

Initial Environmental Examination

Project No: 52174-001
January 2019

Emergency Assistance Project
ADB Project 52174-001 | Grant 0582-BAN

BANGLADESH: Emergency Assistance Project - Construction of 3 nos. school cum cyclone shelter for affected people, 3 storied LGED Prototype, in Teknaf

Package No.: EAP/LGED/W9

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Emergency Assistance Project

ADB Project 52174-001 | Grant 0582-BAN | TA 9546 BAN

Initial Environmental Examination

Package

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Package No.: EAP/LGED/W9

Implementing Agency

Local Government Engineering Department (LGED)
Ministry of Local Government, Rural Development and Cooperatives (MLGRDC)

January 2019

BAN: EMERGENCY ASSISTANCE PROJECT

Component: Agriculture and Natural Resources

January 2018

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ABBREVIATIONS

| | |
|--------|--|
| ADB | ASIAN DEVELOPMENT BANK |
| BCCSAP | BANGLADESH CLIMATE CHANGE STRATEGY AND ACTION PLAN |
| BREB | BANGLADESH RURAL ELECTRIFICATION BOARD |
| DPHE | DEPARTMENT OF PUBLIC HEALTH ENGINEERING |
| EAP | EMERGENCY ASSISTANCE PROJECT |
| EARF | ENVIRONMENTAL ASSESSMENT AND REVIEW FRAMEWORK |
| ECA | ENVIRONMENTAL CONSERVATION ACT |
| ECC | ENVIRONMENTAL CLEARANCE CERTIFICATE |
| ECR | ENVIRONMENTAL CONSERVATION RULES |
| EIA | ENVIRONMENTAL IMPACT ASSESSMENT |
| EIA | ENVIRONMENTAL IMPACT ASSESSMENT |
| EMP | ENVIRONMENTAL MANAGEMENT PLAN |
| ETP | EFFLUENT TREATMENT PLANT |
| GoB | GOVERNMENT OF BANGLADESH |
| H&S | HEALTH AND SAFETY |
| IEE | INITIAL ENVIRONMENTAL EXAMINATION |
| LGED | LOCAL GOVERNMENT ENGINEERING CERTIFICATE |
| MPEMR | MINISTRY OF POWER, ENERGY AND MINERAL RESOURCES |
| NFP | NATIONAL FOREST POLICY |
| NOC | NO OBJECTION CERTIFICATE |
| RHD | ROADS AND HIGHWAYS |
| RRRC | THE REFUGEE RELIEF AND REPATRIATION COMMISSION |
| SPS | SAFEGUARDS POLICY STATEMENT |
| SSC | SITE CLEARANCE CERTIFICATE |
| TOR | TERMS OF REFERENCE |
| UN | UNITED NATIONS |
| US EPA | UNITED STATES ENVIRONMENTAL PROTECTION AGENCY |
| WB | WORLD BANK |

