

Environment and Social Due Diligence Report

June 2014

BAN: Financing Brick Kiln Efficiency Improvement Project

Prepared by Bangladesh Bank for the Asian Development Bank

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Due Diligence Report

Bricks 2010 Limited

Polastoli, Chiteshwari, Mirzapur, Tangail

June 2014



西安墙体材料研究设计院

Xi'an Research and Design Institute of Wall & Roof Materials

Address: No. 6, ChangAn South Road, Xian, China, Tel: 0086-29-85221493



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Address: No. 6, ChangAn South Road, Xian, China, Tel: 0086-29-85221493

Date: September 20, 2014

Project Director, Brick Sector Development Project
&
General Manager
Green Banking and CSR Department
Bangladesh Bank
Motijjel, Dhaka

Subject: Submission of the Environment and Social Safeguard Report

Dear Sir:

Pursuant to the Annexure A of the Contract for Consulting Services between the Asian Development Bank (ADB) and the Xian Research and Design Institute of Wall and Roof Materials (XIAN), Peoples' Republic Of China), Joint ventured with Clean Energy Alternatives Inc. (CEA), United States, signed on 3rd June 2013, we are submitting the following 3 (three) Environment and Social Safeguard Due Diligence Reports of the sub-projects for your perusal and approval:

Sl NO.	Name of the Sub-projects	Areas	Brick Kiln Technology
1.	Priyo Automatic Bricks Ltd.	Maddya Joynagar Doulatkhan, Bhola	HHK
2.	Stone Bricks Ltd	Pukhuria Ghior, Manikganj	Tunnel
3.	Brick 2010	Palashtali, Chiteshwari, Mirjapur, Tangail	HHK

You are requested to review the report and forward those to the concerned authority of Asian Development Bank (ADB).

With regards

Bashir Ahmed
Project Coordinator

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

Copy:

1. Mr Morshed Millat, Deputy Project Manager, Brick Sector Development Program
2. Mr Tariqul Islam, Deputy Director, Green Banking and CSR Department, Bangladesh Bank
3. Mr Xiao Hui, Team Leader/Policy Advisor, TA 8197 BAN : Supporting Brick Sector Development Program
4. Office Copy

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Section1: Sub-Project Background

1.1 SUB-PROJECT TITLE

Bricks 2010 Ltd., Mouza: Polastoli & Chiteshwari, P.S: Mirzapur, District: Tangail, Bangladesh. The general information of Bricks 2010 Ltd. are furnished in Table-1.1

Table-1.1: General Information on Bricks 2010 Limited.

1. Name of the Company	Bricks 2010 Limited.
2. Name of the entrepreneur	Dipro Kaiser Chowdhury and Mina Shaheen Chowdhury
3. Contact Address	Registered Office: Dhanmondi Tower (3 rd Floor), House No. 4/A, Road No. 16 (New) 27 (Old), Dhanmondi, Dhaka-1209
4. Name of the Brick Kiln	Bricks 2010 Limited.
5. Type of the Brick Kiln	Hybrid Hoffman Kiln (HHK)
6. Project Investment	BDT 282.45 million
7. Location Address of the Brick Kiln	Mouza: Polastoli & Chiteshwari, PS: Mirzapur, District: Tangail, Bangladesh
8. Current office address	Registered Office: Dhanmondi Tower (3 rd Floor), House No. 4/A, Road No. 16 (New) 27 (Old), Dhanmondi, Dhaka-1209 Email: info@bricks2010.com ; Web: www.bricks2010.com
9. Telephone/Fax	Phone: +8801750000365, +8801750000368
10. E-mail	info@bricks2010.com , factory@bricks2010.com

1.2 SUB-PROJECT DESCRIPTION

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.

The plant will produce 1 lakh 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.

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 800°C. The process is extremely simple and is carried out manually.

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%

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.

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

The dried green bricks are unloaded manually into the annular kiln. The speed of the firing is 1.25m/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.

The raw materials will be sourcing from the river beds, from digging of ponds through the local supplier of soils. During the site visit on 31.05.2014, the soil suppliers were consulted about the availability and collection of soil. They said that people in the villages around the plant dig pond for domestic use & for fishing and sell the soils. Sometime, they have to go quite far to collect the soil, but they are able to meet the demand. The supplier's addresses are listed below:

Name	Address
1. Abul Hossen, aged 40	Polastoli
2. Chan Miah, aged 60	Polastali

The raw materials are transported through kaccha road of the union and Bongshai River and raw materials are brought to the project site usually by truck. Bricks are transported through the road constructed by the project owner and through the gorai-sokhipur road.

Total 86 nos of employee have been employed in the project. Among the employees, female workers are 20 and unskilled workers of the project are 26. For the operation process, a few experts hired from Dhaka and labours are from local community. For employees, toilets have been provided. There are no separate toilets available for the female workers. But the owner is planning to construct separate toilets for female workers very soon. Drinking water is drawn from the tube well.

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



Inside the Brick Field



Section 2: *Due Diligence on Environmental safeguards*

2.1 ENVIRONMENT SAFEGUARD COMPLIANCE REVIEW

The Environmental Safeguard Due-diligence study was carried out for the project on the basis of site visit observations and understanding project scope based on information and documents provided by sub-project implementing agency.

Bangladesh environment Conservation Act'95 (BECA) 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 (BECR) 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.

Review of documents includes the land registry document, all kinds of NOCs obtained 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 technology of the project etc.

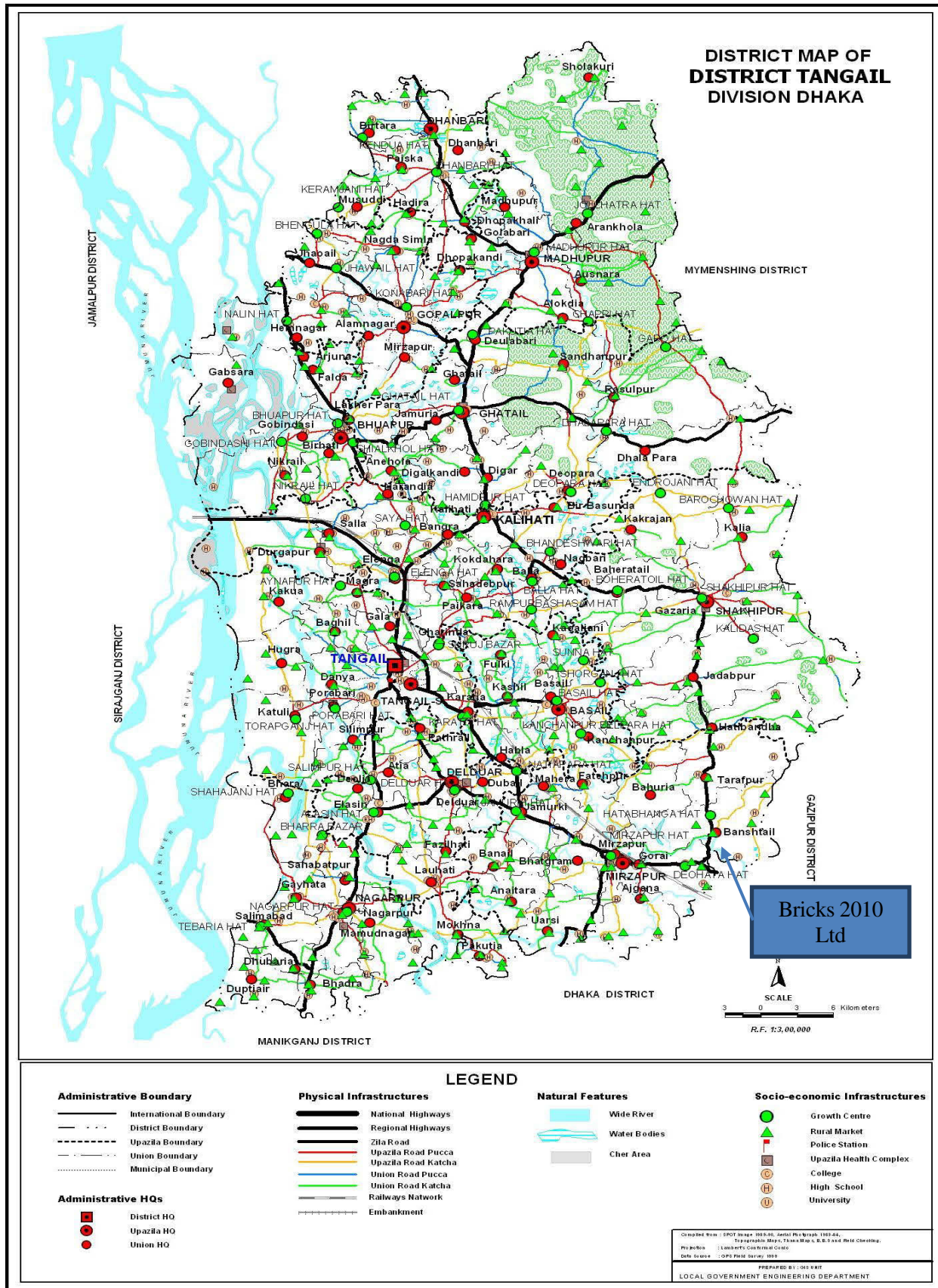
2.2 VISIT TO SUB-PROJECT LOCATION

The project is located on 15 bigha (4.959 acres) of land at Mouza: Polastoli&Chiteshwari,P.S: Mirzapur, District: Tangail,Bangladesh. The project is situated beside the Bongsai River which is streaming on the north-west side of the project.Mirzapurupazilasadaris at a distance of 18 km from the project site and 55 km from Dhaka city. The site is well connected with good unpaved road and water way communication. From the transportation point of view, the location is excellent.There are numerous brick fields surrounding the project siteexcept on the east side of the project. There are around 6-7 brick kilns within the 2 sq.km radius of the Brick 2010 Limited. This area can be called a brick kiln hub. The people of the locality are also mostly engaged in the trade of soil supply and the people in general live with brick kilns in harmony, without complaint. There are crop lands in the south side. Forests are prevailing in the vicinity of the site. Once the area was entirely forest land, a few hundred years back, now the land use is mixed. There are still some patches of forests (owned by the government) in this area surrounded by privet lands. A few local houses are situated beside the brick field. This scenario is quite common in the locality for the brick kilns, may be a tradeoff between the brick kiln owners and surrounding people on employment and business opportunity.

