

Social Monitoring Report

Second Social Monitoring Report
Project Number: 44951-014
June 2016

Bangladesh: Bibiyana II Gas Power Project

Prepared by Bangladesh Centre for Advanced Studies (BCAS) for the Summit Bibiyana II Power Company Limited and Asian Development Bank

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PROJECT SITE SECOND SOCIAL MONITORING REPORT

SUMMIT BIBIYANA II POWER COMPANY LTD

AT

PARKUL, HABIGANJ, BANGLADESH

September 07, 2015

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ABBREVIATIONS AND ACRONYMS

AC	Air Cooler
ADB	Asian Development Bank
BCAS	Bangladesh Centre for Advanced Studies
BOO	Built Operate and Own
BPDB	Bangladesh Power Development Board
CCGT	Combined Cycle Gas Turbine
CDM	Community Development Manager
CDP	Community Development Plan
CV	Curriculum Vitae
DC	Deputy Commissioner
DoE	Department of Environment
DGM	Deputy General Manager
EHS	Environment, Health and Safety
EHS&S	Environmental, Health, Safety and Social
EPC	Engineering, Procurement and Construction
ESIA	Environmental and Social Impact Assessment
GoB	Government of Bangladesh
GRM	Grievance Redress Mechanism
GSAs	Gas Supply Agreements
HH	Household
IAS	Implementation Agreements
JCCR	Joint Committee on Community Relations
JS	Joint Survey
LAO	Land Acquisition Officer
LGED	Local Government and Engineering Department
LLAs	Land Lease Agreements
LRP	Livelihood Restoration Plan
MW	Mega Watt
NA	Not Applicable
NEPC	Northeast Electrical Power Engineering Co.
NGO	Non Government Organization
PGCB	Power Grid Company of Bangladesh
PAH	Project Affected Household
PAPs	Project Affected People
PPAs	Power Purchase Agreements
RFP	Request for Proposal
SBIIPCL	Summit Bibiyana II Power Company Limited
SCAR	Social Compliance Audit Report

SED	Small Enterprise Development
SEP	Stakeholder Engagement Plan
Tk	Taka
TNA	Training Need Assessment

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1.0 Project Description

1.1 Brief Project Description

The policy of the Government of Bangladesh ('GoB') has been to ensure extension and stabilization of the power sector, through both public and private sector undertakings, towards not only meeting the existing power deficiency throughout the country but also ensuring unhindered power provision in view of the projected future demand.

A Request for Proposal (RFP) was issued by Power Cell (the Power Division of the GoB Ministry of Power, Energy and Mineral Resources) on 3rd May 2010 (and subsequently amended on 2nd September 2010) for the sponsor to develop a 330-450 MW CCGT power station at Bibiyana on a 'build, own and operate (BOO)' basis. The RFP was signed by Summit Bibiyana II Power Company Limited (SBIIPCL) on 6th September 2010. In May 2011, to build, own and operate a 341 MW combined cycle gas turbine power plant, SBIIPCL signed: Implementation Agreements (IAs) with the GoB and the Power Grid Company of Bangladesh (PGCB); Power Purchase Agreements (PPAs) with the Bangladesh Power Development Board (BPDB); Land Lease Agreements (LLAs) with the BPDB; and Gas Supply Agreements (GSAs) with the Jalalabad Gas Transmission and Distribution System Limited ('the Gas Supplier'). In addition, for construction of the power plant, an Engineering, Procurement and Construction (EPC) contract was signed with a joint venture comprising the First Northeast Electrical Power Engineering Co. and Northeast China International Electric Power Corporation (herein referred to as 'the EPC Contractor') in June 2011.

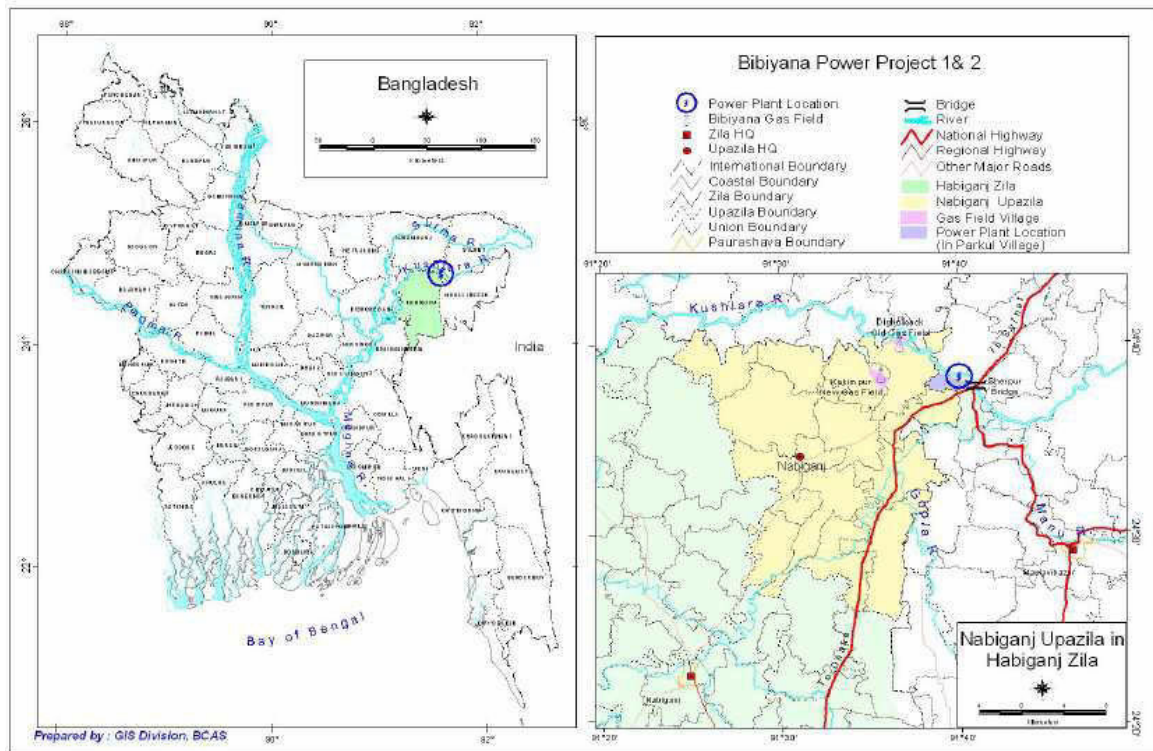


Figure 1.1: Location of SBIIPCL Plant in Bangladesh and in Hobiganj District

The location of SBIIPCL plant in Bangladesh and in Hobiganj District is shown above in Figure 1.1. The SBIIPCL project site is located on the southern bank of the river Kustiyara, at Longitude 91° 39' 37" E. and Latitude 24° 38' 18" N. The site is approximately 2 km to the west of the Sherpur bridge, and lies west of the Dhaka - Sylhet National Highway (N2), approximately 180 km north-east of Dhaka and approximately 45 km south-west of the Sylhet District

Headquarters. Administratively, it is located at the village of Parkul at Aushkandi Union under Nabiganj Upazilla of Hobiganj District. Plant layout for the SBIIPCL Power Plant has been shown in Figure 1.2 below:

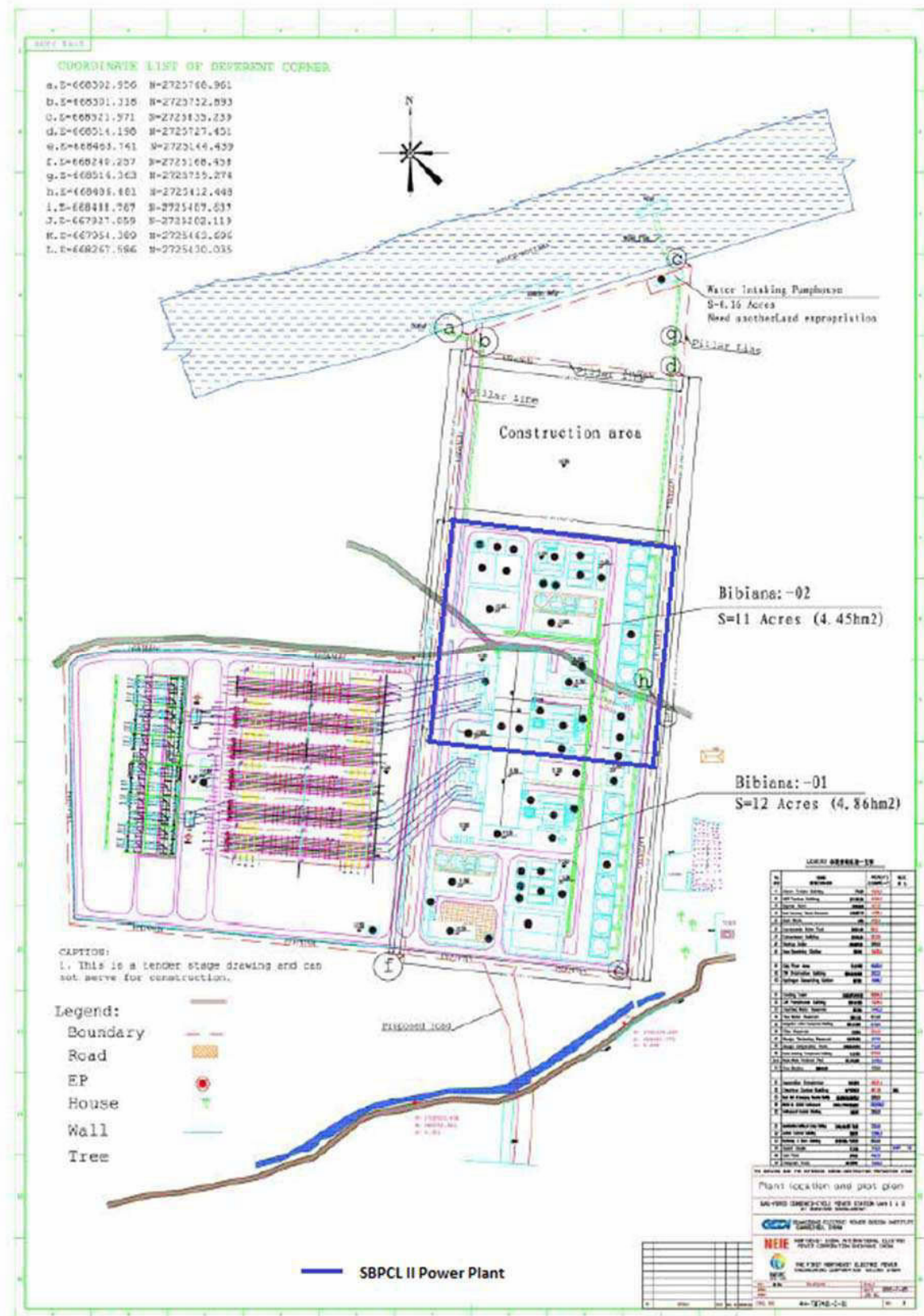


Figure 1.2: Plant layout for the SBIIPCL Power Plant

The project will have a capacity of 341MW and will use a combined cycle technology and will be based on natural gas. The main plant is located on 11 acre single crop agricultural land, which is the main component of the project. SBIIPCL has received this land from BPDB for 22 years under a Land Lease Agreement (LLA). SBIIPCL is responsible for all kinds of development (land filling, machinery setting and electricity production) related to power generation. The main associated facilities of the project are a 8.8 km gas pipeline from the nearby gas field and a switchyard, located adjacent to the plant. A 2 km access road connecting the main plant with the Dhaka-Sylhet highway has been built. ADB is funding the power plant which is located on the 11 acres of land in Parkul village, while the associated facilities are to be developed by the parties identified in Table 1.1 below:

