Environment and Social Due Diligence Report

August 2014

BAN: Financing Brick Kiln Efficiency Improvement Project

Prepared by Bangladesh Bank for the Asian Development Bank

TA 8197 BAN : Supporting Brick Sector Development Program (45273-002)

Due Diligence Report on Environment and Social Safeguards

Prioyo Automatic Bricks Limited (PABL)

MaddhyaJoynagar (Box-A-Ali), Doulatkhan,Bhola

August 2014

Xian Research and Design Institute of Wall and Roof Materials (XIAN), Peoples' Republic Of China)

Joint venture with

Clean Energy Alternatives Inc. (CEA), United States

Annexure

Annexure 1	License Form.
Annexure 2	Environmental Clearance Certificate
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Section 1: Sub-project Background

1.1 SUB-PROJECT TITLE

Prioyo Automatic Bricks Ltd., Mouza: Maddhya Joynagar, PS: Daulotkhan, District: Bhola, Bangladesh. The general information of Priyo Automatic Bricks Ltd. are furnished in Table-1.1

Table-1.1: General Information on Priyo Automatic Bricks Ltd

1. Name of the Company	**Priyo Automatic Bricks Ltd**
2. Name of the entrepreneur	Mainul Hossain
3. Contact Address	Registered Office: 5-A/1, CES(F) 74, Gulshan Avenue, Bir Uttam Mir Showkat Sarak, Gulshan, Dhaka, Bangladesh
4. Name of the Brick Kiln	Priyo Automatic Bricks Ltd.
5. Type of the Brick Kiln	Hybrid Hoffman Kiln (HHK)
6.Project Investment	BDT 2480.02 Lac
7. Location Address of the Brick Kiln	Mouza: Maddhya Joynagar, PS: Daulot khan, District: Bhola, Bangladesh
8. Current office address	Registered Office: 5-A/1, CES(F) 74, Gulshan Avenue, Bir Uttam Mir Showkat Sarak, Gulshan, Dhaka, Bangladesh Email:pabl_bhola@yahoo.com
9. Telephone/Fax	Tel: +88029894519 Fax: +88029894519
10. E-mail	pabl_bhola@yahoo.com

1.2 SUB-PROJECT DESCRIPTION

1.2.1 The project design combines a highly efficient kiln technology, the Hybrid Hoffman Kiln (HHK) with a unique technique of forming green bricks: granulated coal is injected for internal combustion. This approach results in lower energy usage, higher quality bricks and reduced pollution. Bricks of any size, shape and pigmentation can be produced at the plant with minor modifications. All bricks will be of uniform quality and will meet international standards for strength, quality and appearance.

1.2.2 The plant will produce 30 million bricks of size 250 mm x 120 mm x 75 mm annually. The main features are as follows: 80% intestine combustion, raw material preparation with roller mill, shaping with vacuum extruder, tunnel drying and firing with annular kiln. Annual working days have been assumed to be of 300 days. Raw material preparation will be conducted each day in 2 shifts of 7.5 hours. Drying and firing in 3 shifts each of 8 hours.

1.2.3 The HHK is a hybrid version of the Hoffman kiln. Structurally, it is built like the Hoffman but, unlike the traditional Hoffman, the fuel used is coal. The kiln can be made from firebricks or from green bricks. In the latter event, the green bricks get “cooked” during kiln operation. The inner kiln lining is made from refractory bricks and then plastered over by refractory cement. In this version, the firing chamber can be filled manually or automatically with green bricks, usually about 8,500 to 9,000 units at one time, in line stacks of around 1,000. Thus, there are 5 line stacks; and the firing time for each line stack is about half an hour. The fuel, granulated coal, is fed into the firing zone in

the kiln through stoke holes on the roof. Air required for the combustion process is forced from behind; and, as it reaches the line to be fired, it is already preheated from the previous firing zone thus reducing firing time and energy usage. The temperature in the firing zone is about 8000C. The process is extremely simple and is carried out manually.

1.2.4 For the production process, the clay is excavated by hydraulic excavator or by hand from nearby river beds, pond digging, and inevitable river erosion soil and transported to the plant stacking yard by trucks. The clay is then crushed by means of roller mills, then by double-shaft mixer where water is added in such a manner as to ensure moisture content of 15%

1.2.5 The tempered material is fed into a vacuum extruder for continuous column production. The column is then cut with Cutter column and Cutter green to the required size. The green brick is set on drying car by manual loading for drying.

1.2.6 The green bricks are then manually loaded on to the drying car which is then transported into the drying tunnel by means of a hydraulic pusher. Hot air for drying is funneled into the tunnel from the annular kiln. The drying cycle is about 26 hours

1.2.7 The dried green bricks are unloaded manually into the annular kiln. The speed of the firing is 1.25 m/h at a Sintering temperature of about 950°C -1050°C. The fired brick are unloaded and conveyed manually in carts to the stacking yard.

1.2.8 The raw materials will be sourcing from the river beds, soil from digging of ponds and inevitable river erosion soil. The raw materials are transported through river way and raw materials are brought to the project site by lorry; truck etc. from the nearby jetty. Bricks are partly transported through the road constructed by the project owner which is good enough to bear the load and through the bhola-charfassion highway road. The project is well connected to the drain connecting the nearby Box-a-alikhal. The project uses coal as fuel for burning of brick. The coal sourcing is usually from Sylhet, Barisal and local market. The location also enjoys grid supply.

1.2.9 Total 150 no. of employee have been employed in the project. For the operation process, a few experts hired from Dhaka and labors are from local community. For employees, sufficient toilets have been provided. Two separate toilets are also provided for the female workers. Drinking water is drawn from the tube well.

1.2.10 The project is currently fully functional. Commercial production has been started.

Due Diligence on Environmental Safeguard

Section 2: Due Diligence on Environmental Safeguards

2.1 ENVIRONMENT SAFEGUARD COMPLIANCE REVIEW

2.1.1 The Environmental Safeguard Due-diligence study was carried out for the project on the basis of screening of ADB prohibited list, review of ESMS, site visit observations and understanding project scope based on information and documents provided by sub-project implementing agency.

2.1.2 The project has been screened against ADB prohibited list and was reviewed through ESMS and GOB compliance measures.

2.1.3 Bangladesh environment Conservation Act'95 is the key Act in the environmental arena. Under this Act, it requires that no industry or project can be set up in in the country without the clearance from Department of Environment (DoE). Bangladesh environment Conservation Rules'97 provides the procedures how to obtain the environment clearance from DoE. According to this Rule, brick manufacturing projects fall under the "Orange B Category". According to ECR 1997, the project sponsor is required to prepare a comprehensive Initial Environmental Examination (IEE) report including an Environmental Management Plan (EMP) and submit those to DoE for obtaining Environmental Clearance. Brick Kiln Act 2013 is legislation that the brick kiln owners has to comply. It regulates the technology and type of the kiln, location characteristics, source of soils/ earth fuels etc.

2.1.4 Review of documents includes the land registry document, all kinds of NOCs from local administration including District Commissioner's office, Union Parishad's office, Site Clearance and Environment clearance certificates from Department of Environment (DoE), related to the project, feasibility report and detailed design of the process and techno of the project etc.

2.2 VISIT TO SUB-PROJECT LOCATION

2.2.1 The project is located on 500 decimal of land at Mouza: Maddhya Joynagar, P.S.: Doulat khan, Dist.: Bhola, Bangladesh. The project is situated at a distance of 13 km from Daulatkhan Launch ghat through upazila road communication. Bhola upazila sadar lies on Charfasion-Bhola highway road at a distance of 20 km from the project site. Thus the site is well connected with good road and water way communication. All side of the project is crop land, in west side there is a sub-branch of cannel& in north-east side there is a small water body. A small cannel is flowing through the south side of the project. The project location is shown in different maps in Fig 1.1(a), 1.1(b), 1.1(c) & 1.1(d). The satellite image maps of the project site are shown in figure 1.1 (e) &1.1(f) respectively.

Fig: 1.1(a): Location of Priyo Automatic Bricks Ltd. in South Asia with respect to Bangladesh

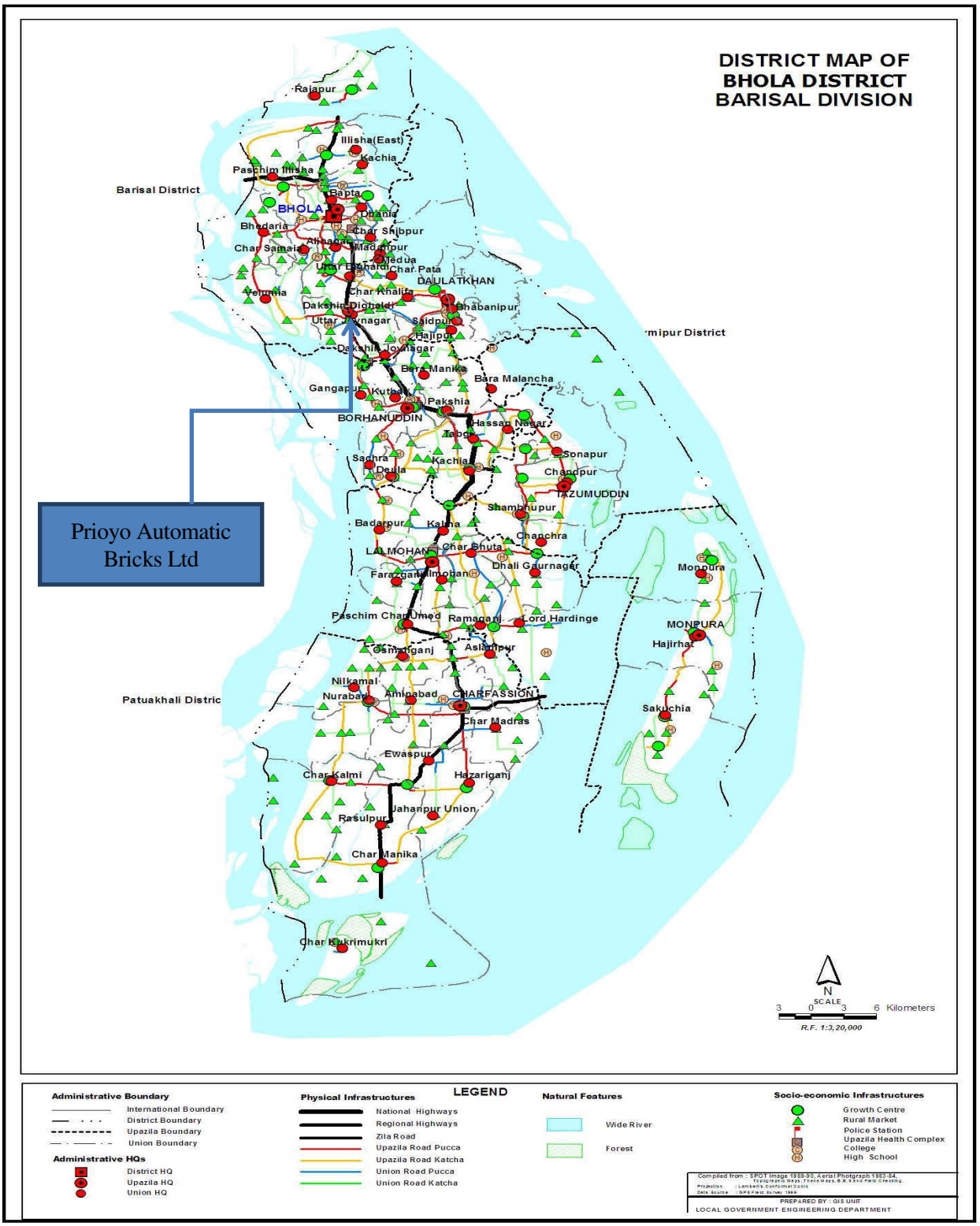


Fig: 1.1(b) Location of Priyo Automatic Bricks Ltd. & Bhola District Map.

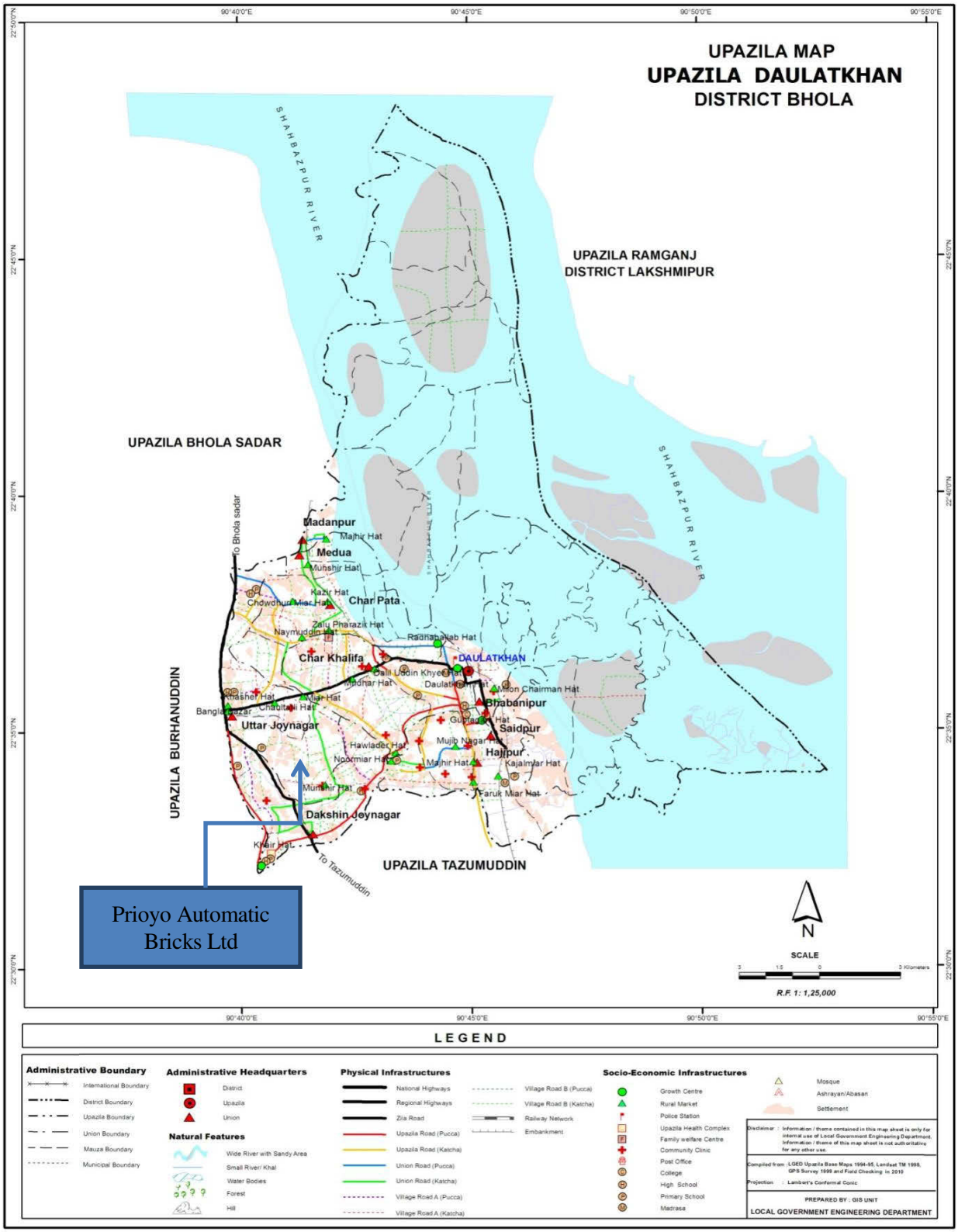


Fig: 1.1(c) Location of Priyo Automatic Bricks Ltd. in Daulatkhan Upazila map

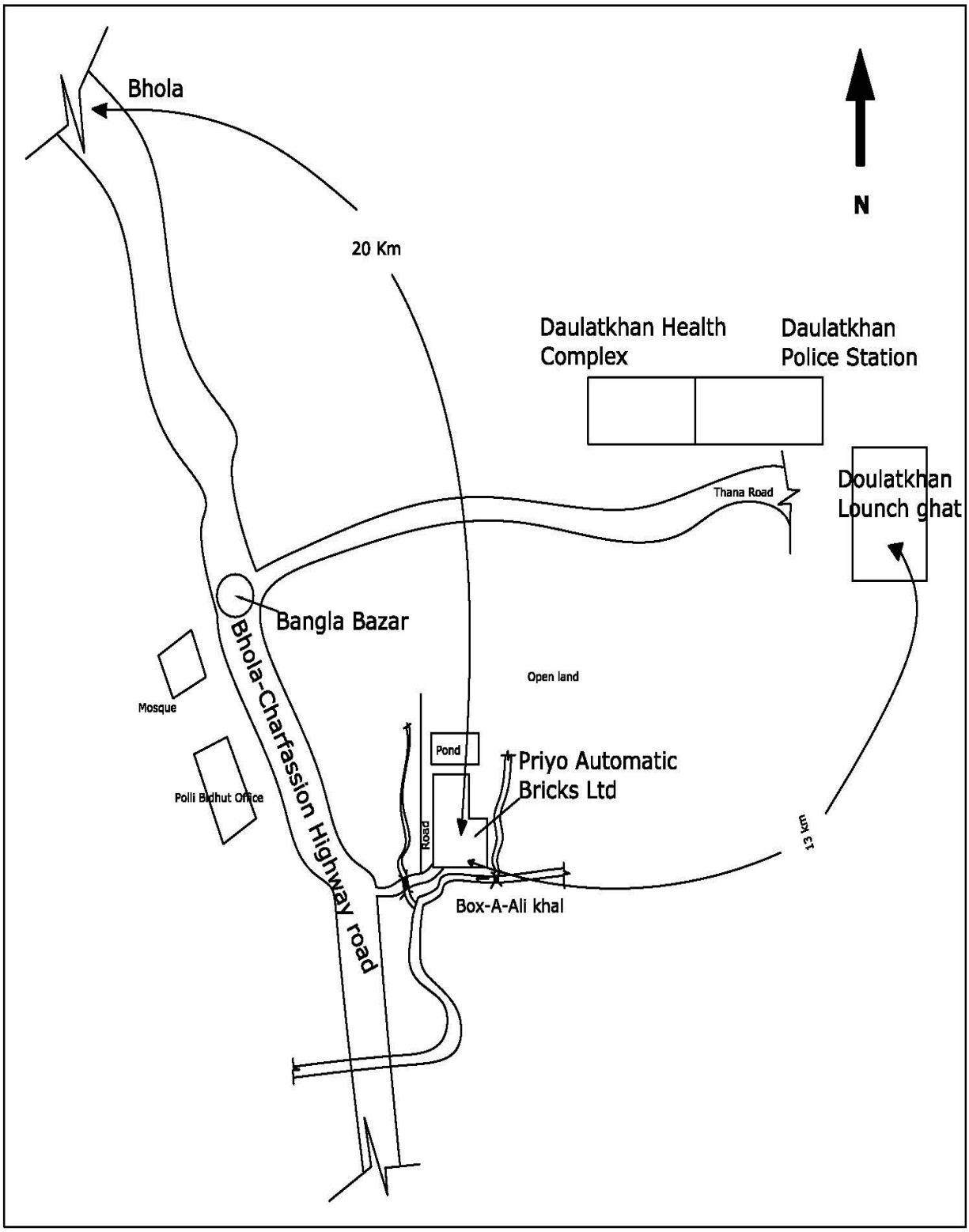


Fig: 1.1(d) Project Location map of Priyo Automatic Bricks Ltd.

