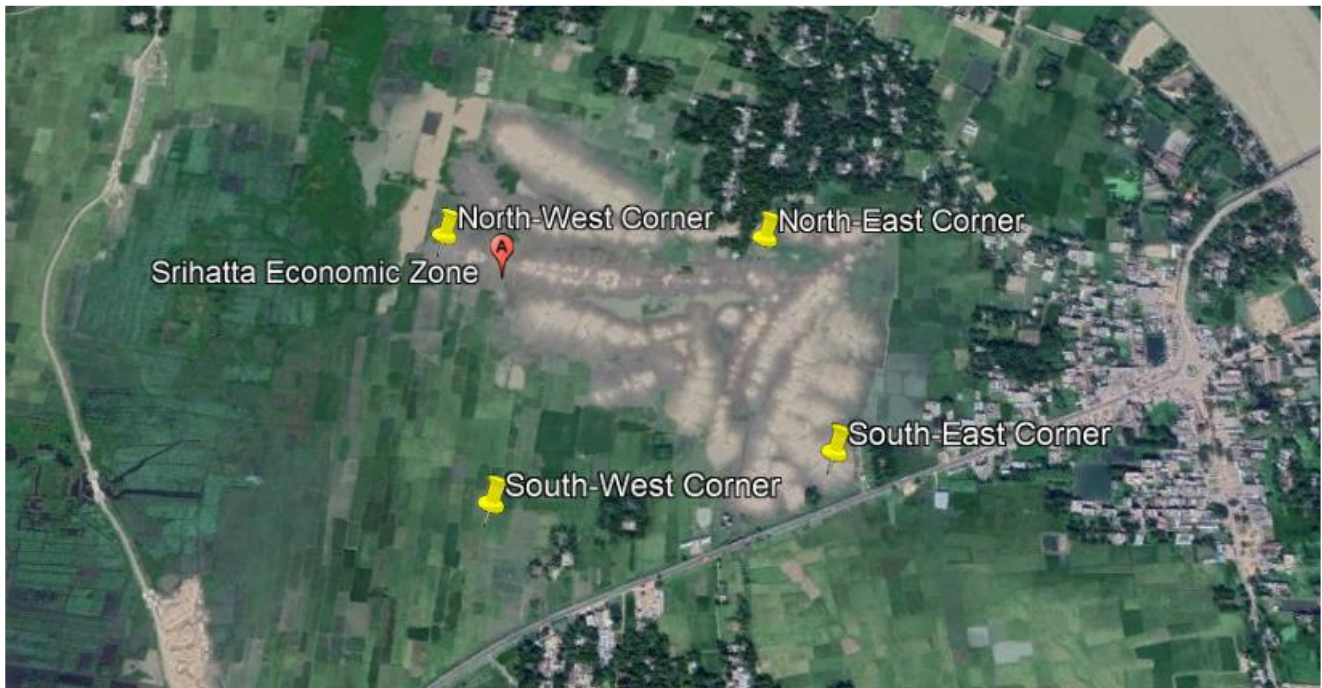


Figure: Air Quality Sampling Locations



Figure: Noise Level Sampling Locations





Figure: Surface Water Sampling Locations

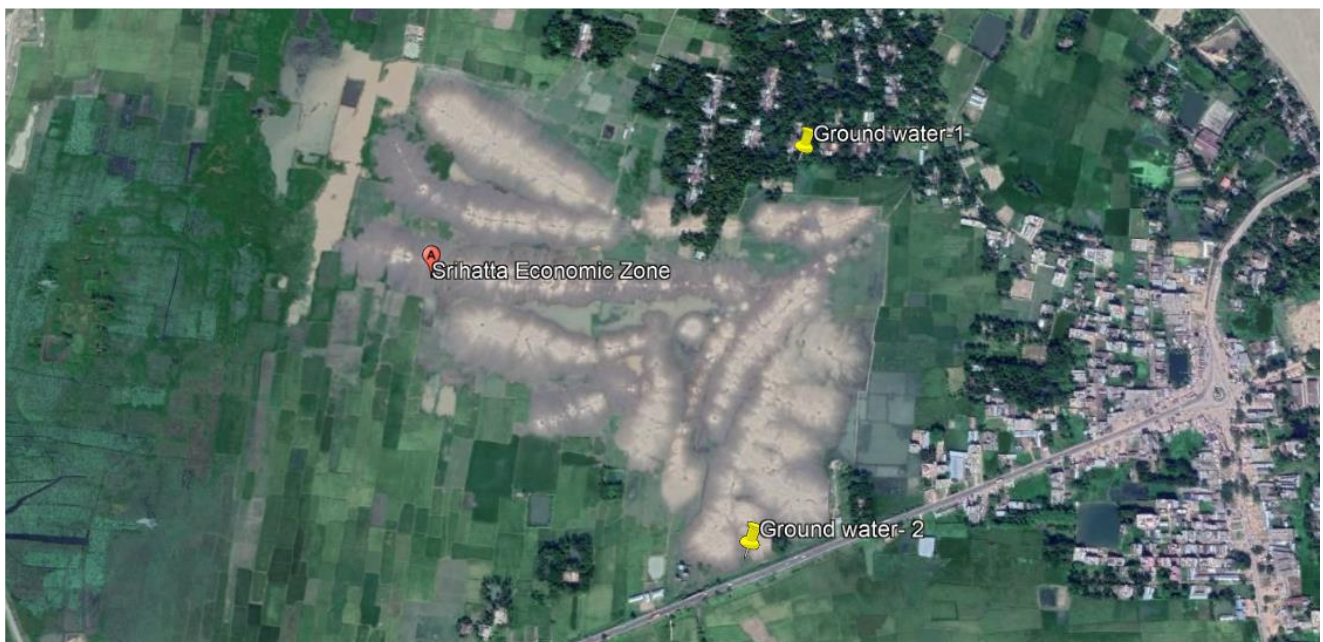


Figure: Groundwater Sampling Locations



## Annex 20: Environmental Monitoring Sample Collection











## **Annex 21: Laboratory Test Reports for Environmental Monitoring**

**See the attached file**

## Annex 22: Injury/Accident Register Format

ফর্ম - ২৮

{ধারা ৮০ বিধি ৭৩(১) দ্রষ্টব্য}

দুর্ঘটনা ও বিপজ্জনক ঘটনার রেজিস্টার এবং মাসিক দুর্ঘটনার প্রতিবেদন ছক

কারখানার নাম ও ঠিকানা : ডিবিএল ইন্ডাস্ট্রিয়াল পার্ক

কারখানা বা প্রতিষ্ঠানের ঠিকানা : শ্রীহট্ট অর্থনৈতিক অঞ্চল, মৌলভীবাজার, সিলেট।

ব্যবসা/সেবা/উৎপাদন প্রক্রিয়াসমূহের ধরন :

ক্রমিক নং	দুর্ঘটনা কবলিত ব্যক্তির নাম, কার্ড নং ও পদবী	দুর্ঘটনা বা বিপজ্জনক ঘটনার তারিখ ও সময়	পরিদর্শকের নিকট নোটিশ প্রদানের তারিখ (যদি আহত শ্রমিক দুই কর্মদিবসের অধিক কাজে যোগদানে অসমর্থ হয়)	দুর্ঘটনা বা বিপজ্জনক ঘটনার প্রকৃতি (সামান্য/গুরুতর/মৃত্যু) জখমের বর্ণনা (আঘাতের স্থান/ধরন) ও ঘটনার সংশ্লিষ্ট বিবরণ	কাজে প্রত্যাবর্ত নের তারিখ	আহত শ্রমিক যত সময় কাজে অনুপস্থিত ছিলেন	চিকিৎসাধীন হাসপাতাল/ ক্লিনিক/ চিকিৎসকের নাম	উপার্জন ক্ষমতা হানির শতাংশ/ ক্ষতিগ্রস্ত প্রদান সংক্রান্ত তথ্য (যদি প্রাপ্য হয়)	মন্তব্য
(১)	(২)	(৩)	(৪)	(৫)	(৬)	(৭)	(৮)	(৯)	(১০)



## Annex 23: Monthly Injury Statistics

### DBL Industrial Park Shreehatta Economic Zone, Moulvibazar, Sylhet

Monthly Injury Statistics.

Month: December 2021

Name of Occurrence/Date	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Total
Head Injury																																0
Construction Work																																0
Hand Injury																																0
Construction Work																																0
Foot Injury by																																0
Construction Work																																0