Table 1.1: Summary of Associated Facilities which are not financed by ADB

Components	Area (acre)	Responsible Parties	Impacts
Switchyard	26.0	PGCB	15 squatters (landless) including 1 land owner have been resettled adjacent to switchyard and given 7 decimal of land for 99 years lease and Tk. 60,000 for housing structure loss and Tk. 7,500 as moving allowance.
Access road	4.0	BPDB	Losses of land and landowners have been compensated.
Gas Pipeline	8.5	Jalalabad Gas	Losses of land and landowners have been partially compensated. Compensation is ongoing
Construction lay down area	14.0	BPDB/SBIIPCL	Losses of land and landowners have been compensated.
Transmission line	70 meters to switchyard	PGCB	No impact, as the transmission line from the plant to the switchyard has no additional environmental or social impact.

1.2 Update on the Status of the Design/Construction Activities of the Bibiyana II Gas Power Plant Project Facilities

SBIIPCL has hired Engineering, Procurement and Construction (EPC) Contractor for construction of the power plant. The EPC Contractor has already completed above 95% construction work (physical progress). Construction work for starting single cycle operation has been completed – first firing has been conducted successfully on 27th April, 2015. Single cycle operation has been started from 6th June 2015. However, necessary construction activities will continue until starting the combined cycle operation. Table 1.2 below depicts important dates and timelines for SBIIPCL Project regarding the ongoing construction phase:

Table 1.2: Important Dates and Timelines for SBIIPCL Project

1.	Name of the Company	:	Summit Bibiyana II Power Company Ltd.
2.	Capacity (MW)	:	341 MW
3.	Type of fuel	:	Natural Gas
4.	Date of signing Implementation Agreement (IA)	:	12 May 2011
5.	Date of signing Power Purchase Agreement (PPA)	:	12 May 2011
6.	Date of signing Gas Supply Agreement (GSA)	:	12 May 2011
7.	Date of Signing Land Lease Agreement (LLA)	:	12 May 2011
8.	Contract effective date	:	12 May 2011
9.	Implementation period as per contract	:	31 March 2013 - 31 Dec 2015
10.	Required Simple Cycle Operation Date (RSCOD)	:	31 Dec 2014 (excluding Force Majeure Days)
11.	Simple Cycle Operation Date	:	06 June 2015
12.	Date of Financial closure	:	08 July 2015
13.	Required Commercial Operation Date (RCOD)	:	31 Dec 2015 (excluding Force Majeure Days)
14.	Expected COD	:	30 October 2015

Table 1.3 below shows the financial progress of the project, while Table 1.4 depicts the physical progress:

Table 1.3: Financial Progress (in respect of Amount) of Construction Work

SLNO	Description	Cumulative Progress up to previous month (%)	Cumulative progress up to current month (%)	Actual progress in reporting month (%)	Target in reporting month (%)
1.	Land development	100%	100%	100%	-
2	Survey & Related Data Collection	100%	100%	100%	-
3	Boundary Wall & With flood protection	Boundary wall and flood protection done	100%	100%	-
4	Building & Construction	Included in EPC	Included in EPC	Included in EPC	Included in EPC
5	Main Machineries (including civil works, installation/erection)	Included in EPC	Included in EPC	Included in EPC	Included in EPC
6	EPC	78%	98%	20%	1%

Table 1.4: Physical Progress of Construction Work

SL NO	Description	Progress (%)	Cumulative Progress up to previous month (%)	Cumulative progress up to current month (%)	Actual progress in reporting month (%)	Target in reporting month (%)
a)	Civil Works					
	• Land Procurement (in respect of Area)	NA	NA	NA	NA	NA
	• Land Development (in respect of volume)	100%	100%	100%	100%	-
	• Foundation (in respect of volume): pile foundation, lean work, pile cap cutting, rebar work, concrete pouring	99%	99%	99%	09%	.05%
	• Civil Construction (in respect of volume): land development, foundation, sub-structure, superstructure, wall, rooftop, etc.	98.5%	98%	98.5%	0.5%	0.5%
b)	Installation/ Erection					
	• GT/ST, Engine and associates works (GTG, STG, main Stack, By-pass Stack, Main Plant Building, HRSG, etc.)	96%	94%	96%	2%	2%
	• Substation (design, engineering, manufacturing, installation)	100%	100%	100%	-	-
	• Control Room (Central Control Building): design, foundation, superstructure, installation, erection, etc.	99%	98%	99%	1%	1%
c)	Interconnection/electrical work	PGCB	PGCB	PGCB	PGCB	PGCB
d)	Arrangement of fuel (Fuel storage, RMS, Pipe Line, etc.)					
	a) Pipe Line	BPDB	BPDB	BPDB	BPDB	BPDB
	b) RMS	Installation Completed & Commissioning	-	-	-	-
e)	Testing/Commissioning	Simple Cycle running and Combined Cycle commissioning on going	-	-	-	-

1.3 Key Developments and any Major Changes in Location and Design

There were no new major developments or changes in the location and design of the project.

1.4 Reporting Period Covered by this Monitoring Report (month/year)

According to the Social Compliance Audit Report submitted to ADB, the first monitoring report was due in December, 2014. However, due to delay for various reasons, the first monitoring report was postponed till March, 2015 through mutual agreement between SBIIPCL and Financiers. Hence, the first social monitoring report was submitted on 30th March, 2015. Following the requirement of the Financiers the first environmental and social monitoring report was submitted on 30th April, 2015. ERM audit team came for validating in May, 2015, and submitted draft EHS&S Compliance Assessment Report on 17th May, 2015.

Although the 2nd quarterly social monitoring report was literally due by 30th June, 2015, the Financiers and SBIIPCL asked BCAS team to start monitoring work after the 1st week of August, 2015. BCAS monitoring team visited the SBIIPCL Plant from 11th to 14th August, 2015. So, the reporting period for this monitoring report is August, 2015. As per requirement of the lenders, the next monitoring report will be due in October, 2015.

1.5 Summary/Highlights of this Current Social Monitoring Report

The 2nd Social Monitoring Report has been prepared for fulfilling the requirement of the Financiers with the vision of monitoring the corrective action plans specified in Social Compliance Audit Report, October 2014. The report consists of 8 chapters.

SBIIPCL is going to establish a 341 MW CCGT power station at Bibiyana on a 'build, own and operate' basis. SBIIPCL has hired Engineering, Procurement and Construction (EPC) Contractor for construction of the power plant. The EPC Contractor has already completed above 95% construction work (physical progress). Construction work for starting single cycle operation has been completed – single cycle operation has been started from 6th June, 2015. However, necessary construction activities will continue until the combined cycle operation.

A total 11 acres of land was acquired for establishing the SBIIPCL Power Plant. Total of 14 landowners lost some or all (1 owner only) of their agricultural land due to this project. All landowners have been compensated for their loss of land. In addition to the allocated compensation which has been paid in full, there was a provision of additional grant in the amount of Taka 200,000 more for the single landowner who lost all his land. The Project Affected Household (PAH) has also been paid the committed amount.

Apart from the 14 land owners, who lost their land, there were also 6 sharecroppers and 11 agricultural laborers, who were also affected by the project. The SCAR document made provision for skill development and livelihood improvement of all the 31 PAHs. The activities are in process of being implemented.

The Livelihood Restoration Plan (the "LRP") for all components of the project (376 PAHs) has been finalized, and implementation of it will be started soon. The next monitoring will cover the LRP implementation. Hence, this monitoring report has focused on the plant site only being considered by ADB.

For continue the construction works, EPC Contractor hires vendors, suppliers and sub-contractors for supply of necessary goods and services including construction workers. Although these workers are employed on temporary basis, child labor, forced labor as well as health and safety issues are complied accordingly. However, Bangladesh labor law and minimum wage circular of Bangladesh Minimum Wages Board are followed by EPC contractor in terms of provision of paid leave after 6 continuous days of regular work with weekly overtime of 12 hours, provision of minimum daily wage of Taka 375 to the workers and paying OT at the rate of double to the regular hourly payments.

There has been no provision for labor union as the workers are temporary in nature. There is a formal grievance redress mechanism in place. Therefore, till date, there is no incidence on labor dispute and conflict between groups and there are no legal disputes. Besides, there has been no media reaction on any issues regarding SBIIPCL.

SBIIPCL prepared a Stakeholder Engagement Plan (SEP) in June, 2015. SEP has been translated into local language (Bengali), and it has been disseminated to the PAHs as well as other stakeholders. Stakeholder engagements have been taking place over the last few months with various categories of PAHs informally through visits of CDM and other SBIIPCL personnel to the project affected villages. Stakeholder engagement has been done in the forms of meeting, FGD, personal interview, visit etc with PAHs (e.g. landowners, sharecroppers and agricultural laborers) as well as other stakeholders (e.g. nearby village residents, local NGO, JCCR and other community people).

SBIIPCL Grievance Redress Mechanism was put in place and made operational from September, 2014 through direct communication with CDM of SBIIPCL and documentation has been done accordingly. Till date 23 grievances have been lodged from community people. Among them 14 grievances have been resolved, 2 have been rejected and the rest 7 are in the process of resolution.