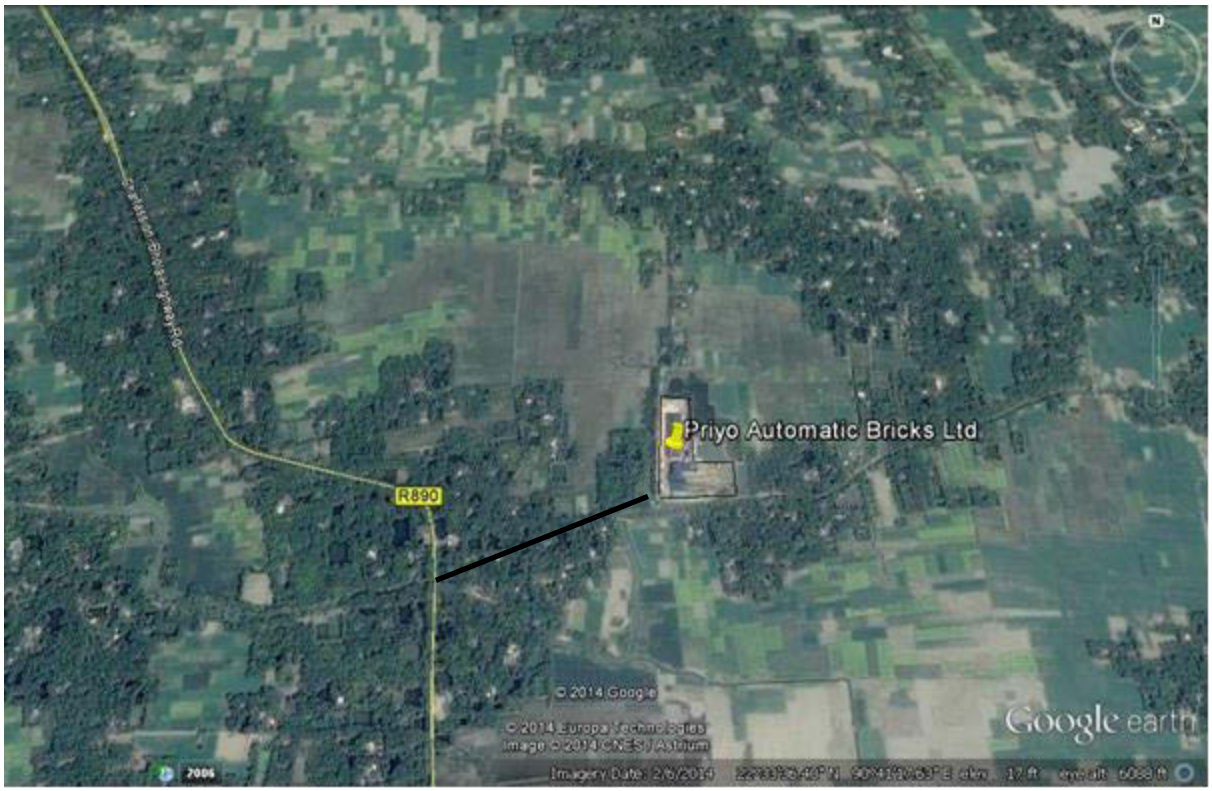


Fig: 1.1(e) Satellite map of Priyo Automatic Bricks Ltd.

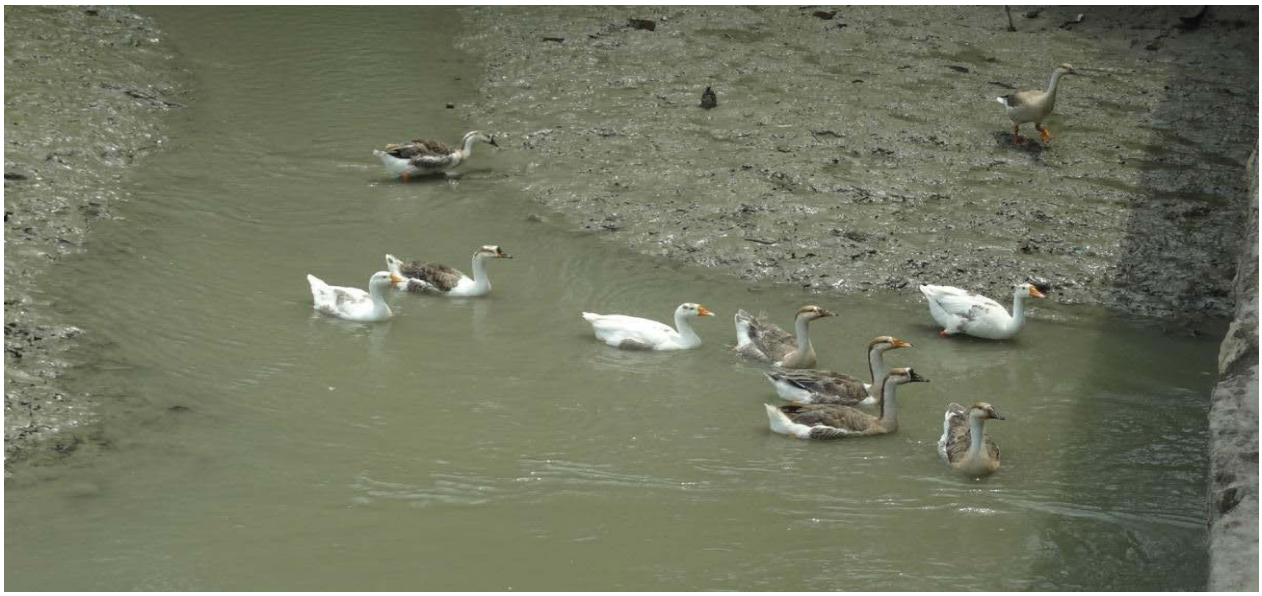
16. As Daulat Khan is in the confluence of the mighty river Meghna and the sea, high tide brings lot of water in to the canals, brings also sediments. These sediments provide a good source of clay for the project. Only a storm surge-can make havoc. Under the current climatic situation around the world this risk factor remains.

17. The inspection & visit was conducted to the site and surrounding thoroughly including the approach road to the project and navigation route for the coal procurement. Consultation was held with the project proponent, local administration regarding every details of the brick production project, people from neighborhood, staff and workers of the plant, soil/ clay suppliers, coal sourcing people etc.

The pictures below depict the project surroundings:

West side of the project

North side of the project and South side of the project



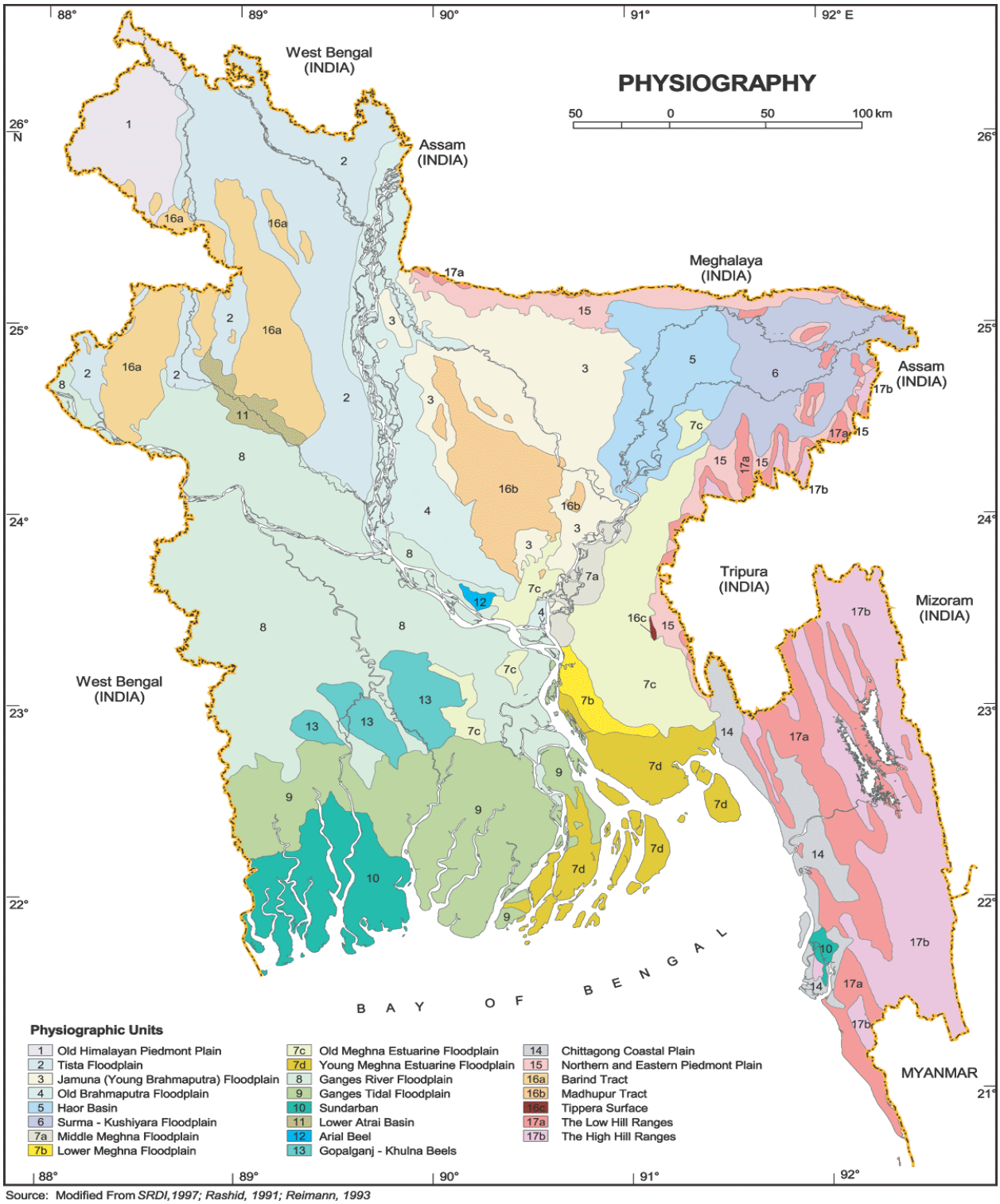
East side of the project

18. Salient environmental and socio-economic features of the project are given below in Table: 2

Indicator	Description
Climate	The climate of this region is tropical, with monsoons, characterized by a change of four seasons: pre-monsoon (March to May), monsoon (June to September), post-monsoon (October to November) and dry season (December to February). High air temperature is observed all throughout the year; daily air temperature variations are insignificant; air humidity is high with abounding rains.
Rainfall	Its annual rainfall is about 2200mm and approximately 80% of it occurs during the monsoon. Average monthly rainfall during monsoon period varies between 269 mm to 434 mm. Maximum daily rainfalls during this period recorded July 2008 is 729 mm. (Source: BMD)
Relative Humidity	As would be expected, relative humidity during the wet season is significantly higher than those occurring at other period of the year.
Wind Speed	Prevailing Wind Speed is in the range of 1 to 3 knots is the south west from Jan to April, south east from June to October and north east from November to December. (Source: BMD)
Ambient Air Temperature	Maximum average temperature of 41.2 degree Celsius was observed in April, 2009 where average minimum temperature was 6.4 degree Celsius in January, 2011 (Source: BMD)
Air Quality	The concentration of air pollutants is expected to be within allowable limit. There are no test results available.
Ambient Noise Level	The operation of Brick Kiln will generate significant noise. It is assumed that the existing noise level is within allowable limit.
Soils & elevations	This area is occupied by clay silt sediment and the top soil is slightly acidic in reaction. Coastal barrier and islands added diversity to the geological characteristics of the districts. The tidal impact is enormous in the area. Because the fertility of soil is increase during monsoon due to tidal affect, on the other hand salinity of land is increased in the dry season. But the level of salinity is not that much high in the middle part of the district. River erosion is regular phenomenon in the costal district of Bhola.
Water Quality	The problem lies with the salinity and turbidity.

Flora	The project is in a semi urban rural setting. There are greenery around the project site. This includes homesteads, horticulture, roadside plantation, natural vegetation, and fallow land. Besides highland (elevated) a forestation and homesteads, the remaining area is mostly lowland. Due to roadside plantations and certain homestead forests, the area is rich with floral diversities. Different fruit, fuel wood trees along with various shrubs are abundant. Among the trees, the most widely available ones are koroi, Tetul, Hijol, Bot, Chatim, Pitraj etc. Also there are some fruit trees such as Mango, Coconut, Jackfruit, Betel nut, Guava, Grapefruit etc.
Fauna	Fish is plenty in the area, given the overall and increasing scarcity of fish in the country. Among reptiles, narrow headed soft-shell turtle deserves special mention .Hilsha, the national fish, is also plenty in the area.
Birds	Among birds, Bok, Salik, Finge, Goose etc. deserve special mention. Kingfishers, House crow, House sparrow, little fern etc. are also common in this area.
Land Use	Mostly Agriculture and fishery
Demography	Not so densely populated like mainland. Almost gender balanced population. Main stay of economy is agriculture followed by fishery and small trades.
Living and Cultural Standard	The project area and the surrounding are having a semi urban look. People have moderate living standard.

The physiographic map of Bangladesh is shown in *Figure 1.2*.Within this area; elevations are from 1-2 m above sea level, which is shown in *Figure 1.3*.



