

Semi-annual Environmental Monitoring Report

Project No. 42466-017
June 2020

Skills for Employment Investment Program (SEIP)
Tranche 3

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ADB Loan Number 3839-BAN (COL): Skills for Employment Investment Program (SEIP) Tranche 3

Prepared by Skills Development Coordination and Monitoring Unit (SDCMU), Skills for Employment Investment Program (SEIP) under Finance Division, Ministry of Finance and The Asian Development Bank

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List of Acronyms

1. BACI= Bangladesh Association of Construction Industry
2. BITAC= Bangladesh Industrial Technical Assistance Center
3. BMET= Bureau of Manpower, Employment and Training
4. CBLM= Competency-Based Learning Material
5. CS= Competency Standard
6. EARF= Environmental Assessment and Review Framework
7. EMP= Environmental Management Plan
8. IEE= Initial Environmental Examination
9. KOICA= Korea International Cooperation Agency
10. MoU= Memorandum of Understanding
11. NHRDF= National Human Resource Development Fund
12. NSDC= National Skills Development Council
13. NSDP= National Skills Development Policy
14. PKSf= Palli Karma-Sahayak Foundation
15. RF=Resettlement Framework
16. SWAp= Sector Wide Approach
17. SEIP= Skills for Employment Investment Program
18. SECPF= Small Ethnic Communities Planning Framework
19. SECPP= Small Ethnic Communities Peoples Plan
20. SPS= Safeguard Policy Statement
21. TMS= Training Management System
22. TTC= Technical Training Center
23. TVET= Technical and Vocational Education and Training

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Executive Summary:

Under Tranche 3, SEIP supports the construction of two training facilities at the Bangladesh Industrial Technical Assistance Centre (BITAC) at Tejgaon, Dhaka and Bangladesh Association of Construction Industry (BACI) at Uttara, Dhaka. The initial environmental examination (IEE) report, along with environmental management plan (EMP) has been prepared for the proposed sites. From the environmental aspects, the project has been categorized as B for environment under the ADB's SPS. The environmental category of the sub-project is not listed in Schedule – 1 of ECR. However, the construction of Training center is relevant to the multistoried building, hotel etc. which is listed in Schedule – 1 of ECR and falls in Orange B.

The semi annual report presents the status of sub project implementation, details of compliance with environmental regulations of the Government and policies of ADB, details of compliance with environmental loan covenants and the status of compliance with various aspects of EMP as stated in the IEE reports. In this report the performance indicators of environmental works under the proposed civil works of tranche 3 has been summarized and analysed to check the monitoring parameters.

This is the first semi-annual report under the SEIP tranche 3 program and in this reporting period no physical works were commenced. The bidding documents have been prepared for the both packages (WD01 & WD02) and reviewed by ADB. The environmental issues and bill of quantities for EMP cost were included in the bid document. The bidding documents have been issued for the both packages and expecting to commence the construction work in Q3 2020.

Though Tranche 3 program have started from January 2020 but training did not commence due to COVID 19 lockdown situation.

In line with the IEE, there is no threat of hampering resettlement of small ethnic community people, or agricultural land due to project, SDCMU will ensure all applicable laws and regulations, relating to environment, health and safety, involuntary resettlement and small ethnic communities' safeguards.

The subprojects are going to commence in the next quarter and the preparatory activities mentioned in the IEE should be completed. However the following upcoming activities are recommended for the next course of action:

- Monitoring the pre construction activities
- Engagement of Environmental specialist
- Nominate focal person at BITAC & BACI for environmental safeguard monitoring.
- Prepare Site specific environmental plan (SEMP)
- Take mitigation measure for preconstruction activities.

I. Introduction:

1.1 Background

The Skills for Employment Investment Program (SEIP) will support the Government of Bangladesh's reforms in skills development articulated in the National Skills Development Policy (NSDP). It will catalyze the private sector to provide market responsive skills development and strengthen public training institutions to ensure skills development is responsive to identified industry skills needs and emerging labor market trends. Large-scale private sector involvement and public-private partnership is critical in reducing existing skills gap and enabling Bangladesh to move from the current "low-skill, low-wage equilibrium" to a higher skill, higher wage equilibrium. The investment program will assist the government to scale up skilling of new entrants and upskilling of existing workers to increase their productivity and income levels, which in turn will contribute to accelerating economic growth in priority sectors. The investment program builds on the government's ongoing efforts to strengthen the skills development ecosystem by establishing a unified funding mechanism and enhancing overall coordination of the fragmented skills development system.

1.2 Impact and Outcome

1. The impact will be increased income and productivity of the working population aged 15 and over, aligned with NSDP. The outcome will be increased employment in priority sectors and skills for males and females.