Considering the ongoing construction phase, the institutional arrangement and social management capacity in place is adequate.

In addition to monitor the implementation of the corrective action plans specified in SCAR, October 2014, an assessment was made on the progress of CDP implementation. Most of the activities of CDP are still under planning phase.

1.6 Social Monitoring Team

The social monitoring team comprised of the following members from BCAS:

1. Dr. Moinul Islam Sharif, Team Leader.
2. Mohammad Imtiaz Sharif, Social & Environmental Specialist.
3. Ikbal Hossain, Resettlement Specialist.

2.0 Social Performance on Land Allocation

2.1 Project Affected Households

A total 11 acres of land was acquired for establishing the SBIIPCL Power Plant. Total of 14 landowners lost some or all (1 owner only) of their agricultural land due to this project. There were also 6 sharecroppers and 11 agricultural laborers, who were also affected by the project. Table 2.1 below shows the types and HH population of PAHs of SBIIPCL Power Plant Project.

Table 2.1: Types and HH population of PAHs of SBIIPCL Power Plant Project

Types of PAHs	Category	Total number of HH	HH affected status	Total affected person	Impact Types
Landowner	A	14	Direct	122	Permanent
Sharecropper	B	6	Indirect	37	Temporary
Agricultural Laborer	C	11	Indirect	59	Temporary
Total		31		218	

For assessing the social performance on land acquisition and loss of income of the sharecroppers and agricultural laborers, the monitoring team visited the households of 4 landowners, 1 sharecropper and 3 day laborers.

2.2 Status of Payment for Acquired Land

Due to land acquisition no physical displacement has occurred. All the 14 landowners as well as 6 sharecroppers and 11 agricultural laborers PAHs were affected by economic displacement. Compensation to the landowners for the 11 acre main plant was started in November 2010 and was completed in December 2013. In some cases land compensation was delayed due to lack of land documents for acquired land and disputes over ownership among the family members of the landowners. All landowners have received their land compensation amounts. There has not been any replacement of agricultural and/or commercial land, as the landowners opted 'money for land' compensation. There was no specific compensation allowance for the landowners due to economic displacement. The amount of compensation paid to the landowners was more than 5 times above the-then land price including 50% premium on the average registered land value at the time of the notice of the acquisition.

From 14 PAHs, 122 PAPs have been affected due to land acquisition for the project. In terms of significance of impact, vulnerable households were identified to be significantly impacted due to acquisition of more than 10% of productive land and most of the PAHs (11 PAHs) have fallen under this category.

2.3 Impacts of Land Acquisition

The landowners received handsome amount of money as compensation of their land – minimum payment was 0.35 million Taka, while the maximum was 11.7 million Taka. 7 out of 14 landowners received more than 1 million Taka – after receiving handsome amount of compensation payment, few of them became pretty rich, and their socio-economic status became changed. A good number of landowners have been found to improve their residences utilizing the compensation payment. Since these landowners were previously farmers and did not have enough education, they could not be able to make the best use of the received compensation. Due to improved change in their socio-economic status, many of them now feel shy to engage themselves into farming activities, while they do not have any know-how to make the best utilization their resources. So, many of them have been found to be sitting idle at home and consuming the money that they received as land compensation.

The 6 sharecroppers lost sharecropping land and 11 agricultural laborers lost their jobs – both belong to the poor section of the society. They received very negligible allowance (Taka 7,500 to

each sharecropper PAH and Taka 8,000 to each agricultural laborer PAH), and the payment was made during the current year – far later from acquisition of land. As a result, the households of the sharecroppers and agricultural laborers were the highly vulnerable PAHs, are specially needed to be addressed through the livelihood restoration activities of SBIIPCL.

2.4 Implementation Progress of Income Restoration Activities

As mentioned earlier, payments of Taka 7,500 to each sharecropper PAH and Taka 8,000 to each agricultural laborer PAH have been made to offset the economic displacement of the affected households.

Apart from the allowances for economic displacement to the sharecroppers and agricultural laborers, SCAR, October 2014 suggested the following livelihood restoration activities for the PAHs:

- Working opportunities and job training in the plant
- Outside vocational training for the selected male with full scholarship. At the end of the training, participants will get free tool kits.
- Project site vocational training for all interested male. At the end of the training, participants will get free tool kits.
- Project site sewing machine training for selected female. At the end of the training, each participant will get a sewing machine free of cost.
- Project site small enterprise development training for all interested women. At the end of the training, each participant will get interest free business start-up loan of Taka 25,000. After 1 year, on successful return of the loan money, the participants will be eligible for further interest free loan of Taka 25,000 for expanding their business.

Table 2.2 below shows the list of affected persons from the 31 PAHs, who are currently working at the plant:

Table 2.2: List of APs currently working at the Plant (From 31 Households)

SL	Name of Beneficiary	Name of Household Head	PAH Type	Position/Dept
1	Mithu	Tera Miah	Landowner	Security
2	Sowkat	Tonjobullah	Landowner	Security
3	Jomshed	Sonjobullah	Landowner	Security
4	Ripu Miah	Sonjobullah	Landowner	Sub contractor/ Supplier
5	Belal	Ansar Miah	Landowner	Sub contractor/ Supplier
6	Saleh	Tonjobullah	Landowner	Labor
7	Gulzar Miah	Zoynal Miah	Agricultural Labor	Labor

Table 2.2 reveals that most of the job beneficiaries of the plant have come from the landowner PAHs. The prioritization for the sharecropper and agricultural laborer PAHs should be followed in future job provision in the plant.

The Social Compliance Audit Report (SCAR), October 2014 developed livelihood restoration budget for all the 31 PAHs. SCAR, October 2014 suggested for development of a skill development and livelihood Improvement plan within the timeline of January, 2015 that would clearly indicate priority wise skill development and livelihood restoration requirements in line with detailed budget. However, the activities are under process – till date, only a preliminary training need assessment has been completed. Table 2.3 below depicts the preliminary training need assessment:

Table 2.3: Preliminary Training Need Assessment for 31 PAHs

Sl. No	Name of HH Head	Types of PAHs	Sewing Training	Agricultural/Fisheries	Welding	AC/Freeze Repairing	Remarks
1	Mr. Tara Miah	Landowner	Sifa Begum (Niece)	-	-	Mithu (Son)	
2	Mr. Ansar	Landowner	-	-	-	-	Not interested
3	Mr. Ripon	Landowner	-	-	-	-	Not interested
4	Mr. Mosaid	Landowner	-	-	-	-	Not interested
5	Abdul Mosabbir	Landowner	-	-	-	Abdul Hasan (Son)	
6	Tanjubullah	Landowner	-	-	Sowkat Miah (Son)	-	
7	Lablu	Landowner	-	Fozlu Miah (Brother)	-	-	
8	Mosadder	Landowner	-	-	-	-	Living in UK
9	Mr. Dulal	Landowner					
10	Yakubullah	Landowner	-	-	-	-	Living in UK
11	Reasatullah	Landowner	-	-	-	-	Living in UK
12	Asmat	Landowner	-	-	-	Aminul (Son)	
13	Abdul Aziz	Landowner	Shaheda Begum (Sister)	-	-	Javer (Nephew)	
14	Sonjobullah	Landowner			Forhad Miah (Son) Afaz Miah (Son)		
15	Lokaman mia	Sharecropper	-	Himself	-	-	
16	Era mia	Sharecropper	-	Himself	-	-	
17	Nunu mia	Sharecropper	-	-	-	-	Wife: SED capital
18	Hazi Abdul Nur	Sharecropper	-	-	-	-	Not interested
19	Masum mia	Sharecropper	-	-	-	-	Considered for SED capital
20	Hurmot Ullah	Sharecropper	-	Habibur Rahman (Son)	-	-	
21	Ashik Mia	Daily Laborer	Runi Begum (Niece)	-	-	-	Will receive SED capital
22	Joynul Ullah	Daily Laborer	Nilufa (Daughter)	-	-	-	
23	Sayed Mia	Daily Laborer	-	Himself	-	-	
24	Johir mia	Daily Laborer	Amirun (Daughter)	-	-	-	
25	Audud Mia	Daily Laborer	-	-	-	-	Not interested
26	Mohibur	Daily Laborer	-	-	-	-	Brother: SED capital
27	Monfor Mia	Daily Laborer	-	-	Sayek Miah (Son)	-	
28	Faruq Mia	Daily Laborer	-	-	-	-	Considered for SED capital
29	Shalai	Daily Laborer	-	-	-	-	Considered for SED capital
30	Idrias Ali	Daily Laborer	Samina Begum (Wife)	-	-	-	
31	Shayasta Mia	Daily Laborer	-	-	-	-	Considered for SED capital

Based on the preliminary training need assessment, SBIIPCL has started the 3 months long sewing training for women from 15 July. Besides, CDM has sent training budgets to SBIIPCL Corporate Office for approval of trainings on welding and AC/fridge repairing – each training activity comprises only 4 members. It is to be noted that out of 8 preliminarily identified male trainees for welding and AC/fridge repairing, 7 belong to the landowner group – the more vulnerable sharecroppers and agricultural laborers PAHs have been left behind again just like job opportunities in SBIIPCL plant. Besides, the overall process of TNA, training approval and training provision appears very slow.

Sample household visits revealed that TNA (Table 2.3) was not detailed enough. Surprisingly the TNA did not consider any option for poultry and livestock/cattle rearing trainings. Tanjubullah (Sl. No 6, landowner) has 3 sons who are currently unemployed having very limited education – only one of them has been selected for welding training. Lablu (Sl. No 7, landowner) lives in a joint family with his parents, brother and sisters, is currently unemployed. His sisters are interested to receive computer training. Sonjubullah's (Sl. No 14, landowner) daughters also wants computer training. Nunu Mia (Sl. No 17, sharecropper) is currently unemployed and his family is now under tremendous financial crisis. Both he and his wife could have been considered under trainings. Ashik Mia (Sl. No 21, day laborer) and Ullah's (Sl. No 22, day laborer) could have been selected for agriculture/fisheries training and their wives could have been considered for poultry/livestock training. Similarly, Mohibur's Ullah's (Sl. No 26, day laborer) could undergo sewing training as well as poultry/livestock training.