Executive Summary

- i. The Government of Bangladesh (GoB) requested Asian Development Bank (ADB) for grant support to provide basic infrastructure and essential services to displaced persons. Given the humanitarian need and heart-wrenching condition of the displaced persons, ADB is providing grant financing of \$100 million for the first phase of the project. ADB support will be focused, selective, and well-targeted in the areas of (i) road access to and within camps; (ii) water and sanitation; (iii) energy supply; and (iv) disaster risk mitigation. It will build on the support provided by GoB and complement support provided by the United Nations (UN) agencies, the World Bank (WB) and other agencies.
- ii. Output 2 of the project is Disaster Risk Management Strengthened. The output includes constructing in and around the camp areas (a) multipurpose cyclone shelters with emergency access roads; (b) food distribution centers; (c) hill slope protection/toe walls to resist landslides; (d) storm water drainage network; and (f) other disaster risk management measures.
- iii. This Initial Environmental Examination Report is on the subproject titled BANGLADESH: Emergency Assistance Project - Construction of 3 nos. school cum cyclone shelter for affected people, 3 story LGED Prototype, in Teknaf". The package include 3 cyclone shelters: a. Construction of 01 no. of cyclone shelter cum primary school at Dakkhin Baradail Government Primary School in Teknaf; b. Construction of 01 no. of cyclone shelter cum primary school at Nhila Burmese Schhol in Teknaf; c. Construction of 01 no. of cyclone shelter cum primary school at Uluchamary Government Primary School in Teknaf. The sub-project is designated as EAP/LGED/W9 and located in Teknaf Upazila in Coxsbazar.
- iv. The IEE has been prepared based on the Environmental Assessment and Review Framework (EARF) developed by the ADB and endorsed by Bangladesh Government. The IEE also follows the guidelines of the Department of Environment (DoE) as required by the Environmental Conservation Rule (ECR) 1997 (amended 2002) and in accordance with the Safeguard Policy Statement 2009 (SPS 2009) of ADB and will be disclosed in the websites of the ADB and the implementing agencies.
- v. The scope of this report and the subsequent IEE is specific to the sub-project. It does not provide any assessment for any other/future developments or activities at the location or anywhere else within Cox's Bazaar Area. Should any further development be planned either as result of this Project or other related work, additional planning and assessment to the requirements of the Government of Bangladesh must be carried out specifically in relation to that proposed development.
- vi. The environmental category of the sub-project is listed in Schedule – 1 of ECR and falls in Orange B. The project has been categorized as B for environment under the ADB's Safeguards Policy Statement 2009 (SPS).
- vii. The shelter to be constructed with the foundation for at least three stories shall have four rooms and RAMP facilities up to the first floor. A reasonably sized room should be kept reserved for the disabled & the helpless and the rest of the first floor should be kept open for domestic animals.
- viii. Cyclone shelters proposed in this project are likely to follow Option 1 LGED Proto type Multipurpose Cyclone Shelter. Usually theis option follow 3 story building with ground floor being open for entrance. 1st floor is usually kept open but bounded with wall for shelter of cattles. The 2nd floor is

designed to be used for class rooms, teacher's room and separate male female toilets with spaces for pregnant women. These spaces are used as shelter during cyclonic storm events.

- ix. Measures of potential impact significance as part of the Project planning and assessment phase presented in this IEE have been determined using a risk-based model. The risk based model is a two dimensional matrix of 'magnitude of impact' and 'likelihood'. Both are assigned score between 1 and 5 based on severity or probability and multiplied to obtain the 'risk band'.
- x. The score of 'Risk' ranges from 1 to 25. The score is classified in 3 classes. The explanation is given in **Table 10**. The score matrix for risk assessment has been used to identify the priority environmental impact and their mitigation plan.

Table 9 Two dimensional risk assessment matrix

| | | | MAGNITUDE OF IMPACT | | | | |
|------------|------------|----------|---------------------|----------|----------|----------|--------------|
| | | | Incidental | Minor | Moderate | Major | Severe/cats. |
| | | | Score: 1 | Score: 2 | Score: 3 | Score: 4 | Score: 5 |
| LIKELIHOOD | Rare | Score: 1 | 1 | 2 | 3 | 4 | 5 |
| | Unlikely | Score: 2 | 2 | 4 | 6 | 8 | 10 |
| | Seldom | Score: 3 | 3 | 6 | 9 | 12 | 15 |
| | Occasional | Score: 4 | 4 | 8 | 12 | 16 | 20 |
| | likely | Score: 5 | 5 | 10 | 15 | 20 | 25 |