2. The outcome for Tranche 1 will be increased inclusive access to skills training in priority sectors. The outcome for Tranche 2 will be increased inclusive access to basic, mid-level, and managerial skills training in priority sectors. The outcome for Tranche 3 will be increased inclusive access to basic, mid-level, and advanced skills training in priority sectors.

1.3 Outputs

The SEIP will be delivered over three overlapping interrelated tranches and will include four outputs: (i) market responsive inclusive skills training delivered; (ii) quality assurance system strengthened; (iii) institutions strengthened; and (iv) monitoring and management for skills development strengthened.

1.4 Scope of the project

Tranche 3 will support the renovation and transformation of BITAC in Dhaka, which was originally established under the Ministry of Industries for the development of light engineering industry through training programs and consultancy services for small and medium businesses. BITAC training facilities will be renovated to offer higher-end job-ready training courses in precision engineering, mechatronics, and electrical technology. The renovated BITAC will also focus on R&D and innovation for the enhancement of industry performance and prototype product development, in close collaboration with industries. The new BITAC building will set up an Industry Cooperation Center to support the upskilling of industry personnel and to foster close collaborations with the industry. In addition, Tranche 3 will support the construction of training facilities for BACI to expand the training capacity in the construction sector.

1.5 Environmental Safeguards Category

Tranche 3 will support the renovation of BITAC training facilities and the new construction of BACI training facilities for construction skills training. Hence, Tranche 3 is classified as

Environment Category B. Initial environment assessments have been carried out for the two sites of BITAC and BACI facilities, and environment management plans have been prepared in accordance with the environmental assessment review framework. Any potential environment impacts during construction are considered manageable as outlined in the environment management plan. Additional sites for upgrading training facilities may be identified for support under Tranche 3. Accordingly, the environment review framework had been updated.

1.6 Physical progress of civil works:

The new BITAC building will be constructed in the BITAC premises at Tejgaon, Dhaka and the new training facilities for BACI at Uttara, Dhaka. The list of expected civil works contracts and estimated time for advertisements is below:

Table 1: Civil works under Tranche 3 of SEIP.

Contract No. and Name	Amount (\$ million)	Current Status	Estimated Time for Issuing Bid Documents
WD-01: Renovation of BITAC Training Center (NCB)	7.50	NOL for Bid documents received from ADB which is under bidding process.	The bid documents issued on 28 th June 2020.
WD-02: Renovation of BACI Training Center (NCB)	3.00	After receiving NOL from ADB, Bid floated on 6 th March 2020 and Bid evaluation is ongoing now.	Bid documents issued on 6 th March 2020

1.7 Scope of the report & Reporting period

The scope of this monitoring report is specific to the sub-project for the construction of BITAC training center and BACI training center. This report also cover the evaluation of effect of the mitigation measures described in the environmental management plan for the proposed constructions and renovation of training facilities by the Bangladesh Industrial Technical Assistance Centre (BITAC) at Tejgaon, Dhaka and Bangladesh Association of Construction Industry (BACI) at Uttara, Dhaka. **The reporting period is January to June 2020.**

1.8 Purpose of monitoring reports

The Semi Annual Environmental Monitoring Report(EMR) presents the status of sub project implementation, details of compliance with environmental regulations of the Government and policies of ADB, details of compliance with environmental loan covenants, details of complaints received and their redressal and the status of compliance with various aspects of EMP as stated in the IEE reports. In this report the performance indicators of environmental works under the proposed civil works of tranche 3 has been summarized and analysed to measure the monitoring parameters. This semi-annual environmental monitoring report consists of three main parts: an introduction section, Environmental monitoring, Environmental management and conclusion.

1.9 Package and sub-project wise progress status

SEIP Tranche 3 has been started from January 2020 consisting of four outputs. The detail of the activities along with progress are provided below:

Output-1: Market responsive inclusive skills training delivered

The SEIP aims to improve job skills of new entrants and the existing workforce in priority economic sectors identified by the government, in order to ensure required skills are available according to industry standards. The priority sectors targeted by SEIP under Tranche 1 are: (i) readymade garment and textile, (ii) construction, (iii) information technology (IT), (iv) light engineering and manufacturing, (v) leather and footwear, and (vi) shipbuilding. Three additional sectors are supported in Tranche 2: (i) agro-processing, (ii) tourism and hospitality, and (iii) nursing and caregiving. For Tranche 3, the renewable energy sector has been chosen for skills training which is under process. The process of developing and approval of business plans for the implementing partners are ongoing. Though Tranche 3 program have started from January 2020 but training did not commence due to COVID 19 lockdown situation.

