

# Environment and Social Due Diligence Report

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October 2014

## BAN: Financing Brick Kiln Efficiency Improvement Project – Arabi Auto Bricks Limited

Prepared by Bangladesh Bank for the Asian Development Bank

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# Due Diligence Report on Environment and Social Safeguards

**Arabi Auto Bricks Limited**

Batasan Fatehpur, Joigerhat, Mithapukur, Rangpur

October 2014



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



Clean Energy Alternatives Inc. (CEA), United States

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## Section1: Sub-Project Background

### 1.1 SUB-PROJECT TITLE

Arabi Auto Bricks Limited, Mouza: BatasanFatehpur, Upazila: Mithapukur, District: Rangpur,Bangladesh. General information of Arabi Auto Bricks Limited are furnished in Table-

#### General InformationonArabi Auto Bricks Limited.

1. Name of the Company	<b>Arabi Auto Bricks Limited</b>
2. Name of the entrepreneur	Md Anwar Hossain
3. Contact Address	10B, Jahanara Apartment, 42-43 Sideshwari circular road, Shantinagar, Dhaka
4. Name of the Brick Kiln	Arabi Auto Bricks Limited
5. Type of the Brick Kiln	Hybrid Hoffman Kiln (HHK)
6.Project Investment	Approximately 21.20 crore
7. Location Address of the Brick Kiln	Mouza: Batasan Fatehpur, Upazila: Mithapukur, District: Rangpur
8. Current office address	Mouza: Batasan Fatehpur, Upazila: Mithapukur, District: Rangpur
9. Telephone/Fax	Cell: 01711456564
10. E-mail	---

### 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 150 thousands bricks of size 9.75" x 4.75" x 2.75" daily. 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 8 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 local soil supplier 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, soil from digging of ponds and local supplier of soils. The raw materials are transported through kaccha road of the union and raw materials are brought to the project site usually by truck. Bricks are transported through the union parishadroad and Rangpur-Dhaka road.

Around 100 staffs and workers shall be employed in the project. For the operation process, a few experts shall be hired from Dhaka. Labours will be recruited from local community

The project has not gone into operation. The construction of the kiln and dryer has just been completed.



Figure: Current Status of the project

## **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 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.

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

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 another 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 different NOCs from local administration including Union Parishad's office, Brick firing license, Site Clearance and Environment clearance certificates from Department of Environment (DoE), related to the project, feasibility report of the project etc.

## **2.2 VISIT TO SUB-PROJECT LOCATION**

The project is located on 219 decimals of land at Mouza: Batasan Fatehpur, Upazila: Mithapukur, District: Rangpur, Bangladesh. The subproject situates 15 kilometer from Rangpur District Headquarter. The subproject site is connected by 1.5 kilometer earthen road from Rangpur- Bogra Highway. The connecting earthen road needs appropriate improvement to bear the load of regular transportation. Rangpur-Bogra highway is a metallic road which is good enough to bear the load of transporting clay, coal and Brick of the project. The project location is shown in different maps in Fig 1.2(a), 1.2(b) &1.2(c). The satellite image maps of the project site are shown in figure 1.1 (d) &1.1(e) respectively.





**Fig: 1.2(a): Location of Arabi Auto Bricks Ltd. in South Asia with respect to Bangladesh**

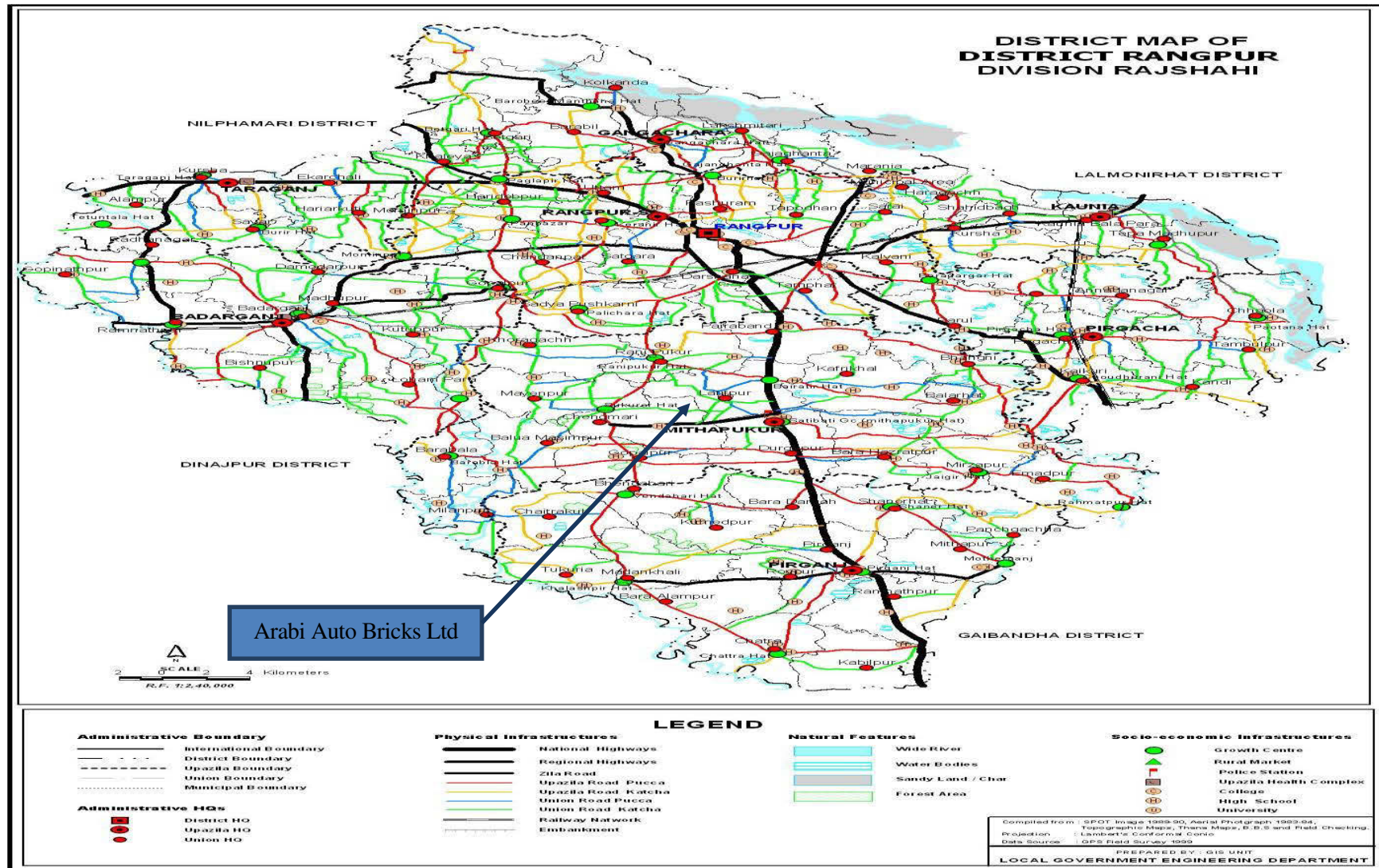


Fig: 1.2(b) Location of Arabi Auto Bricks Ltd. & Rangpur District Map.