In the strict sense of the BECA'95 and the Brick Kiln Act 2013, it is apparent that the brick kiln established in this area doesn't comply with all the requirements for the site. However, as the local people do not have any complains and their daily life are not hampered due to project activities, DOE provides environmental clearance to these plants. This plant has also obtained the Environment Clearance Certificate (ECC) from the Department of Environment. The project location is shown in different maps in Fig 1.1(a), 1.1(b) & 1.1(c).The satellite image maps of the project site are shown in figure 1.1 (d) & 1.1(e) respectively.



Fig: 1.1(a): Location of Bricks 2010 Limited in South Asia with respect to Bangladesh



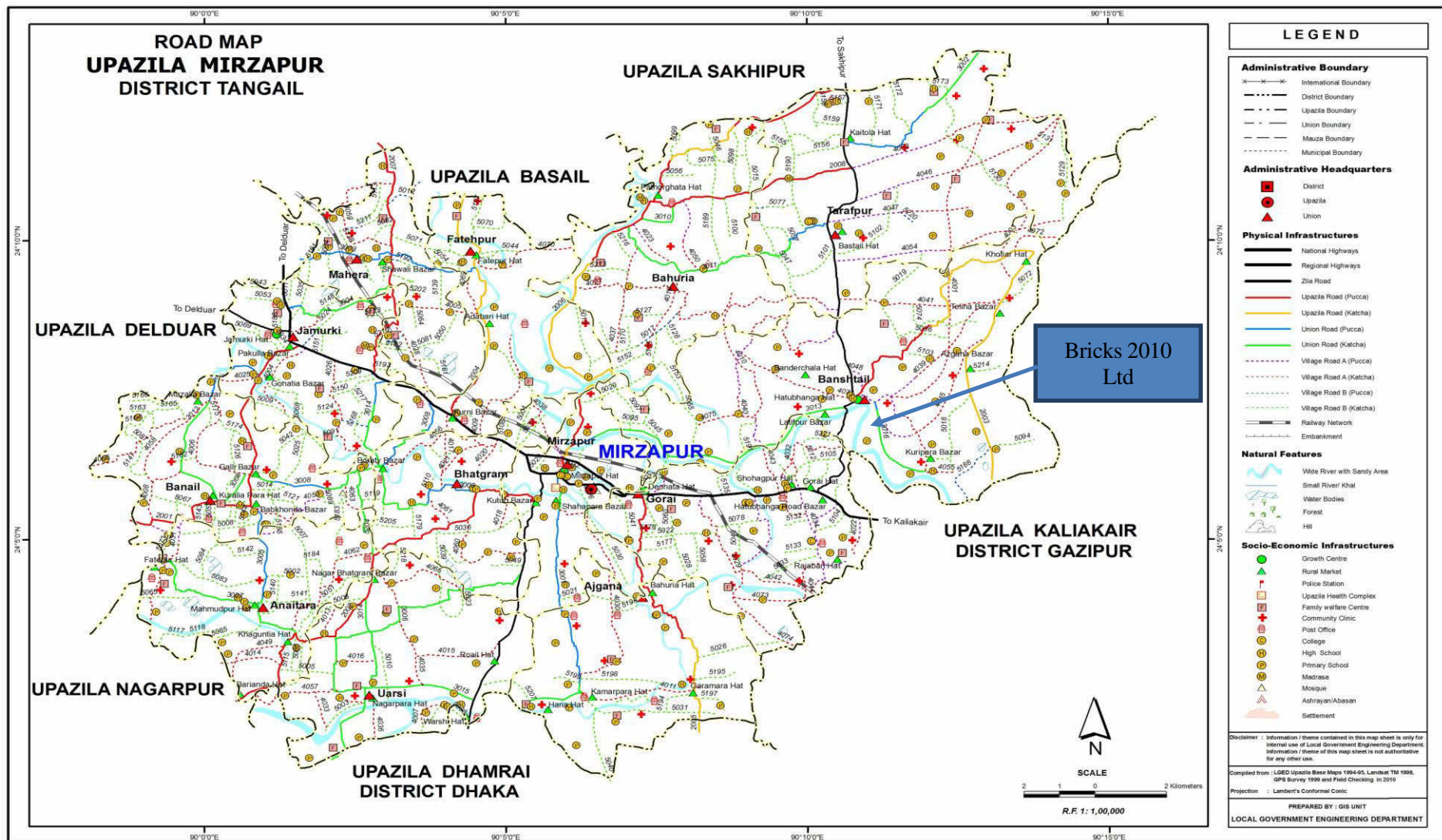


Fig: 1.1(c) Location of Bricks 2010 Limited in Mirzapur Upazilamap



Fig: 1.1(d) Satellite map of Bricks 2010 Limited.



Fig: 1.1(e) Satellite map of Bricks 2010 Limited

As Bongshai river is flowing adjacent to the project whose sediments provide a good source of clay for the project as well. The supplement is being made by the purchase of digged soil from the pond around.

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



Northside of the project



South side of the project



East side of the project

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 1865 mm and approximately 80% of it occurs during the monsoon. Average monthly rainfall during monsoon period varies between 298 mm to 311 mm. Maximum daily rainfalls during this period recorded August 2011 is 761 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 1.8 to 2.7 knots is the North West from October to Feb, South East from March to September. (Source: BMD)
Ambient Air Temperature	Maximum average temperature of 40.3 degree Celsius was observed in April, 2009 where average minimum temperature was 5.5degree Celsius in January, 2011 (Source: BMD)
Air Quality	There are a few brick kilns around. These may have some background air quality impact. There is no test result available for air quality of the locality.
Ambient Noise Level	The operation of Brick Kiln will generate significant noise.
Soils & elevations	This area falls under old Brahmaputra floodplain. The Old Brahmaputra floodplain stretching from the southwestern corner of the Garo Hills along the eastern rim of the Madhupur Tract down to the Meghna River exhibits a gentle morphology composed of broad ridges and depressions. The latter are usually flooded to a depth of more than one meter, whereas the ridges are subject to shallow flooding only in the monsoon.
Water Quality	The problem lies with the presence of arsenic and turbidity.
Flora	<p>The project is in a rural setting. There is greenery around the project site. This includes homesteads, forests, horticulture, roadside plantation, natural vegetation, and fallow land. Besides highland (elevated) affore station and homesteads, the remaining area is mostly low and crop land.</p> <p>Due to roadside plantations and forests, the area is rich</p>

	with floral diversities. Different fruit, fuel wood trees along with various shrubs are abundant. Among the trees, the most widely available ones are shal, shegoon etc. Also there are some fruit trees such as Mango, Jackfruit, Grapefruit etc.
Fauna	Fish is plenty in the area, given the overall and increasing scarcity of fish in the country. Among the fishes, carfu, koi, shing, silver carp, rui, catla, thaisarputi, shoal, taki, prawn, small fish etc. are the prominent in the local market.
Birds	Among birds, pati hash, Bok, Salik, Goose etc. deserve special mention. Kingfishers, House crow, House sparrow, little fern etc. are also common in this area.
Land Use	Mostly Agriculture and forests.
Demography	Not so densely populated like mainland. Almost gender balanced population. Main stay of economy is agriculture followed by business and service.
Living and Cultural Standard	The project area and the surrounding are having rural look. People have moderate living standard.

The physiographic map of Bangladesh is shown in *Figure 1.2*. Within this area; elevations are from 6-7 m above sea level, which is shown in *Figure 1.3*.