Output-2: Strengthening of Quality Assurance System

Tranche 3 will continue to support training of trainers, industry assessors and principals/managers from public and private training providers. The formation of master trainers will continue through a series of training programs, and master trainers will be engaged to deliver the training of trainers (TOT) programs. To further upskill the knowledge and domain skills of trainers, especially for advanced skills programs, trade-specific intense overseas training programs will be implemented for selected trade areas. MoU has been signed among SEIP, BITAC & Korea University of Technology and Education (KOREATECH) for developing BITAC as modern Training center and shared the midterm report with BITAC & SEIP

Output-3: Strengthening of Institutions

- The Detail Engineering design and Drawings for the proposed BITAC training center with bidding documents also have been finalized with prior reviewed by ADB. The bid was floated on 28th June 2020 and the expected time for commence of civil works in Q3, 2020. In the last Quarter, BITAC also prepared the site ready for construction work by auctioning (followed to government procedures) the existing small building.
- The Detail Engineering design and Drawings for the proposed BACI training center along with bidding documents also have been finalized with prior reviewed by ADB. The bid was floated on 6th March 2020 which is under the evaluation and the expected time for commence of civil works in Q3, 2020.

Output-4: Monitoring and management for skills development strengthened

Tranche 3 will support SDCMU to roll out an online financial management system (FinMan) and to implement comprehensive financial management capacity building programs that include (i) orientation workshops on FM manual and other financial management requirements under SEIP training; (ii) follow-up capacity building at the field level to provide hands-on support to financial management personnel; and (iii) continuous

follow-up and support to carry out all FM requirements under SEIP. The implementation of the above activities are in under process.

1.11 Status of IEE/EIA

IEE for the subproject of Skills for Employment Investment Program (Tranche 3) for Construction of two new training centers was prepared by SEIP in June 2019 and it was approved by the ADB. The sub projects have been classified as Category B as per the ADB Environmental Policy. ADB and SEIP disclosed the IEE and the recommendations will be followed during the construction phase.

1.12 Status on relevant GOB permits:

Site clearance has been received from relevant departments (Civil Aviation Authority, Fire service department & Rajuk). The construction permits are under process of approval from the city authority-Rajuk and it is being delayed due to COVID-19 pandemic since March, 2020. In this situation, it is expecting that we will receive the permission in the next quarter.

1.13 Summary Qualitative and quantitative monitoring data.

The construction works of BITAC and BACI training centers were not commence during this reporting period. However the qualitative and quantitative data will be collected according to the guidance of IEE.

1.14 Monitoring parameters/Indicators and methods

The construction works of BITAC and BACI training centres are under bidding stage and will be started in the next quarter. However, the following parameters will be monitored as per the EMP stated in the IEE.

Table 2 Environmental Monitoring Parameters & Methods for the subproject:

No	Environmental Issues /Parameters	Monitoring Method		
		Method	Location	Duration / Frequency
1. Pre-Construction Phase				
1.1	Tree plantation	Visual inspection	In the site	During the pre-construction period
2. Construction Phase				
2.1	Topography and Landscape Changes	Inspection	In the work site	Construction stage/ Weekly inspection

2.2	Air Quality	Visual inspection is suggested since no sensitive areas nearby	In the work site	Daily
2.3	Wastes and drainage congestion	Record of kinds and quantity of waste, and the disposal method	In the work site and Workers camp	Daily
2.4	Disturbance to Existing Social Infrastructure and Services	Record of numbers construction vehicles	Project site	Continuous Record
2.5	Infectious Diseases such as HIV/AIDS	Labor health record	Related institutions	Twice a year
2.6	Work condition (including work safety)	Record of accidents	Contractor's office	Continuous Record
2.7	Accidents	Record of accidents	Contractor's office	Continuous Record
2.8	Disturbance to Community traffic and installation of proper road signage	Records of road signage implemented, visual inspection	Along the approach road	Continuous record
3. Operation Phase				
3.1	Accidents	Record of accidents and fire	Along the r	Continuous Record

1.15 Implementation arrangements

Project management comprises four levels. At the highest level, the executing agency is the Finance Division headed by a Secretary under the Ministry of Finance (MOF). The project steering committee (PSC) chaired by the secretary of the Finance Division includes selected members from the Executive Committee of the NSDA, national project director, and other representatives from key ministries and institutions, with the executive project director (EPD) of SEIP as the member-secretary. At the second level a project implementation unit is headed by the national project director. The national project director provides policy advice, review funding, and release funds for SEIP. At the third level is the Skills Development Coordination and Monitoring Unit (SDCMU) headed by the EPD, which will serve as the program management unit. All the staff of the SDCMU are recruited competitively with required expertise and experience. The SDCMU is responsible for facilitating, coordinating, and monitoring the implementation of SEIP. At the fourth level, the Skills Development Implementation Committee (SDIC) headed by the EPD with representatives from all the partner agencies will provide a common forum to discuss

implementation issues and to make joint efforts to resolve problems emanating from implementation. If problems cannot be resolved at this level, these will be escalated to the PSC level for resolution.