It is to be noted that the formal vocational training is being imparted by Hobiganj Youth Development & Training Center, for which most of the members of the PAHs fail to fulfill the entry criteria of minimum education level (e.g. class 8 pass). Hence, SBIIPCL has planned to provide such trainings through an NGO at nearby workshops.

SCAR, October 2014 identified one special PAH, Abdul Aziz, who lost all his land due to the project, and suggested for special grant of Taka 200,000 to be provided after providing vocational training (e.g. poultry or goat rearing), so that the grant money can best be utilized for livelihood restoration. Out of this, Taka 100,000 was paid in March, 2015, and the rest of the payment has been made in June, 2015. With this grant money, he has constructed tow shops – one is now being run by himself, and the other has been rented to SBIIPCL as CDM's office. Necessary materials (e.g. tins and woods) were also provided to him from SBIIPCL for establishing and decorating the shops. However, Abdul Aziz (Sl. No 13, landowner) is missing from the list of SED program of TNA.

It is suggested that the SBIIPCL should prepare detailed TNA with individual PAH profile for all the household members accompanied with educational qualification, current skill, priority wise job/training requirement, target deadline for training provision and possible sectors of future job provisions. Based on the detailed TNA, a training calendar should be prepared and maintained accordingly. SBIIPCL should also provide necessary assistance to the trained persons in getting jobs and keep track of them how the imparted trainings ensured benefits to them.

2.5 Project-related Construction and/or Operation Impacts

The project is still under construction phase, and operation of single cycle has already been started. The impacts of construction were duly mitigated as per ESIA document. Currently, EPC Contractor is responsible for mitigation of all construction related impacts on air quality, effluent discharge, noise and solid waste management. EPC maintains and records the mitigation measures, which are monitored by SBIIPCL.

One of the major impacts was deterioration of the existing earthen road from Sherpur to the plant due to movement of construction materials. SBIIPCL facilitated the process of improving the road, which has been widened and improved as a bituminous carpeting road by LGED. In addition, another internal road has been improved as a brick soling road with the own finance of SBIIPCL. Furthermore, from funding of PGCB, RHD has constructed a direct road from Dhaka-Sylhet Highway to SBIIPCL Plant bypassing the local settlements. Now, most of the SBIIPCL vehicles

move through the RHD road, and hence, local settlements are less disturbed from traffic movement of SBIIPCL.

2.6 Additional Land Allocation

No additional land allocation was required for the power plant.

3.0 Social Performance on Local Recruitment, Labor Relations and Conditions

3.1 Local Labor Recruitment

SBIIPCL has hired Engineering, Procurement and Construction (EPC) Contractor for construction of the power plant through following procurement policies and procedures. The EPC Contractor has updated its HR Policy to comply with the HR Policy requirements of SBIIPCL.

All the contract workers directly employed by EPC Contractor have been contracted with contract agreement. EPC Contractor hires vendors, suppliers and sub-contractors for supply of necessary goods and services including construction workers. EPC is responsible for entering into formal agreement with the individual vendors, suppliers and sub-contractors. For engaging sub-contractors or labor suppliers, EPC Contractor collects required documents from the concerned parties.

During employing workers directly or through sub-contractors, child labor engagement is strictly avoided, and National ID Card of each worker is checked and copy of the same is kept in the file. The workers are appointed only after passing the physical and medical tests. Non-discrimination as well as protection against sexual harassment and forced labor has been ensured by EPC Contractor.

EPC Contractor maintains files of contract agreements with different parties, and maintains records of working hours and overtime of the workers. There are three categories of staff & workers employed by EPC Contractor at SBIIPCL plant. They are:

- EPC contractor's own staffs (Chinese staffs): about 150 staffs including 6 female staffs;
- Directly hired local staffs and workers by EPC Contractor: 100 staffs and workers including 1 female nurse;
- Locally hired sub-contracted staffs and workers: 215 staffs and workers (all are male).

The construction phase is almost at the finishing stage. Hence, over the last few months, the number of workers is decreasing gradually. Except the Chinese female staff and 1 local nurse, no female worker has been employed by EPC Contractor. This is basically due to lack of scope for female workers in construction phase.

3.2 Labor Relations and Living Conditions

During the construction phase, as most of the workers employed by EPC Contractor are temporary in nature and therefore according to Bangladesh Labor Law, there is no requirement of formation of labor union or collective bargaining agreement (CBA). Moreover, the workers are mainly recruited through local labor suppliers. Hence, no labor union or CBA has been formed in the plant. Labor relations issues are managed by EPC Contractor through a grievance redress mechanism, and it is closely monitored by SBIIPCL personnel. National labor laws and Core Labor Standards (CLS) are complied with in terms of child labor and forced labor.

EPC Contractor has arranged accommodation for outside labors in construction lay-down area. The labor camp is found in reasonable good/healthy condition with running water and adequate sanitation facilities. EHS personnel of SBIIPCL regularly monitor the living condition of the labor camp to check the standards maintained. The records of monitoring are documented. In case of any non-compliance, EPC Contractor is informed and asked to rectify.

3.3 Working Hour and Overtime

According to contemporary labor law of Bangladesh (Bangladesh Labor Law 2006, last amended in 2013), each labor should enjoy a paid weekly holiday after maximum 6 days of continuous works. This implies, there should be maximum 26/27 working days per worker per month, while the worker should be receiving the salary of the whole month. By law, daily working hour is 8 hours and daily overtime should not exceed 2 hours. Maximum working hours including overtime is 60 hours per week, but on the average this should not be more than 56 hours per week.

(according to Bangladesh Labor Law) per year. This means, average maximum overtime per week is 8 hours, from which it might be implied that maximum average overtime per month should not exceed 48 hours in 4 (four) weeks.

Working hour analysis of the workers reveals that provision of one day leave at the end of 6 continuous days of work was not maintained. Few workers have also been found to be working more than the maximum limit of monthly overtime hours. Besides, the workers do not enjoy any paid holiday.

3.4 Salary and OT Payments

In the minimum wage circular, Bangladesh Minimum Wages Board of Bangladesh Government has specified minimum wage rate and salary for different sectors. The construction works of SBIIPCL fall under category 29 of the minimum wages circular of Bangladesh Government. Table 3.1 below depicts the monthly salary and wage structure for the construction sector workers and staff specified by Bangladesh Minimum Wages Board:

Table 3.1: Monthly Salary and Wage Structure for the Construction Sector Workers and Staffs

Ref. No.	Industry Name	Year of Wage Fixation	Labor Category	Basic Salary	House Rent Allowance	Medical Allowance	Transport Allowance	Other Allowance	Annual Increment Rate	Total Salary
29	Construction & Carpentry	2012	Labor	6,950	2,432.50	400	200	-	-	9,982.50 Daily Wage Tk 375.
			Staff	-	-	-	-	-	-	-

Source: Minimum Wages Circular, Bangladesh Minimum Wages Board (issued after April, 2015)

EPC Contractor pays salary regularly to the workers and staff at the end of each month. The locally hired sub-contracted workers and staff are paid their salaries through their concerned sub-contractors. According to the minimum wages circular, the minimum daily wage rate is Taka 375 for the construction labors. However, a good number of labors have been found to be paid less than this minimum wage rate. The minimum actual wage received by the workers is Taka 270 per day, while the maximum wage received is Taka 1,350 per day.

Bangladesh labor law has defined that the overtime rate should be at least double of the basic salary rate. So, from Table 2.1, considering the minimum monthly basic salary of Taka 6,950 the minimum hourly overtime rate should be at least Taka 67 ($=6950/(26*8)*2$). If the labor is employed for short period, and is paid on daily wage basis, the OT rate should be double to his hourly wage rate. However, EPC Contractor has been found to be making OT payment almost equal to the wage rate of the workers.

3.5 Labor Dispute or Grievance

EPC Contractor has placed a gray color box at gate no. 3 for receiving grievances from labors as well as local people. Besides, the safety supervisors move with grievance register books to every site of the plant everyday to note down grievances from the workers. Primarily, grievance issues are solved by EPC Contractor. SBIIPCL personnel monitor grievance redress activities of EPC Contractor on regular basis. Besides, SBIIPCL personnel also remain present in the grievance redress meetings as and when needed as stipulated in the EPC Grievance Redress Mechanism. If the both parties (affected person and EPC Contractor) fail to reach to an agreeable solution, the concerned grievance file will be forwarded to SBIIPCL GRM Plant Committee for redressing the grievance. Then the formal grievance redress mechanism of SBIIPCL will be followed to solve the grievance issue.

Till date, there is no incidence on labor dispute and conflict between groups and there are no legal disputes. Table 3.2 below depicts the summary of the grievances recorded and their status:

Table 3.2: Summary of the Labor Grievances Recorded and Their Status

NO	Issue	Grievance Details	Status		Remarks
			Receiving Date	Closing Date	
1	Job security for migrant workers	Some workers asked for appointment letters	23.09.2014	23.09.2014	NA as they are temporary workers.
2	Job security for migrant workers	Some workers asked for appointment letters	25.09.2014	25.09.2014	NA as they are temporary workers.
3	Mishap between Bengali supervisor and Chinese supervisor	The supervisor was unable to enter at site because of NEPC embargo	02.10.2014	19.10.2014	Redressed with involvement of SBII PCL Plant Committee, JCCR and NEPC jointly Continued to enter at site
4	Medicine from the EPC Medical Centre	Doctor did not supply medicine to the patient, rather gave a token	09.11.2014	09.11.2014	At that time, the particular medicine was not available.
5	Mishap between Bengali labor and Chinese supervisor	Verbal quarrel occurred between Chinese supervisor and Bengali labor	14.12.14	02.01.2015	Redressed by SBII PCL Plant Committee and NEPC EHS Department The Chinese Supervisor was warned and fined
6	Labor grievance	Labor Injury	08.02.2015	21.02.2015	NEPC gave the treatment cost.
7	Mishap between two labors	quarrel occurred between two labors	21.02.2015	23.03.2015	Addressed from the meeting among Supervisor of the labors, EHS Ast. Manager and Safety Supervisor
8	Labor complained about hand gloves	Labor at construction site complained about gloves	03.03.2015	04.03.2015	Received good gloves
9	Mishap between Bengali labor and Chinese supervisor	Verbal quarrel occurred between Chinese supervisor and Bengali labor	03.03.2015	17.03.2015	NEPC Plant committee internally resolved the matter and the applicant started working again under the same supervisor
10	Local boy injured	One local boy injured during an incident with one unknown Chinese person at night	20.03.2015	30.03.2015	NEPC provided treatment cost
No labor grievances in between April-May, 2015					
11	Chinese Supervisor beats Bengali labor	Chinese Supervisor beat Bengali labor at the boundary wall construction site	16.06.2015	24.06.2015	That was solved by organizing a hearing session.