Source: Modified From *SRDI,1997; Rashid, 1991; Reimann, 1993*

Fig. 1.2: Physiographic Map of Bangladesh

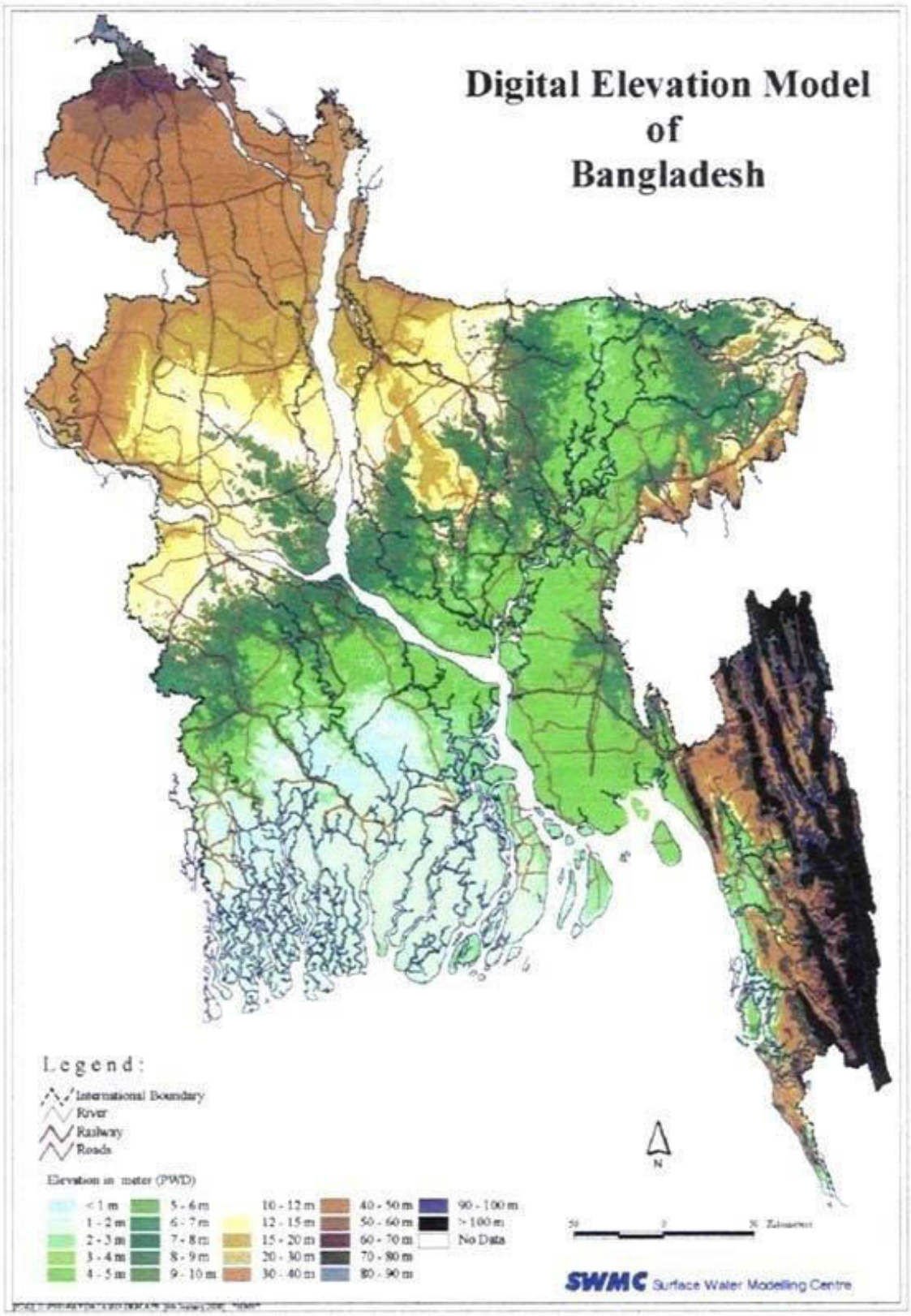


Fig. 1.3: Digital Elevation model of Bangladesh

2.3 ENVIRONMENTAL SENSITIVITY AND DUE DILIGENCE

2.3.1 The environmental sensitivity of Priyo Automatic Bricks Ltd. has been assessed based on the field observations, public consultations & documents review. The environmental sensitivity assessment is given below:

- The locality is not yet an industrial place. So, the power demand is basically for domestic uses. This plant has now a good share of the power demand in the locality. Local administration confirmed that the arrangements for the gas supply in the locality has been completed and connections will be given to both industrial and domestic users very soon This will create a very positive impact in terms of reducing environment pollution.
- A moderate impact on road due to transportation of raw materials and bricks has been anticipated. Coal and bricks are also transported by canals and rivers. Negative impacts on these transportation routes are anticipated to be minor.
- Occupation health and safety problems during construction and operation phase have been anticipated.
- Ecological impact has been minimal as this plant has been installed in the old premises of the brick kiln owned by the entrepreneur. The entrepreneur has not encroached upon any new land.
- The project has two generators stand by for power supply. Due to frequent grid power disruption generators are used. These generators generate quite significant noise.
- The plant does not generate any process liquid from the plant. The process water thus used and consumed in the clay preparation and small amount of water used for occupational floor, equipment washing and for domestic purposes. This wash water does not contain significant amount of pollution, which may impact the surface water quality.
- It identifies that the air quality of the project area will be degraded due to the construction work and transportation of the raw materials like soil and coal.
- The is no impact anticipated on building, structure or any institution as there are no building structures around within 1 Square kilometer.
- A good number of employment opportunities have been created among them a sizeable portion is women. Other positive impacts include meeting the local demand of bricks for construction purposes.
- Operation of the project may affect quality of life due to air pollution, dust pollution especially SPM at a higher level, noise generation from the generator. Increase in occupational health concerns, Spillage/surface runoff during heavy rain, disturbance to flora and fauna due to increased transportation etc. Environmental issues during the operational phase primarily include the following:

    - Air and dust emission (Significant)
    - Noise generation (Moderate)
    - Occupational health and safety (significant)
    - Surface runoff during heavy rains (moderate)
    - Burning of poor quality coal (moderate)

2.4 CATEGORIZATION OF SUB-PROJECT

2.4.1 The project activities are not included in the ADB prohibited list. It is also in compliance with the requirements under ESMS. The brick kiln project normally requires a huge chunk of land. In consideration of the land requirement for the project, investment & likely risk involved over the coastal flooding and in sourcing of soil/clay when the demand of clay will be further increased and concerns about occupational health and safety due to significant dust pollution and noise, the project is **categorized as 'B'**.

2.5 STATUS OF REGULATORY CLEARANCES

2.5.1 It is revealed that the sub-project meets the requirements of appropriate Bangladesh legislations in consideration of obligations and guidelines from Regulatory Authorities. The sub-project has obtained all necessary national and local environmental clearances as well as permits and approvals for project implementation.

2.5.2 Copies of Fire service License from the Department of Fire Service and Civil Defense, Environment Clearance Certificate from Department of Environment, Brick Burning License from District Commissioner Office, Trade license and NOC from Union Parishad are annexed for ready references.

2.6 PUBLIC CONSULTATION AND INFORMATION DISCLOSURE

2.6.1 **Information disclosure**: During a walk through around 11.0 am – 1.0 pm on 1st may 2014 surrounding the project area (Maddhya Joynagar (Box-A-Ali)), (not many people were available) local people were conversed about the project information disclosure. They confirmed that project related information was disclosed during the initial stage of the project and before the project operation phase, in informal manner.

Detail description of the public consultation has been appended in Annexure 11.

2.7 ALTERNATIVE ANALYSIS

2.7.1 **Location alternatives:** No location alternatives were considered as the plant has been constructed in the same premises of the owner's old traditional kiln and the site enjoys all the utilities & facilities for operation of the plant.

2.7.2 The location is also environmentally acceptable.

2.7.3 Considering various factors such as- proven resource potential in the project districts; favorable environmental and social settings; lowest GHG emissions in theproject life cycle; availability of waste lands, governmental support, and local community's acceptance of low emission brick kiln project in the region. Energy efficient brick kiln is the most appropriate alternative in the region of Bhola district.

2.7.4 **Technology alternatives**: Traditional brick kilns are the worst polluters. The government plans to phase-out all the traditional kilns replacing by the energy efficient kilns.

2.7.5 A feasibility study was undertaken to develop a model brick-making factory to manufacture high quality, technically sound and marketable solid bricks. The study was based on actual experience in China with necessary modifications for adaptation in Bangladesh. The project

design combines a highly efficient kiln technology, the Hybrid Hoffman Kiln (HHK) with a unique technique of forming green bricks: granulated coal is injected for internal combustion. This approach results in lower energy usage, higher quality bricks and reduced pollution. Bricks of any size, shape and pigmentation can be produced at the plant with minor modifications. However, proper location / sitting, its processing, waste abatement and control are very important for making it environmentally sound.

2.8 IMPLEMENTATION OF EMP DURING OPERATION PHASE

2.8.1 It is to be noted that the Brick kiln projects were not considered as industry until recently, till introducing Energy-efficient Clean Technologies in the Brick Sector of Bangladesh. So the compliance issues regarding fire fighting, emergency plan, occupational health & safety etc. were not strictly enforced during the issuance of ECC compare to that of other industrial projects. As now, brick manufacturing is transforming into industry, the entrepreneurs of the project needed to be trained through capacity building to upgrade the compliance status to satisfactory level**.**

2.8.2 Certain EMP measures have been undertaken. These include:

Air Quality : There is no exhaust or chimney used for this technology in the highbred Hoffman Kiln, the hot air from the HHK burning chamber are channelized to the drying zone of the green brick and the air finally escaped through two exhaust chimney of 45 ft and 25 ft high respectively. Since the exhaust gas will be travelled through two driers, the concentration of different gaseous pollution and the temperature will be reduced significantly and expected to be within the limit of Bangladesh standard.

Dust pollution: A properly planned water spraying system in the areas of clay and coal procurement and storage sections, coal crushing section and processing sections of bricks in the plant in particular are required. An appropriate buffer zone surrounding the plant premises shall also required to be created and appropriate tree planting shall have to be made.

Liquid Discharge: Since there would be no process liquid waste from the production activities, so, mitigation suggestion is not required. The domestic liquid waste will be disposed through a septic tank with a soak pit.

Solid Waste: All solid waste will be segregated properly. There are some solid wastes as waste clay, misshaped or broken under burnt or over burnt bricks, which have secondary demand and sold to the traders. Other solid wastes will be disposed to the safe places carefully.

Coal transportation and grinding: The coal storage, unloading and coal grinding facility planned to be done in a closed shed so that there is no chance to escape dust Coal transportation is planned to be in the covered trucks.

Noise and Vibration Impact: Necessary noise abatement measures are further required to be taken to avoid adverse noise impact from the generator. Additionally, buffer strip and sufficient green belt would need to be created surrounding the building so as to protect the noise escaping outside the premises during operation period.

Impacts on Soil: The proposed project will not use any top soil from the cultivable land; they will collect clay from their own land which is not used for cultivation. So no mitigation measure suggested in this regard.

Occupational Health: A well planned occupational health and safety measures will have to be undertaken. Protective clothing, goggles, helmets, shoes and accessories should be adequately provided to the workers. Adverse impact on worker's safety would require to be minimized by implementing an occupational health program. Regular medical checkup would need to be done to ensure the soundness of health of employees and workers. Pollution control measures would also need to be duly adopted.

Monitoring & Reporting: The entrepreneur has been suggested to develop a plan and arrangements for regular monitoring of air quality and occupational health issues and submit reports to the concerned authorities.

Table 2.1: Environmental monitoring plan

Phase	Environmental parameter	Sampling Location	Testing Parameter	Frequency
Operation Phase	Ambient Air Quality	Project site at Maddhya Joynagar,Daulot khan, Bhola,	SPM, PM_{10} and $PM_{2.5}$	Quarterly (routine) analysis
	Stack emissions	Project site at Maddhya Joynagar,Daulot khan, Bhola,	SOx, NOx and CO	Quarterly (routine) analysis
	Drinking water	Project site at Maddhya Joynagar,Daulot khan, Bhola,	As, Total hardness, Bacterial total count, E.Coli	Bi-annual basis in each year (pre-monsoon and post-monsoon)
	Noise	At four corners of Project boundary, generator room etc.	Hourly basis for 24 hours	Quarterly (routine) analysis

2.8.3 Roles and Responsibilities of EMP implementation

It is suggested to form an Environmental team to supervise the EMP implementation and periodic monitoring. The manager of the plant shall act as the team leader. Monitoring parameter shall include air quality (SPM, SOx, CO, CO_2), noise, occupational health & safety measures etc.

Table 2.2: An annual tentative budget for environmental monitoring (Operation Phase)

Activity	Unit Cost	Unit per year	Total Cost (Tk.)
Fire fighting and suppression equipments, training and annual fire safety drill		1	150,000
Cost of occupational health and safety equipment		1	125,000
Quarterly test of ambient air	25,000	4	1,00,000

Activity	Unit Cost	Unit per year	Total Cost (Tk.)
quality (SPM, PM_{10}, $PM_{2.5}$)			
Stack emissions (NOx, SOx, PM)	25,000	4	1,00,000
Half yearly test , E.coli			50,000
Training on environmental safeguards and compliance measures	lump sum		50,000
		Sub-total (BDT)	5,75,000

As a part of environmental and social compliances, the project will submit quarterly EHS compliance report of the Project to PFI & Bangladesh Bank (BB). This report will contain the analysis of testing various environmental parameters during monitoring phase. It will also describe in detail about the status of implementation of environmental management plan.

Table 2.3: Reporting schedule

Reporting entity	Frequency of Report	Entity to whom the report
Manager of the plant	Quarterly EHS Compliance Report including the implementation status of EMP	PFI, BB
PFI, BB	Annual ESDDR Report based on the findings of half-yearly monitoring of the plant based on the EMP	ADB

2.9 EMERGENCY PREPAREDNESS AND RESPONSE PLAN

2.9.1 To deal with any kind of emergency situation at project site, the brick kiln management has planned contingency arrangements including fire extinguishers, water reservoirs etc. The representative of the kiln has also promised that it would prepare other emergency plans by identification of types of hazardous areas and types of emergencies anticipated during project operation and from extreme weather events including storm surges.

2.10 OVERALL INSTITUTIONAL FRAMEWORK FOR ENVIRONMENT AND SAFETY MANAGEMENT PLAN

2.10.1 The plant appears to have good staff strength with Manager(s) supervisors, trained & unskilled workers (Men & women)

2.10.2 Currently, for the execution and management of HSE plan at project level, a HSE organization structure is being developed by the management with the defined roles and responsibilities.

2.11 SITE VISIT OBSERVATIONS

2.11.1 A site visit was undertaken by ADB's Environmental and Social Safeguard specialists along with Bangladesh Bank representative, PFI representatives & CEA staff on 1st May, 2014

to review the implementation of the project's environmental safeguards. Based on the discussions with project site team, site visit observations are given below:

- The Priyo Automatic Bricks Ltd. enjoys a good site with lot of buffer spaces in and around. It has built a connecting road to the main road by itself for its road communication.
- The area is quite rich in biodiversity in terms of trees and fishery resources. As there is no liquid discharge from the plant there is no threat for the fishery species. On the other hand, improved production technology (KILN) will have minimal air pollution load. These are not likely to affect trees. However the issue of sustainable resource use (especially clay) is very important from the point of resource conservation. Current focus on the renewable sources for raw material procurement will prove beneficial in the long term. But, there still remains a risk factor of dragging of resources (soil/ earth) from unauthorized places in future. When the demand will be higher than its own sourcing.
- The site enjoys all the utilities & facilities support including electricity. It has dug deep tube-well to meet the water needs of the plant processing and of the staff & workers.
- Surrounding environment including vegetation looks quite pretty (greenish), indicates lesser (acceptable) air pollution from the plant.
- The plant area is well segregated by canals in the surrounding and by the fence, where necessary.
- The plant provides drinking water toilet facilities, first aid facilities and resting places for the workers.
- It does not have yet a closed shed for coal grinding. It does not also have a well planned water spraying system for dust control.
- Though the plant has enough buffer spaces around, but protection would be much better if they plant trees.
- It has appeared that the management is not much aware of the need for occupational health & safety (OHS). The workers are also unaware of the potential threats from OHS. Protective gears & clothing are not provided.
- The plant does not have capacity to develop in-house monitoring on environment pollution control & biodiversity conservation.
- However the management was found appreciative of the suggestions made by the consultants for improving environmental & occupational health & safety situations of the plant & committed to develop a comprehensive EMP including OHS.

2.12 CONCLUSIONS AND RECOMMENDATION

2.12.1 Based upon the available documents and site visit, it is concluded that the sub-project has undertaken its best efforts towards environmental safeguard measures. However, still there is some lacking.

2.12.2 **Recommended mitigation measures (Corrective action)**

- Strict compliance with the Brick burning Act 2013 provisions in the procurement of soil/ earth.
- Closed shed for coal grinding and to develop a Well planned water spraying system in dust pollution places
- Creating a buffer zone and planting trees
- Full compliance on occupational health and safety with PPE
- Training need for occupational health and safety measures
- Adequate abatement measures for generator noise

- Periodic monitoring on environment pollution control and biodiversity Conservation
- Strict compliance with brick quality standard
- Avoid sulfur rich coal in combustion
- Soil/ earth procurement is to be from authorized process and not from Agricultural fields. No topsoil is to be procured.
- Emergency Response Plan is to be prepared.
- Firefighting arrangements are to be in place
- Compliance with Reporting to DoE.

2.12.3 Based on the site visit and due diligence findings, it can be deduced that the sub-project has no significant environmental safeguard issues. The Sub-project, therefore, does not appear to involve any kind of reputational risk to ADB funding on environmental safeguards and recommended for funding.