Project Implementation Units (PIUs) will be formed in each of the IAs (i.e. BACI and BITAC), with a dedicated safeguards focal person. PIUs will be assisted by Individual Design Supervision Consultants (DSC). Consultants will include Environment Specialists engaged during project implementation. Also, there will be a dedicated Environment Officer (EO) from the contractor's part who will monitor the environmental safeguards and report to the IA.

The training centres management and principal will be responsible for overall environmental monitoring during the operation phase of the school building.

II. Environmental Monitoring:

2.1 Status IEE SEMP:

The physical works are expecting to commence in the next quarter and the IEE for site specific environmental management plan (SEMP) will be prepared during that time. It is expecting the SEMP will be prepared in the Q4 of 2020.

2.2 Monitoring parameters:

The status of the monitoring parameters are stated below. The table has been compiled from IEE report under SEIP tranche 3.

Table 3: Environmental Monitoring status for the subproject

No	Environm ental Issues	Significant Impact	Monitoring Method			Responsibility		Progress/ Status
			Methods	Location	Duration and Frequency	Implementa tion	Supervision	
1. Pre- Construction Phase								
1.	Tree plantation	Tree felling (5 matures, couple of samplings /ornamental trees) are expected at BITAC site. However, space is congested and there is no scope of replantation at the site. However, there is scope of plantation at BACI site. Tree planation at this site will improve the site's environmental significance as the site has been sand filled by Rajuk for development which was a precious wetland.	Visual inspection	In the site	During the pre- constructio n period	Contractor	BACI, constructio n Supervision consultant	Tree plantatio n will be started once the contracto r has been selected.

III- Environmental management

3.1 Compliance with Environmental Mitigation and Management Plan (EMP).

The compliance status for the Environmental Mitigation and Management Plan is given below:

Table-4: Compliance with Environmental Mitigation and Management Plan (EMP) for BITAC

Ref. No.	Impact/Issue	Mitigation Measure	Responsibility	Status of the compliance
1. Demolition Phase				
0.1	Planning of demolition It is expected that manual demolition work will take place. If demolition is not planned properly, can create nuisance with deadly hazards. Absence of proper safety cautions, debris disposal and spoils managements plan etc can create havoc local environmental and even can cause death to demolition workers. Given the BITAC hostel to be demolished is single storied, thus risk is relatively low.	Develop a decommissioning plan for the proposed site including risk assessment and management plan for debris disposal, worker safety, solid waste management plan before construction starts. This is the contractor's responsibility and needs to be supervised by the Construction Supervision Engineer and EHS Consultant.	BITAC authority and contractor	BITAC Engaged the contractor and the contractor followed the government's rules during the demolition work.
2. Construction Phase				
2.1	Top soil loss followed by soil erosion <ul style="list-style-type: none"> Significant excavation, cut and fill is expected. 11 story building will also need concrete mixing, although the extent of time may not exceed couple of weeks. 	<ul style="list-style-type: none"> Utilize readily available sources of materials. If contractor procures materials from existing burrow pits and quarries, causing less cut and fill that leads to top soil loss. Borrow areas and quarries (If these are being opened up exclusively for the project) must comply with 	BITAC authority, CSC, EO	The Project will ensure the mitigation measures.

Ref. No.	Impact/Issue	Mitigation Measure	Responsibility	Status of the compliance
	<ul style="list-style-type: none"> The proposed sites are on relatively flat land. BITAC site is on enclosed built-up area. The impacts are negative but short/medium term, site-specific within a relatively small area and reversible by mitigation measures. 	environmental requirements, as applicable.		
2.2	Noise Impacts <ul style="list-style-type: none"> Construction noises may hamper every day educational activities of the students and teachers at BITAC site Temporary increase in noise level and vibrations may be caused by excavation equipment, and the transportation of equipment, materials, and people. Noise Impact on construction workers The impacts are negative but short-term, site-specific within a relatively small area and reversible by mitigation measures. 	<ul style="list-style-type: none"> If it is not practicable to reduce noise levels to or below noise exposure limits, the contractor must post warning signs in the noise hazard areas. Workers in a posted noise hazard area must wear hearing protection. Utilize modern vehicles and machinery with the requisite adaptations to limit noise and exhaust emissions, and ensure that these are maintained to manufacturers' specifications at all times. All vehicles and equipment used in construction shall be fitted with exhaust silencers. Use silent-type generators (if required). 	BITAC authority, CSC, EO	The Project will ensure the mitigation measures.
2.3	Water Pollution <p>Excavation, run-off from stockpiled materials, and chemical contamination from fuels and lubricants may result to silt-laden runoff during rainfall, which may cause siltation and reduction in the quality of adjacent bodies of water, especially at BACI site</p>	<ul style="list-style-type: none"> BITAC site is well drained. The Contractor of the Project shall make simple processing to muddy water like filtering and sedimentation, and direct discharge is prohibited; the Owner shall strengthen construction management to perform civilized construction. Follow the general Waste Management Plan 	BITAC authority, CSC, EO	The Project will ensure the mitigation measures.
2.5	Air Quality: <ul style="list-style-type: none"> Conducting works at dry 	<ul style="list-style-type: none"> The proposed site at BITAC is within busy campus. Therefore, air pollution and public disturbance is 	BITAC authority, CSC, EO	The Project will ensure the