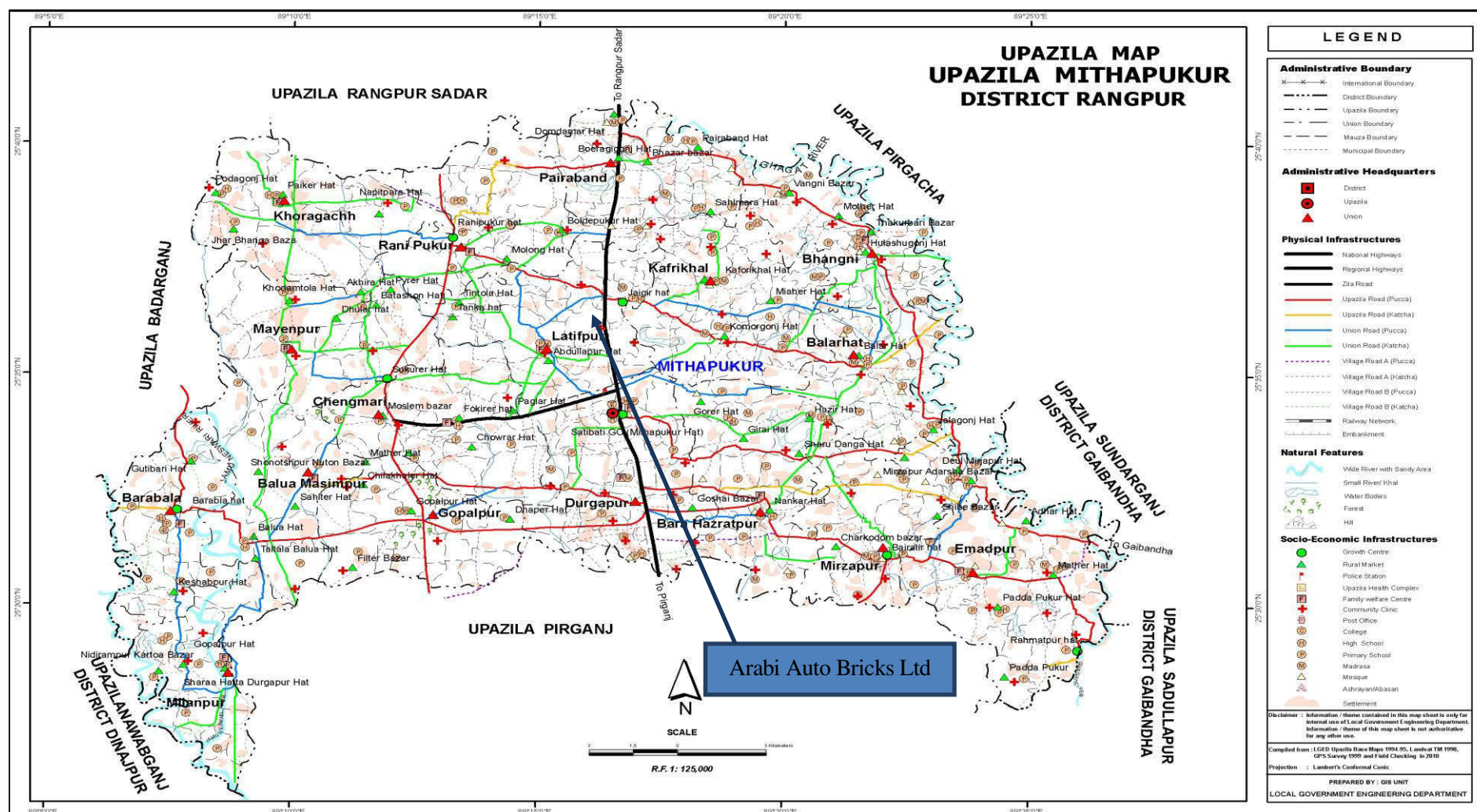
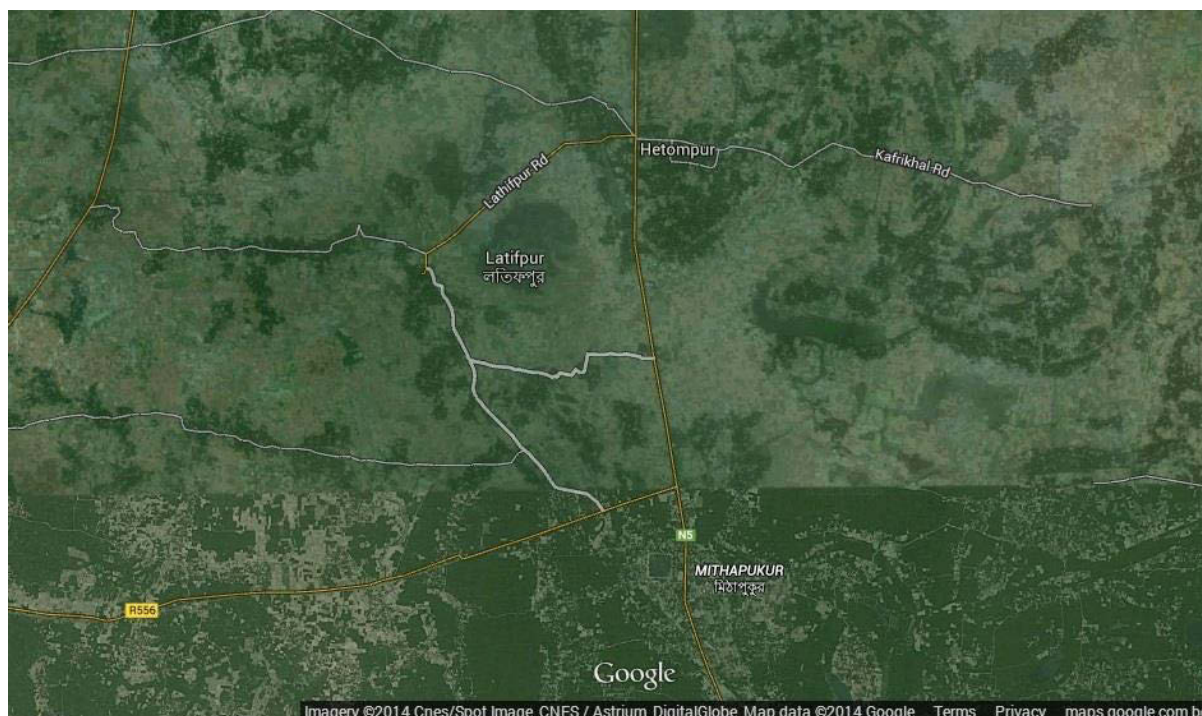
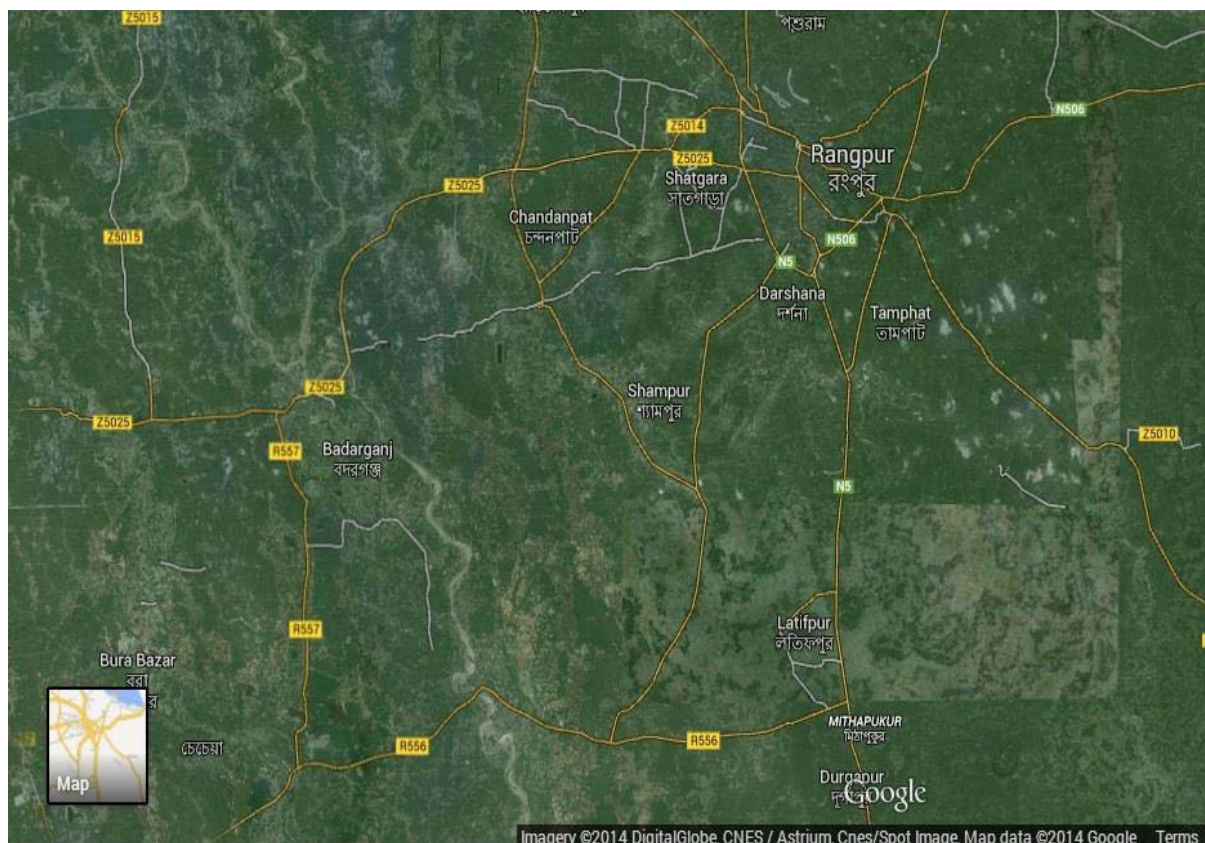


Fig: 1.2(c) Location of Arabi Auto Bricks Ltd. & Mithapukur Upazila Map.





**Fig: 1.1(d) Satellite map of Arabi Auto Bricks Ltd.**

Basic material for the subproject such as clay will be collected from surrounding land by digging ponds for which additional fallow land have been procured for the purpose. Another source of getting clay from the bed of the River Ghagot at Balar Hat point & Damdama point through

tracks and lorry which is 5 to 6 Kilometer far from the project area. Coal will be collected from Barapukuria of Panchagram and bricks will be transported to meet the local demands through roads.