2.13 Environmental Assessment Checklist

Following is the checklist used for environment assessment:

Subproject Title: Priyo Automatic Bricks Ltd

SCREENING QUESTIONS	Yes	No	REMARKS
A. Subproject Siting Is the Subproject area adjacent to or within any of the following environmentally sensitive areas?			
1. Cultural heritage site	☐	☑	
2. Residential /protected /commercial area/educational institution	☐	☑	
3. Wetland / sanctuaring /forests / orchards	☐	☑	
4. Mangrove / ecologically critical area	☐	☑	
5. Tilla / hills	☐	☑	
6. Municipality / Upazilla Sadar	☑	☐	In the vicinity of Upazilla Sadar but with rural neighborhood
B. Potential Environmental Impacts Will the Subproject cause			
1. Impairment of historical/cultural areas; disfiguration of landscape or potential loss/damage to physical cultural resources?	☐	☑	
2. disturbance to precious ecology (e.g. sensitive or protected areas) from the dragging of raw materials (Soil/earth)	☑	☐	Current soil/earth procurement plan is from authorized places and not from agricultural fields. However if the procurement is done from unauthorized places and in unsustainable manner when the demand will be increased, it may create negative environmental impacts.
3. Dust pollution impacts from transportation of soil/earth to the plant as raw materials and bricks from the plant?	☑	☐	Minimal as the transportation shall be made by the lorries and vans under cover.
4. change in land use pattern of the locality	☑	☐	

SCREENING QUESTIONS	Yes	No	REMARKS
5. Increased air pollution due to subproject construction and operation/ and eventually degrade the air shed?	☑	☐	Minimal (due to improved technology). However if the procured coal quality is rich with sulfur content the burning process shall give rise to Sox emission. Periodic monitoring plan has been suggested.
6. Noise and vibration due to subproject construction or operation?	☑	☐	Significant noise generation from generator
7. Involuntary resettlement of people? (physical displacement and/or economic displacement)	☐	☑	
8. Disproportionate impacts on the poor, women and children, Indigenous Peoples, or other vulnerable groups?	☐	☑	
9. Poor sanitation and solid waste disposal in construction camps and work sites, and possible transmission of communicable diseases (such as STI's and HIV/AIDS) from workers to local populations?	☐	☑	
10. Social conflicts if workers from other regions or countries are hired?	☐	☑	
11. Risks and vulnerabilities related to occupational health and safety?	☑	☐	From exposure to dust and noise pollution. A full blown occupational and health safety plan with PPE is required for the staff & workers
12. Severance problem due to the transportation of raw materials & bricks and air pollution from the kiln.	☑	☐	minimal
13. Community safety risks due to both accidental and natural causes	☐	☑	
14. Generation of solid waste and/or hazardous waste?	☐	☑	
15. Generation of wastewater during construction or operation?	☐	☑	
C. National Level Compliance – Key Concerns			
1. Has it obtained location clearance certificate from Department of Environment (DoE)?	☑	☐	
2. Has it obtained no objection certificate from the local body (Union Parishad)	☑	☐	
3. Has it obtained license from the District commissioner office	☑	☐	
4. Has it obtained environment clearance certificate from DOE?	☑	☐	
5. Is the plant located in a degraded air shed?	☐	☑	
6. Does the technology and design satisfy the requirements under Brick Kiln Act, 2013?	☑	☐	A performance test over the rated efficiency is required to be carried out

SCREENING QUESTIONS	Yes	No	REMARKS
7. Has any public consultation organized before start of the project and the significance of impacts of the project been shared with the local community?	☑	☐	Informal public consultation has been made.
8. Does it have any Monitoring Plan to check the results of mitigation measures being implemented?	☐	☑	Not yet Periodic monitoring plan on air, water & noise have been suggested
9. Has proper account been taken of the sanitation and health care needs of the migratory and other workers?	☐	☑	Proper sanitation arrangements have been made. Periodic health check up of the workers are required to be organized
10. Are the provisions of safe drinking water, first aid adequate?	☑	☐	Tube well in the plant premises is the safe source of drinking water. First Aid arrangements are to be further upgraded.

2.14 Environmental Categorization Form:

Following is the summary of the environmental categorization form:

A. Instructions

(i) The project team, based on the subproject due diligence, completes and submits this form to the head of Green Bank and CSR Department or the relevant compliance officer of the Bangladesh Bank for endorsement prior to its disbursement to participating financial institutions.

(ii) The classification of a project is a continuing process. If there is a change in the project components or/and site that may result in category change, the concerned unit must submit a new form and requests for re-categorization, and endorsement by the same authorities mentioned in (i) above. The old form is attached for reference.

(iii) The project team indicates if the project requires broad community support (BCS) of indigenous people's communities. BCS is required when project activities involve (a) commercial development of the cultural resources and knowledge of indigenous peoples, (b) physical displacement from traditional or customary lands; and (c) commercial development of natural resources within customary lands under use that would impact the livelihoods or the cultural, ceremonial, or spiritual use that define the identity and community of indigenous peoples.

B. Project Data

Borrower:	Financing Amount:
Technology:	Address/Contact: **Prioyo Automatic Bricks Ltd.** Mouza: Maddhya Joynagar, PS: Daulotkhan, District: Bhola, Bangladesh Registered Office: 5-A/1, CES(F) 74, Gulshan Avenue, BirUttam Mir ShowkatSarak, Gulshan, Dhaka, Bangladesh Email:pabl_bhola@yahoo.com

C. Subject

√ ☐ Environment	☐ Involuntary Resettlement	☐ Indigenous People

C. Categorization

☐ New ☐ Re-categorization – Previous Category

☐ Category A	√ ☐ Category B	☐ Category C

D. Basis for Categorization/ Re-categorization (pls. attach documents):

[1]Checklist and Type of Check List: Environment Assessment Checklist (Screening questions)

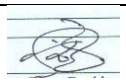
[2] Project and/or Site Description:

[3] Due Diligence Report:

E. Comments

Technical (Project) Team Comments In consideration of the land requirement for the project, investment & likely risk involved over the coastal flooding and in sourcing of soil/clay when the demand of clay will be further increased and concerns about occupational health and safety due to significant dust pollution and noise, the project is **categorized as 'B'.**	Green Banking and CSR Department Comments

F. Approval

Proposed by:	**Endorsed by**: 
Technical (Project) Team Date: **Endorsed by**:  Mohammad Reazuddin Environment Specialist Supporting Brick sector Development Program(45273-002)	
	Approved by: / Compliance Officer (if needed) / Date: — **ADB Concurrence**

Section 3: Due Diligence on Social Safeguard

Section 3: Due Diligence on Social Safeguards

3.1Due diligence of social impact:

Methodology

The Social safeguard due diligence for Priyo Automatic Bricks Limited has been prepared after reviewing the following documents 1) Loan agreement and PAM , Inception report of the project, feasibility study report, Detail design of the project, Transaction history and historical documents of land records, NOC from local Union parishad , clearance from the office of Deputy commissioners., license issued from Standard institution and fire service and civil defense , Electric supply and other social safeguard related documents provided by the Entrepreneur.

3.2 Visit project location:

The due diligence had been carried out by the safeguard specialist through field visit, desk review of existing project documents, data validation at field level stakeholders. The project was visited by the Environment and Social safeguard specialists on 01-04-2014 along with Bangladesh Bank representatives, PFI representatives, project owner, staff and employee

Representatives of the project and local people of the community for field verification of environment and social safeguard related aspect of the project site and Consultation regarding the brick kiln. The side visit photograph is given below:

3.3 Justification of selection of the project site:

The Entrepreneur has ensured to avoid potential social risk in site selection and identification of suitable land for the project:

1. Impact on Use of Disputed land in the right of the way
2. Impact on total landlessness of the land owners
3. Impact on school, hospital, Mosque, human habitation, Utilization of easement or Government land in the right of the way and other common property resources
4. Impact on displacement of unauthorized occupants without compensation
5. Impact on tribal population
6. Impact on agricultural land, vegetation, trees, fisheries
7. Impact on cultural sites

The project site selected by the entrepreneur on the following consideration:

1. The subproject stands on the fringes of the Bay of Bengal. .It is in the confluence of river Meghna and the sea. The high tide brings water to the canal; also bring sediments which is good source of basic material i.e. Clay for the project. The area is cyclone prone area. River erosion is regular phenomenon in the coastal area. Clay is also being procured from the likely erosion area. .Basic Raw Material is very much available in the locality.
2. The project site is connected with the Bhola- Charfession highway by a metallic road which is good enough to bear the load. Thus the sub project is connected with metallic road and also water

way communication. The subproject is connected with big river through canal. Basic material for the subproject such as clay, coal and bricks can transported through canals, rivers and roads.

3. The area enjoys the electric supply and connected with telecommunication. It is learnt that arrangement for the gas supply in the locality is near to completion and expected to connect the subproject shortly. The use of gas instead of coal will create very positive impact in terms of reduction of cost for brick manufacturing and will lead competitive benefit in the market and meet the local demands of bricks for construction purposes.

4. Undisputed land available

5. There is no tribal population in the area

6. There is less impact

Considering the various factors such as favorable social settings, government support and local community acceptance the setting of Priyo Automatic Brick kiln Limited in the locality is the most appropriate

3.4 Information Disclosure and consultation with stakeholders:

The objective of information disclosure is to ensure transparency at all levels in the process of Implementation by educating the people of the project area. The information disclosure and consultation process start from beginning and will continue until the end of the sub project in the following process:

- Group Discussion
- Personal contract
- Community level meeting
- Consultation with stakeholders
- Consultation with Local Representative

Project related information was disclosed during site selection and preparation of feasibility study. Stakeholder's consultation was conducted at that time of Detail Design meeting. Sellers have expressed their satisfaction with the price they have paid and there was a popular support for the project as local people will have employment opportunity.

The munities of the meeting of the consultative meeting along with the photos of the meeting are placed in the annexure.

3.5 Land acquired through willing seller and willing buyer method

The impact is site specific and varies from sub project to sub project. Site selection, identification of suitable land for the project and subsequent procurement of land are the components of planning and preconstruction phase. The subproject requires 5 acres of land to establish HHK brick Kiln project. The entrepreneur gets the field survey by the local surveyor. Based on the ground survey the actual plot size and boundary.

This help to calculate accurate land requirement and corresponding number of plot to be acquired. To avoid lengthy acquisition process, the borrower consider purchasing lands directly from the private land owners on willing buyer—seller basis. This means that the land owners will not be forced directly or indirectly to sell their land, or at a price lower than the current market rates. The proposed land was identified and spread over 20 plots in the Moza Maddaya Jaynagor of Daulatkhan. There was 13.41 acres of land in the name of Mr. Tofayel Ahamed, Anwara Begum

and Mr. Mosharaf Hossain of which brick field on 2.41 acres of land. Mr. Mosharaf Hossain own 6.06 acres of land & have transferred. The land consists of private land and it was lowlying and fellow land. To avoid future conflict and disputes legal status of land title verification was the prime concern. The ownership of land along with the actual size and location of the plot registered with the authority verified by local documents specialist**.**

The procurement of initiated in 2011 and after successful negotiation the land owners are guided and assist within the transfer of land process. Law of the land i.e. the Registration Act 1908 is applicable in the land transfer process. A contract for sale shall be in writing, executed by parties thereto and registered. Properties Market price fixation rules 2010 is the mechanism to ensure fair price for replacement cost of individual land owners. Five members market price fixation committee headed by Additional Deputy commissioner fixes the market price of different types of land for each jurisdiction of the office of Sub register once in a year. Nobody is allowed to sale land bellow the rates fixed by Market price fixation committee.

The Borrower has purchased land from 2 land owners through local document specialist. Each contract for sale needs to be presented for registration. The sale deeds prepared in local language to ensure transparency and easy understanding of the sale deed by the land owner. It is an instrument required to compulsorily register under the act. The Act shall contain the particulars necessary to convey the intention of the parties, complete description of the properties to be transferred and nature of transaction. Each sale contract contain 23 points consist of 7 pages Summary of the legal documents is stated as under : 1) the latest khatian of the property prepared under the state acquisition and Tenancy act,1950, in the name of the seller, if he is owner of the property otherwise than by inheritance 2) the latest khatian of the property prepared under the state acquisition and Tenancy act,1950, in the name of the seller, or his predecessors, if he is owner of the property by inheritance 3) Nature of the property 4) Price of the property 5)a map of the property together with the axes and boundaries 6) a brief description of the property for last 25 years 7) an affidavit by the executants affirming that he has not transferred the property to any person before execution of this sale deeds and that he has lawful title thereto. 8) Photograph of both the executants and the recipients shall be pasted on every instrument and the parties shall sign and put their left thumb impressions across their photographs in the instruments. Photo copy relating to sale deeds of land records is in the possession of the Clean Energy Alternatives.

The registered sale deeds of land are the outcome of third party validation report. The land owners were taken to the office of the Sub Register. The contract for sale was placed to the sub register. No document will not be accepted for registration unless it contains all information as mentioned above. The sale deeds registered in the name of Dr. Taslima Ahamed Zaman, Chairman Dr. Tawhiduj Zaman, Director and Mainul Hossain, Managing Director on behalf of Priyo Automatic Bricks Limited

During transfer of land the payment is made to the land owners. The registering authority asked the owner of the land weather they have got the fair price of land in presence of Local government representative and other witness of the locality. All amounts including details of the instrument are recorded in the registered documents subsequently entered in to an agreement and took over the possession of land. According to the registered sale deeds the land was muted in the name of Dr. Taslima Ahamed Zaman, chairman Dr. Tawhiduj Zaman Director and Mainul Hossain Managing Director on behalf of Priyo Automatic Bricks Limited under four Mutations case which is shown below:

Utilization of Disputed land, deprivation of getting adequate and fair price for the land is not a concern. . There was absence of informal title holder in the land, households headed by women

and other vulnerable groups, such as indigenous people and ethnic minorities, elderly and disable persons in the right of the way.

3.6 Impact on Common Property resources:

However the representative of BB, PFI and TA Consultant visited the subproject area, met representative of the different beneficiaries and held discussions with the Local people, on 31-4-2014reviewed all records there was no common property loss such as Mosque, schools and Union Paris had and hospital. There was no public easement or Government land in the Right of the way.

3.7 Indigenous Peoples Safeguards:

Indigenous peoples affects depends on the magnitudes of impact on customary rights of use and access to land and natural resources, their socio Economic status, cultural and communal integrity, health, education livelihood and social security status, and the level of vulnerability of the affected indigenous people. The protections of the fundamental rights of all citizens which include indigenous peoples are provided in the 1972 Constitution (Articles 11, 19 and 28). Specifically, Articles 23 and 24 set forth the protection of the cultural tradition of indigenous peoples.

Table 3: Areas of Small Ethnic Community People (Tribal People) Concentration in Bangladesh

Sl. #	Areas of SEC Concentration	Predominant SECs	% National SECs	% of District Populations
	Plains			
1	Rajshahi Division, Naogaon, Dinajpur Rajshahi, Rangpur &Joypurhat Districts	Santal, Munda and Oraon	36	4
2	Sylhet Division, Maulavibazar and Hobigonj Districts	Khasia, Manipuri, Patro, Garo and Tripura	8	3
3	Madhupur Area of Dhaka Division	Garo/Mandi	7	2
4	Patuakhali (Barisal Division) and Cox' Bazar (Chittagong Division) Districts	Rakahain	6	
5	Khulna Division, in *Sundarbans*	Munda	2	
	Hills			
6	CHT	Chakma, Marma& Tripura	41	44
	Total		100	--

Impact on indigenous people: The above record does not report the presence of scheduled Tribal population in the project area.

3.8 Monitoring Of Project Implementation

Bangladesh Bank has been holding regular meeting on the progress, which are attended by PFI, Consultant and the project personnel. In these meetings both the progress and problems are reviewed, analysed and necessary instructions are given. Bangladesh Bank site visit on a regular basis, where discussion on progress and constraints. The constraints are identified and task

assigned and peruse to the respective agencies for early execution. Effective co-ordination among the implement agencies (EA/IA/ PFI and Borrower) to be harmonized for early implementation of subproject. Senior officers of BB and the professionals of Consultant visit the field and monitor progress review the safeguards compliances and , spot decisions are given which are compiled instantaneously.

3.9 Grievance Redress Mechanism

Community consultation process start from beginning continues until the end of the sub project. Grievance is being redressed through consultation. Grievance redress mechanism is to receive and facilitate resolution of the affected person concern .If the complain are so grave it cannot be resolved in the consultation process. it may be forwarded to GRC committee.The functions of the GRC are to receive application and hold meetings on EPs' grievances regarding resettlement issues and dispose the EPs' complaints. The formation of Grievance Redress Committee for each subproject was widely discussed in the Public Consultation Meetings. As there were no resettlement issues, no GRC were formed for disposal of grievance.
However in the discussion process it is agreed upon to form Grievance redress Committee (GRC)and place complain Box both outside and inside the factory. GRC will consist of. Manager of PFI as the chairman, Union Parishad chairman or member of the concerned local government; representative One male and one female member from the affected person, Borrower or the Client will act as e member secretary.

The functions of the GRC will be to:

1. Receive application of APs grievances within one month of the receipt of ID card or from when APs are informed of their entitlements.
2. Hold open hearings in the office of the Chairperson and resolve the grievance within 15 days of receiving complaints from APs.
3. Inform aggrieved persons about GRC meetings and give them an opportunity to place their grievance before the GRC.
4. Keep meeting minutes and records of grievances.
5. Refer the APs' grievances to the DC or the concerned legal authority, if the grievance relates to land acquisition or conventional law.
6. Make decisions to resolve APs' grievances following RP policy, if outside conventional law and the grievance do not lend itself to arbitration.
7. Amicably resolve issues quickly without resorting to expensive, time consuming legal actions.
8. Ensure participation of concerned local people and be an advocate for the interests of vulnerable APs

3.10 Employment Generation and Income restoration:

The increasing economic activity which have multi-dimensional effect on poverty reduction and consequent socioeconomic improvement of the area. The project impacts reveal that local people will be engaged for employment and they will be trained on specific vocational skills that would ease their ability to find employment which can support economic self-reliance.

3.11 Site visit observation

A site visit undertaken by Environment and social safeguard specialist on 1st may 2014 to review the implementation of the project social safeguard. During the site visit it has been observed that:

Regarding employment:

Seasonal nature of production cycle in the bricks industry determines the employment patterns which lead to insecurity to their livelihood of the workers is anticipated. However a good number of employments generated and a sizeable portion from women folk have taken from the locality

Regarding Safety:

Safety of the subproject covers safety of the building, Notice specifying use of precautions regarding any accident. Precaution in case of fire, Fencing of machinery, proper placement office fighting apparatus, notice of information regarding dangerous operation and restricted area, obligation of using personal protective apparatus protective clothing, helmet, goggles, shoes, and accessories is requirement for workers. These are the area where the proponent is lacking.

Working condition:

During operation in the factory some health and security problems are anticipated. No protective clothing, helmet, goggles, shoes, and accessories for the workers should be provided to the workers. So that workers safety could be ensured.