Ref. No.	Impact/Issue	Mitigation Measure	Responsibility	Status of the compliance
	<p>season and moving large quantity of materials may create dusts and increase in concentration of vehicle-related pollutants (such as carbon monoxide, sulphur oxides, particulate matter, nitrous oxides, and hydrocarbons) which will affect people who live and work near the sites.</p> <ul style="list-style-type: none"> The impacts are negative but short-term, site-specific within a relatively small area and reversible by mitigation measures. 	<p>expected from construction works and construction vehicles. Provide dust-proof measures like construction barrier at concrete mixing station, or mix concrete inside building to effectively control dust pollution.</p> <ul style="list-style-type: none"> Water in due time the construction site on non-rainy days, including the road section in construction and major transportation road. Watering frequency shall be determined by the site supervision personnel according to the actual situation. 		mitigation measures.
2.6	<p>Community Health and Safety:</p> <ul style="list-style-type: none"> Exposure to physical hazards from use of heavy equipment and cranes; trip and fall hazards; Construction works will impede the access of residents and businesses in limited cases. The impacts are negative but short-term, site-specific within a relatively small area and reversible by mitigation measures. 	<ul style="list-style-type: none"> Contractor's activities and movement of staff will be restricted to designated construction areas. Use small mechanical excavators to attain faster excavation progress. For rock and concrete breaking, use non-explosive blasting chemicals, silent rock cracking chemicals, and concrete breaking chemicals. Under no circumstances may open areas or the surrounding bushes be used as a toilet facility. Create traffic regulation and diversion zones during construction work. The proposed site is on the main road, and it is expected that heavy vehicle movements can cause traffic nuisance. Therefore, traffic regulation and diversion will be important to avoid traffic nuisance. A generic Traffic Management Plan (TMP) is attached with this IEE as Error! 	BITAC authority, CSC, EO	The Project will ensure the mitigation measures.

Ref. No.	Impact/Issue	Mitigation Measure	Responsibility	Status of the compliance
		Reference source not found.		
2.7	Waste generation <ul style="list-style-type: none"> • The site is expected to generate construction waste. • Without proper management, this will pollute soil, water and air and spread public nuisance 	<ul style="list-style-type: none"> • Update the 'Waste Management Plan and get approval from site supervising engineer and environmental officer. • Conduct separate waste collection and promote recycling and reuse. • Appropriate disposal of non-recyclable waste according to rules • Hazardous waste should be treated under the related regulation 	BITAC authority, CSC, EO	The Project will ensure the mitigation measures.
2.8	Worker's health and safety: <ul style="list-style-type: none"> • There is invariably a safety risk when construction works such as excavation and earthmoving are conducted in populous areas. Workers need to be mindful of the occupational hazards, which can arise from working in height and excavation works. • Potential impacts are negative and long-term but reversible by mitigation measures. 	<ul style="list-style-type: none"> • Comply with requirements of Government of Bangladesh Labour Law of 2006 (amended in 2013) and all applicable laws and standards on workers' health and safety (H&S). • Ensure that all site personnel have a basic level of environmental awareness training. If necessary, the environmental management specialist and/or a translator shall be called to the sites to further explain aspects of environmental or social behavior that are unclear. • Produce and implement a site H&S plan which include measures as: (i) excluding the public from worksites; (ii) ensuring all workers are provided with and required to use personal protective equipment (reflectorized vests, footwear, gloves, goggles and masks) at all times; (iii) providing H&S training for all site personnel; (iv) documenting procedures to be followed for all site activities; and (v) maintaining accident reports and records. 	BITAC authority, CSC, EO	The Project will ensure the mitigation measures.