3.6 Media or Community Reactions

There has been no media reaction on any issues regarding developing of SBII PCL. Stakeholder consultations during the preparation of ESIA and SCAR, the community reaction primarily focused on the compensation for the land acquired. This issue has been resolved. Subsequent consultations after dissemination of the ESIA and SCAR there are certain concerns regarding environmental issues especially for the water logging in the resettled area.

4.0 Stakeholder Engagement

4.1 Stakeholder Engagement Plan

SBIIPCL prepared a Stakeholder Engagement Plan (SEP) in June, 2015. A copy of the SEP has been attached in Annex 3. The SEP comprises of the following components: identification of stakeholders, stakeholder profiling, disclosure of project information, consultation and participation, negotiation and partnership, grievance management, preparation and implementation of corrective action plans, responsible departments/personnel and stakeholder engagement process. SEP has been translated into local language (Bengali), and it has been disseminated to the PAHs as well as other stakeholders.

Stakeholder engagements have been taking place over the last few months (from before preparation of SEP) with various categories of PAHs informally through visits of CDM and other SBIIPCL personnel to the project affected villages. The primary objective of these engagements was dissemination of the Bengali versions of ESIA Summary, CDP and livelihood restoration framework.

4.2 Consultation and Participation

Stakeholder consultations have been carried out not only with the 31 PAHs but also with other stakeholders of the power plant project. Consultations were carried out to disseminate the social and environmental impacts as well as mitigation measures being followed so far by SBIIPCL. The concerns of the participants and future action plan of SBIIPCL were discussed. Table 4.1 depicts the list of different types of consultations done with the different categories of PAHs and other stakeholders, while Table 4.2 shows similar types with consultations done with other stakeholders.

Table 4.1: List of Different Types of Consultations with PAHs

Stakeholder Type	Engagement Process	Date	Covered Subject
Landowners	Meeting	13/09/2013, 10/03/2015, 24/03/2015	GRM, ESIA, CDP, LRP, Other Project Concerns
	FGD	23/03/2015	GRM, ESIA, CDP, LRP, Other Project Concerns
	Personal Interview	26/10/2014, 13/03/2015, 15/03/2015, June-July, 2015	Socio economic survey LR opportunity assessment survey
Sharecroppers	Meeting	10/09/2013, 17/09/2013, 10/03/2015, 24/03/2015, June-July, 2015	GRM, ESIA, CDP, LRP, Other Project Concerns, LR opportunity assessment survey
	FGD	23/03/2015	ESIA
	Personal Interview	2/11/2014, 16/03/2015, 17/03/2015	Socio economic survey, LR opportunity assessment survey
Agricultural Labors	Meeting	10/03/2015, 24/03/2015	GRM, ESIA, CDP, LRP, Other Project Concerns
	FGD	23/03/2015	GRM, ESIA, CDP, LRP, Other Project Concerns
	Personal Interview	2/11/2014, 14/03/2015, 17/03/2015, June-July, 2015	Socio economic survey, LR opportunity assessment survey

Table 4.2: List of Different Types of Consultations with other Stakeholders

Stakeholder Type	Engagement Process	Timeline	Covered Subject
Nearby Village	Meeting	03/09/2013, 05/09/2013, 09/09/2013, 10/03/2015, 24/03/2015	GRM, ESIA, CDP, LRP, Other Project Concerns
	FGD	08/03/2015, 22/03/2015	GRM, ESIA, CDP, LRP, Other Project Concerns
	Personal Interview	24/09/2014, 25/09/2014, 14/03/2014, 15/03/2015, June-July, 2015	Socio economic survey, LR opportunity assessment survey
	Visit	23/09/2014, 28/09/2015, 13/10/2014, 13/12/2014, 27/01/2015	Regular visit
Local NGO (SEBA)	Health Service Delivery to community people	October, 2014- Till Date	Health Assessment Skill Development Plan
	Visit to SEBA office	03/02/2015	
JCCR	Meeting	28/10/2014, 05/11/2014, 31/12/2014, 18/02/2015, 04/03/2015, 20/04/2015, 17/05/2015, 07/06/2015, 19/07/2015	CDP, Drainage, Previous issues, Grievances, Future responsibilities, Job at plant, Tree Plantation, School and Hospital Enhancement
Community People (Local Subcontractors)	Meeting	29/09/2014	Site and labor issues
Community People (Local elite)	FGD	05/03/2014	CDP, GRM
Community People	Meeting, FGD based on Baseline Study	29/03/2008, 07/04/2008, 08/04/2008, 09/04/2008, 01/05/2008, 02/05/2008, 06/05/2008, 13/05/2008, 19/03/2011, 20/05/2011, 20/08/2011, 20/08/2011, 02/05/2011, 24/03/2011, 22/03/2011, 29/03/2011, 17/09/2013, 23/09/2011, 05/03/2014	Misc
Community People	Meeting, FGD based on ESIA Study	19/05/2011 28/05/2011	Misc
Community People	Visit	29/12/2014	Drainage and road construction scope

4.3 Issues and Concerns

The major issues and concerns raised during the consultation meetings were as follows:

- Provision of more employment at the plant.
- Demand for quick implementation of livelihood restoration plan.
- Ensuring sustainable livelihood after receiving vocational trainings.
- Reassessment of training needs, especially for women.
- Ensuring more roadway connectivity, especially to schools.
- Ensuring better accessibility to management of SBIIPCL.
- Demand for fresh drinking water through improvement of installed tube wells by SBIIPCL.

- Demand for improved efficiency of JCCR.
- Demand for quick implementation of CDP.
- Demand from the resettled PAHs for construction of drainage system to avoid water logging during monsoon.
- demand for more sanitation coverage.

4.4 Women's Participation & Engagement

Several women's group discussions were held. The group showed interest in the vocational training programs on sewing, poultry and cattle rearing. Women group in the resettlement village expressed their concern on water logging which is affecting their homestead and normal during monsoon. Availability of constant access to the doctor provided by SBIIPCL was appreciated by women. However the demands for free medicine and diagnostic facilities were made, which have not yet been addressed by SBIIPCL.

4.5 Procurement Opportunities Extended to Local Community

All procurements for the pre-construction and construction phase were done by EPC Contractor through competitive bidding. Priority was given to local contractors/sub-contractors, suppliers and vendors. For example, labor supply sub-contracts were given to local sub-contractors.

5.0 Implementation of Grievance Redress Mechanism

5.1 SBIIPCL Grievance Redress Mechanism

SBIIPCL Grievance Redress Mechanism was put in place and made operational from September, 2014 through direct communication with CDM of SBIIPCL and documentation has been done accordingly. Both GRC-Corporate Committee and GRC-Plant Committee have been formed. For ensuring dissemination of GRM within the community people, hand bills have been distributed, verbal communication has been done, registry book (at CDM Office) is maintained, complain box has been installed outside gate no. 3 and communication details of CDM has been displayed (outside gate no. 3 as well as in front of CDM's Office).

SBIIPCL grievance redress mechanism is basically a three tier mechanism. Local people may lodge their complaints directly to CDM through complaint box, over telephone or email and even by directly coming to his office. CDM is responsible to address the grievance issues and disseminate the result to complainants by two weeks. If the CDM is unable to resolve the issue, it is referred to the GRC-Plant Committee, which is responsible to resolve it by one week. In case of failure of the GRC-Plant Committee in resolving the grievance issue, it is referred to GRC-Corporate Committee, which will have to provide solution by one more week. The grievance redress mechanism has been translated into Bengali, and has been disseminated among the PAHs and other stakeholders.

5.2 Grievance Issues and Status

Till date 23 grievances have been lodged from community people. Among them 14 grievances have been resolved, 2 have been rejected and the rest 7 are in the process of resolution. The unresolved grievances were basically regarding provision of livelihood restoration assistance and job provision requests from the PAHs and drainage facility development at the nearby village to tackle water logging problem during monsoon. All the unresolved issues have been forwarded to GRC-Corporate Committee. Table 5.1 below depicts the grievances lodged by community people and status of addressing them.

Table 5.1: Grievances Lodged by Community People and Status

No.	Issue	Grievance Details	Status		Remarks
			Receiving Date	Closing Date	
1	Land allotment at nearby village	Previously they owned 10 decimal now received 7 decimals of land.	24.09.2014	24.09.2014	On spot redress CDM told that, they have less land but tenure is secured.
2	Road construction request for the village area	The individual requested to construct the road in front of his house	29.09.2014	29.09.2014	On spot redress – additional road will be constructed for the community that needs most.
4	Job request	The local people asked for job at SBIIPCL	30.10.2014	30.10.2014	On spot redress CDM assured that local people will be consulted if such opportunity arises.
5	Sand Lifting by subcontractors	Subcontractors lifted sand without submitting written letter	14.11.2014	14.11.2014	On spot redress The subcontractors submitted written letter
6	Scrap materials of Plant	Local people wanted to have the scrap materials	24.11.2014	24.11.2014	On spot redress CDM told them that, these will be given first come first get service, but priority should be given to local people
8	Scarp materials of Plant	Local people wanted to have the scrap materials	03.01.2015	07.01.2015	Closed and feedback given to the applicant after discussion between EHS Dept. of NEPC and Plant Committee of SBIIPCL
9	Sub contract scope at Plant	River side people (Tajpur) wanted to have work at plant	25.01.2015	27.01.2015	Redressed by SBIIPCL Plant Committee, NEPC and community