- xi. **Dakkhin Baradail Government Primary School:** The proposed school cum cyclone shelter site is next to Cox's Bazar Marine drive with a HBB access road about 50 meters from Marine drive. The proposed area is predominantly surrounded by agricultural land and has two existing school buildings, one very old and damaged.
- xii. **Uluchamary Government Primary School:** The proposed school is located within the agricultural region of Naf river basin. To east of the proposed site lies the hilly region. The access road to this site is quite important and busy with local motor vehicle. A large pond is nearby. The site is surrounded by agricultural land to the east and to the west, and surrounded by hilly vegetation to the north and to the south.
- xiii. **Nhila Burmese School:** The proposed site is next to Naf River and often flooded during high tide at monsoon. The site is surrounded by agricultural low land. Some area on the front of the scexisiting school building becomes waterlogged during rains. The access road is 3m wide on average and in good HBB condition
- xiv. **Impacts:**
- xv. **Site clearance:** Failure to obtain necessary consents, permits, NOC's can result in design revisions and/or stoppage of the Works. Failure to obtain No Objection Certificate from the local authority

can hamper the entire project, even stop the construction project. In this case, the subproject's land is already available to the authority as it is government owned land.

- xvi. **Landscape and existing utilities:** Often construction of structure may disrupt the existing utilities installed underneath the soils. In this case, the proposed structures are within the existing building complex. It is possible that the new construction will interrupt the existing utilities. Therefore, investigation before construction and formulation of plan of restoration of existing utilities within shortest time is recommended. The plan must be formulated with coordination with LGED, contractor and the field level construction supervisor. The plan must be shared with the school committees and approved by them.
- xvii. **Top soil loss followed by soil erosion:** For the school cum cyclone shelters, four parameters have been considered for screening of ecological impacts during construction phase; these include access road, felling of trees, clearing of vegetation, and impact on aquatic (water) habitat. Significant excavation, cut and fill is expected. 3-story building will also need concrete mixing, although the extent of time may not exceed couple of weeks. The proposed sites are on relatively flat land on the Basin of Naf River. Therefore, significant soil erosion is not expected.
- xviii. **Impact water and air quality: The Nhila Burmese school site is the most vulnerable site for water pollution or contamination from stock pile materials and construction waste.** There is no water body (e.g., khal, pond) located close to the proposed cyclone shelter locations, therefore the potential adverse impact (e.g., through discharge of waste/ wastewater from sub-project activities, spills and leaks of oil/ chemical) on water quality (in the absence of any mitigation/management) could to be classified as “none”. The location of the proposed cyclone shelter sites are on elevated land and well above flood level, therefore the construction works is not expected to obstruct the flow of natural drainage water, and therefore impact on drainage would most likely be “minor”.
- xix. **Occupational, Health, and Safety Risks:** Occupational hazards may arise if not properly managed (risk of fall and electrocution, etc). Increase in dust may cause health problems to workers. Insufficient supply and improper use of personal protective equipment (PPE) and lack of safety procedures may cause injuries or fatal accidents. For safety, there will be a need to interrupt electricity supply to existing businesses while new poles, conductors and other installations are put in place.
- xx. **Community Health and Safety Hazards:** Community hazards may arise during construction (dust, air quality, noise, electrocution etc.). Traffic accidents and vehicle collision with pedestrians during material and waste transportation may occur if no proper signage are placed.
- xxi. The EMP implementation cost stands at BDT 467,000.
- xxii. ADB will monitor projects on an ongoing basis until a project completion report is issued. ADB will carry out the following monitoring actions to supervise project implementation:
- conduct periodic site visits for projects with adverse environmental impacts;
 - review the periodic monitoring reports submitted by the executing agency to ensure that adverse impacts and risks are mitigated as planned and as agreed with ADB;
 - work with executing agency to rectify to the extent possible any failures to comply with their safeguard commitments, as covenanted in the legal agreements, and exercise remedies to re-establish compliance as appropriate; and