Ref. No.	Impact/Issue	Mitigation Measure	Responsibility	Status of the compliance
2.9	Traffic disruption BITAC site is on busy premises. Expected minor impact may rise from traffic movement (heavy vehicles) during construction works	<ul style="list-style-type: none"> Warning lights should be set up along the construction road sections, guiding the access of vehicles. Follow the TMP stipulated in Appendix I of this IEE 	BITAC authority, CSC, EO	The Project will ensure the mitigation measures.
3. Post Construction Phase				
3.1	Post-construction clean-up: Damage due to debris, spoils, excess construction materials.	<ul style="list-style-type: none"> Remove all spoils wreckage, rubbish, or temporary structures (such as buildings, shelters, and latrines) which are no longer required; All excavated roads shall be reinstated to original condition; All disrupted utilities restored; 	BITAC authority, CSC, EO	The Project will ensure the mitigation measures.

Table-5: Compliance status with Environmental Mitigation and Management Plan (EMP) for BACI

Ref. No.	Impact/Issue	Mitigation Measure	Responsibility	Compliance status
1. Planning Phase				
1.1	Climate Enhancement Measures The BACI site is located on a low lying area that has potential of flooding.	Follow Environmental Enhancement Measures stipulated in the IEE like as Rain water harvesting, Solar lighting, Water management, Green building materials	BACI authority	The Project will ensure the mitigation measures.
2. Construction Phase				
2.1	Disturbances in Ecological setting The construction/campsites are devoid of vegetation, birds or local fauna. No impact is expected during construction or operation.	<ul style="list-style-type: none"> The BACI site is barren and wetlands is nearby. It is possible to plant a few trees in the site during construction. Trees with small but long canopy should be preferred during plantation. About 20 plants can be planted in the site given the current design. 	BACI authority, CSC, EO	The Project will ensure the mitigation measures.

Ref. No.	Impact/Issue	Mitigation Measure	Responsibility	Compliance status
2.2	Noise Impacts <ul style="list-style-type: none"> - Temporary increase in noise level and vibrations may be caused by excavation equipment, and the transportation of equipment, materials, and people. - Noise Impact on construction workers - The impacts are negative but short-term, site-specific within a relatively small area and reversible by mitigation measures. 	<ul style="list-style-type: none"> • BACI site is not populated and traffic is absent. Therefore, noise impacts are expected to be restricted within the site workers. • Utilize modern vehicles and machinery with the requisite adaptations to limit noise and exhaust emissions, and ensure that these are maintained to manufacturers' specifications at all times. • All vehicles and equipment used in construction shall be fitted with exhaust silencers. Use silent-type generators (if required). 	BACI authority, CSC, EO	The Project will ensure the mitigation measures.
2.3	Water Pollution <p>Excavation, run-off from stockpiled materials, and chemical contamination from fuels and lubricants may result to silt-laden runoff during rainfall, which may cause siltation and reduction in the quality of adjacent bodies of water</p>	<ul style="list-style-type: none"> • There are waterbodies near to the site. Water pollution may occur in this water bodies. See the general Waste Management Plan at Appendix II. • Awareness must be raised among workers on solid waste management. • Specific dumping containers are to be kept in the site. • All waste materials should be disposed in proper places after completion of construction. 	BACI authority, CSC, EO	The Project will ensure the mitigation measures.
2.4	Air Quality: <ul style="list-style-type: none"> • Conducting works at dry season and moving large quantity of materials may create dusts and increase in concentration of vehicle-related pollutants (such as carbon monoxide, sulphur oxides, particulate matter, nitrous oxides, and hydrocarbons) which will affect people who live and work near the sites. • The impacts are negative but short-term, site-specific within a relatively small area and reversible by mitigation measures. 	<ul style="list-style-type: none"> • The sand and other such dispersible material must be removed after completion of work. • Provide dust-proof measures like construction barrier at concrete mixing station, or mix concrete inside building to effectively control dust pollution. • Water in due time the construction site on non-rainy days, including the road section in construction and major transportation road. • Watering frequency shall be determined by the site supervision personnel according to the actual situation. 	BACI authority, CSC, EO	The Project will ensure the mitigation measures.
2.5	Community Health and	<ul style="list-style-type: none"> • Contractor's activities and movement of staff will be restricted to 	BACI authority, CSC, EO	The Project