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 people regarding every details of the brick, 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



South side of the project







East side of the project



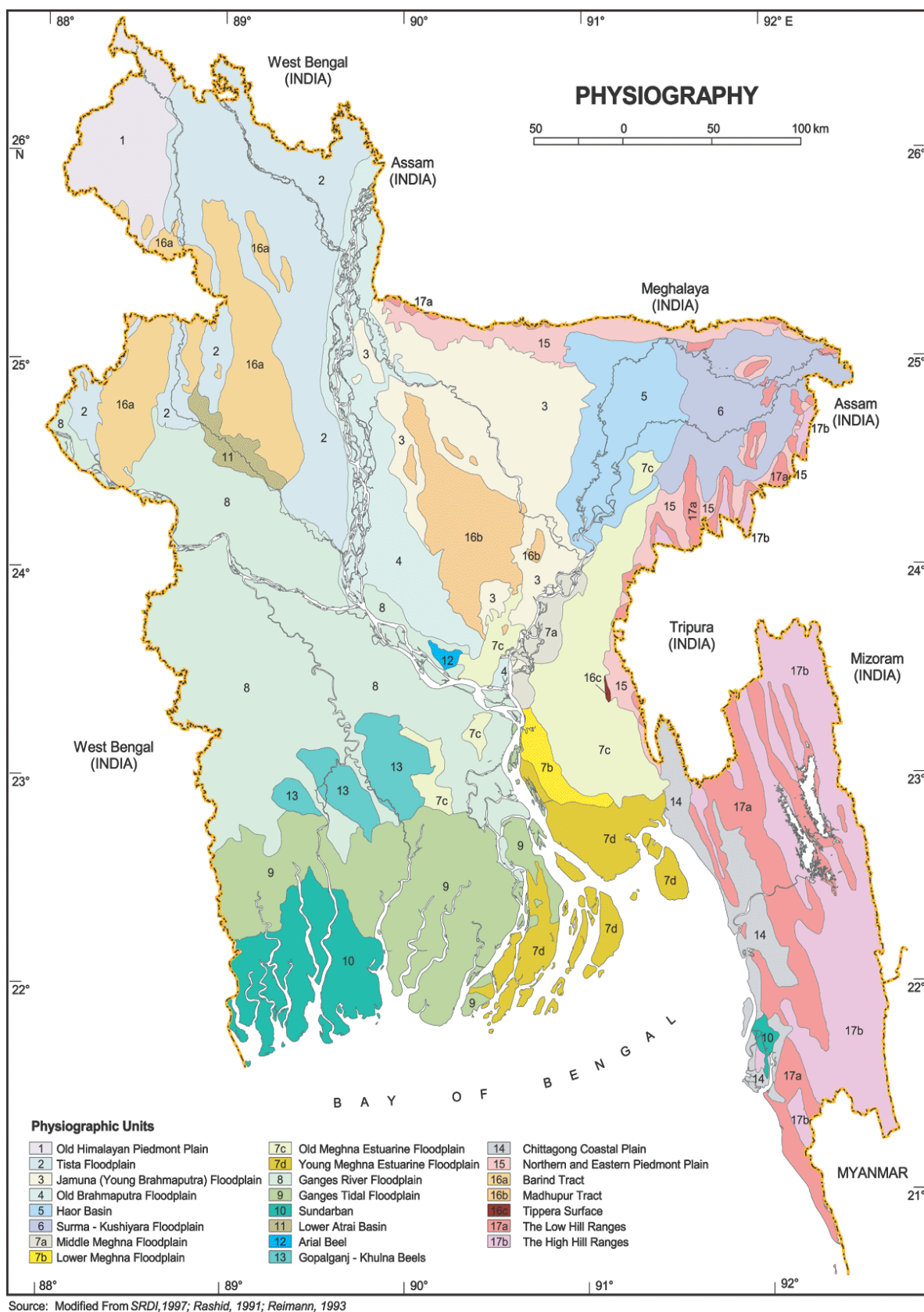
From the images of the surroundings it can be seen that the project area is in midst of agricultural lands though land records identify it as non-agricultural land. Entire surrounding of the project area is under paddy cultivation. It's clearly a land use conflict, but the local people have accepted the land use change, it seems.

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

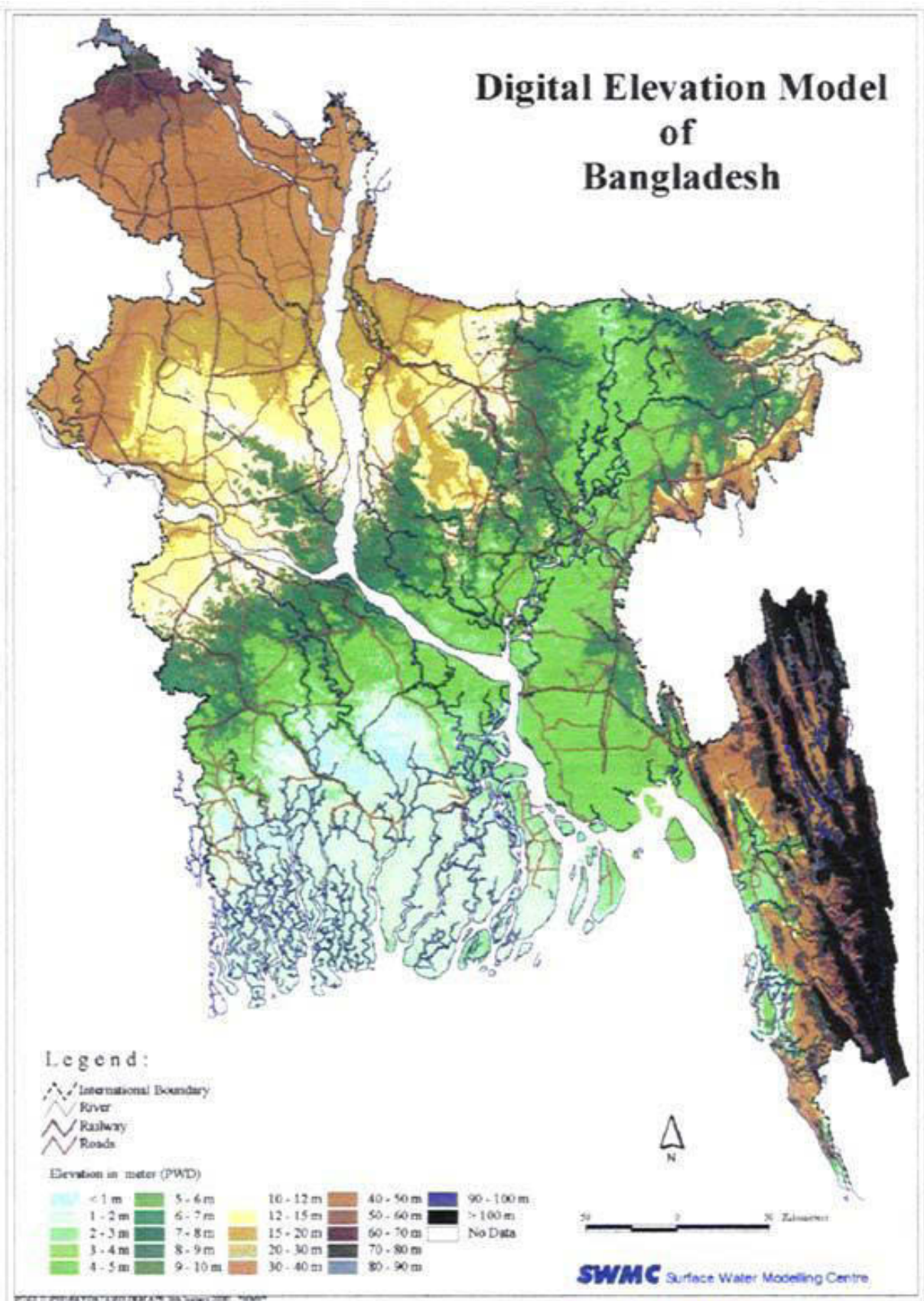
Indicator	Description
<b>Climate</b>	Rangpur has a tropical wet and dry climate. The climate of Rangpur is generally marked with monsoons, high temperature, considerable humidity and heavy rainfall. The hot season commences early in April and continues till July.
<b>Rainfall</b>	The highest rainfall is observed during the months of monsoon. The annual rainfall in the district is about 1,448 millimeters (57.0 in) ( Source: BBS)
<b>Relative Humidity</b>	As would be expected, relative humidity during the wet season is significantly higher than those occurring at other period of the year.
<b>Wind Speed</b>	From November to March, the prevailing winds are often from the north and north-west. In March, sudden storms from the north-west were uncommon and are a source of considerable danger to the light crafts cruising in the rivers. From April to October the wind is generally from the east and southeast.
<b>Ambient Air Temperature</b>	The maximum mean temperature observed is about 32 to 36 °C (90 to 97 °F) during the months of May, June July and August and the minimum temperature recorded in January is about 7 to 16 °C (45 to 61 °F). (Source: BMD)
<b>Air Quality</b>	The concentration of air pollutants is expected to be within allowable limit as the project area is in a rural agricultural setting.
<b>Ambient Noise Level</b>	The operation of Brick Kiln will generate significant noise. It is assumed that the existing noise level is within allowable limit.
<b>Soils &amp; elevations</b>	About 80% area of the zila is composed of alluvial soil of Tista basin and 20% Barind land. The location has an elevation of 30 to 40 meter.
<b>Flora</b>	The project is in a rural setting. There is greenery around the project site. This includes homesteads, agricultural lands, horticulture, roadside plantation, natural vegetation, and fallow land. Besides highland (elevated) afforestation and homesteads, the remaining area is mostly lowland. Due to roadside plantations and rural setting, 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 shishu, rain tree, mahegany etc. Also there are some fruit trees such

	as Mango, Coconut, Jackfruit, Guava etc.
<b>Fauna</b>	Fish diversity in rivers and streams in the surrounding are still rich.
<b>Birds</b>	Among birds, crows, sparrows, magpie etc. deserve special mention. Kingfishers, House crow, House sparrow, little fern etc. are also common in this area.
<b>Land Use</b>	Mostly Agriculture (80%) and residential (20%).
<b>Demography</b>	The density of the location is moderate. Almost gender balanced population. Main stay of economy is agriculture followed by business and service.
<b>Living and Cultural Standard</b>	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 1-2 m above sea level, which is shown in *Figure 1.3*.