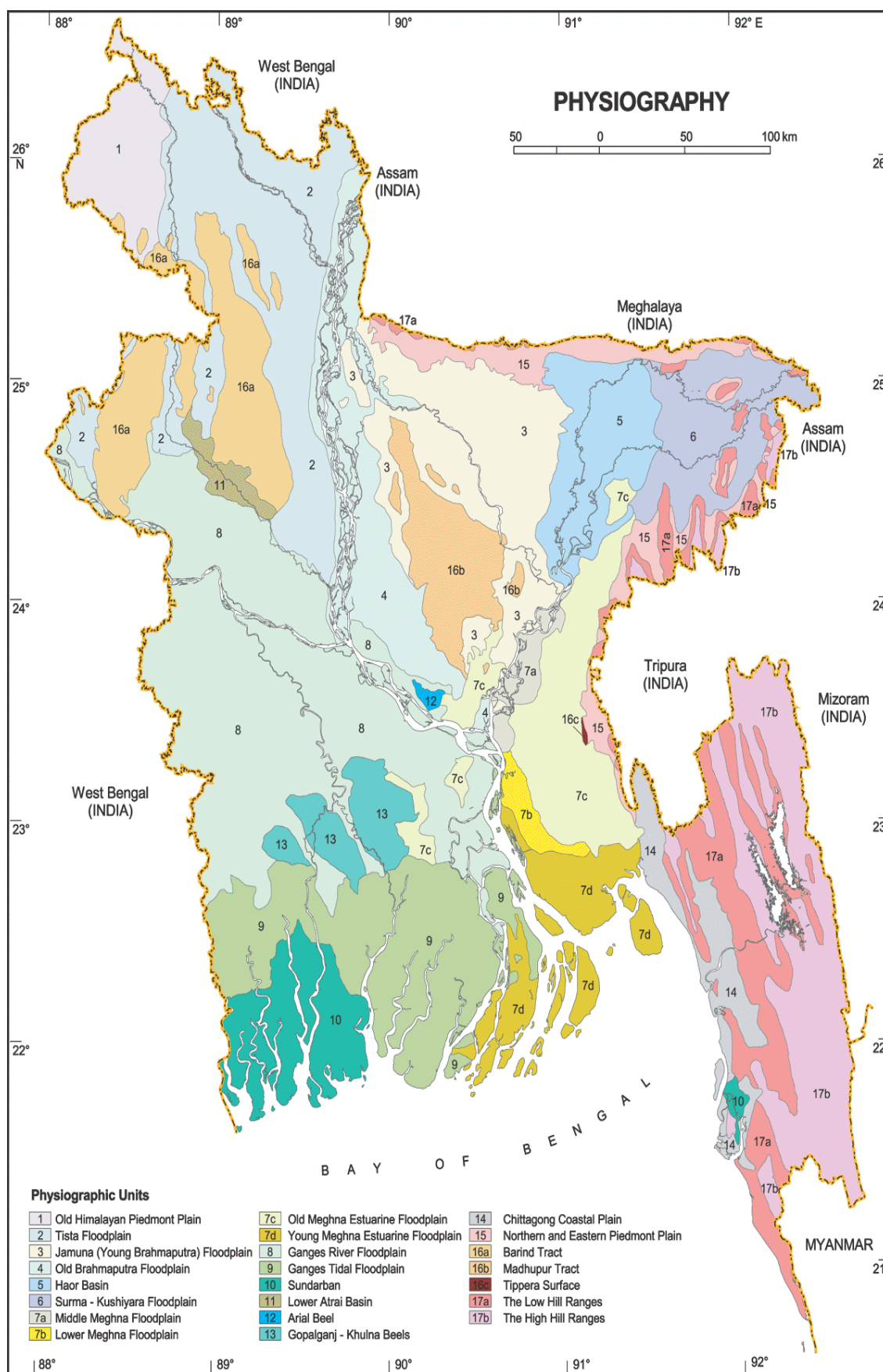
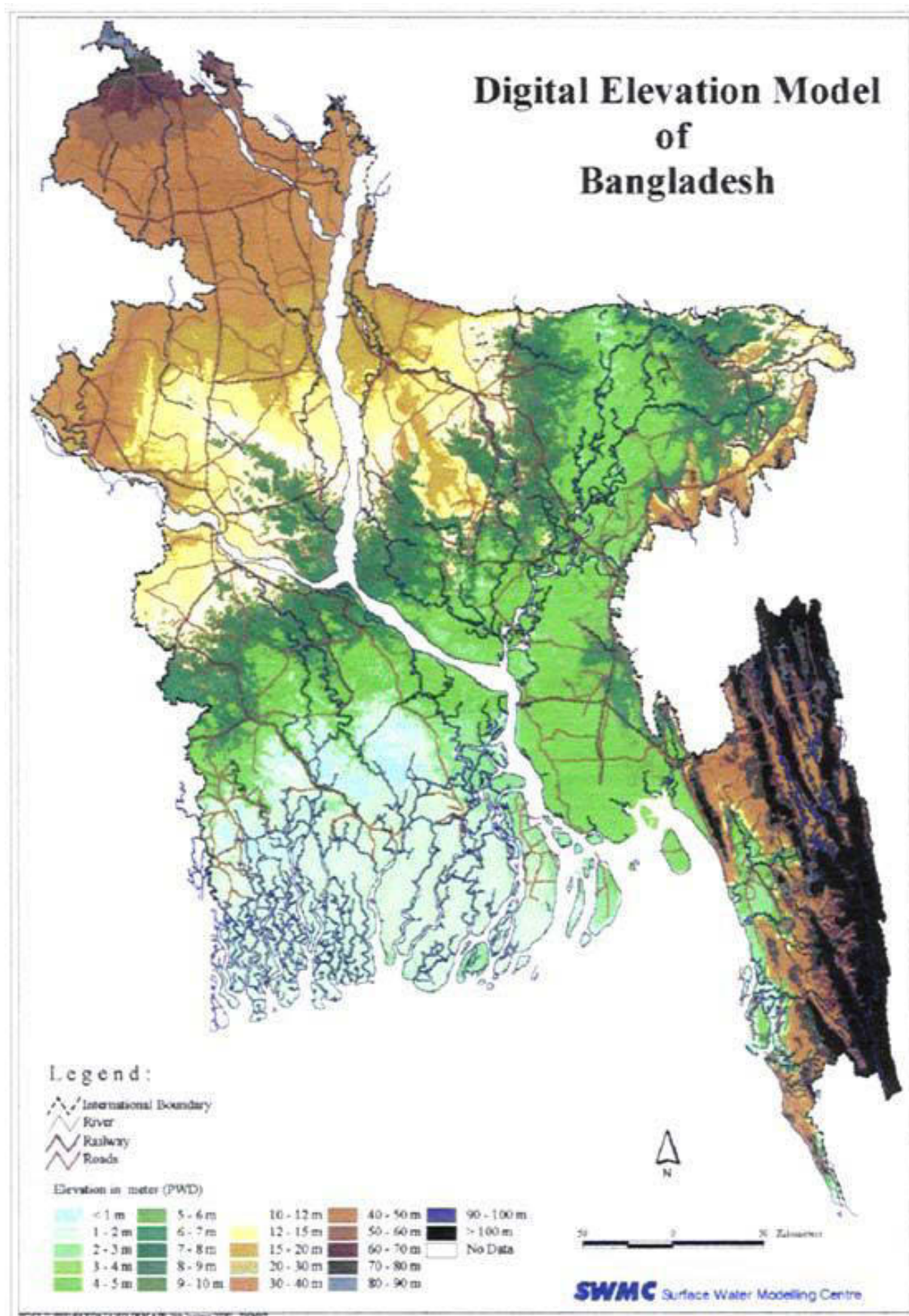


Fig. 1.2: Physiographic Map of Bangladesh



2.3 ENVIRONMENTAL SENSITIVITY AND DUE DILIGENCE

The environmental sensitivity of Bricks 2010 Ltd. has been assessed based on the field observations, public consultations & documents review. The environmental sensitivity assessment is given below:

- The locality is in mixed land use area. So, the severance problem is anticipated.
- A moderate impact on road due to transportation of raw materials and bricks has been anticipated. Coal and bricks are also transported by 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. A few crack on the kiln wall has also been observed, require immediate intervention
- Ecological impact has been anticipated due to change of land use towards industrialization
- 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. During the visit, it was observed that coal was stored on the soil without any solid foundation which might lead to water contamination.
- 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.
- There is no impact anticipated on building, structure or any institution as there are no building structures around within 1 Square kilometer, but there are homestead around, they might get impacted upon.
- 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 PM_{10} & $PM_{2.5}$, 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:
 - Severance Problem (Significant)
 - 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)
 - Risk & hazard, due to crack in the kiln wall (Significant)

2.4 CATEGORIZATION OF SUB-PROJECT

In consideration of the land requirement for the project, investment & likely risk involved with the homestead people around 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'**. (Please see Annex)

2.5 STATUS OF REGULATORY CLEARANCES

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.

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

Information disclosures:

During a walk through around 12.30 pm – 1.30 pm on 31st may 2014 surrounding the project area (Polastoli, Chiteshwari), (not many people were available) few people were available in the neighborhood. 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.

2.7 ALTERNATIVE ANALYSIS

Location alternatives: Location alternatives were considered during site selection. This site was chosen because the site enjoys all the utilities & facilities for operation of the plant.

The location is in the hub of brick kilns in this region.

Considering various factors such as- proven resource potential in the project districts; lowest GHG emissions in the project life cycle; governmental support, and local community's acceptance of low emission brick kiln project in the region, energy efficient brick kiln is considered the most appropriate alternative in the region of Tangail district.

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.

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 process and waste abatement and control are very important for making it environmentally sound.