- prepare a project completion report that assesses whether the objective and desired outcomes of the safeguard plans have been achieved, taking into account the baseline conditions and the results of monitoring.
- xxiii. Different stakeholders were consulted to give them the opportunity to express their views and concerns. As part of the process, they were also provided with relevant and sufficient information on the project prior to its start-up. These stakeholders include the central and local authorities, as well as the local population to determine their thoughts, opinions and feedback on the impact of the project. Attendees in the consultation meeting were apprised of the processes through which the project was to proceed toward implementation and the environmental impacts to arise out of such processes along with the steps to be taken toward mitigating the impacts.
- xxiv. The EAs/IAs will send a written endorsement to ADB for disclosing these documents on the ADB website. The PIUs will provide relevant safeguards information in a timely manner, in an accessible place and in a form and language understandable to affected people and other stakeholders. For illiterate people, other suitable communication methods will be used. Disclosure will follow ADB's Public Communication Policy, 2011.

1 Introduction

1.1 BACKGROUND

1 The Government of Bangladesh (GoB) requested Asian Development Bank (ADB) for grant support to provide basic infrastructure and essential services to displaced persons. Given the humanitarian need and heart-wrenching condition of the displaced persons, ADB is providing grant financing of \$100 million for the first phase of the project. ADB support will be focused, selective, and well-targeted in the areas of (i) road access to and within camps; (ii) water and sanitation; (iii) energy supply; and (iv) disaster risk mitigation. It will build on the support provided by GoB and complement support provided by the United Nations (UN) agencies, the World Bank (WB) and other agencies. With the principle of putting people first, the project will seek to ease the vulnerabilities and risk of hunger, disease, and disaster. The project is known as Emergency Assistance Project (Project No. 52174-001, Grant 0582-BAN).

2 The project is known as the Emergency Assistance Project (EAP). The project will support the Government of Bangladesh in addressing the immediate and urgent needs of the displaced persons from Myanmar in Coxsbazar District, as identified by the United Nations (UN) in its Joint Response Plan (JRP) (displaced persons). The project will mainly support the improvement of water supply and sanitation, disaster risk management, sustainable energy supply, and access roads.

3 The impact of the project will be: Social recovery of affected communities accelerated in the sub-districts of Ukhyia and Teknaf. The outcome will be: Living conditions and resilience of affected communities improved. Four (04) outputs are expected from this project. They are:

- Output 01: Water supply and sanitation improved.
- Output 02: Disaster risk management strengthened
- Output 03: Energy sources provided
- Output 04: Access roads improved.

4 Output 2 of the project is Disaster Risk Management Strengthened. The output includes constructing in and around the camp areas (a) multipurpose cyclone shelters with emergency access roads; (b) food distribution centers; (c) hill slope protection/toe walls to resist landslides; (d) storm water drainage network; and (f) other disaster risk management measures. Output 4 of the project include a) sub-district and Union roads to connect food storage centers, food distribution centers, field hospitals, primary health care centers, and primary education centers; (b) emergency access roads to the camp areas; (c) existing access roads to and within the camps and drainage systems; and (d) resurfacing the road from Cox's Bazar to Teknaf including improvement of critical sections such as market areas and culverts. A location map of the proposed subproject is presented in **Figure 1**. The proposed sub-project of this report belongs to Output 02.

5 This Initial Environmental Examination Report is on the subproject titled BANGLADESH: Emergency Assistance Project - Construction of 3 nos. school cum cyclone shelter for affected people, 3 story LGED Prototype, in Teknaf". The package include 3 cyclone shelters:

- a. Construction of 01 no. of cyclone shelter cum primary school at Dakkhin Baradail Government Primary School in Teknaf.

- b. Construction of 01 no. of cyclone shelter cum primary school at Nhila Burmese Schhol in Teknaf.
- c. Construction of 01 no. of cyclone shelter cum primary school at Uluchamary Government Primary School in Teknaf.