**Fig. 1.3: Physiographic Map of Bangladesh**



**Fig. 1.4: Digital Elevation model of Bangladesh**



## 2.3 ENVIRONMENTAL SENSITIVITY AND DUE DILIGENCE

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

- The location is surrounding by single crop agricultural land. The site is connected to main road by earthen road.
- A moderate impact on road due to transportation of raw materials and bricks has been anticipated. Negative impacts on this transportation route 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 single crop land purchased by the entrepreneur.
- The project has two generators stand by for power supply. Due to frequent grid power disruption generators will be used. It's anticipated that these generators will generate quite significant noise.
- The plant will not generate any process liquid from the plant. The process water thus will be used and consumed in the construction work, clay preparation and small amount of water used for occupational floor, equipment washing and for domestic purposes. This wash water will 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 affected during 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.
- 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<sub>10</sub> & PM<sub>2.5</sub> 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:
  - Impact on land use change (significant)
  - Impact on the road due to transportation of raw materials from river to plant (moderate)
  - Dust emission (Significant)
  - Noise generation (Moderate)
  - Occupational health and safety (moderate)
  - Surface runoff during heavy rains ( moderate)
  - Burning of poor quality coal (moderate)

## 2.4 CATEGORIZATION OF SUB-PROJECT

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 and location for the project, investment & likely risks

involved in sourcing of soil/clay when the demand of clay will be further increased and concerns about occupational health and safety due to dust pollution and noise, the project is **categorized as 'B'**.

## 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.

Environment Site Clearance Certificate from Department of Environment, Brick Burning License from District Commissioner Office, Electricity connection permission letter from Rural Electrification Board and NOC from Union Parishad are annexed for ready references.

## 2.6 PUBLIC CONSULTATION AND INFORMATION DISCLOSURE

**Information disclosure:** During a walk through around 11.00 am – 1.00 pm on 30<sup>th</sup> September 2014 surrounding the project area (Batasanfatehpur), 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 during the project construction phase, in informal manner.

### Consultation with affected people and other stakeholders:

Time : 2.00 pm  
Date : September 30<sup>th</sup>, 2014  
Place : BatasanFatehpur, Mithapukur, Rangpur  
Subproject : Arabi AutoBricks Limited

**Consultation Participants:** Around 25 people enthusiastically participated in the meeting including PFI representatives, ADB consultants in environment and social issues, project owner, staff and employee representatives of the project and local people of the community. The local community including the Chairman of the Union Parishad was informed earlier for the participation in the consultation meeting.

Attendance of the stakeholder consultation is as follows:

- Mr. Idris Ali Mondal, Chairman, Latifpur Union Parishad
- Mr. Mohammad Reazuddin, ADB environment specialist
- Mr. Shah Alam, ADB social specialist
- Mr. Md Anwar Hossain, Managing Director, Arabi Auto Bricks Ltd
- Mr. Md Alamgir Hossain, Assistant General Manager Rupali Bank

Representative of Local Community:

Name	Profession	Address
1. Md Shahjahan, aged 35	Farmer	Vill: BatasanFatehpur, Rangpur
2. Abdul Munaf, aged 38	Small Trader	Vill: BatasanFatehpur, Rangpur
3. Joydul, aged 42	Farmer	Vill: BatasanFatehpur, Rangpur
4. Majnu, aged 45	Farmer	Vill: BatasanFatehpur, Rangpur
5. Abdul Baten, aged 53	Farmer	Vill: BatasanFatehpur, Rangpur
6. NurunNabi Mia, aged 32	Service	Vill: BatasanFatehpur, Rangpur
7. AnamulHoque, aged 39	Small Trader	Vill: BatasanFatehpur, Rangpur
8. Md Golam Rabbani, aged 37	Service	Vill: BatasanFatehpur, Rangpur

Name	Profession	Address
9. Mukul Mia, aged 43	Business	Vill: BatasanFatehpur, Rangpur
10. AbdurRazzak, aged 47	Farmer	Vill: BatasanFatehpur, Rangpur
11. Abdul Malek, aged 37	Businessman	Vill: BatasanFatehpur, Rangpur
12. Abdus Salam, aged 63	Retired Bank officer	Vill: BatasanFatehpur, Rangpur
13. Nuruzzaman, aged 34	Service	Vill: BatasanFatehpur, Rangpur
14. Jasin, aged 29	Small Trader	Vill: BatasanFatehpur, Rangpur
15. AbdusSattar, aged 30	Farmer	Vill: BatasanFatehpur, Rangpur
16. Mukaddes, aged 32	Service	Vill: BatasanFatehpur, Rangpur
17. Kamruzzaman, aged 52	Farmer	Vill: BatasanFatehpur, Rangpur
18. Mominul Islam, aged 57	Teacher	Vill: BatasanFatehpur, Rangpur
19. BiplobHossen, aged 44	Farmer	Vill: BatasanFatehpur, Rangpur
20. Ashraful Islam, aged 42	Small trader	Vill: BatasanFatehpur, Rangpur
21. Abdul Hakim, aged 33	Small trader	Vill: BatasanFatehpur, Rangpur
22. Rakibul Islam, aged 35	Farmer	Vill: BatasanFatehpur, Rangpur
23. MakbulHossen, aged 37	Farmer	Vill: BatasanFatehpur, Rangpur
24. Al Amin, aged 47	Farmer	Vill: BatasanFatehpur, Rangpur

### Conduct of the Meeting:

Chairman of Latifpur Union Parishad **Mr. Idris Ali Mondal** presided over the meeting. The discussion was moderated by two consultants of ADB on Environment and Social respectively.

At the beginning, Mr Idris Ali Mondal welcomed the ADB consultants and PFI representatives. He requested the ADB consultants to brief the participants of the meeting about the Hybrid Hoffman Kiln 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. The consultants provided all relevant information.

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 representative of the brick kiln about the land related documentation, resettlement issues during land purchase and fair price assurance to the seller of the land. The Managing Director of Brick Kiln, Mr. Anwar Hossain, 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 ecosystem like land use changes and damage to agriculture were discussed in the meeting. People responded that they have accepted this land use change provided the brick kiln owner collects the clay and operates the kiln in an environment friendly manner.

**Severance Problem:** Both the ADB specialists raised the issue regarding severance problem. There was no severance problem people responded. However, they noted that connecting union parishad road shall have to be raised and paved.

**No Objection Certificates related issues:** Mr Mohammad Reazuddin, ADB environment specialist, questioned the Managing Director of the Brick kiln about different NOCs related to the Arabi Auto 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 Anwar Hossain informed that road communication will be used for raw material transportation from the river. This may create a traffic situation on the road, the consultant observed.

**Dust and Noise pollution:** Mr Mohammad Reazuddin, ADB environment specialist, raised the issues related to dust pollution during processing of clay and noise from the generator using for the captive electricity generation. The project management assured that they would adopt appropriate mitigation measures during the operation of the plant 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 etc. MD of the plant informed that they are in the process of recruitment. Most of the labourers including women will be recruited from locality. Salary scale of the staff and worker will be as per national standard.

**Health and Hygiene:** Both the ADB specialist, queried about health and hygiene. The Company shall provide 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 representative assured that they would make proper arrangements on OHS based on the recommendation of the consultants.







**Figure: 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 will be some dust and noise problems in the plant and they lack experience in occupational health & safety including PPE.

## **2.7 ALTERNATIVE ANALYSIS**

**Location alternatives:** Location alternatives were considered during the site selection. This site was chosen, because the site is single crop agricultural land and the site will enjoy all the utilities & facilities for operation of the plant.

Moreover the local community has accepted this land use change and they want industrialization.

Supporting factors such as- proven resource potential in the project districts; favourable environmental and social settings; lowest GHG emissions in the project life cycle; governmental support, and local community's acceptance..

**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 Tunnel Kiln (TK) with a unique technique of forming green bricks: powdered 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

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.

However, certain EMP measures will have to be undertaken. These include:

**Air Quality:** The project is in construction phase. During the operational phase, the hot air from the HHK burning tunnel are channelized to the drying zone of the green brick and the air finally escaped through two exhaust chimney. Since the exhaust gas will be travelled through two tunnels, the concentration of different gaseous pollution and the temperature will be reduced significantly and expected to be within the limit of Bangladesh standard. It will depend on the efficient operation of the plant.