2.8 IMPLEMENTATION OF EMP DURING OPERATION PHASE

Certain EMP measures have been undertaken. These include:

Air Quality : 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

There has not been any visible mitigation measure. 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.

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, storing 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. Coal storage floor is still kucha: The owner has made the plan to make it paved.

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 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 and form the local soil supplier. So no mitigation measure suggested in this regard.

Occupational Health

Occupational health and safety measures undertaken are not yet in full gears. 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: Monitoring of air quality has not yet been done in the plant site since its construction stage to till date. 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.

2.9 EMERGENCY PREPAREDNESS AND RESPONSE PLAN

To deal with any kind of emergency situation at project site, the brick kiln management has not yet developed any on-site emergency plan. However, the owner of the kiln has promised that it would prepare an appropriate emergency plan by identification of types of hazardous areas and types of emergencies anticipated during project operation and form extreme weather events including storm surges. The project owner is also required to give due attention for repair & maintenance of the crack developed on the wall of the kiln.

2.10 OVERALL INSTITUTIONAL FRAMEWORK FOR ENVIRONMENT AND SAFETY MANAGEMENT PLAN

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

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. Bangladesh Bank can provide them with the required training.

2.11 SITE VISIT OBSERVATIONS

A site visit was undertaken by ADB's Environmental and Social Safeguard specialists along with Bangladesh Bank representative, PFI representatives & CEA staff on 31st 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 Bricks 2010 Ltd. located in a mixed land use zone, surrounded by homestead.
- 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 provides drinking water, toilet facilities, first aid facilities and resting places for the workers.
- It does not have yet a proper shed for coal grinding and coal storage. It does not also have a well-planned water spraying system for dust control.
- 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

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.

Recommended Mitigation Measures (Corrective action)

- Crack in the kiln wall to be immediately repaired
- Strict compliance with the Brick burning Act 2013 provisions in the procurement of soil/ earth.
- Closed shed for coal grinding, concrete foundation for coal storage
- 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 Authorities Concerned.

Based on the site visit and due diligence findings, it can be deduced that the sub-project has some environmental safeguard issues. If taken proper care and attention, this will not create any kind of reputational risk to ADB funding.

Environmental Assessment Checklist

3.13 Environmental Assessment Checklist

Following is the checklist used for Environmental assessment:

Subproject Title:

Bricks 2010 Limited

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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
2. Residential /protected /commercial area/educational institution	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
3. Wetland / sanctuary /forests / orchards	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. Mangrove / ecologically critical area	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
5. Tilla / hills	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6. Municipality / Upazilla Sadar	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
2. disturbance to precious ecology (e.g. sensitive or protected areas) from the dragging of raw materials (Soil/earth)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Gradually forestry ecosystem is getting changed to mixed land use
3. Dust pollution impacts from transportation of soil/earth to the plant as raw materials and bricks from the plant?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Minimal as the transportation shall be made by the lorries and vans under cover.
4. change in land use pattern of the locality	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5. Increased air pollution due to subproject construction and operation/ and eventually degrade the air shed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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. Current level of emission is not also tested
6. Noise and vibration due to subproject construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	quite significant noise generation from generator
7. Disproportionate impacts on the poor, women and children, Indigenous Peoples, or other vulnerable groups?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

SCREENING QUESTIONS	Yes	No	REMARKS
8. 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
9. Social conflicts if workers from other regions or countries are hired?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
10. Risks and vulnerabilities related to occupational health and safety?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	From exposure to dust and noise pollution. A full blown occupational and health safety plan with PPE is required for the staff & workers
11. Severance problem due to the transportation of raw materials & bricks and air pollution from the kiln.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There are many homestead around
12. Community safety risks due to both accidental and natural causes	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
13. Generation of solid waste and/or hazardous waste?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
14. Generation of wastewater during construction or operation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
C. National Level Compliance – Key Concerns			
1. Has it obtained location clearance certificate from Department of Environment (DoE)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2. Has it obtained no objection certificate from the local body (Union Parishad)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Has it obtained license from the District commissioner office	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. Has it obtained environment clearance certificate from DOE?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5. Is the plant located in a degraded air shed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
6. Does the technology and design satisfy the requirements under Brick Kiln Act, 2013?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	A performance test over the rated efficiency is required to be carried out
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8. Does it have any Monitoring Plan to check the results of mitigation measures being implemented?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not yet. It should organize periodic monitoring on SPM, CO ₂ , CO & SO ₄ .
9. Has proper account been taken of the sanitation and health care needs of the migratory and other workers?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Tube well in the plant premises is the safe source of drinking water. First Aid arrangements are to be further upgraded.

3.14 Environmental Categorization Form**Following is the categorization for environmental assessment:****ENVIRONMENTAL CATEGORIZATION FORM****A. Instructions**

(1) 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.

(2) 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.

(3) 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: Bricks 2010 Limited

Financing Amount:

Technology: Hybrid Hoffman Kiln (HHK)

Address/Contact: Dhanmondi Tower (3rd Floor), House No. 4/A, Road No. 16 (New) 27 (Old), Dhanmondi, Dhaka-1209**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 with homestead people in the vicinity 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:**

Technical (Project) Team

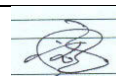
Date:

Endorsed by:

[Mohammad Reazuddin]

Environment Specialist

Supporting Brick Sector Development program(45273-002)

Endorsed by:


Manoj Kumar Biswas
General Manager
Green Banking & CSR Department
Bangladesh Bank
Head Office, Dhaka.

Approved by:

Compliance Officer (if needed)

Date:

**ADB
Concurrence**

Section 3: Due Diligence on Social Safeguards

Section 3: Due Diligence on Social Safeguards

3.1 DUE DILIGENCE OF SOCIAL IMPACT:

Methodology:

The Social safeguard due diligence for Bricks2010 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 31-05-2014 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 site visit photo is given below:



Inside the factory Mr. Dipro Kaiser Director of Bricks2010, Environmental specialist and safeguard specialist are seen in the picture



This is a Brick kiln hub; Brick 2010 is one of the Brick kiln locates in the western side of the river Bongshi.



Photo of Local kucha Road passes' by eastern side and connected with the project



The approach road of the Project

3.3 JUSTIFICATION OF SELECTING THE PROJECT SITE:

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

1. 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:

a) The subproject stands by the side of the River Bongshi which is connected with canal and big rivers. The project site is also connected with the Dhaka –Dinajpur highway by a metallic road which is good enough to bear the load. Thus the sub project is connected through feeder road with metallic road and also water way communication. Basic material for the subproject such as clay, coal and bricks are transported through rivers and roads.

- b) The area enjoys the electric supply and connected with telecommunication
- c) Undisputed land is available
- d) There is no tribal population in the area

- e) There is no loss of common property
- f) There are also numbers of Brick fields in the vicinity of the locality
- g) There is less impact

Considering the above factors, government support and local community acceptance the setting of Brick 2010 kiln in the locality is appropriate.



Photo of human habitation and residential area around the project site



Photo of nearness to reserve forest area

The project locates within the human habitation and residential area. The project is very nearer to reserve forest which is not congenial for establishment of project. It does not comply the requirement of project site. But the project has obtained the Environment Clearance Certificate (ECC) from the Department of Environment and Government approval has already been given. In such a situation necessary caution and strict compliance of security and safety is a requirement

3.4 INFORMATION DISCLOSURE AND CONSULTATION WITH AFFECTED PERSONS AND OTHER 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.