6 The sub-project is designated as EAP/LGED/W9 and located in Teknaf Upazila in Coxsbazar.

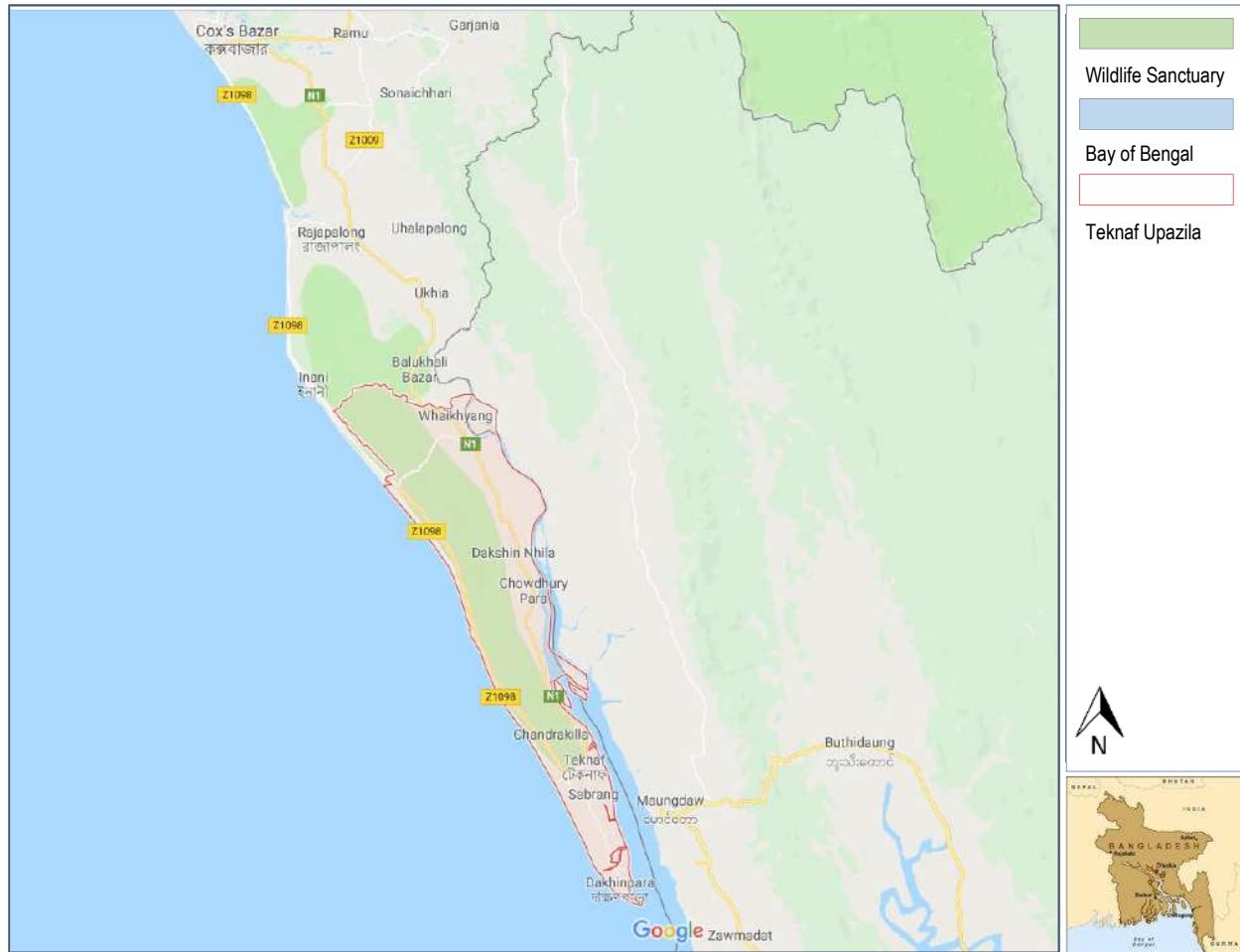


Figure 1 Location map of the proposed subproject

1.2 PURPOSE OF THE REPORT

7 The IEE has been prepared based on the Environmental Assessment and Review Framework (EARF) developed by the ADB and endorsed by Bangladesh Government. The IEE also follows the guidelines of the Department of Environment (DoE) as required by the Environmental Conservation Rule (ECR) 1997 (amended 2002) and in accordance with the Safeguard Policy Statement 2009 (SPS 2009) of ADB and will be disclosed in the websites of the ADB and the implementing agencies. This document shall serve as the base of environmental assessment of the proposed sub-project to be implemented by the executing agency and guideline for environmental management activities on-site.