**Dust pollution:** A properly planned water spraying system in the areas of earth filling and internal road in the plant will have to be in place. 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 will be some solid wastes as waste clay, misshaped or broken under burnt or over burnt bricks during operation period, 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 would be planned to be in a closed shed so that there is no chance to escape dust. Coal transportation is planned to be in the covered trucks during less traffic in the highway.

**Noise and Vibration Impact:** Necessary noise abatement measures will have to be undertaken to avoid adverse noise impact from the generator. Additionally, buffer strip and sufficient green belt would be required to be created surrounding the building and the plant 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 and also from sediment deposits of nearby river. 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 would be required to provide 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
<b>Operation Phase</b>	Ambient Air Quality	Project site at Batasan Fatehpur, Mithapukur, Rangpur	SPM, PM <sub>10</sub> and PM <sub>2.5</sub>	Quarterly (routine) analysis
	Stack emissions	Project site Batasan Fatehpur, Mithapukur, Rangpur	SOx, NOx and CO	Quarterly (routine) analysis
	Drinking water	Project site at Batasan Fatehpur, Mithapukur, Rangpur	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

### 2.8.1 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<sub>2</sub>), 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 quality (SPM, PM <sub>10</sub> , PM <sub>2.5</sub> )	25,000	4	1,00,000
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**

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.

## **2.10 OVERALL INSTITUTIONAL FRAMEWORK FOR ENVIRONMENT AND SAFETY MANAGEMENT PLAN**

The project has not yet recruited with Manager(s) supervisors, trained & unskilled workers (Men & women). They plan to hire a few skilled technicians from Dhaka and the rest are to be recruited from local community.

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**

A site visit was undertaken by ADB's Environmental and Social Safeguard specialists along with Local administrative representative, PFI representatives on 30<sup>th</sup> September, 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 Arabi Auto Bricks Ltd. enjoys a good site with lot of buffer spaces in and around in an agricultural setting, but It is situated along the Rangpur-Bogra highway.
- The area is quite rich in biodiversity in terms of trees. Improved production technology (HHK) 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. Plans on the renewable sources for raw material procurement will prove beneficial in the long term.
- The site enjoys all the utilities & facilities support including electricity. It has dug deep tube-well to meet the water needs of the plant construction, processing and of the staff & workers.
- It is in the midst of an agricultural land (one crop), indicates lesser (acceptable) air pollution in the background.
- The proposed project is in construction stage.(nearly complete)
- 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 project does not have capacity to develop in-house monitoring on environment pollution control & biodiversity conservation. They would require support from appropriate resource persons.
- The management was found appreciative of the suggestions made by the consultants for up keeping 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, the following measures are recommended:

### Recommended mitigation measures (Corrective action)

- Strict compliance with the Brick burning Act 2013 provisions in the procurement of soil/ earth.
- Construction of 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 during operational period
- Training need for occupational health and safety measures
- Adequate abatement measures for generator noise
- Periodic monitoring on environment pollution control
- Strict compliance with brick quality standard
- Avoiding 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 concerned authorities.

Based on the site visit and due diligence findings, it can be concluded 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.

## Environmental Assessment Checklist

### 3.13 Environmental Assessment Checklist

Following is the checklist used for Environmental assessment:

**Subproject Title:**

Arabi Auto Bricks Limited

SCREENING QUESTIONS	Yes	No	REMARKS
<b>A. Subproject Siting</b>			
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"/>	The project site is in the proximity of village forest but in a vacant land.
4. Mangrove / ecologically critical area	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
5. Tilla / hills	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
6. Municipality / Upazilla Sadar	<input checked="" type="checkbox"/>	<input type="checkbox"/>	In the vicinity of Upazilla Sadar but with rural neighborhood
<b>B. Potential Environmental Impacts</b>			
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 type="checkbox"/>	<input checked="" type="checkbox"/>	
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"/>	Getting a mixed land use pattern
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 toSOx emission. Periodic monitoring plan has been suggested.
6. Noise and vibration due to subproject construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	quite significant noise generation from generator. Periodic monitoring plan has been suggested.
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 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"/>	
<b>C. National Level Compliance – Key Concerns</b>			
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. 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?	<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.

# ENVIRONMENTAL / SOCIAL 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 peoples 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: Arabi Auto Bricks Limited	Financing Amount:
Technology: Hybrid Hoffman Kiln (HHK)	Address/Contact: 10 B, Jahanara Apartment, 42-43 Sideshwari circular road, Shantinagar, Dhaka

## C. Subject

<input checked="" type="checkbox"/> Environment	<input type="checkbox"/> Involuntary Resettlement	<input type="checkbox"/> Indigenous People
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### C. Categorization

☒ New ☐ Re-categorization — Previous Category

<input type="checkbox"/> Category A	<input checked="" type="checkbox"/> Category B	<input type="checkbox"/> Category C
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## D. Basis for Categorization/ Re-categorization (pls. attach documents):

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

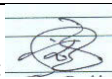


[ 2 ] Project and/or Site Description:

[ 3 ] Due Diligence Report:

## E. Comments

Technical (Project) Team Comments In consideration of the land requirement and location for the project, investment & likely risks involved in sourcing of soil/clay when the demand of clay will be further increased and concerns about occupational health and safety due to dust pollution and noise, the project is <b>categorized as 'B'</b> .	Green Banking and CSR Department Comments
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## F. Approval

Proposed by:	Endorsed by: 	
Technical (Project) Team Date:		
Endorsed by: 	Approved by:	ADB Concurrence
[Mohammad Reazuddin] Environment Specialist Supporting Brick Sector Development program(45273-002)	Compliance Officer (if needed)	
	Date:	



## **Section 3: Due Diligence on Social Safeguards**

## Section 3: Due Diligence on Social Safeguards

### 3.1 DUE DILIGENCE OF SOCIAL IMPACT:

The Social safeguard due diligence for Arabi Auto Bricks Limited has been prepared after reviewing the following documents feasibility study report and 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 fire service and civil defense, Electric supply Permission, Registration in the Board of investment as proposed industrial unit 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 30<sup>th</sup> September 2014 along with PFI representatives, representative of project owner, staff 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 project is under construction and is planning to complete the construction by the end of 2014. The entrepreneur expects to run the factory on commercial production by March 2015. The side visit photograph is given below:



Arabi Auto Bricks Industry is a prefabricated establishment which is under construction.



Photo of paddy land by the side of the Industry. It was low-lying single cropped area, Require 7' earth filling to develop the factory premises



Another side of the project where construction of office building is running





*There are buffer paddy land where cultured fisheries grows surrounding the project area*



*This is an earthen road connected factory with the Highway*

### 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. Avoid Impact on Use of Disputed land in the right of the way
2. Avoid Impact landlessness of the land owners
3. Avoid 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. Avoid Impact on tribal population
6. Impact on cultural sites

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

a) The subproject stands 15 kilometer far from Rangpur District Headquarter. The subproject site is connected by 1.5 kilometer earthen road from Rangpur- Dinajpur Highway. The connecting earthen road needs suitable development to bear the load of regular transportation. Rangpur-Dinajpur highway is a metallic road which is good enough to bear the load of transporting clay, coal and Brick of the project. Basic material for the subproject such as clay will be collected from surrounding land by digging ponds for which additional fellow land procured for this purpose. Another source of getting clay from the bed of the River Ghagot at Balar Hat point & Damdama point through tracks and lorry which is 5 to 6 Kilometer far from the project area, coal will be collected from Barapukuria of Panchagram and bricks will be transported to meet the local demands through roads.

- a) The project area enjoys the electric supply
- b) Undisputed land is available and plenty of buffer land
- c) There is no tribal population in the area
- d) There is no loss of common property
- e) There is less impact

Considering the above factors, government support and local community acceptance the setting of stone Brick limited in the locality is 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:

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

Project related information was disclosed during site selection and preparation of feasibility study. Informal discussion was conducted at that time of the visit of PFI representative.

The TA Consultant visited the subproject area, met representative of the different beneficiaries and held discussions with the Local people, on 30-9-2014 .During the visit the team walk through surrounding the sub project area. Some people enthusiastically participated in the meeting including PFI representatives, ADB consultants of environment and social, representative of project owner, staff of the project and local people of the community. , the discussions showed popular support for the subproject and there is no known opposition to the subproject



Photo of Consultation held with the local administration regarding every details of the brick production project, people from neighborhood of different category, staff of the plant,





**At the end of Consultation local people all local people prayed for the success of the project**

The very intuition of adjacent land owners brought in the discussion that digging of ponds by the borrower in the sporadic plot of land for collection of clay as basic raw material for the project may cause adverse impact in the adjacent land. Though no coercion and unfair practice happened. However During public consultation due emphasis has given to the local people concern, the project team noted the views and solution suggested and verbally assured to address the within stipulated period which will be kept on monitoring.

Besides consultation by the specialist in the locality, Borrower the Managing Director of Arabi Auti Bricks limited categorically mention that the project will create job opportunity and nobody will be adversely affected out of this project. No people displaced from the project site due to intervention of construction. No loss of economic and lively hood ascertained.