Ref. No.	Impact/Issue	Mitigation Measure	Responsibility	Compliance status
	Safety: <ul style="list-style-type: none"> Exposure to physical hazards from use of heavy equipment and cranes; trip and fall hazards; Construction works will impede the access of residents and businesses in limited cases. The impacts are negative but short-term, site-specific within a relatively small area and reversible by mitigation measures. 	<p>designated construction areas.</p> <ul style="list-style-type: none"> Use small mechanical excavators to attain faster excavation progress. For rock and concrete breaking, use non-explosive blasting chemicals, silent rock cracking chemicals, and concrete breaking chemicals. Under no circumstances may open areas or the surrounding bushes be used as a toilet facility. Create traffic regulation and diversion zones during construction work. The proposed site is on the main road, and it is expected that heavy vehicle movements can cause traffic nuisance. Therefore, traffic regulation and diversion will be important to avoid traffic nuisance 		will ensure the mitigation measures.
2.6	Climate extremities due to geographic location <p>BACI site is located in a flood vulnerable zone. Therefore, climate extreme events should be considered during construction</p>	<ul style="list-style-type: none"> Plinth height should be considered using flood level analysis Painting should be weatherproof and building design should consider ample space for accommodate more people during flood and storm event. 	BACI authority,	The Project will ensure the mitigation measures.
2.7	Waste generation <ul style="list-style-type: none"> The site is expected to generate construction waste. Without proper management, this will pollute soil, water and air and spread public nuisance 	<ul style="list-style-type: none"> Awareness must be raised among workers on solid waste management. Specific dumping containers are to be kept in the site. All waste materials should be disposed in proper places after completion of construction Update the 'Waste Management Plan and get approval from site supervising engineer and environmental officer. Conduct separate waste collection and promote recycling and reuse. Appropriate disposal of non-recyclable waste according to rules Hazardous waste should be treated under the related regulation 	BACI authority, CSC, EO	The Project will ensure the mitigation measures.
2.8	Worker's health and safety: <ul style="list-style-type: none"> There is invariably a safety risk when construction works such as excavation and earthmoving are conducted in populous 	<ul style="list-style-type: none"> Comply with requirements of Government of Bangladesh Labour Law of 2006 (amended in 2013) and all applicable laws and standards on workers' health and safety (H&S). Ensure that all site personnel have a basic level of environmental awareness training. If necessary, the environmental management 	BACI authority, CSC, EO	The Project will ensure the mitigation measures.

Ref. No.	Impact/Issue	Mitigation Measure	Responsibility	Compliance status
	<p>areas. Workers need to be mindful of the occupational hazards, which can arise from working in height and excavation works.</p> <ul style="list-style-type: none"> Potential impacts are negative and long-term but reversible by mitigation measures. 	<p>specialist and/or a translator shall be called to the sites to further explain aspects of environmental or social behavior that are unclear.</p> <ul style="list-style-type: none"> Produce and implement a site H&S plan which include measures as: (i) excluding the public from worksites; (ii) ensuring all workers are provided with and required to use personal protective equipment (reflectorized vests, footwear, gloves, goggles and masks) at all times; (iii) providing H&S training for all site personnel; (iv) documenting procedures to be followed for all site activities; and (v) maintaining accident reports and records. 		
3. Post Construction Phase				
3.1	<p>Post-construction clean-up:</p> <p>Damage due to debris, spoils, excess construction materials.</p>	<ul style="list-style-type: none"> Remove all spoils wreckage, rubbish, or temporary structures (such as buildings, shelters, and latrines) which are no longer required; All excavated roads shall be reinstated to original condition; All disrupted utilities restored; 	BACI authority, CSC, EO	The Project will ensure the mitigation measures.

3.2 Compliance with loan covenants

The compliance with loan covenants with status are presented in the following table.

Table -5: The compliance status of SEIP tranche 3 with respect to loan covenants is presented in table below:

SI No	Status of Loan Covenants	Status of Compliance
1	<p>Environment</p> <p>The Borrower shall ensure, and cause each of the Project Implementing Agencies to ensure, that the preparation, design, construction, implementation, operation and decommissioning of the Project and all project facilities comply with (a) all applicable laws and regulations of the Borrower relating to environment, health and safety; (b) the Environmental Safeguards; (c) The EARF and (d) all measures and requirements set forth in the IEEs, the EMPs, and any corrective or preventative actions set forth in a Safeguards Monitoring Report.</p>	<p>The Project will ensures (a) all applicable laws and regulations of the Borrower, relating to environment, health and safety, involuntary Resettlement and small ethnic communities; (b) the communities Safeguards; and (c) The EARF and (d) all measures and requirements set forth in the IEEs, the EMPs, and any corrective or preventative actions set forth in a Safeguards Monitoring Report.</p>