1.3 SCOPE OF THIS REPORT

8 The Project require that any proposed development will require that the laws and regulations of Bangladesh are applied in full. The Project is then subject to approval under the Government of Bangladesh's Environment Conservation Act (1995) (ECA) and Environment Conservation Rules (1997).

9 The IEE report aims to provide guidance on safeguard screening, assessment, institutional arrangement and process to be followed for components of the project, where design takes place after Boards approval. This IEE:

- (i) describes the project and its components;
- (ii) explains the general anticipated environmental impacts and mitigation measures for the subprojects;
- (iii) specifies the requirements that will be followed in relation to screening and categorization, assessment, and planning, including arrangements for meaningful consultation with affected people and other stakeholders and information disclosure requirements;
- (iv) assesses the capability of the project proponents to implement national laws and ADB's requirements, and identifies needs for capacity building;
- (v) specifies implementation procedures, institutional arrangements, and capacity development requirements; and
- (vi) specifies monitoring and reporting requirements. Moreover, this IEE is to ensure, in line with ADB EARF, that the sub-project, in the entirety of its project cycle, will not deteriorate or interfere with the environmental sensitivity of the project area, but rather improve environmental quality.

10 This report fulfils the requirements of IEE under the provisions of the ECR. The IEE identifies potential environmental and social impacts and issues associated with undertaking the proposed project. It provides an outline of the potential positive and negative impacts as a result of the Project and proposes suitable mitigation and management measures.

11 The scope of this report and the subsequent IEE is specific to the sub-project. It does not provide any assessment for any other/future developments or activities at the location or anywhere else within Cox's Bazaar Area. Should any further development be planned as result of either this Project or other related work, additional planning and assessment to the requirements of the Government of Bangladesh must be carried out specifically in relation to that proposed development.

1.4 APPROACH AND METHODOLOGY

12 The primary purpose of the IEE is to investigate and describe impacts of the proposed subproject to the existing environmental elements. Specifically, the study aims to predict the potential impacts of the project activities and recommend mitigation and abatement measures for impacts (in the pre-construction, construction and operational stages of development) that are considered potentially adverse to the surrounding environment.

13 In general, this IEE intends to:

- Examine and describe the existing status of the various ecological, physical and human related components surrounding the project area;
- Predict the potential significant impacts of the project on the surrounding environment during the pre-construction, construction, operations and maintenance stages and recommend appropriate mitigation and abatement measures; and
- Identify residual impacts of the project and recommend appropriate short-term and long-term management plans.

1.4.1 Data sources of IEE

14 The following documents were used as reference in the preparation of the IEE report:

- Available technical reports from various organization
- Available laws, rules, regulations, acts, policies from Bangladesh Government websites
- Maps from open sources and various governmental and non-governmental websites
- Data from secondary literatures in including books and relevant websites

1.4.2 Scoping and gathering baseline data

15 Scoping of issues to be addressed in the IEE was conducted early in the assessment process (i.e. Field visit) to collect the appropriate baseline information so that collected and the IEE report/study can focused on the relevant issues needed.

16 The objectives of undertaking the scoping activities were:

- To provide an early link among the implementing agency, the recipient and affected community and the IEE preparer;
- To ensure that the IEE will address only relevant issues and concerns;
- To present the scope of environmental studies, issues and alternatives that requires thorough examination and consideration in the master plan; and
- To ensure complete coverage of potential environmental and social issues that is required under the ADB Environmental and Social Considerations.