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.

Chairman Latifpur Union Parishad , Assistant General Manager Rupali Bank, Corporate Branch Rangpur certified that during feasibility and site selection they had been in the local consultation meeting and opined that there will be no physical and Economic displacement of people and no one will be negatively affected due to intervention of the proposed subproject activities are attached.

**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 4.5 acres of land to establish HHK brick Kiln project. The required land for the project will not be acquired through Government. The land acquired through willing seller willing buyer method. 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.

#### MOUZA MAP OF BATASAN FATEHPUR



This help to calculate accurate land requirement and corresponding number of plot to be acquired. Total 6.7425 Acres of land acquired for the project. 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 16 -plots in Batasan Fatehpur Mouza under Mithapukur upazila. The land was low-lying single cropped less costly land. The land belongs to private owner with formal legal rights to 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 verified by local documents specialist. The Local document specialist play role as third party. The detail status of proposed land in Mouza Batasan Fatehpur under Mithapukur upazila is given bellow:

**Table 1: Land Details of MouzaBatasan under MithapukurUpazila**

SL No	Name of owner of land	Plot No	Quantity of land	Present land use	Kind of ownership
1	Khaleda Begum	239,241	1.19+.18= 1.37Acre	Single cropped land	through Inheritance
2	Mr. Shafikul Islam shah	240	0..82 acre	Single cropped land	Purchase
3	Khaleda Begum	416	0.88Acre	Single cropped land	Inheritance



SL No	Name of owner of land	Plot No	Quantity of land	Present land use	Kind of ownership
4	Khalil Uddin	242	0.12	Single cropped land	Purchase
5	AbdurRauf	243,244	0.67.50+0.23 =0.90.50	Single cropped land	Purchase
6	Mr. Abdul Malek	391	0.08	Single cropped land	Purchase
7	Mr. MostafijurRahman and MahfujurRahman	369	0.06	Single cropped land	Purchase
8	Mr. Mograb Ali	392	0.12	Single cropped land	Purchase
9	Mr. Noor Islam & MizanurRahman	238,138,396, 242,243,369, 1388,	0.6325+0.21+0.14+0.03+0.66+0.06+0.0150 =1.7475	Single cropped land	Purchase
10	Mr. MatiurRahman,Abdur Rahim & Mohammad Monnaf	418	0.50	Single cropped land	Inheritance
11	Mrs. Morgina Begum	245	0.14	Single cropped land	Inheritance
		Total	6.7425		

Procurement of land initiated in 2010 through willing seller willing buyer method. 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. 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 give the price of land below the rates fixed by Market price fixation committee.

A contract for sale shall be in writing, executed by parties thereto and registered. The Borrower has purchased land from 14 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 this 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 are the outcome of third party validation. The land owners were taken to the office of the Sub Register. The contract for sale deeds was placed to the sub register. No document will be accepted for registration unless it contains all information sufficiently. Sub register otherwise satisfied that the persons they represent themselves to be and admits the execution of the documents. The sale deeds registered in the name of Mr. Anwar Hossain, on behalf of Arabi auto Bricks Limited. During transfer of land the payment is made to the land owners. The registering authority sub register 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. 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 Anwar Hossain, Managing Director on behalf of Arabi Auto Bricks Limited under four Mutations case which is are shown below:

**Table 2; Transfer of ownership of Land**

Name of the purchaser	Plot No	Quantity of land in Decimal	Transfer Deed Number	Mutation No
Mr. Anwar Hossain Managing Director Arabi Auto Bricks Limited	239,240,241,416	$1.19+0.82+0.18+0.88=3.07$	10604 of dated 23-09-2010	Mutated Khatian 525 vide case No 890/ 2010-2011 of dated 21-10-2010 of Assistant commissioner Land of Mithapukur, Rangpur
Mr. Anwar Hossain Managing Director Arabi Auto Bricks Limited	369	0.06	3685/10 dated 10-04-2010	Mutated Khatian 358 vide case No 579/ 2009-2010 of dated 22-05-2010
Mr. Anwar Hossain Managing Director Arabi Auto Bricks Limited	392	0.12	6978/11 dated 30-07-2011	Mutated Khatian 469 vide case No 885/ 2009-2010 of dated 02-08-2011
Mr. Anwar Hossain Managing Director Arabi Auto Bricks Limited	242,243,244	$0.12+0.67.50+0.23=1.02.50$ Acre	5372/11,6875/11 dated 29-06-2011	Mutated Khatian 537 vide case No 180/ 2011-2012 of dated 07-08-2011
Mr. Anwar Hossain Managing Director Arabi Auto Bricks Limited	391	0.08	8510 of dated 11-11-2010	Mutated Khatian 536 vide case No 3042/10-11 of dated 10-7-2011
Mr. Anwar Hossain Managing Director Arabi Auto Bricks Limited	238,138,396,242,243,369,1388,	$0.6325+0.21+0.14+0.03+0.66+0.06+0.0150=1.7475$	2324/12 dated 08-02-2012	Mutated Khatian 672 vide case No 1466/13-14 of dated 23-12-2013-

Name of the purchaser	Plot No	Quantity of land in Decimal	Transfer Deed Number	Mutation No
Mr. Anwar Hossain Managing Director Arabi Auto Bricks Limited	418	0.50	1827/14 dated 13-02-2014	Mutated Khatian 568 vide case No 1735/13-14 of dated 25—02- 2014
Mr. Anwar Hossain Managing Director Arabi Auto Bricks Limited	245	0.14	11725/13 dated 13-10-2013	Mutated Khatian 469 vide case No 1948/13-14 of dated 17-02-2014-
	Total	6.7425		

### 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 31-4-2014 reviewed 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
	<b>Plains</b>			
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)	Rakahain	6	

Sl. #	Areas of SEC Concentration	Predominant SECs	% National SECs	% of District Populations
	Districts			
5	Khulna Division, in <i>Sundarbans</i>	Munda	2	
	<b>Hills</b>			
6	CHT	Chakma, Marma & Tripura	41	44
	<b>Total</b>		<b>100</b>	<b>--</b>

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 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 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 30 September 2014 to review the implementation of the project social safeguard. During the site visit it has been observed that:

#### **Regarding employment:**

The project is under construction. A good number of employments generated and a sizeable portion from women folk in the earth filling and construction work of the plant. Most of the labour and worker have taken from the locality.

#### **Regarding Safety**

Safety of the subproject covers safety of the pre fabricated building, Notice specifying use of precautions regarding any accident. Precaution in case of fire, 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**

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 representative 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 construction and project operation .During operation in the factory some health and security problems are anticipated..

#### **Health impact**

First Aid Box were not found in the factory premises, Washing facility, canteen, shelters, Rooms for children have been anticipated.. There is no doctor in the factory. An occupational health program as well as regular checkup would need to be done to ensure the soundness of health of the worker.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.

#### **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
- Ensure issuance of Notice specifying use of precautions regarding any accident. Precaution in case of fire, 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. Board of Investment registered Arabi auto bricks as an industrial project, Bangladesh fire service and civil defense has issued license,. Photocopy of Licenses are in possession of the due diligence mission.

The land acquired by Arabi Auto Bricks 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 labour 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, the PFI representative and the chairman Latifpur 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.

The entrepreneur has taken care to address regarding Payment of minimum wages to the workers, Improvement of working condition, safety and security, welfare measures and hence it does not appear to involve in reputational risk to ADB bank funding on social safeguard issues

# Resettlement Checklist

Subproject Title: Arabi Auto Bricks Limited

## INVOLUNTARY RESETTLEMENT CHECKLIST

Probable Involuntary Resettlement Effects	Yes	No	Not Known	Remarks
<b>Involuntary Acquisition of Land</b>				
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?		√		apprehension of coercion
d. Is there an independent third party to document the negotiation and settlement processes?	√			Local Document specialist play the role
e. Is there a third-party to validate the process (d)?		√		
f. Are all the affected people consulted?	√			All people consulted
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?	√			Single crop agricultural land
7. Will there be losses of crops, trees, and fixed assets due to land acquisition?	√			Lose of Crops
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?	√			
<b>Involuntary restrictions on land use or on access to legally designated parks and protected areas</b>				
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?		√		
<b>Information on Displaced Persons:</b>				
Any estimate of the likely number of persons that will be displaced by the Project?				
[ ] No [x] Yes				
If yes, approximately how many? _____				
Are any of them poor, female-heads of households, or vulnerable to poverty risks?				
[ ] No [x] Yes				

Are any displaced persons from indigenous or ethnic minority groups?

[ ] No ☒ Yes

## IMPACT ON INDIGENOUS PEOPLES CHECKLIST

### Subproject Title: Arabi Auto Brick Limited

- There is no IP in the subproject area.