No.	Issue	Grievance Details	Status		Remarks
			Receiving Date	Closing Date	
					people. They were given some work orders for sand and labor supply.
10	Road condition improvement	Road became slippery due to excess water use for dust prevention	31.01.2015	01.02. 2015	Quantity of water was reduced
11	Threat to migrant workers	One local people gave threat to a migrant worker	07.02.2015	18.02.2015	This was informed to Site In-Charge and he shared this with local police station.
12	Local boy injured	One local boy injured during an incident with one unknown Chinese person at night	20.03.2015	30.03.2015	NEPC provided treatment cost
13	Chinese worker stole dog	Chinese worker stole a dog and killed which belong to a local people	2.05.2015	12.05.2015	Taka 20,000 was given as compensation
14	Land beside switch yard	Land is useless due to sand and water beside switch yard area	17.06.2015	07.07.2015	BPDB and PGCB will take care of the issues by the time of drain construction
Rejected:					
15	Scarp materials of Plant	Local people wanted to have the scrap materials	03.01.2015	03.01.2015	Rejected Same as case 8
16	Scarp materials of Plant	Local people wanted to have the scrap materials	04.01.2015	04.01.2015	Rejected Same as case 8
Not Closed/ Not addressed:					
17	Community Drainage	Community people want to have the community drainage constructed by SBII PCL	25.10.2015	NA	Not Closed Scope of drainage work assessed but not addressed. Transferred to GRM Corporate Committee
18	Attention and assistance for PAH from SBII PCL	Local people (poor) wanted to have assistance/support from SBII PCL	09.11.2014	NA	Not Closed LRP not implemented yet. Referred to GRC-Corporate Committee.
19	Drainage at nearby village	People at nearby village want to have the community drainage constructed by SBII PCL	12.12.2014	NA	Not Closed Scope of drainage work assessed but not addressed. Referred to GRC-Corporate Committee.
20	Resettlement PAHs	Assistance/job from SBII PCL	22.12.2014	NA	Not addressed LRP not implemented yet. Referred to GRC-Corporate Committee.
21	Resettlement PAHs	Assistance/job from SBII PCL	03.02.2015	NA	Not addressed LRP not implemented yet, TNA conducted. Referred to GRC-Corporate Committee.
22	Job opportunity at plant	Job opportunity at plant to local people	2.06.2015	NA	Not addressed LRP not implemented yet
23	Job opportunity at plant	Liton Miah asked to get Job opportunity at plant	04.08.2015	NA	Not Closed. He did not get job yet

5.3 Effectiveness of Grievance Mechanism

GRM monitoring form is filled up on quarterly basis for assessing the effectiveness of grievance mechanism. Till date, GRM monitoring has been done for the 1st and 2nd quarters of the current year. After commencement of implementation of skill development and livelihood restoration plan in full swing as, the effectiveness of the grievance mechanism can be assessed more rigorously from the next reporting periods.

6.0 Adequacy of Institutional Arrangements and Social Management Capacity

6.1 Institutional Arrangements and Social Management

There was no resettlement requirement for the plant area. The land acquisition institutional arrangements have already been discussed in Section 2.2 of the previous social monitoring report.

SBIIPCL is responsible for development as well as implementation of skill development and livelihood restoration plan, community development program, stakeholder engagement and grievance redress mechanism. Besides, SBIIPCL is also responsible for complying with Bangladesh Labor Laws and SPS, 2009 of ADB.

The institutional arrangements for dealing with the social aspects are emerging. For dealing with the above issues, Deputy General Manager (DGM), EHS Assistant Manager and CDM have been appointed. Additionally, a Livelihood Restoration Consultant has also been appointed.

Deputy General Manager (DGM) and EHS Assistant Manager are responsible for ensuring compliances for labor issues along with other EHS responsibilities. Besides, EPC Contractor has HR and EHS personnel to ensure the required labor compliances. EHS personnel of both EPC Contractor and SBIIPCL provide on-job trainings to the labors.

Livelihood Restoration Consultant and CDM are responsible for implementation of skill development and livelihood restoration plan. A local NGO (SEBA) has been hired for implementation of the skill development/vocational trainings and small enterprise development (SED) activities being specified under the livelihood restoration plan. CDM has additional responsibility to ensure effective implementation of community development plan, stakeholder engagement plan and grievance redress mechanism.

JCCR has been formed and is functional since October, 2014. The committee consists of 9 members (2 local government representatives, 3 from PAH, 1 female, 1 school headmaster, 2 local representatives. Membership of the committee needs to be reviewed quarterly to assess their performances, and if necessary, the committee members should be replaced through consultation with the concerned community people.

Grievance Redress Mechanism is in place and is functional since September, 2014. Both GRC-Corporate Committee and GRC-Plant Committee have been formed.

Deputy General Manager (DGM), EHS Assistant Manager and CDM will report the progress to the site management, who will report to the corporate level for final decisions if required. They will also be responsible for disseminating all project related social issues to the PAHs and local community.

6.2 Adequacy of Institutional Arrangements and Social Management Capacity

Considering the ongoing construction phase, the institutional arrangement and social management capacity in place is adequate.

7.0 Corrective Actions

7.1 Summary Assessment of Implementation of Corrective Actions

SCAR, October 2014 identified 13 corrective actions. Monitoring of the corrective actions has been carried out, which reveals that 6 actions were partially complied. Revised timeline and required corrective measures have been suggested for these partially complied actions. Summary assessment of implementation of corrective actions including the suggested revised timeline and required/additional corrective measures has been depicted in Annex 1. To visualize the compliance status, color codes have been used as follows:

Complied:	
Partially complied:	
Partially complied, but considerable activities yet to be accomplished:	
Not complied:	

7.2 Action Plan for the Next Reporting Period

The next reporting period will be due in November, 2015. All the actions being monitored in the current report will be monitored in the next quarter. Besides, special focus will be provided on the actions that were partially complied during the current monitoring, which has been describe below in Table 7.1.

Table 7.1: Corrective Actions Required for the Next Quarterly Monitoring

SI No	Key areas	Status	Corrective Actions Required	Responsible Party	Revised Timeline
1	Prioritization of employment opportunity to affected persons, especially vulnerable households: Review of present status to maximize opportunities for employment of PAHs specially venerable people	Partially Complied.	Through systematic review of present status on eligibility of members from specially venerable PAHs as well as regarding the employment opportunities, maximization of employment from specially venerable PAHs has to be ensured.	SBIIPCL in coordination with EPC Contractor	Oct-15
2	Development of a skill development and livelihood restoration plan: Based on recommendation of Social Compliance Audit finalize the implementation plan	In process/ partially complied.	Skill Development and Livelihood Improvement Plan should be finalized with detailed TNA, which should also consist of an implementation plan. Timely implementation of trainings as well as improvement of livelihood improvement of the trainees should be monitored.	SBIIPCL in coordination with independent NGO	Oct-15
3	Restoration of Income Loss of 6 Sharecroppers & 11 Agricultural Laborers	Partially complied.	Priority for sharecropper and agricultural laborer PAHs should be ensured in skill development trainings. After provision of SED training, interest free micro credit loan of Tk. 50,000 for two years (and/or direct employment) should be	SBIIPCL in coordination with independent NGO	Oct-15

			disbursed. Effectiveness of SED and its impact on livelihood improvement of the PAHs should be monitored.		
4	Develop and maintain all legal register of the all project components & documents the Stakeholder engagement Records	Partially complied.	Collection of actual compensation and legal documents (paid by LAO) has to be ensured. Maintenance of legal register and record keeping of all other relevant events should continue.	SBIIPCL	Oct-15
5	Prepare Specific Training Module for Vocational Training and SED for the PAHs	Partially complied.	Training modules for each type of vocational training and SED should be finalized by concerned technical experts.	SBIIPCL/NGO	Oct-15
6	Green Belt: Plantation around the project boundary and Access Road.	Partially complied.	Plantation along the access road is complete; SBIIPCL will do green belting around the project boundary at suitable locations.	SBIIPCL	Dec-15

8.0 Implementation of Community Development Program

8.1 SBIPCL Community Development Program

SBIPCL prepared a Community Development Program (CDP) as a stand alone document to assist the overall social and economic development for the affected communities. CDP suggested for the following community development programs for improvement of social and environmental wellbeing of the community to be implemented in one year, and then the services to be continued afterwards:

- i) Enhance medical facilities
- ii) Enhancement of an expanded hospital
- iii) Enhancement of high school education
- iv) Tube wells for safe drinking water
- v) Plantation Program

8.2 Status of Implementation of Community Development Programs

CDP suggested for initiation of all the community development programs in full swing by the mid of current year. However, commendable progress did not take place. Summary Assessment of implementation of community development programs along with revised deadlines and additional corrective measures has been depicted in Annex 2.

8.3 Monitoring and Evaluation of CDP Implementation

The Community Development Program suggested for timely monitoring and evaluation of implementation of the proposed community development programs through engagement of an independent NGO. The first monitoring period was due in March, 2015. However, no monitoring and evaluation NGO has been appointed till date.

Annex 1 Social Monitoring Status on Corrective Action Plan

Color Codes Showing Current Status of Compliance:

Complied:	
Partially complied:	
Partially complied, but huge task ahead:	
Not complied:	

No	Corrective Actions	Responsibilities	Deliverable Actions to be Taken	Time Line	SBIIPCL Status till date	BCAS Comments
1	Strengthening of record keeping of grievance redress of SBIIPCL	SBIIPCL	Putting GRMP in place	Dec-14	<ul style="list-style-type: none"> Both GRC-Corporate Committee and GRC-Plant Committee have been formed. Activities are on going, documentation has been done since September, 2014 through direct communication with CDM of SBIIPCL. Till date 23 grievances have been lodged from community people. Among them 14 grievances have been resolved, 2 have been rejected and the rest 7 are in the process of resolution. All the unresolved issues have been forwarded to GRC-Corporate Committee. 	Complied.
2	Strengthening of record keeping of grievance redress of EPC Contractor	EPC Contractor	Make present GRMP more efficient through more access to employees	Dec-14	<ul style="list-style-type: none"> GRM of EPC is closely monitored by SBIIPCL and records have kept accordingly. This has increased access of workers to the GRM process. 	Complied.