Health impact:

Presently some first Aid Box is found in the factory premises. There is no doctoor in the factory and Upazila health complex 18 kilometer far from the subproject area. No incidence was recorded till date. An occupational health program as well as regular checkup would need to be done to ensure the soundness of health of the worker

Impact on road:

Raw materials are being carried through feeder roads and water ways. The regular movement of trucks for carrying basic raw materials for the factory and delivering the bricks to the user end may cause damages; adverse impact on to the roads is expected.

Health and Hygiene of the subprojects covers Cleanliness, ventilation and temperature, dust and fume, or other impurity likely to be injurious or offensive to the workers, disposal of waste and effluents, lighting, drinking water, latrines and urinals and keep dust bean and spittoon of the factory. This is an area where the proponent is lacking.

Wages and Payment:

It is expected that process of payment of wages to the worker may lead discomfort.

Welfare Measure:

First Aid appliance, maintain safety record book. Washing facility, canteen, shelters, Rooms for children have been anticipated.

Formation of labor organization in the factory:

The problem of formation of labor organization for the purpose of regulating the relation between workers and employers is anticipated. Site visit photo are given below:

Mitigation measure:

Construction of four walls for proper safety of the plant

- Issuance of Letter of appointment along with identity card with photograph and maintain register of workers and service bookfor the staff and workers of the factory may minimize their insecurity of their livelihood.
- The question of child and adolescent to be determined on the basis birth certificate, school certificate or a certificate from registered medical practitioner. To avoid child under age of 18 shall employed in the factory
- Introduction of occupational health program as well as regular checkup and periodic service of a Medical practitioner in the factory to ensure the soundness of the workers
- Payment of wages of every worker before expiry of seven days after the first day of wage period on a working day and maintain their records in the factory following minimum wages Act is a requirement.
- Provide First Aid appliance, maintain safety record book. Washing facility, canteen, shelters, Rooms for children following the
- Provide training to the workers for safety measures
- Extend permission to form labor organization for the purpose of regulating the relation between workers and employers in the factory
- Ensure issuance of Notice specifying use of precautions regarding any accident. Precaution in case of fire, Fencing of machinery ,proper placement of fire fighting apparatus, notice of information regarding dangerous operation and restricted area, obligation of using personal protective apparatus protective clothing, helmet, goggles, shoes, and accessories is requirement for workers.
- More Improvement of working condition for the workers in the Plant is a requirement
- Strictly Comply the Bangladesh Labour laws Act 2006 amended up to 2013 in all sphere of administration of the factory

Other Specific Issues

Under utilization of Production capacity is specific issue.

3.12 Conclusion and Recommendation:

The popular support of the locality is the prime concern. The sub project has obtained No objection clearance certificate from local government mentioning the area and the plot. The subproject got the trade license from the union parishad. The project has obtained Brick kiln license from the office of the Deputy Commissioner. The Priyo Automatic Kiln is producing quality bricks and Bangladesh Standard Institution has issued license for using PABL Brand of clay bricks as for its quality. Bangladesh fire service and civil defense has issued license,. Photocopy of Licenses are in possession of the due diligence mission.

The land acquired by Priyo Automatic Kiln limited after negotiation and discussion with the land owner. The sale deeds are prepared in Bengali language to ensure transparency and easy understanding of the sale deeds by the owner. The sale deed was registered by competent authority.

The local people were aware about the project they have kept informed before the construction of the infrastructure and have conducted meeting with the local people during feasibility study, Detail Design and at the time of Inauguration.

Local labor are being engaged in the earth filling, Civil construction and in the production process of Bricks for skilled as well as unskilled activities

To address the grievances of the local community, Now Grievance redress Mechanism is in place. The entrepreneur has taken care to address regarding issuance of appointment letter to the workers, maintenance of service book, Payment of minimum wages to the workers, Improvement of working condition, safety and security, welfare measures and formation of labor organization. Hence it does not appear to involve in reputational risk to ADB bank funding on social safeguard issues.

Brick manufacturing is a major business sector in Bangladesh, contributing to about 1% of GDP and expecting to increase in the coming years. Brick fields with recent technological modernization with huge investment and robust development now is a reality and deserves formal declaration that Modern brick kiln as an industry.

3.13 Social Assessment Checklist

Involuntary Resettlement Checklist

Subproject Title: Priyo Automatic Bricks Limited

Probable Involuntary Resettlement Effects	Yes	No	Not Known	Remarks
Involuntary Acquisition of Land				
1. Will there be land acquisition?	√			Land not acquired through Government
a. If yes, is the land acquired through a willing-buyer and willing seller arrangement?	√			Document Checked
b. Is the land acquired through the government?		√		
c. If the land is acquired through a willing-buyer and willing seller arrangement, is there any coercion or unfair practice?		√		
d. Is there an independent third party to document the negotiation and settlement processes?	√			Local Document specialist act as third party
e. Is there a third-party to validate the process (d)?		√		
f. Are all the affected people consulted?	√			Due consultation done
g. Has the compensation been offered?	√			Price of land duly paid
h. If so, is the compensation a fair market value?	√			Market price fixation rules 2010 to ensure fair price for replacement cost.
2. Is the site for land acquisition known?	√			Through survey and physical verification
3. Is the ownership status and current usage of land to be acquired known?	√			Checked legal documents along with the plots
4. Will easement be utilized within an existing Right of Way (ROW)?		√		
5. Will there be loss of shelter and residential land due to land acquisition?		√		
6. Will there be loss of agricultural and other productive assets due to land acquisition?	√			Low lying area
7. Will there be losses of crops, trees, and fixed assets due to land acquisition?	√			
8. Will there be loss of businesses or enterprises due to land acquisition?		√		
9. Will there be loss of income sources and means of livelihoods due to land acquisition?	√			
Involuntary restrictions on land use or on access to legally designated parks and protected areas				
1. Will people lose access to natural resources, communal facilities and services?		√		
2. If land use is changed, will it have an adverse impact on social and economic activities?		√		
3. Will access to land and resources owned communally or by the state be restricted?		√		
Information on Displaced Persons:				
Any estimate of the likely number of persons that will be displaced by the Project? [√] No [ ] Yes If yes, approximately how many?				
Are any of them poor, female-heads of households, or vulnerable to poverty risks? [√] No [ ] Yes				
Are any displaced persons from indigenous or ethnic minority groups? [√] No [ ] Yes				

Impact on Indigenous Peoples Checklist (Social Safeguard Checklist)

IMPACT ON INDIGENOUS PEOPLES CHECKLIST

Subproject Title: Priyo Automatic Brick Limited

- There is no IP in the subproject area.

KEY CONCERNS	YES	NO	NOT KNOWN	Remarks
A. Indigenous Peoples Identification				
1. Are there socio-cultural groups present in or use the project area who may be considered as indigenous, "minorities" (ethnic or national minorities), or "indigenous communities" in the project area?		√		No indigenous minorities in project area
2. Are there national or local laws or policies as well as anthropological researches/studies that consider these groups present in or using the project area as belonging to indigenous peoples, national minorities, or cultural communities?				N/A
3. Do such groups self-identify as being part of a distinct social and cultural group?				N/A
4. Do such groups maintain collective attachments to distinct habitats or ancestral territories and/or to the natural resources in these habitats and territories?				N/A
5. Do such groups maintain cultural, economic, social, and political institutions distinct from the dominant society and culture?				N/A
6. Do such groups speak a distinct language or dialect?				N/A
7. Has such groups been historically, socially and economically marginalized, disempowered, excluded, and/or discriminated against?				N/A
8. Are such groups represented as indigenous peoples in any formal decision-making bodies at the national or local levels?				N/A
B. Identification of Potential Impacts				N/A
1. Will the project directly or indirectly benefit or target Indigenous Peoples?				N/A
2. Will the project directly or indirectly affect Indigenous Peoples' traditional socio-cultural and belief practices? (e.g. child-rearing, health, education, arts, and governance)				N/A
3. Will the project affect the livelihood systems of Indigenous Peoples? (e.g., food production system, natural resource management, crafts and trade, employment status)				N/A
4. Will the project be in an area (land or territory) occupied, owned, or used by Indigenous Peoples, and/or claimed as ancestral domain?				N/A
C. Identification of Special Requirements *Will the project activities include:*				N/A
1. Commercial development of the cultural resources and knowledge of Indigenous Peoples?				N/A
2. Physical displacement from traditional or customary lands?				N/A
3. Commercial development of natural resources (such as minerals, hydrocarbons, forests, water, hunting or fishing grounds) within customary lands under use that would impact the livelihoods or the cultural, ceremonial, spiritual uses that define the identity and community of Indigenous Peoples?				N/A
4. Establishing legal recognition of rights to lands and territories that are traditionally owned or customarily used, occupied or claimed by indigenous peoples?				N/A

5. Acquisition of lands that are traditionally owned or customarily used, occupied or claimed by indigenous peoples?				N/A

3.14 Social Categorization Form (Social Safeguard)

A. Instructions

(iv) The project team, based on the subproject due diligence, completes and submits this form to the head of Green Bank and CSR Department or the relevant compliance officer of the Bangladesh Bank for endorsement prior to its disbursement to participating financial institutions.

(v) The classification of a project is a continuing process. If there is a change in the project components or/and site that may result in category change, the concerned unit must submit a new form and requests for re-categorization, and endorsement by the same authorities mentioned in (i) above. The old form is attached for reference.

(vi) The project team indicates if the project requires broad community support (BCS) of indigenous people's communities. BCS is required when project activities involve (a) commercial development of the cultural resources and knowledge of indigenous peoples, (b) physical displacement from traditional or customary lands; and (c) commercial development of natural resources within customary lands under use that would impact the livelihoods or the cultural, ceremonial, or spiritual use that define the identity and community of indigenous peoples.

B. Project Data

Priyo Automatic Bricks Ltd.	Financing Amount: BDT 2480.02 Lac
	Address/Contact:MainulHossain, Registered Office: 5-A/1, CES(F) 74, Gulshan Avenue, BirUttam Mir ShowkatSarak, Gulshan, Dhaka,Bangladesh

☐Environment	√☐Involuntary Resettlement	√☐Indigenous People

☐√New ☐Re-categorization – Previous Category

☐ Category A	☐ Category B	√☐Category C

D. Basis for Categorization/ Re-categorization(pls. attach documents):

[√1]Checklist and Type of Check List: Involuntary resettlement and indigenous people Checklist (Screening questions)

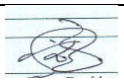
[√2] Project and/or Site Description:

[√3] Due Diligence Report:

E. Comments

Technical (Project) Team Comments In consideration of the land requirement for the project, land acquired through willing seller willing buyer method and there will be no physical and economic displacement of affected person in the subproject. There is no IP in the subproject area. Hence the project is categorized as 'C'	Green Banking and CSR Department Comments

F. Approval

Proposed by:	**Endorsed by**: 	
Technical (Project) Team Date: **Endorsed by**:  Shah Alam Social Safeguard Specialist Supporting Brick Sector Development Program(45273-002)		
	Approved by:	**ADB Concurrence**
	Compliance Officer (if needed) Date:	

Annex

Annexure 1: License form

বিভাগ | লাইসেন্স নং
লাইসেন্স নং ... ভোলা [illegible] | ২২৬
[illegible]-১৬

লাইসেন্স ফরম

বাংলাদেশ ফায়ার সার্ভিস ও সিভিল ডিফেন্স অধ্যাদেশ, ২০০৩ সালের ৪ ধারা মোতাবেক লাইসেন্স প্রদান।

এতদ্বারা উত্তর জয়নগর, দৌলতখান, ভোলা ... স্থিত
মেসার্স প্রিয় অটো [illegible] ... কে [illegible] ঠিকানায়
বাংলাদেশ ফায়ার সার্ভিস ও সিভিল ডিফেন্স অধ্যাদেশ, ২০০৩ সালের অধীনে (ক) ...
কয়লা ... এর গুদামজাতকরণ, চাপন বা একত্রে [illegible]
গুদামকরণে (খ) ... এর প্রক্রিয়াকরণের কারখানারূপে [illegible]
লাইসেন্সের অপর পৃষ্ঠায় বর্ণিত শর্তাবলী আরোপ সাপেক্ষে ও তাহা যথাযথ পালনের শর্তে [illegible]
উদ্দেশ্যে লাইসেন্স মঞ্জুর করা হইল।

এতদ্বারা স্বীকার করা যাইতেছে যে, উপরোল্লিখিত গুদামের/কারখানার জন্য বার্ষিক ফিস = ৫০০/-
২০১২ ([illegible]) হইতে ২০১৬ (৩০-০৬-১৬)
মোট টাকা ... পাঁচশত [illegible] ... লাইসেন্সের মাশুল বাবদ পাওয়া গিয়া [illegible]

...
(গৃহ/জায়গার মূল মালিকের নাম ও ঠিকানা)

মোঃ [illegible]
(গুদামের/কারখানার দখলকারীর নাম ও ঠিকানা)
[illegible]-০৮-১৬

সহ/উপ-পরিচালক
বাংলাদেশ ফায়ার সার্ভিস ও সিভিল ডিফেন্স
[illegible] বিভাগ।
[illegible]

যে সন পর্যন্ত নবায়ন করা হইল	নবায়ন মাশুল	লাইসেন্স প্রদানকারী কর্তৃপক্ষের স্বাক্ষর
৩০ শে জুন, ২০১৪ [illegible]	৪৫০০/-	[illegible]
৩০ শে জুন, ২০১৬ [illegible]		
৩০ শে জুন, ২০০		
৩০ শে জুন, ২০০		
৩০ শে জুন, ২০০		

২

৩০ শে জুন, ২০[illegible]		
৩০ শে জুন, ২০[illegible]		
৩০ শে জুন, ২০[illegible]		

প্রতিটি ক্ষেত্রে ৪(এক) নম্বর বিধি মোতাবেক মান নির্ধারণ করিতে হইবে।

শর্তাবলী

১।	বাংলাদেশ ফায়ার সার্ভিস ও সিভিল ডিফেন্স বিভাগের পরিচালকের দ্বারা নিয়োজিত অফিসার বা অফিসারগণ কর্তৃক পরিদর্শনের নিমিত্তে গুদাম/কারখানা সর্বদা খোলা রাখিতে হইবে।
২।	গুদামকে /কারখানাকে ৫ সংখ্যক ধারায় বর্ণিত শর্তাবলীর সাদৃশ্য হইতে হইবে।
৩।	কোন গুদামের বা কারখানার উপরের বা মধ্যে পূর্ণ বা আংশিকভাবে ২ সংখ্যক ধারার ১১ সংখ্যক দফায় বর্ণিত দ্রব্যাদি তৈয়ার, প্রস্তুত, শুকান অথবা অন্য কোন প্রকার ব্যবহার চলিবে না।
৪।	পাট বা তুলা প্রক্রিয়াকরণ কারখানারূপে ব্যবহৃত গুদামের কোন অংশ বাসস্থানরূপে ব্যবহার করা চলিবে না এবং পাট বা তুলা গুদামজাত থাকা অবস্থায় গুদামে কোন ব্যক্তি ধূমপান করিতে অনুরূপ দিয়াশলাই খোলা বা দিয়াশলাই শলাকা বা অসংরক্ষিত কোন কৃত্রিম আলো বা বাতি বহন করার অনুমতি দেওয়া যাইবে না।

৫। নিম্নে বর্ণিত অগ্নি প্রতিরোধ ব্যবস্থাসমূহ পালন করিতে হইবে।

(১) পানি ভর্তি ৪০-৪৫ গ্যালনের ড্রাম গুদামের বাহিরে সহজে দেখা যায় এমন স্থানে স্থাপন করিতে হইবে। প্রতি ড্রামের পার্শ্বে লোহার হাতলে ৩টি করিয়া বালতি হুকের সাহায্যে ঝুলাইয়া রাখিতে হইবে। ড্রাম ও বালতির বাহিরে লাল এবং ভিতরে সাদা রং দ্বারা চিহ্নিত হইবে। ড্রামের পানি [illegible] যাহাতে নষ্ট করিতে না পারে সেই জন্য সহজে খোলা যায় এমন ঢাকনি দিতে হইবে।

(২) কর্মরত কর্মকর্তা ও কর্মচারীদের আপদকালীন সময় সহজে বাহির হওয়ার জন্য নির্ধারিত সিঁড়ি ছাড়াও উপর হইতে নিচ তলা পর্যন্ত একটি বিকল্প সিঁড়ি ব্যবস্থা রাখিতে হইবে।

(৩) ....50/60... [illegible] পরিমাণের বালতি/বিট/...২ টি ....৫০ কেজি
ড্রাই কেমিক্যাল এক্সটিংগুইশার ....০২ টি.........। পাঁচ কেজি ধারণক্ষমতাসম্পন্ন
৩ টি