KEY CONCERNS	YES	NO	NOT KNOWN	Remarks
<b>A. Indigenous Peoples Identification</b>				
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?		<input checked="" type="checkbox"/>		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>B. Identification of Potential Impacts</b>				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
<b>C. Identification of Special Requirements</b>				N/A
<i>Will the project activities include:</i>				
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

## ENVIRONMENTAL / SOCIAL 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**

Arabi Auto Bricks Limited

Financing Amount: BDT

Technology: Hybrid Hoffman Kiln (HHK)

10 B, Jahanara Apartment, 42-43 Sideshwari circular road, Shantinagar, Dhaka

☐ 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

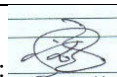
In consideration of the land requirement for the project, land acquired through willing seller willing buyer method and there will be no physical and economic displacement of affected person in the subproject. There is no IP in the subproject area. Hence the project is categorized as 'C'

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)

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

Approved by:

ADB  
Concurrence

Compliance Officer (if needed)

Date:

# Annexure

## Annexure 1: Acceptance Paper for Electric Connection



রংপুর পলী বিদ্যুৎ সমিতি-১  
শঠিবানী, রংপুর।

অতিসং-০৫২২৫-৫৬৩৪০  
সংসং-১২২৫-৫৬৩৪১

স্মারক নং-রপবিস-১/৪০০.০১/২০১১/ ৮৩৬

তারিখঃ ১-১০/০২/২০১১ইং

### বিষয়ঃ-বিদ্যুৎ সংযোগের জন্য লোড সংরক্ষণ সম্মতিপত্র।

এইমর্মে প্রত্যায়ন করা যাইতেছে যে, নিম্নে উল্লিখিত প্রস্তাবিত শিল্প নিম্নবর্ণিত শর্তানুযায়ী অত্র সমিতির বিদ্যুৎ বিতরণ ব্যবস্থা হইতে বিদ্যুৎ সংযোগ দেওয়ার জন্য ০৯/০২/২০১৩ তারিখ পর্যন্ত লোড সংরক্ষণ করা হইলঃ

১। শিল্প/শিল্প কমপ্লেক্স এর নাম : আরাবী অটোব্রিক্স লিঃ  
২। শিল্প/শিল্প কমপ্লেক্সের অবস্থান : বাতাসন ফতেপুর

(ক) দাগ নং : ২৩৯.২৪০.২৪১ মৌজা/গ্রাম : বাতাসন ফতেপুর  
ইউনিয়ন : লতিবপুর উপজেলা : মিঠাপুকুর জেলাঃ-রংপুর

(খ) বিদ্যুৎ লাইনের নিকটবর্তী খুঁটি হইতে দূরত্ব : ৪৬১ মিটার

৩। সংরক্ষণকৃত লোড ৩০০ কিঃওয়াঃ/কে ডি এ ও ফেজ ৪০০ ভোল্ট ৫০ সার্কিট।

৪। উল্লিখিত পরিমাণ লোডে বিদ্যুৎ সংযোগের এ সম্মতি পত্র কেবলমাত্র ০৯/০২/২০১৩ তারিখ পর্যন্ত বৈধ থাকিবে।

৫। উপরোক্ত শর্তাবলীকে কোন পরিবর্তন হইলে তৎসহ অত্র প্রসিদ্ধানের বিদ্যুৎ সংযোগ সম্পর্কিত নিয়ন্ত্রিত বিধি বিধান এই শিল্প সংযোগের লোড সংরক্ষণের শর্ত হিসাবে গন্য হইবে।

(মোহাম্মদ মিজানুর রহমান মিজান)  
সহকারী জেনারেল ম্যানেজার(সদস্য সেবা)  
রংপুর পলী বিদ্যুৎ সমিতি-১

স্বাক্ষর,

জনাব/মেসার্স আরাবী অটোব্রিক্স লিঃ  
পঃ নোঃ আনোয়ার হোসেন  
জাহানারা এ্যাপটিমেন্ট ১০ বি রাস্তা  
৪৩-৪৩ সিঙ্গেলরী সারকুলার রোড  
থানা- রমনা, ঢাকা-১২১৭

অনুলিপিঃ-

- ০১। জেনারেল ম্যানেজার, রংপুর পবিস-১। সদয় অবগতির জন্য
- ০২। সহকারী জেনারেল ম্যানেজার(অর্থ), রংপুর পবিস-১।



## Annexure 2: Environmental Clearance Certificate.

### ৭নং লতিবপুর ইউনিয়ন পরিষদ

ডাকঘর : জায়গীরহাট, উপজেলা : মিঠাপুকুর, জেলা : রংপুর।  
চেয়ারম্যান : শাহ মোঃ মাকসুদুর রহমান

সূত্র :.....

তারিখ :.....

অবস্থানগত/পরিবেশগত ছাড়পত্রের জন্য স্থানীয় কর্তৃপক্ষ কর্তৃক প্রদেয় অনাপত্তি পত্র

- ১। আবেদনকারীর নাম : মোঃ আলোয়ার হোসেন।
- ২। পিতা/স্বামী/পুত্রের নাম : আলহাজ্ব নবী হোসেন।
- ৩। আবেদনকারীর ঠিকানা : ধাপ, পিটিআই রোড, পানা-কোতরাণী, জেলা-রংপুর।
- ৪। কারখানা/প্রকল্পের অবস্থানগত ঠিকানা : ৭নং লতিবপুর ইউনিয়ন, ডাকঘর-জায়গীরহাট, উপজেলা-মিঠাপুকুর, জেলা-রংপুর।
- ৫। কারখানা/প্রকল্পের তফসিল :

জেলার নাম	উপজেলার নাম	মৌজার নাম	খতিয়ান নম্বর	দাগ নম্বর	জমির ধরণ	মোট জমির পরিমাণ
রংপুর	মিঠাপুকুর	বাতানন ফতেপুর	সিএস-১৪৬	২৪০/৩৭৩	অকৃষি	২.০০
			এসএ-১৪৮	২৩৯/৩৭২	অকৃষি	
			সিএস-১৮৭	২৪১/৩৭১	অকৃষি	

- ৬। কারখানা/প্রকল্পের উৎপাদিত/উৎপাদিতব্য পণ্যের নাম : ইট ভাটা।

উপর্যুক্ত তথ্যাদির আলোকে মেম্বার্স আরাবী অটো ব্রিকস্‌ লিঃ প্রকল্পকে নিম্ন শর্ত সাপেক্ষে অনাপত্তি পত্র প্রদান করা হলো।

#### শর্তাবলী:

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

উল্লিখিত যে কোন শর্ত লঙ্ঘন করলে মধ্যপন্থক কর্তৃপক্ষ কর্তৃক কারখানা/প্রকল্পের বিরুদ্ধে আইনগত ব্যবস্থা নেওয়া যাবে।

তারিখ:.....

*(স্বাক্ষর)*  
৭নং লতিবপুর ইউনিয়ন  
চেয়ারম্যান

*(স্বাক্ষর)*  
স্থানীয় কর্তৃপক্ষের স্বাক্ষর ও সীল  
৭নং লতিবপুর ইউনিয়ন  
চেয়ারম্যান

### Annexure 3: Brick Burning Certificate

**ইট পোড়ানোর লাইসেন্স**  
(ইট পোড়ানো (নিয়ন্ত্রণ) (সংশোধন) আইন ১৭, ২০০১ এর ধারা-৩)।

লাইসেন্স নং- ১৮/২০১০-১১ তারিখ: ২৬/০১/২০১১

স্বাক্ষর নামে লাইসেন্স প্রদান করা হলো মোসার্স আরবিসি ফটো প্রিন্স লিঃ  
তার নাম ও ঠিকানাঃ মোঃ মেজ আনওয়ার হোসেন  
সহঃ জাতীয়রাষ্ট্র, উপজেলা- মিঠাপুকুর, মহলা- রংপুর।

অপনার ০৫/১২/২০১১ তারিখের আবেদনপত্র ও সংশ্লিষ্ট কাগজপত্রাদি রংপুর জেলার ইটভাটা উপজেলায় স্থাপনক্রমে ইট পোড়ানো (নিয়ন্ত্রণ) (সংশোধন) আইন ১৭, ২০০১ এর ধারা-৩ মোতাবেক ০৭২ ইটভাটা জমি ব্যবহার সংক্রান্ত জমি মন্ত্রণালয় কর্তৃক জারীকৃত ইট খোলা নির্মাণের জন্য জমি ব্যবহার শীতমালা (জমি মন্ত্রণালয় হইতে ২৫/৭/১৯৯০ তারিখের জি নং /গা-১০/৩৩ দঃ/সংসারণ ১৭/৯০/৫৭২(৬৪) এরফলে নং স্মারকে জারীকৃত পরিপত্র) এবং বিদ্যমান কার্যসম্পন্ন ২০১০-২০১১ সালের ০৫/১২/২০১১ পর্যন্ত (১/৭/২০১০ হইতে ০৫/১২/২০১১) ইট পোড়ানো যেসকল ইটভাটা নির্মাণ ও ইট পোড়ানোর জন্য জমি ব্যবহারের অনুমোদন দেওয়া হইল।