No	Corrective Actions	Responsibilities	Deliverable Actions to be Taken	Time Line	SBIIPCL Status till date	BCAS Comments
3	Prioritization of employment opportunity to affected persons, especially vulnerable households	SBIIPCL in coordination with EPC Contractor	Review of present status to maximize opportunities for employment of PAHs specially venerable people	Dec-14 Revised Timeline: Oct-15	<ul style="list-style-type: none"> Among 31 PAHs, currently 7 are employed. However, 6 of them are from landowner PAHs and 1 from agricultural laborer PAH. SBIIPCL is assessing the eligibility of interested members from each vulnerable PAH (sharecroppers, agricultural laborers and landowners losing more than 10% land). 	<p>Partially Complied.</p> <p>Through systematic review of present status on eligibility of members from specially venerable PAHs as well as regarding the employment opportunities, maximization of employment from specially venerable PAHs has to be ensured.</p>
4	Development of a skill development and livelihood Improvement plan.	SBIIPCL in coordination with independent NGO	Based on recommendation of Social Compliance Audit finalize the implementation plan	Jan-15 Revised Timeline: Oct-15	<ul style="list-style-type: none"> An NGO (SEBA) has been engaged by SBIIPCL. SEBA has prepared a skill development and livelihood Improvement plan. But the plan did not take into account detailed training need assessment. Preliminary Training Need Assessment (TNA) has been done. But thorough TNA has not yet been conducted. No implementation plan has yet been finalized. 	<p>In process/ partially complied.</p> <p>Skill Development and Livelihood Improvement Plan should be finalized with detailed TNA, which should also consist of an implementation plan. Timely implementation of trainings as well as improvement of livelihood improvement of the trainees should be monitored.</p>
5	Income Loss of 6 Sharecroppers & 11 Agricultural Laborers	SBIIPCL in coordination with independent NGO	Priority to be given to this group for training and small enterprise development through facilitating interest free micro	Jan-15 Revised Timeline: Oct-15	<ul style="list-style-type: none"> Payment of Taka 7,500 to each sharecropper PAH and Taka 8,000 to each agricultural laborer PAH has been made to offset their economic displacement. Three months sewing training for 6 female 	<p>Partially complied.</p> <p>Priority for sharecropper and agricultural laborer PAHs should be ensured in skill development trainings. After provision</p>

No	Corrective Actions	Responsibilities	Deliverable Actions to be Taken	Time Line	SBIIPCL Status till date	BCAS Comments
			credit loan Tk. 50,000 for two years and direct employment		<p>trainees has been started from 15 July, 2015.</p> <ul style="list-style-type: none"> Vocational Training Proposal for males (welding training and AC/fridge repairing training each for only 4 trainees) has been prepared and these trainings are expected to be started from September, 2015. However, out of these 8 males only 1 belong to the sharecropper and agricultural laborer group. Thorough TNA will ensure identification of more trainees. SBIIPCL is currently assessing the potential SED activities and PAHs (who will come under this program). Concurrently, SBIIPCL is negotiating with Grameen Bank, ASA and BRAC to implement the SED activities including concerned trainings. Further discussions have been carried out with Friends in Village Development (FIVD) for the implementation. 	of SED training, interest free micro credit loan should be disbursed. Effectiveness of SED and its impact on livelihood improvement of the PAHs should be monitored.
6	Outstanding Compensation Payment	SBIIPCL in coordination with LAO	CDO to arrange legal assistance to expedite compensation payment	Dec-14	Completed. Idrias Ali received his compensation later, as he was not available during last monitoring period.	Complied.

No	Corrective Actions	Responsibilities	Deliverable Actions to be Taken	Time Line	SBIIPCL Status till date	BCAS Comments
7	Appoint Trained Community Development Officer (CDO) to implement monitoring the Livelihood Restoration Plan as well as any other issue raised by community.	SBIIPCL	In TOR of CDO it would clearly mentioned the desired education Level (URP, Geography, Social Science Background) having Theoretical and practical experience in LRP implementation in Bangladesh	Oct-14	<ul style="list-style-type: none"> CDM has been appointed in September 15, 2014 He has been working accordingly. 	Complied within deadline.
8	Develop and maintain all legal register of the all project components & documents the Stakeholder engagement Records	SBIIPCL	CDO office will be established, where all the documents related to land Acquisition, Legal Notice, Payment Status, Stakeholder engagement and all contractual records should be maintained for future reference	Oct-14 Revised Timeline: Oct-15	CDM Office has been established, and the appointed CDM is working on collecting all the legal documents from LAO. Documents of serving 3 acquisition & requisition notices (by DC) are already available. Collection of actual compensation and legal documents (paid by LAO) is in process. Legal register has been developed and is being maintained. Stakeholder engagement records are maintained. Contractual records are also maintained.	In process/partially complied. Collection of actual compensation and legal documents (paid by LAO) has to be ensured. Maintenance of legal register and record keeping of all other relevant events should continue.
9	Training of SBIIPCL official for preparation of Training calendar and Implement the LRP and CAP	SBIIPCL authority through engagement of a Independent Consultant or Consulting firm	Hands on Training on monitoring the implementation of LRP, CAP	Dec- 14	<ul style="list-style-type: none"> Awareness raising, induction and capacity building has been carried out by BCAS. The Livelihood Restoration Expert imparted hands on training to the CDM on opportunity assessment, training needs assessment, livelihood restoration measures, training calendar preparation and implementation of LRP and CAP. 	Complied.

No	Corrective Actions	Responsibilities	Deliverable Actions to be Taken	Time Line	SBIIPCL Status till date	BCAS Comments
10	Prepare Specific Training Module for Vocational Training and SED for the PAHs	SBIIPCL/ NGO	Engagement of a Technical Expert (Vocational Training Expert)	Dec- 14 Revised Timeline: Oct-15	<ul style="list-style-type: none"> SEBA (engaged NGO) has already produced Training Module for Sewing Training (hands on training on women: 3 hours per day and 5 days a week for 3 months). One expert has been engaged for sewing training Two other experts have been selected who will conduct agriculture/fisheries training in September, 2015. 	In process/partially complied. Training modules for each type of vocational training and SED should be finalized by concerned technical experts.
11	Formation and activate The Joint Committee for Community Relation (JCCR)	SBIIPCL, CDO will take initiatives	From each components of the Project at least 2 representatives, Local Government and SBIIPCL representatives will form the committee for discussion and resolve any kind of Grievances and compensation	November , 2014	<ul style="list-style-type: none"> JCCR has been formed, and first meeting of JCCR was held on 28 October, 2014. 9 JCCR meetings have already taken place, and minutes have been kept. 	Complied. Membership of the committee needs to be reviewed quarterly to assess their performances, and if necessary, the committee members should be replaced through consultation with the concerned community people.
12	Maintain proper Record of employment and vendor opportunity provided to the PAPs and local community & Recording the engagement of Local community in	SBIIPCL CDM, EPC Contractor	List the local Vendors Daily Register of labor specially labor engaged from PAHs. Total Number of working days of each labor. Documents of each Labor contract.	October, 2014	Record keeping of vendors and other details is ensured.	Complied.

No	Corrective Actions	Responsibilities	Deliverable Actions to be Taken	Time Line	SBIPCL Status till date	BCAS Comments
	the ongoing construction project and in the associates components		Record daily & Overtime payment sleep having signature and finger sprint of each labor			
13	Green Belt	SBIPCL	Plantation around the project boundary and Access Road. Suitable Species will be selected consultation with a botanist	May 2015 Revised Timeline: Dec_15	Plantation has been done on either sides of the access road. However, plantation around the project boundary shall be undertaken within Dec 15.	Partially complied. Plantation around the project boundary should be ensured within Dec 2015.

Annex 2 Monitoring Status on Implementation of Community Development Program

Color Codes Showing Current Status of Compliance:

Complied:	
Partially complied:	
Partially complied, but huge task ahead:	
Not complied:	

Sl. No.	Category of Expenditure	Cost (Tk)	Description	Timeline	Responsibility	SBIIPCL Status till date	BCAS Comments
1	Enhancement of Local Education (including non-formal education)	10,000,000	Free education materials, to reduce dropout of students and enhance construction of new building (modern toilet and drinking water facilities) & development of non-formal education facilities	1/2015 Revised Timeline: Oct-15	SBIIPCL	15 schools have been visited. Short listing process for selecting schools is in process. Among them, one school (Parkul Primary School) is identified. The enhancement work will start after the formation of new school committee.	In process but not complied.
2	Establishment of a Library	3,000,000	establishment of library, Furniture, Book Shelf, new books, Scientific Journal, Setting up Internet for access to information data and related materials for modern education	1/2015 Revised Timeline: Oct-15	SBIIPCL	A High school in Sherpur has been identified. SBIIPCL team has talked with the school management committee and assessed the scope to develop the library.	In process but not complied.

Sl. No.	Category of Expenditure	Cost (Tk)	Description	Timeline	Responsibility	SBIIPCL Status till date	BCAS Comments
3	Enhance Health Service in existing centre	1,500,000	Doctors and technical staff, medicine supply in the existing Centre for 5 years	12/2014 Revised Timeline: Oct-15	SBIIPCL	Doctor has already been employed. Since the community health complex situated adjacent the plant site is under the government, it is not allowed to permit the private doctor practicing at the premise. Hence, SBIIPCL has rented a separate place at Parkul (in front of the power plant beside CDM's Office) for ensuring access to the Doctor's service at free of cost. However free supply of medicine has not yet been started.	Partially complied.
4	Enhancement of a Local Hospital	13,500,000	Civil structure, beds, medical equipment, lab facilities and additional running cost.	6/2015 Revised Timeline: Jan-16	SBIIPCL	Local hospital is not available within 15 km area. SBIIPCL is now negotiating with health service providers for further work.	In process but not complied.
5	Improvement of 3 km Road	2,600,000	Paved Road Sherpur-Bongaon	6/2015 Revised Timeline: Jan-16	SBIIPCL	Completed improvement from Sherpur to Plant (2.5 km). However the road has not yet been extended up to Bongaon.	Partially complied.
6	Installation of 5 tube wells	1,00,000	Parkul, Resettlement site Tk. 20,000 x 5 Tube well	Revised Timeline: Jan-16	SBIIPCL	Completed. However, all the installed tube wells are arsenic contaminated, and need remedial measures to ensure supply of pure drinking water.	Partially complied.

Sl. No.	Category of Expenditure	Cost (Tk)	Description	Timeline	Responsibility	SBIIPCL Status till date	BCAS Comments
7	Plantation Program	1,000,000	Along the access road and project site boundary	6/2015 Revised Timeline: Oct-15	SBIIPCL	Plantation has been done on either sides of the access road. However, no plantation has been done around the project boundary. Rather, the boundaries of the power plant has been paved.	Partially complied.
8	Monitoring & Evaluation of CDP	60,00,000	Total 13 Report for 5 years	12/2014-12/2019	SBIIPCL	No independent NGO has yet been appointed for monitoring and evaluation of CDP.	Not complied.