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

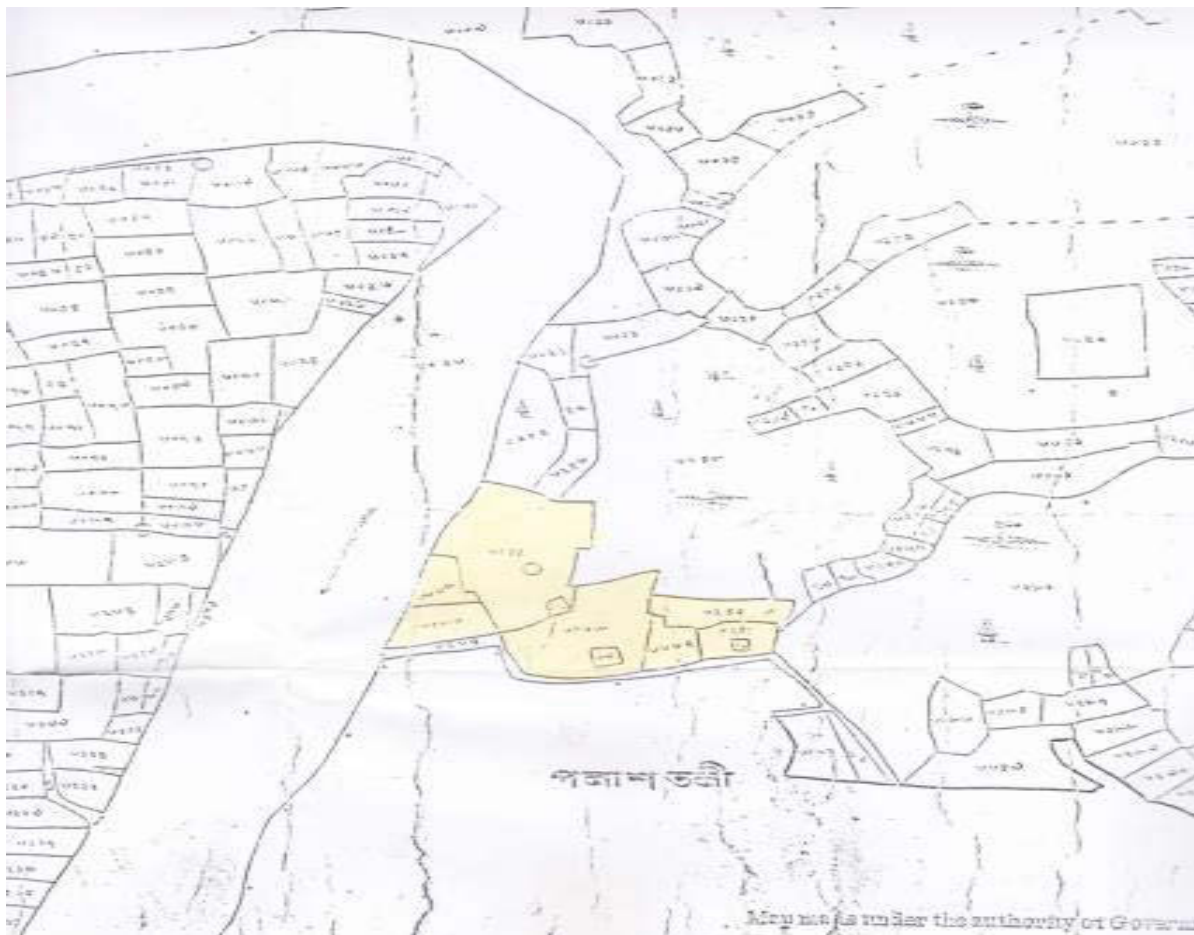
It is learnt that project related information were disclosed during site selection and preparation of feasibility study. Stakeholder's consultation was conducted at that time. Bricks 2010 Ltd authority had conducted a stakeholder consultation meeting on February 17, 2010 at 12.30 pm at the project premises. During the consultation period the community people showed their popular support for the project as local people will have employment opportunity in the industry. The minutes of the consultative meeting along with the photos of the meeting are placed in the annexed.

3.5 LAND ACQUIRED THROUGH NEGOTIATED SETTLEMENT:

The impact is site specific and varies from sub project to sub project. The subproject requires 5 acres of land to establish brick Kiln project. The required land for the project will not be acquired through Government. The land acquired through willing seller willing buyer method. No people displaced from the project site due to intervention of construction. No loss of economic and lively hood ascertained.

Site selection, identification of suitable land for the project and subsequent procurement of land are the components of planning and preconstruction phase. The entrepreneur gets the field survey by the local surveyor. Based on the ground survey the actual plot size and boundary was marked in the Mouza Map.

This help to calculate accurate land requirement and corresponding number of plot to be acquired. Total 5 Acres of land required for the project. The proposed land was identified and spread over 9 Nine plots in Asgona Mouza under Mirgapur upazila. The land consists of private land. Some of the land was used as dwelling purposes; there was tress and fellow land within the site of the project. 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 by local documents specialist. The detail status of proposed land in Asgona Mouza is given below:



Mouja Map

Table 1: Land details of Asgona Mouza

Name of owner of land	Plot No	Quantity of land	Present land use	Kind of ownership through inheritance	Through Sale deeds
Mr. Naimuddin	3338	15.5Decimel	Kanda	inheritance	4442/10
Mr. Abul Basher	3238	45 Decimal	Resident	ownership	5163/10
Mr.shamsul Hoque	3242,3240,3337,3378	56.5	Kanda	inheritance	552/11
Mr. Joynal Abedin, Badsha Mia	3242,3240,3337,3338	56.5	Nama, Kanda	ownership	6867/10
Mr. Waresh & shahid	3238	33 Decimal	Resident		546/10
Mr. Jahangir Hossain, Abu Taher, Abu Taleb, Shah alam, Masud rana, Alamgir Hossain	3238	24 Decimal	Resident	inheritance	2186/11
Mr. Gafur	3236	55Decimal	Kanda	inheritance	2934/10
Nannu Sikder	3238,3239	04 Decimal	Resident	ownership	5860/10
Mr. Manan Sikder	,3238,3239,3337,3240,3241	71Decimal	Resident		5858/10
Mr. Shamsul sikder sikder , Joynal sikder	3236,3238	21Decimal	Kanda		5888/10
Shamsul Hoque	3242,3240,3337,3338	56.5 Decimal	Nama		552/2011
Mr. Moazzam Hossain	,32383240,3347	37	Kanda	inheritance	4743/11
Mr. Nazir Hossain/ Mosharaf Hossain	3244	62Decomal	Kanda	ownership	3705 /10
Mr. Mosharef Hossain,Mr. Abul Hossain, Sakina Begum	3244/9506	100 Decimal	Kanda		3704/10

Based on the identification the title owner of land were contacted and negotiated

The land procurement initiated in 2010 through willing seller and willing buyer method. After successful negotiation the land owners are the guided and assist within the transfer of land

process. The entrepreneur has purchased land from 23 land owners through local document specialist. The sale deeds prepared in local language to ensure transparency and easy understanding of the sale deed by the land owner by the deed writer. The land owners were taken to the office of the sub Register. The sale deeds were registered in the name of Bricks 2010 Limited.

During transfer of land execution the payment of land is done. The registering authority asked the owner of the land whether they have got the fair price of land in presence of Local government representative and other witness of the locality. and the sub register Land purchase through appropriate authority. 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 mutated in the Name of Dipro Kaiser Chaudhary on behalf of Bricks 2010 which are shown below

Name of the purchaser	Plot No	Quantity of land	Mutation
Mr. Dipro Kaiser Chawadhary s/o Mr. Osman Kaiser Chawadhary. Green Taz Centre 5 th floor, 81 Dhanmondi Residential area Road 8/A Dhaka 1206 on behalf of Brick Klin Limited	3238,3240,3347,3240,3242,3338	1.3850	Vide mutation case No 363(1x) 11-12 of Assistant commissioner Land of Mirjapur , Tangail
Mr. Dipro Kaiser Chawadhary s/o Mr. Osman Kaiser Chawadhary. Green Taz Centre 5 th floor, 81 Dhanmondi Residential area Road 8/A Dhaka 1206 on behalf of Brick Klin Limited	3236,3244,3338,3238,3240	3.6250	Vide mutation case No 642(1x) 10-11 of Assistant commissioner Land of Mirjapur , Tangail

Land is purchased after negotiation and discussion with the land owners. The entrepreneur has procured the 5 Acres of land for the project use from the land owners using legal instrument including the registered sale deeds. Apart from the value of land additional assistance for trees, transfer and reconstruction of houses has provided by the entrepreneur to the involved families. It is evident from the record that none of the land sellers has become land less after selling the land for the project. Some of the land owners have purchased alternative land in the locality out of the compensation received. During the discussion it is learnt that sellers appreciated the transparency and satisfied with the price paid for the land purchase. Photo copy relating to sale deeds of land records is in the possession of the office CEA.

So Utilization of Disputed land, deprivation of getting adequate and fair price for the land is not a concern for the project. 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 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 31-4-2014 reviewed all records there was no common property loss such as Mosque, schools and Union Parish 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 <i>Sundarbans</i>	Munda	2	
	Hills			
6	CHT	Chakma, Marma & Tripura	41	44
	Total		100	--

Impact on indigenous people: The above record depicts that there are indigenous people in Madhupur of Dhaka Division which 60 kilometer far from the project area. No report of 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 visits sites 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 complains 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 placed 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 SUSTAINABLE LIVELIHOOD GENERATION MANAGEMENT:

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 31st may 2014 to review the implementation of the project social safeguard. During the site visit it has been observed.

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 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. These are the area where the proponent is lacking.

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

Health impact: Presently some first Aid Box is found in the factory premises 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: Though raw material 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:

The problems of 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 book for 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 institution 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 and Bangladesh fire service and civil defense has issued license in favor Bricks 2010 Limited.

The land acquired by Bricks 2010 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.

The Entrepreneur, the PFI representative and the chairman Baliakhora Union Parishad certified that During feasibility study, site selection and Detail Design they were present in the project site and have certified that there will be no loss of land due to intervention of the project and no one is negatively affected by this subproject are attached.

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.