SI No	Status of Loan Covenants	Status of Compliance
2	<p>Land Acquisition and Involuntary Resettlement</p> <p>The Borrower shall ensure, and cause each of the Project Implementing Agencies to ensure, that the Project does not have any involuntary resettlement impacts within the meaning of the Safeguard Policy Statement. In the event that the Project does have any such impact, the Borrower shall take all steps required to ensure that the Project complies with the applicable laws and regulations of the Borrower, the Safeguard Policy Statement, the RF and any corrective or preventative actions set forth in a Safeguard Monitoring Report.</p>	<p>The proposed BITAC and BACI training centers under SEIP Tranche 3 will take place within their existing training campus or existing land. Hence, there is no issue of involuntary resettlement. There is no threat of hampering resettlement of small ethnic community people risks, or agricultural land due to project activities and hence no such requirement for reinstating pathways, other local infrastructure, and agriculture land to at least their pre-project condition upon the completion of construction.</p>
3	<p>Small Ethnic Community Peoples</p> <p>The Borrower shall ensure, and cause each of the Project Implementing Agencies to ensure, that the preparation, design, construction, implementation and operation of the Project and all Project facilities comply with (a) all applicable laws and regulations of the Borrower relating to small ethnic community peoples; (b) the Small Ethnic Community Peoples Safeguards; (c) the SECPP and (d) all measures and requirements set forth in the SECPP, and any corrective or preventative actions set forth in a Safeguards Monitoring Report.</p>	<p>There is no intervention in this project which can hamper environment and possibility of dislocation of ethnic minority. As such no separate budget allocation and dedicated manpower is required to implement EARF, RF and SECPF.</p>
4	<p>Human and Financial Resources to Implement Safeguards Requirements</p> <p>The Borrower shall make available, or cause each of the Project Executing Agencies to make available, necessary budgetary and human resources to fully implement the EMPs and the SECPP.</p>	<p>When the constructions works of training centers begin, there will be close monitoring of EMP implementation, which will be carried out by DSC and SDCMU.</p>
5	<p>Safeguards Related Provisions in Bidding Documents and Works Contracts</p> <p>The Borrower shall ensure, and cause each of the Project Implementing Agencies to ensure, that all bidding documents and contracts for Works contain provisions that require contractors to:</p> <p>(a) comply with the measures and requirements relevant to the contractor set forth in any safeguards documents (to the extent they concern impacts on affected people during</p>	<p>All required provisions on Safeguard related issues, as specified by EMPs, has been included in the bidding documents which were reviewed by ADB.</p>

SI No	Status of Loan Covenants	Status of Compliance
	<p>construction), and any corrective or preventative actions set out in a Safeguards Monitoring Report;</p> <p>(b) make available a budget for all environmental and social measures;</p> <p>(c) provide the Borrower with a written notice of any unanticipated environmental, resettlement or small ethnic community peoples risks or impacts that arise during construction, implementation or operation of the Project that were not considered in the IEEs, the EMPs and SECPP;</p> <p>(d) adequately record the condition of roads, agricultural land and other infrastructure prior to starting to transport materials and construction; and</p> <p>(e) fully reinstate pathways, other local infrastructure, and agricultural land to at least their pre-project condition upon the completion of construction.</p>	
6	<p>Safeguards Monitoring and Reporting</p> <p>The Borrower shall do the following, or shall cause each of the Project Implementing Agencies to do the following:</p> <p>(a) submit semi-annual Safeguards Monitoring Reports to ADB and disclose relevant information from such reports to affected persons promptly upon submission;</p> <p>(b) if any unanticipated environmental and/or social risks and impacts arise during construction, implementation or operation of the Project, promptly inform ADB of the occurrence of such risks or impacts, with detailed description of the event and proposed corrective action plan; and</p> <p>(c) report any actual or potential breach of compliance with the measures and requirements set forth in the EMPs and the SECPP promptly after becoming aware of the breach.</p>	<p>(a) The semi-annual Safeguards Monitoring Reports from January to June 2020 submitted to ADB on 30 June 30, 2020;</p> <p>(b) The civil works for constructing BACI and BITAC training centers are going to be started soon. Close monitoring of construction activities and submission of required reports will be done when upgrading works commence.</p>

Conclusion and Recommendation

BACI and BITAC sites are ready for construction work and expecting to commence the construction work in Q3, 2020. Although there is no threat of hampering resettlement of small ethnic community people, or agricultural land due to project, SDCMU will ensure all applicable laws and regulations, relating to environment, health and safety, involuntary resettlement and small ethnic communities' safeguards. In addition, it will also take care of the issues relating to the IEE and EMP, RF and any other corrective or preventative actions set forth in Environmental Monitoring Report during implementation of civil works.

The civil construction are expecting to commence in the next quarter and the preparatory activities shoul completed. However the following upcoming activities are recommended for the next course of action:

- Monitoring the pre construction activities
- Engagement of Environmental specialist
- Nominate focal person at BITAC & BACI for environmental safeguard monitoring.
- Prepare Site specific environmental plan(SEMP)
- Take mitigation measure for preconstruction activities.

Annex-1: Site pictures



Figure 1: Proposed site condition & its access road at the BITAC site



Figure 2: Existing condition at the BACI site and its access road