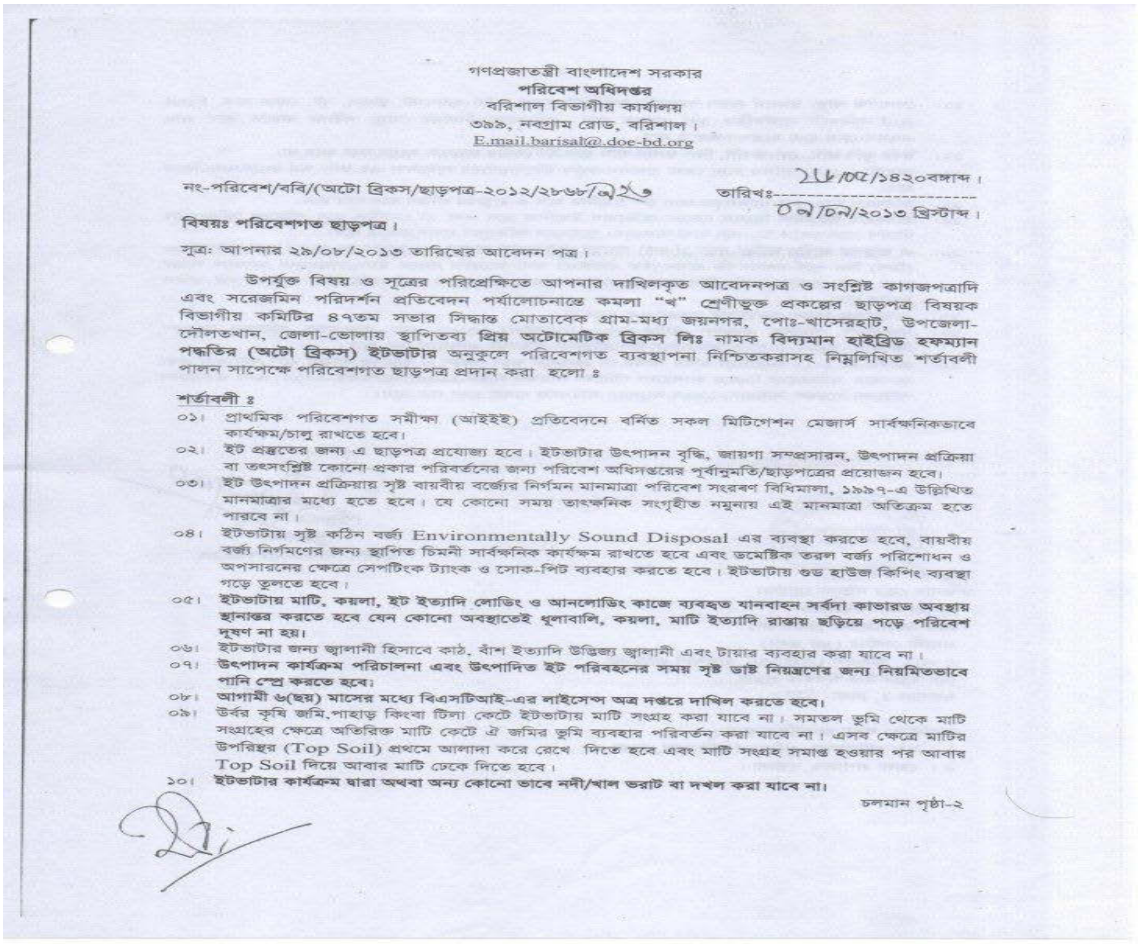
(৪) অগ্নি নির্বাপন যন্ত্রাদি সমূহ ব্যবহার ও রক্ষণাবেক্ষণ এর জন্য সংশ্লিষ্ট কর্মকর্তা ও কর্মচারীদের প্রশিক্ষণ গ্রহণ করিতে হইবে।

সহ/উপ-পরিচালক
বাংলাদেশ ফায়ার সার্ভিস ও সিভিল ডিফেন্স
মজুমদার মোঃ [illegible] .... বিভাগ।
উপ-সহকারী পরিচালক [illegible]
ফায়ার সার্ভিস ও সিভিল ডিফেন্স
ভোলা।

যে সব শর্তে নবায়ন করা হইল নবায়ন মঞ্জুর লাইসেন্স প্রদানকারী কর্তৃপক্ষের স্বাক্ষর।

বাঃ সঃ মুঃ - ২০১২/১১-২২০১কম/সি-৩০,০০০কপি,২০১০।

Annexure 2: Environmental Clearance Certificate.



গণপ্রজাতন্ত্রী বাংলাদেশ সরকার
পরিবেশ অধিদপ্তর
বরিশাল বিভাগীয় কার্যালয়
৩৯৯, নবগ্রাম রোড, বরিশাল।
E.mail.barisal@.doe-bd.org

নং-পরিবেশ/বিবি/(অটো ব্রিকস/ছাড়পত্র-২০১২/২৮৬৮(৯)২৯ তারিখঃ ২৬/০৫/১৪২০বঙ্গাব্দ। / ০৯/০৮/২০১৩ খ্রিস্টাব্দ।

বিষয়ঃ পরিবেশগত ছাড়পত্র।

সূত্রঃ আপনার ২৯/০৮/২০১৩ তারিখের আবেদন পত্র।

উপর্যুক্ত বিষয় ও সূত্রের পরিপ্রেক্ষিতে আপনার দাখিলকৃত আবেদনপত্র ও সংশ্লিষ্ট কাগজপত্রাদি এবং সরেজমিন পরিদর্শন প্রতিবেদন পর্যালোচনান্তে কমলা "খ" শ্রেণীভুক্ত প্রকল্পের ছাড়পত্র বিষয়ক বিভাগীয় কমিটির ৪৭তম সভার সিদ্ধান্ত মোতাবেক গ্রাম-মধ্য জয়নগর, পোঃ-খাসেরহাট, উপজেলা-দৌলতখান, জেলা-ভোলায় স্থাপিতব্য **প্রিয় অটোমেটিক ব্রিকস লিঃ** নামক **বিদ্যমান হাইব্রিড হফম্যান পদ্ধতির (অটো ব্রিকস) ইটভাটার** অনুকুলে পরিবেশগত ব্যবস্থাপনা নিশ্চিতকরাসহ নিম্নলিখিত শর্তাবলী পালন সাপেক্ষে পরিবেশগত ছাড়পত্র প্রদান করা হলো ঃ

শর্তাবলী ঃ

০১। প্রাথমিক পরিবেশগত সমীক্ষা (আইইই) প্রতিবেদনে বর্নিত সকল মিটিগেশন মেজার্স সার্বক্ষনিকভাবে কার্যক্ষম/চালু রাখতে হবে।

০২। ইট প্রস্তুতের জন্য এ ছাড়পত্র প্রযোজ্য হবে। ইটভাটার উৎপাদন বৃদ্ধি, জায়গা সম্প্রসারন, উৎপাদন প্রক্রিয়া বা তৎসংশ্লিষ্ট কোনো প্রকার পরিবর্তনের জন্য পরিবেশ অধিদপ্তরের পূর্বানুমতি/ছাড়পত্রের প্রয়োজন হবে।

০৩। ইট উৎপাদন প্রক্রিয়ায় সৃষ্ট বায়বীয় বর্জ্যের নির্গমন মানমাত্রা পরিবেশ সংরক্ষণ বিধিমালা, ১৯৯৭-এ উল্লিখিত মানমাত্রার মধ্যে হতে হবে। যে কোনো সময় তাৎক্ষনিক সংগৃহীত নমুনায় এই মানমাত্রা অতিক্রম হতে পারবে না।

০৪। ইটভাটায় সৃষ্ট কঠিন বর্জ্য Environmentally Sound Disposal এর ব্যবস্থা করতে হবে, বায়বীয় বর্জ্য নির্গমণের জন্য স্থাপিত চিমনী সার্বক্ষনিক কার্যক্ষম রাখতে হবে এবং ডমেষ্টিক তরল বর্জ্য পরিশোধন ও অপসারনের ক্ষেত্রে সেপটিংক ট্যাংক ও সোক-পিট ব্যবহার করতে হবে। ইটভাটায় শুড হাউজ কিপিং ব্যবস্থা গড়ে তুলতে হবে।

০৫। **ইটভাটায় মাটি, কয়লা, ইট ইত্যাদি লোডিং ও আনলোডিং কাজে ব্যবহৃত যানবাহন সর্বদা কাভারড অবস্থায় স্থানান্তর করতে হবে যেন কোনো অবস্থাতেই ধূলাবালি, কয়লা, মাটি ইত্যাদি রাস্তায় ছড়িয়ে পড়ে পরিবেশ দূষণ না হয়।**

০৬। ইটভাটার জন্য জ্বালানী হিসাবে কাঠ, বাঁশ ইত্যাদি উদ্ভিজ্য জ্বালানী এবং টায়ার ব্যবহার করা যাবে না।

০৭। **উৎপাদন কার্যক্রম পরিচালনা এবং উৎপাদিত ইট পরিবহনের সময় সৃষ্ট ভাই নিয়ন্ত্রণের জন্য নিয়মিতভাবে পানি স্প্রে করতে হবে।**

০৮। **আগামী ৬(ছয়) মাসের মধ্যে বিএসটিআই-এর লাইসেন্স অত্র দপ্তরে দাখিল করতে হবে।**

০৯। উর্বর কৃষি জমি,পাহাড় কিংবা টিলা কেটে ইটভাটায় মাটি সংগ্রহ করা যাবে না। সমতল ভুমি থেকে মাটি সংগ্রহের ক্ষেত্রে অতিরিক্ত মাটি কেটে ঐ জমির ভুমি ব্যবহার পরিবর্তন করা যাবে না। এসব ক্ষেত্রে মাটির উপরিস্থর (Top Soil) প্রথমে আলাদা করে রেখে দিতে হবে এবং মাটি সংগ্রহ সমাপ্ত হওয়ার পর আবার Top Soil দিয়ে আবার মাটি ঢেকে দিতে হবে।

১০। **ইটভাটার কার্যক্রম দ্বারা অথবা অন্য কোনো ভাবে নদী/খাল ভরাট বা দখল করা যাবে না।**

চলমান পৃষ্ঠা-২

-২-

১১। পেশাগত স্বাস্থ্য রক্ষার্থে সকল ব্যবস্থাদি যথাঃ শ্রমিকদের সর্বদা হ্যালমেট, গ্লাভস, বুট, নোজ মাস্ক, First Aid সুবিধাদি সার্বক্ষনিক চালু রাখতে হবে। শ্রমিকদের নিয়মিত স্বাস্থ্য পরীক্ষা করতে হবে এবং এতদসংক্রান্ত তথ্য সংরক্ষণ করতে হবে।

১২। **উর্বর কৃষি জমি, দো-ফসলি, তিন ফসলি জমি হতে ইট তৈরীর কাচমাল সংগ্রহ করা যাবে না।**

১৩। আগামী ৬ (ছয়) মাসের মধ্যে জেলা প্রশাসন কর্তৃক ইটপোড়ানোর লাইসেন্স এর কপি অত্র দপ্তরে জমা দিতে হবে।

১৪। ভবিষ্যতে উদ্যোক্তার দাখিলকৃত তথ্য ভুল প্রমানিত হলে এ ছাড়পত্র বাতিল বলে গণ্য হবে।

১৫। ভবিষ্যতে ইটভাটার বিরুদ্ধে কোনো অভিযোগ উত্থাপিত হলে এবং তা প্রমানিত হলে পরিবেশ অধিদপ্তরের নির্দেশ মেনে চলতে উদ্যোক্তা বাধ্য থাকবেন। প্রয়োজনে ক্ষতিপূরণ প্রদান করতে হবে।

১৬। **এ ছাড়পত্র জারীর তারিখ হতে ১(এক) বছরের জন্য বহাল থাকবে।** এ ছাড়পত্রের মেয়াদ শেষ হওয়ার ৩০ (ত্রিশ) দিন পূর্বে নবায়ন ফি প্রদানপূর্বক নবায়নের জন্য আবেদন করতে হবে। নবায়নের আবেদন পত্রের সাথে জেলা প্রশাসন কর্তৃক ইটপোড়ানোর লাইসেন্স এবং আয়কর ও ভ্যাট পরিশোধের প্রত্যয়ন পত্র দাখিল করতে হবে।

১৭। এ ছাড়পত্র কোনো অবস্থাতেই হস্তান্তর করা যাবে না।

১৮। বাংলাদেশ পরিবেশ সংরক্ষণ আইন-১৯৯৫ (সংশোধিত-২০১০) এবং বাংলাদেশ পরিবেশ সংরক্ষণ বিধিমালা-১৯৯৭-এ প্রদত্ত ক্ষমতাবলে উপরোল্লিখিত শর্তসমূহ এনফোর্স করা হবে।

১৯। ক্রমিক নং ১-১৭ অনুচ্ছেদে বর্ণিত শর্তের যে কোনোটি ভংগ করলে এ ছাড়পত্র বাতিল বলে গণ্য হবে এবং আপনার প্রতিষ্ঠানের বিরুদ্ধে বাংলাদেশ পরিবেশ সংরক্ষণ আইন-১৯৯৫(সংশোধিত-২০১০) এবং বাংলাদেশ পরিবেশ সংরক্ষণ বিধিমালা-১৯৯৭ অনুসারে আইনগত ব্যবস্থা গ্রহণ করা হবে।

20/07/2010

(সুকুমার বিশ্বাস)
পরিচালক
ফোন: ০৪৩১-২১৭৭৫১৩

গ্রাপক
জনাব মোঃ মইনুল হোসেন
ব্যবস্থাপনা পরিচালক
প্রিয় অটোমেটিক ব্রিকস লিঃ
ওয়ালী সেন্টার (৬ষ্ঠ তলা)
৫-এ/১, সিইএস (এফ) ৭৪, গুলশান এভিনিউ
বীর উত্তম মীর শওকত সড়ক
গুলশান-১, ঢাকা- ১২১২।

অনুলিপিঃ সদয় অবগতির জন্য।
১। মহা পরিচালক, পরিবেশ অধিদপ্তর, ঢাকা।
২। জেলা প্রশাসক, ভোলা।

Annexure 3: Brick Burning Certificate

ফরম নং - 'খ'

(বিধি - ৩ দ্রষ্টব্য)

ইট পোড়ানো লাইসেন্স

লাইসেন্স নং ০২/২০১৩- ভোলা।

তারিখ: ৩০/০৯/২০১৩ খ্রি.

১। প্রতিষ্ঠানের নাম : প্রিয় অটোমেটিক ব্রিকস্ লিমিটেড
মইনুল হোসেন, ব্যবস্থাপনা পরিচালক

পিতার নাম : মৃত আলী আশরাফ
সাকিন : মধ্য জয়নগর বক্স এ-আলী)
ইউনিয়ন : উত্তর জয়নগর
উপজেলা : দৌলতখান
জেলা : ভোলা।

আপনার ১৪/০৪/২০১২ খ্রি. তারিখের দরখাস্তের পরিপ্রেক্ষিতে আপনাকে পরিবেশ বান্ধব, আধুনিক প্রযুক্তি, হাইব্রিড হফম্যান কিলন পদ্ধতিতে পরিচালনার জন্য নিম্নে বর্ণিত শর্তে ইট পোড়ানোর লাইসেন্স প্রদান করা হলো।

২। ইটের ভাটার অবস্থান: ভোলা জেলাধীন দৌলতখান উপজেলার ৪নং উত্তর জয়নগর ইউনিয়নের ভোলা টু চরফ্যাশন সড়কের বক্স এ আলী রোডে অবস্থিত।

মৌজা- মধ্য জয়নগর।
হো, এল নং- ২৫।
এস. এ খতিয়ান নং- ১৩১৪।
দাগ নং-২৩৬৫,২৩৬৬,২৩৬৭,২৩৭০,২৩৭১, ২০৭২,২০৭৩,২০৭৪, ২০৭৫,২০৭৬, ২০৭৯,।
চৌহদ্দি নং- ৩১।
জমির পরিমান- ৫.৩৪ শতাংশ।

৩। লাইসেন্স এর মেয়াদ ১০/০৯/২০১৪ খ্রি. তারিখ পর্যন্ত।

৪। শর্তাবলী:

(ক) ইট পোড়ানো (নিয়ন্ত্রণ) (সংশোধন) আইন, ২০০১ অনুসারে ইটের ভাটায় কোন অবস্থাতেই কোন প্রকার জ্বালানী কাঠ ব্যবহার করা যাবে না।

(খ) জেলা প্রশাসক বা জেলা প্রশাসক কর্তৃক ক্ষমতাপ্রাপ্ত কার্যকর্তা বা বন কার্যকর্তা বা পরিবেশ অধিদপ্তরের কর্মকর্তা যাহাদের পদ মর্যাদা সহকারী বন সংরক্ষক/সমপর্যায়ের নিম্নে নহে বা উপজেলা পরিষদের চেয়ারম্যান কোন প্রকার নোটিশ ব্যতীত যে কোন ইটের ভাটা পরিদর্শন করিতে পারিবেন এবং ইহাতে কোন বাধা প্রদান বা ওজর আপত্তি চলিবে না।

(গ) পোড়ানো ইটের পরিসংখ্যান ও বিক্রয়ের ব্যাপারে রেজিস্টার সংরক্ষণ করতে হবে।

(ঘ) ইট পোড়ানো (নিয়ন্ত্রণ) আইন, ১৯৮৯ (সংশোধিত ২০০১) এবং উক্ত আইনের অধীন বিধির পরিপন্থী কর্মের ক্ষেত্রে আইন অনুযায়ী মোকদ্দমা দায়ের করা যাইবে।