Involuntary Resettlement Checklist (Social Safeguard)**Subproject Title: Bricks 2010 Limited**
INVOLUNTARY RESETTLEMENT CHECKLIST

Probable Involuntary Resettlement Effects	Yes	No	Not Known	Remarks
Involuntary Acquisition of Land				
1. Will there be land acquisition?	√			
a. If yes, is the land acquired through a willing-buyer and willing seller arrangement?	√			
b. Is the land acquired by or 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?	√			
e. Is there a third-party to validate the process (d)?	√			
f. Are all the affected people consulted?	√			
g. Has the compensation been offered?	√			
h. If so, is the compensation a fair market value?	√			
2. Is the site for land acquisition known?	√			
3. Is the ownership status and current usage of land to be acquired known?	√			
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?		√		
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				

2.13 Impact on Indigenous Peoples Checklist (Social Safeguard)

IMPACT ON INDIGENOUS PEOPLES CHECKLIST

Subproject Title: Brick 2010 Limited

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?		√		
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?		√		
3. Do such groups self-identify as being part of a distinct social and cultural group?		√		
4. Do such groups maintain collective attachments to distinct habitats or ancestral territories and/or to the natural resources in these habitats and territories?		√		
5. Do such groups maintain cultural, economic, social, and political institutions distinct from the dominant society and culture?		√		
6. Do such groups speak a distinct language or dialect?		√		
7. Has such groups been historically, socially and economically marginalized, disempowered, excluded, and/or discriminated against?		√		
8. Are such groups represented as indigenous peoples in any formal decision-making bodies at the national or local levels?		√		
B. Identification of Potential Impacts				
1. Will the project directly or indirectly benefit or target Indigenous Peoples?		√		
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)		√		
3. Will the project affect the livelihood systems of Indigenous Peoples? (e.g., food production system, natural resource management, crafts and trade, employment status)		√		
4. Will the project be in an area (land or territory) occupied, owned, or used by Indigenous Peoples, and/or claimed as ancestral domain?		√		
C. Identification of Special Requirements				
<i>Will the project activities include:</i>				
1. Commercial development of the cultural resources and knowledge of Indigenous Peoples?		√		
2. Physical displacement from traditional or customary lands?		√		
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?		√		
4. Establishing legal recognition of rights to lands and territories that are traditionally owned or customarily used, occupied or claimed by indigenous peoples?		√		
5. Acquisition of lands that are traditionally owned or customarily used occupied or claimed by indigenous peoples?		√		

2.14 Social Categorization Form (Social Safeguard)

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

Bricks 2010 Limited.	Financing Amount: BDT 2480.02 Lac
	Mr. Dipro Kaiser Chawadhury Director Factory: Polashtoli, Chitewashwary, Mijapur Tangail, Phone+8801750000368 Email:factory@ bricks2010.com

<input type="checkbox"/> Environment	<input checked="" type="checkbox"/> Involuntary Resettlement	<input checked="" type="checkbox"/> Indigenous People
--------------------------------------	--	---

☒ New ☐ Re-categorization — Previous Category

<input type="checkbox"/> Category A	<input type="checkbox"/> Category B	<input checked="" type="checkbox"/> 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, there will be no physical and economic displacement of affected person in the subproject. But concerns the Employment condition, wage and payment, occupational health and safety, Welfare measures. However the project is categorized as 'C'	Green Banking and CSR Department Comments
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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:	

Annexure

Annexure 1: Trade License

গণপ্রজাতন্ত্রী বাংলাদেশ সরকার

১১নং আজগানা ইউনিয়ন পরিষদ
মির্জাপুর, টাঙ্গাইল।

ট্রেড লাইসেন্স

ক্রমিক নম্বর- 23
লাইসেন্স নম্বর- ১১৩

বহি নম্বর- ০১

ওয়ার্ড নম্বর- ০৬
হোল্ডিং নম্বর-

স্থানীয় সরকার (ইউনিয়ন পরিষদ) আইন, ২০০৯ এর ধারা ৬৫ ও চতুর্থ তফসিল অনুযায়ী ২০১৩ - ২০১৪ ইং সালের জন্য
ট্রেড লাইসেন্স প্রদান করা হল।

প্রতিষ্ঠানের নাম- ব্রিক্স ২০১০ লিমিটেড।

পরিচালক/মালিকের নাম- দীপ্তি কার্জার চৌধুরী।

পিতা/স্বামীর নাম- ওসমান কার্জার চৌধুরী।

ঠিকানা- পদ্মাভাড়াডাঙ্গা, উপজেলা- মির্জাপুর, জেলা- টাঙ্গাইল।

ব্যবসার ধরন- অটো ব্রিক্স ম্যানুফ্যাকচারিং।

মেয়াদ- ০১/০৭/২০১৩ইং থেকে ৩০/০৬/২০১৪ইং পর্যন্ত।

লাইসেন্স ফি-
ক) চলতি : ৫০০/-
খ) বকেয়া :
গ) বিজ্ঞাপন কর : ১
ঘ) ফোক্সী/জরিমানা :
মোট : ৫০০/-

কথায় : পাঁচশত টাকা মাত্র।

১১নং আজগানা ইউনিয়ন পরিষদ
মির্জাপুর, টাঙ্গাইল।

বিঃদ্রঃ- এই লাইসেন্স কোন কারণ দর্শানো ব্যতিরেকে, কর্তৃপক্ষ যে কোন সময় বাতিল করার ক্ষমতা রাখে।

Annexure 2: No Objection Letter

বিশ্বমিত্রাধিকার প্রাপ্তি

মোঃ মোঃ ওয়াজেদ আলী

চেয়ারম্যান
১১নং আজগাণা ইউনিয়ন পরিষদ
মির্জাপুর, টাঙ্গাইল।

মোবাইল : 01819-843794
গ্রাম : চিতেশ্বরী
পোঃ : চিতেশ্বরী
থানা : মির্জাপুর
জেলা : টাঙ্গাইল।

স্মারক :
তারিখ :
অনুমতি পত্র

প্রত্যক্ষ প্রদর্শন করা যাচ্ছে যে, ব্রিক্স ২০১০
লিমিটেড, পরিচালক- দীপ্ত কায়সার চৌধুরী গ্রীন
জন্ম মেম্বর, (৫ম মেম্বর ৮২, কার্যকরী আনুমানিক
মাসিক, ব্রিক্স ২০- ৮/৭ টাঙ্গাইল-২০১০। উক্ত প্রতিষ্ঠান
এই প্রদর্শন ইতিমধ্যে অনুষ্ঠিত চিতেশ্বরী
মৌজায় ৭০০০ ইট তৈরি করে এবং ইট তৈরি
ইট তৈরি করে এবং ইট তৈরি করে এবং ইট তৈরি
কোন ক্ষতি হইবে না।

আমি উক্ত প্রতিষ্ঠান (১১নং আজগাণা ইউনিয়ন পরিষদ)
স্বাক্ষর করি।

মোঃ ওয়াজেদ আলী
চেয়ারম্যান
১১নং আজগাণা ইউনিয়ন পরিষদ
মির্জাপুর, টাঙ্গাইল।

Annexure 3: Environmental Clearance Certificate.

গণপ্রজাতন্ত্রী বাংলাদেশ সরকার
পরিবেশ অধিদপ্তর
টাঙ্গাইল জেলা কার্যালয়
বি-২৪/১০, বিশ্বাস বেতকা, ঢাকা রোড,
আটপুকুরপাড়, টাংগাইল-১৯০০।

Mr. Mannan, PLS,
27-5-14

স্মারক নং-পরিবেশ/টাজে/৩০.৯৩.৬৬.৩.২৪.১০০৩১০/নবা- ১৪৪, তারিখঃ ১৭/০১/২০১৩ খ্রিঃ।

জনাব দীপ্ত কায়সার চৌধুরী
স্বত্ত্বাধিকারী
ব্রিকস ২০১০ লিঃ
খীনতাজ সেন্টার(৬ষ্ঠ তলা), ৮১ ধানমন্ডি আ/এ
রোড-৮এ, ঢাকা-১২০৯।


বিষয়ঃ পরিবেশগত ছাড়পত্র নবায়ন।
সূত্রঃ (ক) পরিবেশ/টাজে/৩০.৯৩.৬৬.৩.২৪.১০০৩১০/ছাড়-৩৯১, তারিখঃ ১৭/০১/২০১৩ খ্রিঃ।
(খ) ছাড়পত্র নবায়নের আবেদন সংক্রান্ত ২২/১২/২০১৩ তারিখের কাগজপত্রাদি।

উপরিউক্ত বিষয় ও সূত্রের প্রেক্ষিতে আপনার চিঠেখরী, হাটভাঙ্গা, মির্জাপুর, টাঙ্গাইলে অবস্থিত ব্রিকস
২০১০ লিমিটেড নামক প্রকল্পটির অনুকূলে পরিবেশ অধিদপ্তরের স্মারক নং-
পরিবেশ/টাজে/৩০.৯৩.৬৬.৩.২৪.১০০৩১০/ছাড়-৩৯১, তারিখঃ ১৭/০১/২০১৩ খ্রিঃ এর বরাতে জারীকৃত
পরিবেশগত ছাড়পত্রের প্রদত্ত শর্তাবলী অপরিবর্তিত রেখে আগামী ১৬/০১/২০১৫ খ্রিঃ তারিখ পর্যন্ত মেয়াদের
জন্য নবায়ন করা হলো।

মোঃ জিহ্মুর রহমান
উপ-পরিচালক
ফোনঃ ০৯২১-৬১৩৩৭

অনুলিপিঃ সদয় অবগতির জন্য।
১। পরিচালক(ঢাকা অঞ্চল), পরিবেশ অধিদপ্তর, ঢাকা বিভাগীয় কার্যালয়, ঢাকা।

Annexure 4: Brick Burning Certificate



গণপ্রজাতন্ত্রী বাংলাদেশ সরকার
জেলা প্রশাসকের কার্যালয়, টাঙ্গাইল।
(ব্যবসা ও বাণিজ্য শাখা)
www.dctangail.gov.bd