Machine Injury																																0
Burn																																0
Chemical Injury																																0
Slip, trip & fall																																0
Injury																																0
Others																																0
Total																																0

Provable corrective action	Corrective action taken Date	Follow up	Remarks
Awareness training will be given		Next month	

Prepared by: DIP Security

Checked by:

Pankaj Kumar Ghosh  
Asst. Manager (Production)  
DBL Group

## Annex 24: Dust Control Measures in the project site



## **Annex 25: SOP For Waste Disposal System**

Please see the attached file.

## **Annex 26: Health & Safety Management Manual**

Please see the attached file.

**Annex 27: Annual Working Plan (Environmental and Social Compliance Work Schedule)**  
**(January 2022 to December 2022)**

## **DBL Industrial Park Limited.**

Shreehatta Economic Zone, Moulvibazar, Sylhet.

### **Environmental and Social Compliance Work Schedule**

Auditor: Ariful Haque , Assistant Manager-EHS

NO	Activities	Timeline
1	Implementation of the Project in accordance with the commitments in the Project Documents, including the ESIA	For the life of the Project.
2	Air Quality Monitoring	Quarterly
3	Noise Quality Monitoring	Quarterly
4	Surface water and Ground water Quality Monitoring	Quarterly
5	Internal Audit social and Environment	Monthly
6	Chemical inventory	Monthly
7	Training on EHS	Monthly
8	Training on Chemical	Monthly
9	Training on waste management	Monthly
10	OHS Checking	Weekly
11	Aspect and impact register	Quarterly
12	Environmental impact Identification	Quarterly
13	Promoting community health and safety through awareness programs	Quarterly

  
Ariful Haque  
Assistant Manager (EHS)  
Compliance Department  
DBL Industrial Park Limited.