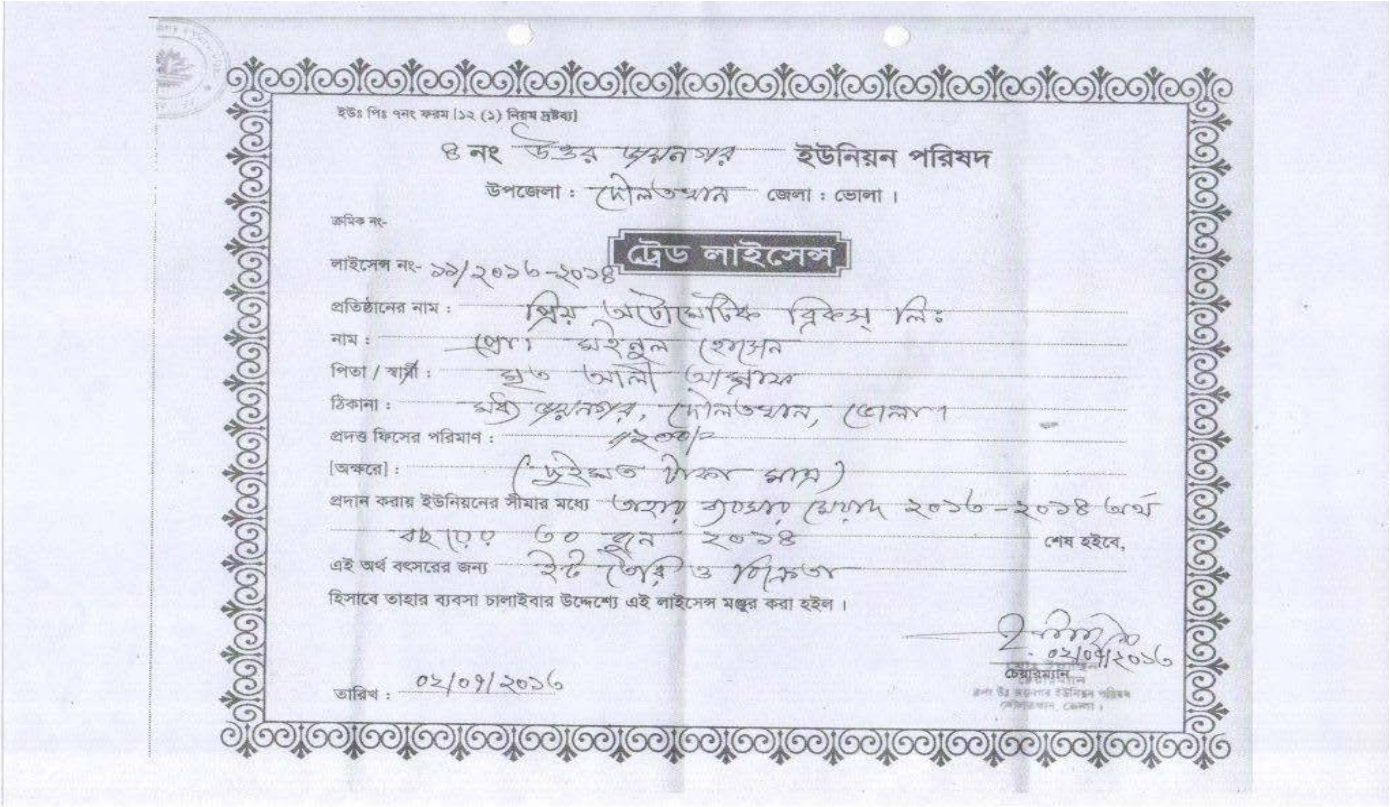
(ঙ) ইটের ভাটার কার্যক্রম ২.০০ একর জমির মধ্যে সীমাবদ্ধ রাখিতে হইবে।

৩০/৯/১৩

জেলা প্রশাসক
ভোলা।

তারিখ: ৩০/০৯/২০১৩ খ্রি.

Annexure 4: Trade License.



ইউঃ পিঃ ৭নং ফরম [১২ (১) নিয়ম দ্রষ্টব্য]

৪ নং উত্তর জয়নগর ইউনিয়ন পরিষদ

উপজেলা : দৌলতখান জেলা : ভোলা।

ক্রমিক নং-

লাইসেন্স নং- ৯৯/২০১৬-২০১৪

ট্রেড লাইসেন্স

প্রতিষ্ঠানের নাম : প্রিয় অটোমেটিক ব্রিকস্ লিঃ

নাম : (প্রো:) রহমুল হোসেন

পিতা / স্বামী : মৃত আলী আক্কাস

ঠিকানা : মধ্য জয়নগর, দৌলতখান, ভোলা।

প্রদত্ত ফিসের পরিমাণ : ১২০০/=

[অক্ষরে] : (এক হাজার দুইশত টাকা মাত্র)

প্রদান করায় ইউনিয়নের সীমার মধ্যে অত্র লাইসেন্স মেয়াদ ২০১৬-২০১৪ অর্থ বছরের ৩০ জুন ২০১৪ শেষ হইবে,

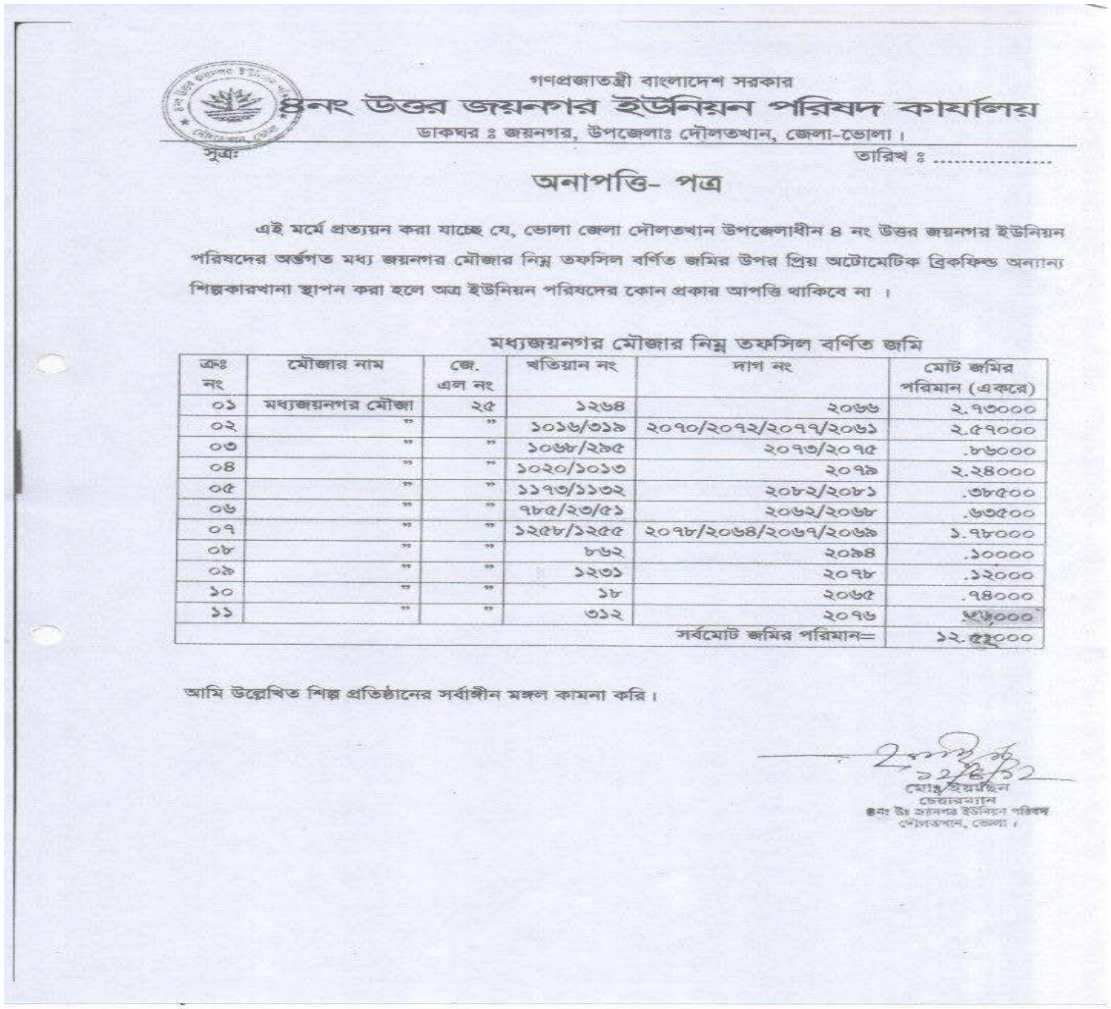
এই অর্থ বৎসরের জন্য ইট তৈরি ও বিক্রয়

হিসাবে তাহার ব্যবসা চালাইবার উদ্দেশ্যে এই লাইসেন্স মঞ্জুর করা হইল।

০২/০৭/২০১৬
চেয়ারম্যান
৪নং উত্তর জয়নগর ইউনিয়ন পরিষদ
দৌলতখান, ভোলা।

তারিখ : ০২/০৭/২০১৬

Annexure 5: No Objection Certificate from Union Parishad(Union Level Local Government)



গণপ্রজাতন্ত্রী বাংলাদেশ সরকার

৪নং উত্তর জয়নগর ইউনিয়ন পরিষদ কার্যালয়

ডাকঘর ঃ জয়নগর, উপজেলাঃ দৌলতখান, জেলা-ভোলা।

সূত্রঃ

তারিখ ঃ .....

অনাপত্তি- পত্র

এই মর্মে প্রত্যয়ন করা যাচ্ছে যে, ভোলা জেলা দৌলতখান উপজেলাধীন ৪ নং উত্তর জয়নগর ইউনিয়ন পরিষদের অর্ন্তগত মধ্য জয়নগর মৌজার নিম্ন তফসিল বর্ণিত জমির উপর প্রিয় অটোমেটিক ব্রিকফিল্ড অন্যান্য শিল্পকারখানা স্থাপন করা হলে অত্র ইউনিয়ন পরিষদের কোন প্রকার আপত্তি থাকিবে না ।

মধ্যজয়নগর মৌজার নিম্ন তফসিল বর্ণিত জমি

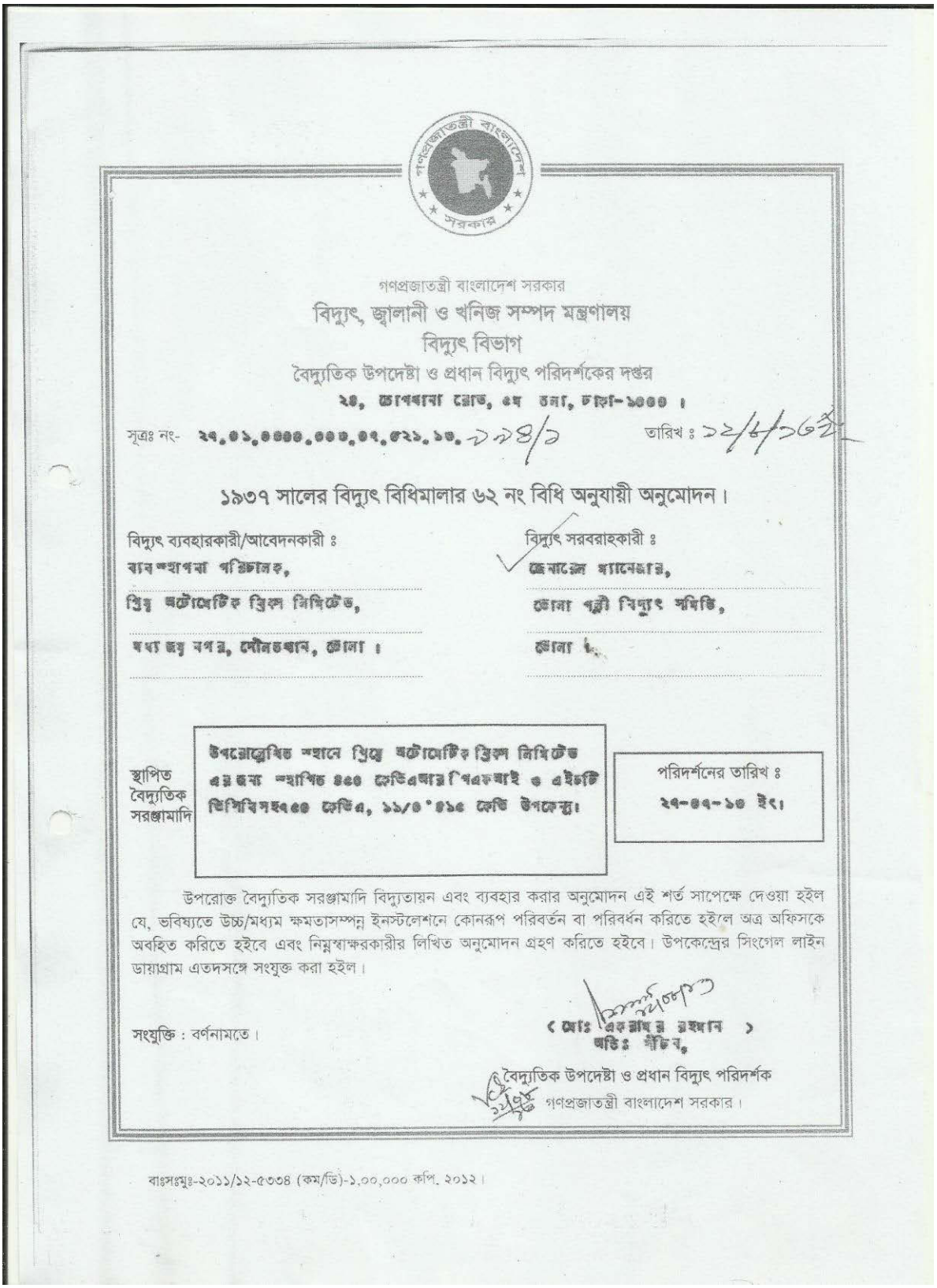
ক্রঃ নং	মৌজার নাম	জে. এল নং	খতিয়ান নং	দাগ নং	মোট জমির পরিমান (একরে)
০১	মধ্যজয়নগর মৌজা	২৫	১২৬৪	২০৬৬	২.৭৩০০০
০২	"	"	১০১৬/৩১৯	২০৭০/২০৭২/২০৭৭/২০৬১	২.৫৭০০০
০৩	"	"	১০৬৮/২৯৫	২০৭৩/২০৭৫	.৮৬০০০
০৪	"	"	১০২০/১০১৩	২০৭৯	২.২৪০০০
০৫	"	"	১১৭৩/১১৩২	২০৮২/২০৮১	.৩৮৫০০
০৬	"	"	৭৮৫/২৩/৫১	২০৬২/২০৬৮	.৬৩৫০০
০৭	"	"	১২৫৮/১২৫৫	২০৭৮/২০৬৪/২০৬৭/২০৬৯	১.৭৮০০০
০৮	"	"	৮৬২	২০৯৪	.১০০০০
০৯	"	"	১২৩১	২০৭৮	.১২০০০
১০	"	"	১৮	২০৬৫	.৭৪০০০
১১	"	"	৩১২	২০৭৬	.৫৬০০০
				সর্বমোট জমির পরিমান=	১২.৫২০০০

আমি উল্লেখিত শিল্প প্রতিষ্ঠানের সর্বাঙ্গীন মঙ্গল কামনা করি।

২১/৫/১২

মোঃ ইয়াছিন
চেয়ারম্যান
৪নং উঃ জয়নগর ইউনিয়ন পরিষদ
দৌলতখান, ভোলা।

Annexure 6: Approval of Electricity Connection



গণপ্রজাতন্ত্রী বাংলাদেশ সরকার
বিদ্যুৎ, জ্বালানী ও খনিজ সম্পদ মন্ত্রণালয়
বিদ্যুৎ বিভাগ
বৈদ্যুতিক উপদেষ্টা ও প্রধান বিদ্যুৎ পরিদর্শকের দপ্তর
২৪, কাওরান বাজার, ঢাকা-১২১৫।

সূত্রঃ নং- ২৭.০১.০০০০.০০০.০৭.৩২১.১৩.২২৪/১ তারিখ ঃ ২২/৮/১৩ বঙ্গাব্দ

১৯৩৭ সালের বিদ্যুৎ বিধিমালার ৬২ নং বিধি অনুযায়ী অনুমোদন।

বিদ্যুৎ ব্যবহারকারী/আবেদনকারী ঃ
ব্যবস্থাপনা পরিচালক,
প্রিয় অটোমেটিক ব্রিকস লিমিটেড,
মধ্য জয় নগর, দৌলতখান, ভোলা।

বিদ্যুৎ সরবরাহকারী ঃ
জেনারেল ম্যানেজার,
ভোলা পল্লী বিদ্যুৎ সমিতি,
ভোলা।

স্থাপিত বৈদ্যুতিক সরঞ্জামাদি: উপরোল্লেখিত স্থানে প্রিয় অটোমেটিক ব্রিকস লিমিটেড এর জন্য স্থাপিত ৪৫০ কেভিএ/পিএফ ও এইচটি সিপিসিবি সহ ৫০ কেভি, ১১/০.৪১৫ কেভি উপকেন্দ্র।

পরিদর্শনের তারিখ ঃ ২৭-৩৭-১৩ ইং।

উপরোক্ত বৈদ্যুতিক সরঞ্জামাদি বিদ্যুতায়ন এবং ব্যবহার করার অনুমোদন এই শর্ত সাপেক্ষে দেওয়া হইল যে, ভবিষ্যতে উচ্চ/মধ্যম ক্ষমতাসম্পন্ন ইনস্টলেশনে কোনরূপ পরিবর্তন বা পরিবর্ধন করিতে হইলে অত্র অফিসকে অবহিত করিতে হইবে এবং নিম্নস্বাক্ষরকারীর লিখিত অনুমোদন গ্রহণ করিতে হইবে। উপকেন্দ্রের সিংগেল লাইন ডায়াগ্রাম এতদসঙ্গে সংযুক্ত করা হইল।

সংযুক্তি : বর্ণনামতে।

(মোঃ একরামুর রহমান)
অতিঃ পরিচালক,
বৈদ্যুতিক উপদেষ্টা ও প্রধান বিদ্যুৎ পরিদর্শক
গণপ্রজাতন্ত্রী বাংলাদেশ সরকার।

বাঃসঃমুঃ-২০১১/১২-৫৩৩৪ (কম/ডি)-১,০০,০০০ কপি, ২০১২।

Annexure 7: Land Ownership Records

ফরম নং ৫৪৬২ (সংশোধিত) খতিয়ান নং ২৩৭৯

লা উপজেলাঃ দৌলতখান মৌজাঃ মধ্য জয়নগর জে. এল নং ২৫ রেঃ সাঃ নং ....