ইট পোড়ানো (নিয়ন্ত্রণ) আইন, ১৯৮৯ এর ৪ ধারার (৪) উপ-ধারা ইট পোড়ানো (নিয়ন্ত্রণ) (সংশোধন) আইন, ২০০১ এর ৩ অনুচ্ছেদের (৬) উপ-অনুচ্ছেদ অধীনে (৪) উপ-ধারা দ্বারা (সংশোধিত) মোতাবেক ইট পোড়ানোর লাইসেন্স।

ফর্ম-খ

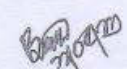
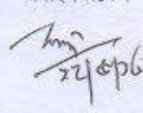
লাইসেন্স নম্বর : ১৫/২০১২-২০১৩। তারিখ : ২০১৩।

প্রাপকের নাম ও ঠিকানা : ব্রিক্স ২০১০ লিমিটেড
প্রোঃ দীপ্ত কায়সার চৌধুরী
সাং-পলাশতলী, উপজেলা-মির্জাপুর, জেলা-টাঙ্গাইল।


আপনার ১৮-১২-২০১২ খ্রি. তারিখের আবেদনের পরিপ্রেক্ষিতে এবং পরিবেশ অধিদপ্তরের ছাড়পত্রের আলোকে আপনাকে নিম্নবর্ণিত পরিমাণ ইট পোড়ানোর জন্য নিম্নলিখিত শর্তে লাইসেন্স প্রদান করা হইল।

১। ইট জটার অবস্থান : ২। আবেদনে উল্লিখিত ইট পোড়ানোর পরিমাণ :
১। দাগ নং-৩২৩৬, ৩২৩৮, ৩২৪০, ৩২৪৪, ৩৩৩৮ ২০ (বিশ) লাফ।
২। মৌজার নাম-চিন্তেশ্বরী
৩। গ্রামের নাম/রাস্তার নাম-চিন্তেশ্বরী
৪। ইউনিয়নের নাম-আজগানা
৫। উপজেলা-মির্জাপুর, জেলা-টাঙ্গাইল।
৩। লাইসেন্সের মেয়াদ : ২০১২-২০১৩ অর্থ বছর।
৪। শর্তাবলী :

ক) ইট পোড়ানো (নিয়ন্ত্রণ) আইন, ১৯৮৯ এর ২ (ক) ইট পোড়ানো (নিয়ন্ত্রণ) (সংশোধন) আইন ২০০১ এর ২(ক) দ্বারা সংশোধিত ধারা মোতাবেক ইটের ভাটায় কোন অবস্থাতেই কোন প্রকার জ্বালানী কাঠ (জ্বালানী কাঠ অর্থাৎ বাঁশের মোথা ও বেজুর গাছসহ জ্বালানী কাঠ হিসাবে ব্যবহার যোগ্য কাঠ) ব্যবহার করা যাইবে না।
খ) উক্ত আইনের ৬(১) ধারা মোতাবেক জেলা প্রশাসক বা তৎকর্তৃক ক্ষমতা প্রাপ্ত যে কোন কর্মকর্তা বা বন কর্মকর্তা, পরিবেশ অধিদপ্তরের কর্মকর্তা, যাহাদের পদমর্যাদা সহকারী বন সংরক্ষকের নিম্নে নাহে বা উপজেলা পরিষদের চেয়ারম্যান, কোন প্রকার নোটিশ ব্যতীত যে কোন ইটের ভাটা পরিদর্শন করিতে পারিবেন।
গ) পোড়ানো ইটের রেজিস্টার সংরক্ষণ করিতে হইবে।
ঘ) ইট পোড়ানো (নিয়ন্ত্রণ) আইন, ১৯৮৯ ইট পোড়ানো (নিয়ন্ত্রণ) (সংশোধন) আইন, ২০০১ দ্বারা সংশোধিত ও উক্ত আইনের অধীনে প্রণীত কোন বিধির পরিপন্থি কোন কাজ করিলে জেলা প্রশাসক বা ক্ষমতা প্রাপ্ত কর্মকর্তা কর্তৃক মোকদ্দমা দায়ের বা উক্ত আইন মোতাবেক কার্যকরী ব্যবস্থা গ্রহণ করা হইবে।
ঙ) পরিবেশ অধিদপ্তর হইতে যথারীতি পরিবেশ পত্র ছাড়পত্র নবায়ন করে লাইসেন্স নবায়ন করিতে হইবে।
চ) ইট পোড়ানো (নিয়ন্ত্রণ) আইন, ১৯৮৯ ইট পোড়ানো (নিয়ন্ত্রণ) (সংশোধন) আইন, ২০০১ দ্বারা সংশোধিত ও উক্ত আইনের অধীনে প্রণীত কোন বিধির পরিপন্থি কোন কাজ করিলে বা অত্র লাইসেন্সে উল্লিখিত কোন শর্ত ভঙ্গ করিলে এই লাইসেন্স বাতিল করা হইবে।


জেলা প্রশাসক
টাঙ্গাইল পক্ষে।


Annexure 5: License Form



P. No: ১০৭
বিভাগ লাইসেন্স নং
টঙ্গাইল ১৪০৬/১২-১২

লাইসেন্স নং এ.ডি.
লাইসেন্স ফর্ম

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

এতদ্বারা চিৎশ্বরী, মির্জাপুর, টাঙ্গাইল হিত
মোহন ব্রিকস ২০১০ লিমিটেড কে উপরোক্ত ঠিকানার
বাংলাদেশ ফায়ার সার্ভিস ও সিভিল ডিফেন্স অধ্যাদেশ, ২০০৩ সালের অধীনে (ক) কম্বিন
এর ওদামজাতকরণ, চাপন বা রক্ষণের জন্য ওদাম রূপে
(খ) এর প্রক্রিয়াকরণের কারখানা রূপে ব্যবহারের জন্য
লাইসেন্সের অপর পৃষ্ঠায় বর্ণিত শর্তাবলি আরোপ সাপেক্ষে ও তাহা যথাযথ পালনের শর্তে ব্যবসা বা বাণিজ্যের
উদ্দেশ্যে লাইসেন্স মঞ্জুর করা হইল।

এতদ্বারা স্বীকার করা যাইতেছে যে, উপরোল্লিখিত ওদামের/কারখানার জন্য বার্ষিক টাকা = ২২০০৮
হারে ২০১ ০২/০৭/২০১১ খ্রিঃ হইতে ২০১ ০০/০৬/২০১২ খ্রিঃ
পর্যন্ত মোট টাকা = ২২০০৮ (দুই হাজার দুইশত টাকা) লাইসেন্সের মাতুল বাবদ পাওয়া গিকে।

মোহন ব্রিকস ২০১০ লিমিটেড
(গৃহ/জায়গার মূল মালিকের নাম ও ঠিকানা)
তারিখঃ ২০/১০/২০১১ সন।
(গৃহ/জায়গার দখলকারীর নাম ও ঠিকানা)
দীপ কায়স্থ চৌধুরী
২০/১০/১১
সহকারী পরিচালক

যে সন পর্যন্ত নবায়ন করা হইল	নবায়ন মাতুল	লাইসেন্স প্রদানকারী কতপক্ষের স্বাক্ষর
৩০ শে জুন, ২০১৬ খ্রিঃ <u>২২০০৮</u>		<u>চিৎশ্বরী</u> মোহন ব্রিকস ২০১০ লিমিটেড ফায়ার সার্ভিস ও সিভিল ডিফেন্স টাঙ্গাইল
৩০ শে জুন, ২০১		
৩০ শে জুন, ২০১		
৩০ শে জুন, ২০১		
৩০ শে জুন, ২০১		
৩০ শে জুন, ২০১		
৩০ শে জুন, ২০১		
৩০ শে জুন, ২০১		

(অপর পৃষ্ঠা দ্রষ্টব্য)

Annexure 6: Public Consultation and Information Disclosure.

PUBLIC CONSULTATION AND INFORMATION DISCLOSURE

Information disclosures:

During a walk through around 12.30 pm – 1.30 pm on 31st may 2014 surrounding the project area (Polastoli, Chiteshwari), (not many people were available) few people were available in the neighborhood. Available local people were conversed about the project information disclosure. They confirmed that project related information were disclosed during the initial stage of the project and before the project operation phase, in informal manner.

BRICKS 2010 Ltd authority had conducted a stakeholder consultation meeting on February 17, 2010 at 12.30 pm at the project premises. The details of the meeting minutes are attached in the annexure.

Consultation with affected people and other stakeholder:

Time : 1.40 pm
Date : May 31, 2014
Place : Polastoli, Chiteshwari, Mirzapur, Tangail
Subprojects : Bricks 2010 Limited

Consultation Participants: Around 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. The local community was informed earlier for the participation in the consultation meeting.