**ইটভাটার অবস্থানঃ**

১) দাগ নম্বর	২	২৪০, ২৩৯, ২৪১
২) প্রতিষ্ঠান নম্বর	১	১৪৬/১৮৭
৩) কো, থানা নম্বর	২	১০৫
৪) মৌজার নাম	২	বাকাসন ফতেপুর
৫) গ্রামের নাম	২	লাতাসন ফতেপুর
৬) পাক্সার নাম	২	রংপুর-ঢাকা মহাসড়ক জাতীয়রাষ্ট্র
৭) ইউনিয়নের নাম	২	মিঠাপুকুর
৮) উপজেলা	২	মিঠাপুকুর
৯) জেলা	২	রংপুর।

ইটের মার্ক  
A-432

ইট ভাটার ফর্ম ১  
আবেদনকারীর  
স্বাক্ষর, নামঃ

**শর্তাবলীঃ**

- ইটভাটা তৈরীর সামগ্রিক কাজের জন্য সর্বোচ্চ ২.০০ (দুই নশমিক পূন্য পূন্য) একর জমি ব্যবহার করা যাবে। জমি মন্ত্রণালয় কর্তৃক জারীকৃত ইট খোলা নির্মাণের জন্য জমি ব্যবহার শীতমালা (জমি মন্ত্রণালয় হইতে ২৫/৭/১৯৯০ তারিখের জি নং /গা-১০/ ৩৩ দঃ/ সংসারণ ১৭/৯০/৫৭২(৬৪) এরফলে নং স্মারকে জারীকৃত পরিপত্র) মানিয়া চলিতে হইবে।
- ইটের ভাটায় কোন অবস্থাতেই কয়লা ব্যতীত অন্য কোন জ্বালানী মধ্যঃ কাঠ, খড়, গাম, বাশেত মাশা ও খেজুরগাছ বা অনুরূপ উদ্ভিদজাত জ্বালানী ব্যবহার করা যাইবে না। ইট পোড়ানো (নিয়ন্ত্রণ) (সংশোধন) আইন ১৭, ২০০১ এর বিধান মোতাবেক ইটভাটার জ্বালানী হিসাবে কয়লা ব্যবহার নিষিদ্ধ করিতে হইবে। কয়লা ব্যতীত কোন প্রকার উদ্ভিদজাত জ্বালানী ব্যবহার করিলে এই লাইসেন্স সরাসরি বাতিল বলিয়া গণ্য হইবে এবং প্রচলিত আইন অধিবাদন প্রাপ্য হইয়া ফরা হইবে।



(পাতা নং-২)

- ইউজাটের তরীক জন্য যে স্থান হইতে মাটি কাটা হইবে ঐ স্থানকে লাড় বিশিষ্ট পূর্ণাঙ্গ পুত্রে পরিণত করিতে হইবে যাহাতে সেখানে মৎস্য চাষ করা যায় এবং কোন কৃষি জমি হইতে মাটি উদ্ধৃত করা যাইবে না।
- ৯.৭. ঐরকম ইউজাট হইতে পোড়া মাটি/ইটের টুকরা অপসারণ করিতে হইবে এবং পুত্রর বাসে ইট পোড়ানোর কিলন ও অব্যাহা গর্ত জটোজটীয় মাটি দ্বারা ভরাট করিবে। ঐ স্থানকে পূর্বের অবস্থায় কৃষিযোগ্য ভূমিতে ফিরাইয়া আনিতে হইবে।
- ৯.৮. পরিবেশ বৃক্ষণ/পরিবেশের উপর মারাত্মক ক্ষতিকর প্রভাব ফেলিতে পারে এমন কিছু (বোঝা, শাড়ীর টায়াত) জ্বালানী হিসেবে ব্যবহার করা যাইবে না।
- ৯.৯. জেলা প্রশাসক নিজে অথবা তাহার নিকট হইতে ক্ষমতাপ্রাপ্ত যে কোন কর্মকর্তা বা ব্যক্তি অথবা বন অধিদপ্তরের যে কোন কর্মকর্তা (সহকারী বন সংরক্ষক পদ মর্যাদার নীচে নহে) অথবা পরিবেশ অধিদপ্তরের কর্মকর্তা (উপ-পরিচালক পদমর্যাদার নীচে নহে) অথবা সর্বশ্রেষ্ঠ কর্তৃপক্ষ যে কোন সময় কোন প্রকার নোটিশ প্রদান ব্যতিরেকে ইউজাট পরিদর্শন করিতে পারিবেন এবং ইহাতে কোন বাধা বা ওলট আশঙ্কি করা চলিবে না।
- ৯.১০. ইউজাটের পোড়ানো ইটের পরিসংখ্যান ও বিক্রয় এর বাশারে রেকর্ডটির ও অনুমতিপত্র, জাট, উৎস কর পরিশোধের চালান ও ভূমি উন্নয়ন কর পরিশোধের দাবিলা সংরক্ষণ করিতে হইবে।
- ৯.১১. ইউজাটের পূর্বে অবশ্যই আশুন দেওয়ার লাইসেন্স গ্রহন করিতে হইবে। ইউজাটের আশুন দেওয়ার অবধেনন পত্রের সহিত বিধি মোতাবেক ১ম ভিত্তির জাট, উৎস কর পরিশোধের চালান ও বাণিজ্যিক দ্বারে ভূমি উন্নয়ন কর পরিশোধের দাবিলা দাখিল করিতে হইবে।
- ৯.১২. ইউজাটের উপর প্রসেক্ষ সকল প্রকার সরকারী কাছেরক নির্ধারিত বিধি যথাসময়ে পরিশোধ পূর্বক জেলামের কর্তৃক জেলা প্রশাসক, কম্পুত বহানরে দাখিল করিতে হইবে। অন্যথায় এই লাইসেন্স বাতিল বলিয়া গণ্য হইবে।
- ৯.১৩. ইউজাটের (নিয়ন্ত্রণ) (সংশোধন) আইন-১৭, ২০০১, ভূমি ব্যবহার নীতিমালার অধীন প্রণীত বিধি ও বাংলাদেশ পরিবেশ সংরক্ষণ (সংশোধন) আইন-১২, ২০০০ ও ৯,২০০২ এর পরিপন্থী কর্মকাণ্ডের জন্য উপযুক্ত আদালতে প্রদত্ত আইনে মোকদ্দমা দায়ের করা যাইবে।

বি.এ.এ.এ.এ.এ.  
জেলা প্রশাসক  
রংপুর।

Annexure 4: License from Fire Service.



লাইসেন্স নং-৮২৫৬ অর্থ বৎসর ২০১১-২০১২  
বিকল্প

লাইসেন্স ফর্ম

অগ্নি প্রতিরোধ ও নির্বাপন আইন-২০০৩ মোতাবেক প্রদত্ত লাইসেন্স ফর্ম।

এতদ্বারা ফতেপুর, জায়গীরহাট, মিঠাপুকুর, রংপুর। হিত  
জনাব/মেসার্স আরাবী অটো প্রিক্স লিঃ কে উপরোক্ত ঠিকানায়  
অগ্নি প্রতিরোধ ও নির্বাপন আইন ২০০৩ এর ৪ ধারা মোতাবেক কয়লা দাহ্য বস্তুর  
০১ (এক) খানা মালগুদাম/কারখানার অপর পৃষ্ঠায় বর্ণিত শর্তাবলীর ভিত্তিতে ফায়ার সার্ভিস ও সিভিল  
ডিফেন্স হইতে ২০১২ - ২০১৩ অর্থ সালের জন্য লাইসেন্স মঞ্জুর করা হইল।  
এতদ্বারা স্বীকার করা যাইতেছে যে, ১ লা জুলাই/২০১২ হইতে ৩০ শে জুন/২০১৩ সময় কালের  
লাইসেন্স মাসুল বাৎসরিক ৮০০/- (আটশত) টাকা হারে মোট ৮০০/- টাকা  
ওয়্যারহাউজ/ওয়ার্কসপ লাইসেন্স এর মাসুল বাবদ পাওয়া গিয়াছে।

(গৃহ/জায়গার মূল মালিকের ঠিকানা)

আরাবী অটো প্রিক্স লিঃ

ফতেপুর, জায়গীরহাট, মিঠাপুকুর, রংপুর।

(গুদামের/কারখানার দখলকারীর নাম/ঠিকানা)

তারিখ ২৭.০২.২০১৬ সন

মিত্রা নৌশাদ দাস  
সহকারী পরিচালক  
অগ্নি সার্ভিস ও সিভিল ডিফেন্স

উপ-পরিচালক/সহকারী পরিচালক  
বাংলাদেশ ফায়ার সার্ভিস ও সিভিল ডিফেন্স

যে সন পর্যন্ত নবায়ন করা হইল	নবায়ন মাসুল	লাইসেন্স নবায়নকারীর স্বাক্ষর ও নামযুক্ত সীল
২০১০-২০১১ হইতে ৩০ শে জুন, ২০১১	৮০০/-	স্বাক্ষর/সীল (মিত্রা নৌশাদ দাস) সহকারী পরিচালক অগ্নি সার্ভিস ও সিভিল ডিফেন্স
৩০ শে জুন, ২০১১		
৩০ শে জুন, ২০১১		
৩০ শে জুন, ২০১১		