মালিক বা অকৃষি প্রজা বা ইজারাদারের নাম ও ঠিকানা	অংশ	রাজস্ব	দাগ নং	জমির শ্রেণী		দাগের মোট পরিমাণ		দাগের মধ্যে অত্র খতিয়ানের অংশ	অংশানুযায়ী জমির পরিমাণ		দখল বিষয়ক বা অন্যান্য বিশেষ মন্তব্য
				কৃষি	অকৃষি	একর	শতাংশ		একর	শতাংশ	
১	২	৩	৪	৫(ক)	৫(খ)	৬(ক)	৬(খ)	৭	৮(ক)	৮(খ)	৯
ডাঃ তাসলিমা আহমেদ জামান	০.৩৩৪	[illegible]	২০৭৯	নাল		৩	১৭	০.৩৯১	১	২৪	আগত খতিয়ান নং এস,এ -১৩১৪
জং-ডাঃ তৌহিদুজ্জামান			২০৯৪	নাল		১	৬৪	০.০৩০	-	০৫	
ডাঃ তৌহিদুজ্জামান	০.৩৩৩		২০৮২	নাল		-	৯০	০.১৬৭	-	১৫	
			২০৮১	নাল		-	৫২	০.০৭৭	-	০৪	
পিং মৃতঃ আবদুল ওহাব			২০৬১	নাল		১	১৮	০.৩০৫	-	৩৬	
সাং-প্লট নং-১৩, এপার্টমেন্ট-১০৪			২০৬৮	নাল		-	০৭	০.৫৭২	-	০৪	
			১৯১৭	নাল		২	৩০	০.০০৯	-	০২	
রোড নং-৫১			২০৭২	নাল		-	১১	০.৫৪৫	-	০৬	
গুলশান-২,ঢাকা-১২১২			২০৭৭	নাল		১	১৪	০.৪৯১	-	৫৬	
			২০৭৮	নাল		১	২০	০.৫৬৭	-	৬৮	
মইনুল হোসেন	০.৩৩৩		২০৭০	নাল		-	১৯	০.৫২৬	-	১০	
পিং মৃতঃ আলী আশরাফ	১.০০০		২০৬৬	নাল		২	৭৩	০.৫৫০	১	৫০	
সাং-বাসা নং-৩৮,রোড নং-২৫			২০৬৭	নাল		-	১১	০.৫৪৫	-	০৬	
			২০৬৪	নাল		-	৫৫	০.৫১০	-	২৮	
ব্লক -এ ,বনানী,ঢাকা-১২১৩			২০৬০	নাল		-	৬০	০.৩৬৭	-	২২	
			২০৬৫	নাল		-	৭৪	০.৫৪১	-	৪০	
			২০৭৩	নাল		-	৬৬	০.৫৪৫	-	৩৬	
			২০৭৪	নাল		-	২৪	০.২৫০	-	০৬	
			২০৭৫	নাল		-	৪০	০.২৫০	-	১০	
			২০৬২	নাল		-	৬৩	০.৪৪৫	-	২৮	
			২০৭১	নাল		-	০৭	০.৫৭১	-	০৪	
								মোট জমির পরিমাণ	৬	৬০	

নামজারী/জমা খারিজ মোকদ্দমা নং ৪৫০ ডি/১১-১২ ইং 22/4/12 তারিখের আদেশ বলে অত্র .... খতিয়ান খোলা হল।

মোঃ মিজানুর রহমান
ইউনিয়ন ভূমি সহঃ কর্মকর্তা
উত্তর জয়নগর, দৌলতখান।

.... ধারা মতে নোট বা পরিবর্তন বয় মোকদ্দমা নং এবং সন।

(মোঃ আলী আজগর)
সার্ভেয়ার
উপজেলা ভূমি অফিস
দৌলতখান,ভোলা।

22/4/12
(শেখ মুর্শিদুল ইসলাম)
পরিচিতি নং-১৫৬০৩
সহকারী কমিশনার (ভূমি)(অঃ দাঃ)
দৌলতখান,ভোলা।

থানা : দৌলতখান জেলা : ভোলা তৌজি নং- ৬১
মৌজা : মধ্য জয়নগর জে, এল, নং- খতিয়ান নং- ১৬১৪

রায়ত অথবা দখলকারের নাম ও ঠিকানা	অংশ	খাজনা	পথ ও পূর্তকর	শিক্ষাকর	মন্তব্য
তোফাজ্জল আহমদ পিং মৃত মৌলভী আব্বাস আলী	১২৫৭।।	৪৭১৫/-			
আনোয়ারা বেগম স্বা: তোফাজ্জল আহমদ সাং বোরহানউদ্দিন	৫				বিক্রয় বিলুপ্তের আধুনিক জমি বাণিজ্যিক হারে ২.৪১ একর ১৫/- টাকা হারে ৩৬১৫/- টাকা
মোসাম্মৎ নুরুন্নাহার পিং মৃত আবদুল হাকিম পাটওয়ারী সাং চরজব্বার ভোলা সদর ভোলা	১২৫৭।। / ২				কৃষি জমি ১১.০০ শতক ১/- টাকা হারে ১১০০/- টাকা সর্ব মোট ভূমি উন্নয়ন কর- ৪৭১৫/-

১৩ মি/১১-১২ নং নামজারী কেস ও জমা খারিজ মূলে মোকদ্দমার ০১/০৮/১১ ইং তারিখের আদেশ মোতাবেক অত্র খতিয়ানের দাগের ১০১৬, ৮৫২, ১১৭৩, ১৬২, ৩১৯, ৩১৩, ১০১৫, ১১২৫, ৩১৩, ১৮, ১১৫৪, ১১৫৮/১, ৮২৭, ৫১, ২৩, ৭৬৫, ৮৬০, ১০৫৫, ২৯৫, ৮২৯, ১১৩১, ২৩১ ও ১০১১ নং খতিয়ান হইতে যথাক্রমে ২.২৪ একর ০.১০ একর ০.০৮ ১/৪ একর ০.৫ ১/৪ একর ০.১৪ একর ০.০৪ ১/৪ একর ১.১০ একর ১.৮৩ একর ০.৪২ একর ০.৭৪ একর ২.৫৩ একর ০.৮০ একর ০.০১ ১/২ একর ০.৫২ ১/২ একর ০.০২ একর ০.০৮ একর ০.০৪ একর ০.৭৭ একর ০.৪৯ একর ০.২২ একর ০.০৪ ১/৪ একর ০.১০ একর সর্বমোট ১৩.৪১ একর জমি নিয়া অত্র খতিয়ান খোলা হইল।

৩১/০৭/১১
মোঃ মিজানুর রহমান
সার্টিফিকেট সহকারী কর্মকর্তা
উপজেলা ভূমি অফিস
দৌলতখান, ভোলা।

২৮/০৭/১১
(মোঃ মিজানুর রহমান)
সার্ভেয়ার
উপজেলা ভূমি অফিস
দৌলতখান, ভোলা।

০১/০৮/১১ ইং
উপজেলা নির্বাহী অফিসার
ও
সহকারী কমিশনার (ভূমি)(অঃ দাঃ)
দৌলতখান, ভোলা।

৪৯, ৫০, ৫১, ৫২ ও ৫৩ (৪) ধারামতে হুকুমের নোট বা পরিবর্তন (ময় মকদ্দমা নম্বর বা সন)	[redacted]

দাগ নম্বর	জমির শ্রেণী	মন্তব্য	দাগের মোট পরিমাণ		দাগের মধ্যে অত্র খতিয়ানের হিস্যা	দাগের মধ্যে অত্র খতিয়ানের রসদীয় পরিমাণ	
			একর	শতাংশ		একর	শতাংশ
২০৭৯	নালা	আপত্তি মঃ নং ২০১৯	৬	১৭	।।৶৴	২	২৪
২০৯৪	ঐ	আপত্তি মঃ নং ৮৬২	১	৬৪	২৯।।		১৫
২০৮২	ঐ	আপত্তি মঃ নং ৮২৯ ১১৭৩		৯০	৵৮		৩০ ১/৪
২০৮১	ঐ	আপত্তি মঃ নং ২৩২ ৮২৭		৫২	৶৮		০৭ ৩/৪
২০৬১	ঐ	আপত্তি মঃ নং ৩১৯	১	১৮	৸৭		৯১
২০৬৮	ঐ	আপত্তি মঃ নং ৩১৯ ৫৩, ৭৮৫			১৴		০৭
১৯১৭	ঐ	আপত্তি মঃ নং ৩১০	২	৩০	৬৴		২৫ ১/৪
২০৭২	পুকুর/নালা	আপত্তি মঃ নং ২০২৫, ২০৬৮, ২০৬৪, ২২৫৮			১৴		১১
২০৭৭	নালা	আপত্তি মঃ নং ২০১৫	১	২৪	৸৶৮	১	০৬
২০৭৮	ঐ	আপত্তি মঃ নং ২২৫৮, ২২৬৪, ২২৫৮/১			১৴	১	২৬
২০৭০	ঐ	ঐ			১৴		১৯
২০৬৬	ঐ	ঐ	~~২~~	~~৭৩~~	১৴	২	৭৬
২০৬৭	ঐ	ঐ			১৴		১১
২০৬৪	ঐ	ঐ		৫৫	৸৶		৪৮
২০৫৬	ঐ	আপত্তি মঃ নং ৬১৩		৬০	।।২/৪		৪২
২০৬৫	ঐ	আপত্তি মঃ নং ১৮			১৴		৭৪
২০৫৯	ঐ	আপত্তি মঃ নং ১২৫৮		০৬	৶৭		০৫
২০৫১	ঐ	আপত্তি মঃ নং ১২৬৪	১	০৯	।৶১৮		৪৭
২০৬২	ঐ	আপত্তি মঃ নং ৭৮৫, ৫৩		৬৩	৸৶৭		২৫ ১/২
২০৯০	ঐ	আপত্তি মঃ নং ২৩		৩৯	১৬।।		০২
১৯৫৭	ঐ	আপত্তি মঃ নং ৮৬০		৬৫	/০		০৪
২০৭৩	ঐ	আপত্তি মঃ নং ২০৬৮			১৴		৬৩
২০৭১	ঐ	ঐ			১৴		০৭
২০৭৫	ঐ	আপত্তি মঃ নং ২৯৫		৪০	।।		২০
২১১৪	ঐ	ঐ		৬১	।।৶৩		২৫
২০৭৪	ঐ	আপত্তি মঃ নং ১২৬১		২৪	।।		১১
২০৯৯	ঐ	আপত্তি মঃ নং ১৬১		১৯	২/১১		০৪ ১/৪
২২৮২	ঐ	আপত্তি মঃ নং ২০১১		৫৯	৶৩		১০
২১১৭	বাগান	আপত্তি মঃ নং ২৯৫		০৮	।।		০৪
		মোট জমির পরিমাণ				১৩	৪১

Annexure 8: Public Consultation and Information Disclosure

However the representative of BB, PFI and TA Consultant visited the subproject area, met representative of the different beneficiaries and held discussions with the Local people, on 31-4-2014 .During the visit the team walk through surrounding the sub project area not many people were available, but local people were conversed about the project information disclosure. They confirmed that project related information was disclosed during the initial stage of the project and before the project operation phase, in informal manner, the discussions showed popular support for the subproject and there is no known opposition to the subproject.

Consultation with affected people and other stakeholder:
Minutes of the Stakeholder Consultation Meeting at Project Location of Priyo Automatic Bricks Ltd

Time : 2.0 pm
Date : May 01, 2014
Place : Maddhya Joynagar (Box-A-Ali), Doulatkhan, Bhola
Subprojects : Priyo Automatic Bricks Limited

Nearly 20 people enthusiastically participated in the meeting including Bangladesh Bank representatives, PFI representatives, CEA consultant, ADB consultants of environment and social, project owner, staff and employee representatives of the project and local people of the community.

Attendance of the stakeholder consultation is as follows:
- Mr. Shahid ullah Akanda, Bangladesh Bank
- Mr. Toriqul Islam, Bangladesh Bank
- Mr. Mohammad Reazuddin, ADB environment specialist
- Mr. Shah Alam, ADB social specialist
- Mr. Md Masroor Abedin, Environmental Activist, Green Belt Trust
- Mr. Md Iqbal Hossain, CEA, HHK Technology expert
- Mr. Firoz Alam, National Bank
- Mr. Mainul Hossain, Managing Director, Priyo Automatic Bricks Ltd
- Mr. Yousuf Abdullah, General Manager, Priyo Automatic Bricks Ltd

Table 2: Representative of Local Community

Name	Profession	Address
1. Jamal Uddin , aged 55	Farmer	MaddhyaJoynagar, Doulatkhan, Bhola
2. Azizul Hoque, aged 28	Small Trader	MaddhyaJoynagar, Doulatkhan, Bhola
3. Abdul Aziz, aged 32	Fisherman	MaddhyaJoynagar, Doulatkhan, Bhola
4. Md Mofizul Islam, aged 40	Fisherman	MaddhyaJoynagar, Doulatkhan, Bhola
5. Shamsul Hoque, aged 35	Businessman	MaddhyaJoynagar, Doulatkhan, Bhola
6. Md Bodiuzzaman, aged 39	Small Trader	MaddhyaJoynagar, Doulatkhan, Bhola
7. Safi Uddin, aged 60	Farmer	MaddhyaJoynagar, Doulatkhan, Bhola

Conduct of the Meeting:

Bangladesh Bank Representative **Mr. Shahidullah Akanda** presided over the meeting. The discussion was moderated by two consultants of ADB on Environment and Social respectively.

At the beginning, Mr Shahidullah Akanda with the assistance of Mr. Iqbal Hossain, technology expert of CEA briefed the participants of the meeting about the HHK technology and its manufacturing process, magnitude of pollution caused by the traditional brick manufacturing technology, project background and its environmental, social and economic objectives, information on the positive environmental impacts of the project, information on the project's socioeconomic impacts in the surrounding localities, information on improved working condition for the brick manufacturing workers, in comparison with the traditional kilns.

After briefing; this was followed by an open discussion allowing participants to voice their concerns and opinion. The participants were assured that they could ask questions or seek clarifications without any hesitation about the project. The responses from the people in general were appreciating and they were happy to have a modern brick kiln in their locality.

Major Issues Discussed:

Land Title: Mr. Shah Alam, ADB social specialist, questioned the owner of the brick kiln about the land related documentation, resettlement issues during its installation and fair price assurance to the seller of the land. The owner of Brick Kiln, Mr. Mainul Hossain, explained clearly about all the concerns and also provided the required land related documents asked by the ADB social specialist. He also informed that this plant has been built in the same premises of the previous fixed chimney kiln. No extra land was required.

Environmental Pollution: Mr Mohammad Reazuddin, ADB environment specialist, queried about the environment pollution due to the establishment of the brick kiln. Different issues related to ecosystem specially trees, fishery resources and damage to agriculture were discussed in the meeting. People responded that they were facing no problem. However, the consultants witnessed dust generation and noise problem in the plant operation.

Severance Problem: Both the ADB specialists raised the issue regarding severance problem. There was no severance problem people responded.

46 No Objection Certificates related issues: Mr Mohammad Reazuddin, ADB environment specialist, questioned the owner of the Brick kiln about different NOCs related to the Priyo Automatic Bricks Ltd, e.g. NOC from local representative, District administrator, Department of Environment, fire service etc. All the NOCs related to project were in place and presented to the consultants.

Raw material Transportation: Mr Mohammad Reazuddin, ADB environment specialist, questioned the owner of the Brick kiln about the raw material transportation. The owner introduced the soil and coal supplier of the project in the meeting as well. Mr Mainul Hossain informed that both road communication and river way are used for raw material transportation.

Noise: Mr Mohammad Reazuddin, ADB environment specialist, raised the issues related to noise from the generator using for the captive electricity generation. The project management assured that they would rectify the issue and will also supply PPEs to the workers working in the generator room.

Benefits to Staff & Worker: Mr. Shah Alam, ADB social specialist, wanted to know about the benefits to staff & workers, payment scale, employment agreement, documentation regarding

payment and attendance. Payment related documentation was not available but the workers conveyed their satisfaction about the payment and benefits providing by the company.

Health and Hygiene: Both the ADB specialist, queried about health and hygiene. The Company has provided separate toilets for the female workers. Deep Tube well water is being used for the drinking and washing purposes.

Occupational health & safety: Mr. Mohammad Reazuddin ADB environment specialist raised concern about occupational health & safety and lack of PPE. The plant owner assured that they would make proper arrangements on OHS based on the recommendation of the consultants.

Stakeholder consultation at the Project office

At the end of the meeting, it became clear that there were no disputes related to the land, no severance problem being faced by the people. There are some dust and noise problems in the plant and they lack experience in occupational health & safety including PPE.