Attendance of the stakeholder consultation is as follows:

- Mr. Shahidullah Akanda, Bangladesh Bank
- Mr. Toriqul Islam, Bangladesh Bank
- Mr. Mohammad Reazuddin, ADB environment specialist
- Mr. Shah Alam, ADB social specialist
- Mr. MdMasroorAbedin, Environmental Activist, Green Belt Trust
- Mr. MdIqbalHossain, CEA, HHK Technology expert
- Mr. Abdul Mamun, IFIC Bank
- Mr. Dipro Kaiser Chowdhury, Director, Bricks 2010 Ltd

Representative of Local Community:

Name	Profession	Address
1. Wares Miah, aged 50	Small Trader	Chiteshwary, Polashtali
2. AzharMiah, aged 40	Small Trader	Chiteshwary, Polashtali
3. ShahidMiah, aged 30	Fisherman	Chiteshwary, Polashtali
4. Abdul Majid, aged 70	Farmer	Chiteshwary, Polashtali
5. AlhajAbdusSamad, aged 60	Farmer	Chiteshwary, Polashtali
6. MdAlal, aged 50	Small Trader	Chiteshwary, Polashtali
7. Khatujan, aged 45	Housewife	Chiteshwary, Polashtali
8. Kahinur, aged 28	Service	Chiteshwary, Polashtali
9. Helena, aged 29	Housewife	Chiteshwary, Polashtali
10. AbulHasan, 40	Trader	Chiteshwary, Polashtali

11. Chanmia, 60	Co-trader	Chiteshwari, Polashtali
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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 including reduction of pollutants, magnitude of pollution caused by the traditional brick manufacturing, 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. Dipro Kaiser Chowdhury, explained clearly about all the concerns and also provided the required land related documents asked by the ADB social specialist.

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 severance problem, sitting of the plant adjacent to the households, ecosystem related issues like forests, fishery resources and damage to agriculture were discussed in the meeting. People responded that they were facing no problem. However, the consultants witnessed severance problem, dust generation and noise problem in the plant operation.

Severance Problem: Both the ADB specialists raised the issue regarding severance problem. The participants (local people) have not considered it a major problem.

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. He informed that both road communication and river way are used for raw material bricks 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 provide 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 not yet provided separate toilets for the female workers. Deep Tube well water is being used for the drinking and washing purposes. The owner committed that he would build separate toilet for female workers soon.

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.

Minutes of public consultation

Minutes of the Stakeholder Consultation Meeting
At
Project Location of Bricks 2010 Ltd.

Time : 12.30 pm
Date : February 17, 2010
Place : Chiteshwari, Hantu Bhanga, Mirzapur, Tangail
Subprojects : Bricks 2010 Ltd.

Consultation Participants:

Nearly 100 people enthusiastically participated in the meeting including members and leaders of the local community, Union Parishad Chairman, local businessmen, as well as a Member of the Bangladesh National Parliament. The following persons represented the local community, HHK technology provider, Bricks 2010 Ltd. management, IIDFC and the World Bank:

Mr. Dipro Kaysar Chowdhury, Director, Bricks 2010 Ltd.
Mr. Akabbar Hossain, MP, Mirzapur, Tangail-7 & Member, Parliamentary
Standing Committee, Ministry of Environment and Forests.
Mr. Shaymal Barman, IIDFC
Mr. Shafiqul Alam, IIDFC
Mr. Zaydul Abedin, Nestor Consulting Agency
Mr. T.K. Barua, World Bank

Consultation Purpose:

The purpose of the consultation was to explain the overall project to the local communities and different stakeholder groups and gathering their views/inputs/feedbacks on environmental and social aspects of the project through open discussions. It was expected that stakeholder inputs and feedbacks, as they might apply to different operational aspects, would help to improve the project's performance in achieving the environmental and social objectives.

Meeting Proceedings:

In the beginning, Shaymal Barman, Senior Project Associate, CDM projects, IIDFC Ltd, briefed the participants of the meeting about the following things:

- Global warming and its impacts on the earth, recent world-wide efforts at reducing global warming and its impacts on the coastal regions of Bangladesh
- Current environmental pollution status in Bangladesh and magnitude of pollution caused by the traditional brick manufacturing technology (fixed-chimney-kilns or FCKs)
- Project background and its environmental, social and economic objectives

Mr. Dipro Kaysar Chowdhury, Director, Bricks 2010 Ltd., informed the meeting that this investment is being made to benefit the country, as well as to take part in the world-wide initiative on reducing global warming.

Conclusion:

In the meeting, it became clear that the local communities and other stakeholders were highly impressed by the environmental benefits embodied in the HHK technology. As to the future of FCKs, there was clearly a concern about finding finances to switch to new environment-friendly technologies like HHK.

Encl:

Picture of the meetings



Annexure 7: Certification of Information Discloser at Community Level

প্রত্যয়নপত্র


তারিখ- ১০.০২.২০১০ইং

এই মর্মে প্রত্যয়ন করিতেছি যে, টাঙ্গাইল জেলার মির্জাপুর উপজেলাধীন আজগানো ইউনিয়নের চিত্রেশ্বরী মৌজার প্রস্তাবিত মেশিন মেড অটো ব্রিকস তৈরি প্রকল্প প্রণয়ন ও বাস্তবায়ন প্রক্রিয়ায় সম্ভাব্য সমীক্ষা, স্থান নির্বাচন ও পূর্ণাঙ্গ নকশা প্রস্তুত সংক্রান্ত সভা অর্থাৎ ০২.০২.২০১০ইং রোজ মঙ্গলবার বিকেল ৩.০০ ঘটিকায় পলাশতলী গ্রামে অনুষ্ঠিত হয়।

সম্ভাব্য সমীক্ষা, স্থান নির্বাচন ও নকশা সংক্রান্ত সভায় স্থানীয় জনসাধারণ ও প্রতিনিধিগণ উপস্থিত ছিলেন। প্রকল্পের সামগ্রিক বিষয় বিস্তারিত ভাবে সাধারণ জনসাধারণকে অবহিত করা হয়। স্থানীয় উপস্থিত জনসাধারণের নিকট হতে জানা যায় যে, এ প্রকল্প বাস্তবায়িত হলে প্রকল্পের জন্য জয়কৃত জমি ব্যতীত অন্য কোন স্থাপনা, গাছ, মৎস্য বা অন্য কোন সম্পদের কোন প্রকার ক্ষতি হবে না। আরো আলোচনা হয় যে, প্রকল্পের সল্লিকটে যাদের কাঁচা ঘড়-বাড়ী আছে, প্রতিষ্ঠানের তত্ত্বাবধানে সুষ্ঠুভাবে তাদেরকে অন্যত্র স্থানান্তর করা হবে এবং পরবর্তিতে প্রতিষ্ঠানের তত্ত্বাবধানে সুষ্ঠুভাবে তাদেরকে অন্যত্র স্থানান্তর করা হয়েছে।

স্থানীয় জনসাধারণের কর্মসংস্থান হবে এবং এলাকার দাবিদ্রতা হ্রাস করার প্রয়োজনে অত্র প্রতিষ্ঠানের সাফল্য কামনা করছি।

For Bricks 2010 Limited


(দীপ্ত কায়সার চৌধুরী) Director

পরিচালক

ব্রিকস ২০১০ লিমিটেড

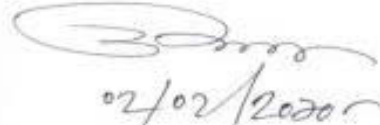
প্রত্যয়নপত্র

তারিখ- ০২.০২.২০১০ইং

এই মর্মে প্রত্যয়ন করিতেছি যে, টাঙ্গাইল জেলার মির্জাপুর উপজেলায়ীম আজগানা ইউনিয়নের চিতেশ্বরী মৌজায় প্রস্তাবিত মেশিন মেড অটো ব্রিকস তৈরি প্রকল্প প্রণয়ন ও বাস্তবায়ন প্রক্রিয়ায় সমীক্ষা, স্থান নির্বাচন ও পূর্ণাঙ্গ নকশা প্রস্তুত সংক্রান্ত সভা যথাক্রমে ০২.০২.২০১০ইং রোজ মঙ্গলবার বিকেল ৩.০০ ঘটিকায় পলাশতলী গ্রামে অনুষ্ঠিত হয়।

সমীক্ষা, স্থান নির্বাচন ও নকশা সংক্রান্ত সভায় স্থানীয় জনসাধারণ ও গণপ্রতিনিধিগণ উপস্থিত ছিলেন। প্রকল্পের সামগ্রিক বিষয় বিস্তারিত ভাবে সাধারণ জনসাধারণকে অবহিত করা হয়। স্থানীয় উপস্থিত জনসাধারণের নিকট হতে জানা যায় যে, এ প্রকল্প বাস্তবায়িত হলে প্রকল্পের জন্য ক্রয়কৃত জমি ব্যতীত অন্য কোন স্থাপনা, গাছ, মৎস্য বা অন্য কোন সম্পদের কোন প্রকার ক্ষতি হবে না। প্রকল্প এলাকায় কোন ব্যক্তির উপার্জন সংক্রান্ত কোন কর্মকাণ্ড ব্যহত হবে না এবং প্রকল্পবীন এলাকায় কোন খাস জমি বা সর্বসাধারণের ব্যবহার্য কোন জমি নাই।

স্থানীয় জনসাধারণের কর্মসংস্থান হবে এবং এলাকার দারিদ্রতা হ্রাস করার প্রয়োজনে এই প্রকল্প বাস্তবায়নের জন্য সুপারিশ করছি।


০২/০২/২০১০
মৌলভী মোঃ ওয়াজেদ আলী
ডেপুটি ম্যানেজার