STAKEHOLDER ENGAGEMENT PLAN

Summit Bibiyana II Power Company
Limited

Parkul, Nobigonj, Habiganj

Stakeholder Engagement Plan

INTRODUCTION

Stakeholders are the entities those have stake or share of a project and who are affected directly or indirectly by a project. Generally individual, group, any organization or community within a particular project's influence area are considered as stakeholders of the project. The World Bank Operational Policies, Performance Standard IFC or Safeguard Policy Statements of ADB suggest that, the operating company should have a Stakeholder Engagement Plan (SEP) for better development practices.

According to IFC Stakeholder Engagement Practice Book, a good Stakeholder Plan should be:

- ☐ well targeted towards its stakeholders
- ☐ should properly inform about the actions and key concerns
- ☐ gender inclusive that ensures proper participation of women representatives
- ☐ free from biasness
- ☐ meaningful to its objectives and strategies
- ☐ properly documented
- ☐ continuous

THE PROJECT

Summit Bibiyana II Power Company is developing a 341 MW combined cycle power plant at Parkul, Nabigonj, Habiganj. Economic displacement due to land acquisition for the plant construction, loss of employment for sharecroppers, khashland cultivators and agricultural workers and loss of homestead has resulted due to the project. Good Industrial Practice (GIP) refers that, a stakeholder engagement plan is required to minimize or mitigate the adverse impacts of the project PAHs and the neighboring community.

OBJECTIVES OF STAKEHOLDER ENGAGEMENT PLAN

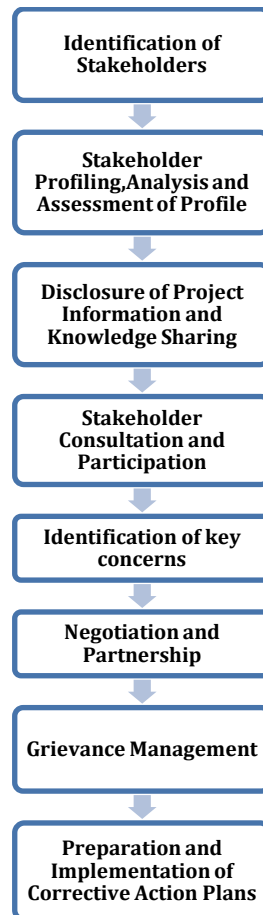
Stakeholder Engagement Plan is considered to be a useful tool for maintaining communications between the project authority and its stakeholders. It will help to improve and facilitate decision making of the local community and will create an atmosphere in such a way so that the stakeholder groups are provided with sufficient opportunities to improve their livelihood.

The objectives for the Stakeholder Engagement Plan should be:

- ☐ to disseminate the SEP to the community and the PAHs.
- ☐ to provide a proper guidance for stakeholder engagement in such a way so that it meets the international standards
- ☐ to identify and monitor the project stakeholders through the SEP
- ☐ to identify and resolve the grievances in an efficient way
- ☐ to engage with the stakeholders on Livelihood Restoration process, Community Development Plan to be executed by SBIIPCL and environmental and social issues..

- to establish a respectful and long lasting relationship with the community and stakeholders

The following flowchart represents the major components of Stakeholder Engagement Process:



A. Identification of Stakeholders

Identification of different level of stakeholders is the primary requirement for the engagement plan. For a large scale project like SBLLPCL, there can be different level of stakeholders. From the analysis of project planning, the stakeholders can be classified into the four following categories:

i. Project Affected Households (PAH)

The project affected households are the families those are directly affected by the project. These include the landowner groups, sharecroppers, khasland cultivators, agricultural labors and resettlers whose livelihoods are disrupted due to the project development. So they will be considered as the most vulnerable groups and the early engagement strategy should be applied for them.

ii. Interested Group

Generally, community people including local elites, politicians, civil society, business people or general community representatives will be considered as the interested group of stakeholders.

iii. Strategic Partners

Since the very inception to smooth operational level, this project will engage several types of entities who will work as strategic partners for the project. The major strategic partners for SBLLPCL are:

- NEPC: The EPC Contractor
- Jalalabad Gas: Exclusive gas pipeline installation
- Power Grid Company Bangladesh: Work of access T-line to transmit power
- NGOs: Social service delivery

iv. Government Entities

Government entities include National and Local Government Officials including Ministries, DC Office, Union Parishad Office, Police Stations etc.

B. Stakeholder Profiling

An effective stakeholder engagement plan can be attained when it is properly documented and is aware about each and every individual stakeholder. To do so, profiling of stakeholders can be key to better SEP. The following template can be used for future level stakeholder profiling.

Type of Stakeholders	Influence and Risk Level	Key Information																			
Affected Households (APs)	Influence Level:	Name of Household Head: Address: Occupation: Contact: Engagement Method: <i>Socio-Economic Information</i>																			
	High																				
	Medium																				
	Low																				
	Risk Level:	<table border="1"> <thead> <tr> <th>Name of Family Member</th><th>Age</th><th>Education</th><th>Occupation</th><th>Key Concerns</th></tr> </thead> <tbody> <tr> <td></td><td></td><td></td><td></td><td></td></tr> <tr> <td>1</td><td>2</td><td>3</td><td>4</td><td>5</td></tr> </tbody> </table>					Name of Family Member	Age	Education	Occupation	Key Concerns						1	2	3	4	5
	Name of Family Member	Age	Education	Occupation	Key Concerns																
1	2	3	4	5																	
Interested Group	Influence Level:	Type of Group: Address: Key Concerns: Engagement Method:																			
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Strategic Partners	Influence Level:	Type of Partners: Address: Key Concerns: Engagement Method:																			
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Government Entities	Influence Level:	Type of Entity: Address: Key Concerns: Engagement Method:																			
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	Risk Level:	<table border="1"> <tbody> <tr> <td></td><td></td><td></td><td></td><td></td></tr> </tbody> </table>																			

Here, 5= Very High Risk, 4= High Risk, 3= Medium Risk, 2= Low Risk, 1= Minimum Risk Level

C. Disclosure of Project Information

The main aim of the stakeholder engagement is to disclose project information as clearly as possible. The technical issues should be communicated in a manner that is comprehensible to the stakeholders and should reflect transparency accountability..

D. Consultation and Participation

World Bank Operational Policy (OP) 4.12 states that, affected persons should be meaningfully consulted and should have opportunities to participate in planning and implementing development programs. Furthermore, one of the core components of ADB's Safeguard Policy Statement is enhancement of consultation and participations of the stakeholders. So to ensure meaningful consultation, the project will initiate some consultation strategies which will include Focus Group Discussion (FGD), structured and semi structured interview, meeting, Participatory Rural Appraisal (PRA), Rapid Rural Appraisal (RRA), visit, Key Informant Interview (KII), Community Mapping, assessment which will be determined based on the requirements of the Project. Most importantly, proper documentation of the consultation events should be regularly maintained and updated.

E. Negotiation and Partnership

Good Industrial Practice suggests that, project within a community should be people intensive. Stakeholder's involvement within project by creating opportunities of partnership is required to be considered with great importance. Community Engagement strategies such as engagement of community people as representatives in committees, involvement within various events led by project will enhance peoples right in the decision making process.

F. Grievance Management

Grievance management is an important task for the implementation of Stakeholder Engagement. From the land acquisition, construction to operation, various grievances can be raised from the community, particularly for environmental and social aspects. So to address and resolve grievances properly, the Company should have a Grievance Redress Plan or Mechanism. The plan will describe grievance address procedure, channel of communication, responsible authority to resolve and timeframe for mitigation. Any grievances which will be raised by the community, will be referred either to Joint Committee for Community Relations (JCCR) or to GRC-Plant based on the type of the grievances. If the GRC-Plant fails to resolve the grievance within one month or deems to transfer, then it will be transferred to GRC-Corporate for better outcomes.

G. Preparation and Implementation of Corrective Action Plans

Corrective Action Plans are the initiatives that take place as an outcome of the consultations and engagement. For SBII PCL, the Livelihood Restoration Plan, GRM, Environmental and Social Impact Assessment, Community Development Plan will be used as guiding documents for making the corrective action plan.

Responsible Departments/Personnel

Following departments or personnel should be responsible for the implementation of Stakeholder Engagement Plan for SBII PCL.

- a. SBII PCL Site Office for Site level assistance or SBII PCL Corporate Office for corporate level assistance
- b. NEPC, the EPC Contractor for site level assistance
- c. Operation and Maintenance Team for site level assistance
- d. CDM of SBII PCL for direct engagement
- e. Ast. EHS Manager for direct engagement
- f. Local NGO assigned by SBII PCL for social service delivery
- g. Any other parties assigned by SBII PCL

The following template will be used for Stakeholder Engagement and will be updated regularly.

Stakeholder Engagement Process for PAH

Stakeholder Type	Engagement Process	Discussed/Raised Issues	Issues referred to the GRC or JCCR	Action Taken	Timeline
Landowners	Meeting				
	FGD				
	Personal Interview				
	KII				
Sharecroppers	Meeting				
	FGD				
	Personal Interview				
	KII				
Resettlers	Meeting				
	FGD				
	Personal Interview				
	Visit				
Agricultural Labors	Meeting				
	FGD				
	Personal Interview				

Stakeholder Engagement Process for Others

Stakeholder Type	Engagement Process	Discussed/Raised Issues	Action Taken	Timeline
Local NGO (SEBA)	Service Delivery to community people			
	Visit to SEBA office			
	Meeting			
JCCR	Meeting			
	Visit			
Community People (Local Subcontractors)	Meeting			
Community People (Local elite)	FGD			
	Meeting			

Community People (General)	FGD			
	Meeting			
	KII			

Annex 4 Photographs



SBIIPCL Plant View



SBIIPCL Plant View: Construction almost finished



Inside SBIIPCL Plant (Direction & Fire Fighting)



SBIIPCL Plant: Ongoing Construction Work



Visiting a landowner's house



Cattle Rearing at a Landowner's House



Improvement of Residence done with Land Compensation



A Landowner has Constructed a Shop Utilizing the Land Compensation



Meeting with Abdul Aziz, who lost 100% land. He has opened up a shop with the special allowance of Taka 200,000.



A Typical Poor Sharecropper PAH Standing in front of Their Residence



Skill Development Training on Farming/Fisheries and Poultry/Livestock and Provision of SED Loan will Definitely Improve Their Livelihood



Sewing Training is now Under Operation



View of the Labor Camp



Labor Camp: Inside View



Labor Camp Toilet



Emergency Exit for the Labor Camp