1.5 STRUCTURE OF THIS REPORT

17 Following the ADB SPS 2009, the Report is structured as follows:

Executive Summary

- | | |
|------------------|---|
| Chapter 1 | Introduction provides the background on the project, purpose of this report, approach and methodology |
| Chapter 2 | Policy, Legal, and Administrative Framework presents a review of relevant national laws and policies, international environmental obligations, and ADB's environmental requirements, procedure of environmental clearance, environmental categorization |
| Chapter 3 | Description of the Project provides a brief description of the Project, the location, size and need, description of project components |
| Chapter 4 | Analysis of Alternatives presents the alternatives considered during the feasibility study in order to arrive at the best option. |

| | |
|-------------------|---|
| Chapter 5 | Description of the Baseline Environment includes details on the baseline data for environmental conditions in the project area (current features and conditions, pre-project) |
| Chapter 6 | Anticipated Potential Project Impacts identifies the potential environmental, economic and social impacts from pre-construction, construction, and operation phase. |
| Chapter 7 | Environmental Mitigation and Management Plan |
| Chapter 8 | Environmental Monitoring Program and Institutional Responsibilities outlines the environmental monitoring program, institutional responsibilities including the cost of implementing the EMP |
| Chapter 9 | Grievance Redress Mechanism describes the process of addressing complaints |
| Chapter 10 | Stakeholder Consultation and Information Disclosure discusses the issues raised during the consultations, proposed actions to address them, and the information needed to disclose to the public. |
| Annex I | List of Participants in FGD |

2 Policy, Legal and Administrative Framework

2.1 INTRODUCTION

18 This section of the IEE details the Administrative Framework for the Project, covering national requirements as well as applicable international treaties and conventions. The intent of this section is to lay out the regulatory and non-regulatory performance requirements for all stages of the Project. For the purposes of this report, only those regulatory elements directly relevant to the proposed Project will be discussed.

2.2 ENVIRONMENTAL LEGISLATION FRAMEWORK

2.2.1 Overview of the project approval process

19 Key legislation governing the environmental approvals process for the proposed Project is the Bangladesh Environmental Conservation Act, 1995 (BECA, 1995)¹ and the Environmental Conservation Rules (ECR, 1997)²

20 According to Rule 7 of the ECR, proposed developments within Bangladesh are classified as one of four categories, as follows:

- Green;
- Orange A;
- Orange B; and
- Red

21 These categories define proposed developments according to their potential environmental impact. Section 12 of the ECA states that 'No industrial unit or project shall be established or undertaken without obtaining an Environmental Clearance Certificate from the Director General, in the manner prescribed by the Rules'.

2.2.2 Environmental Approval Framework

22 Key milestones in the approvals process are outlined in **Figure 2**. These comprise:

- **Project Authorization Letter:** Formal authorization of the Project by the Department of Energy and Mineral Resources is required in order for the environmental approvals process to formally commence.
- **No Objection Certificate (NOC):** An NOC must be received from the Deputy Commissioner in the sub-project area before the SCC application can be made.
- **Site Clearance Certificate (SCC):** An SCC will be issued by DoE upon approval of the IEE study (note that the IEE submission is to include the Project Authorization Letter, NOC and SCC application form). The SCC will include a ToR for the IEE/EIA study, and typically provides authorization for site establishment works to commence.

¹ The Act was amended by Act Nos 12 of 2000, 9 of 2002, and 50 of 2010.

² The ECR was amended in 2002, 2005, 2010 and 2017.

- **Environmental Clearance Certificate (ECC):** The ECC will be issued by DoE upon approval of the IEE/EIA study (including associated EMP). The ECC allows project construction to commence, and contains specific approvals requirements for matters such as pollution control and environmental monitoring.

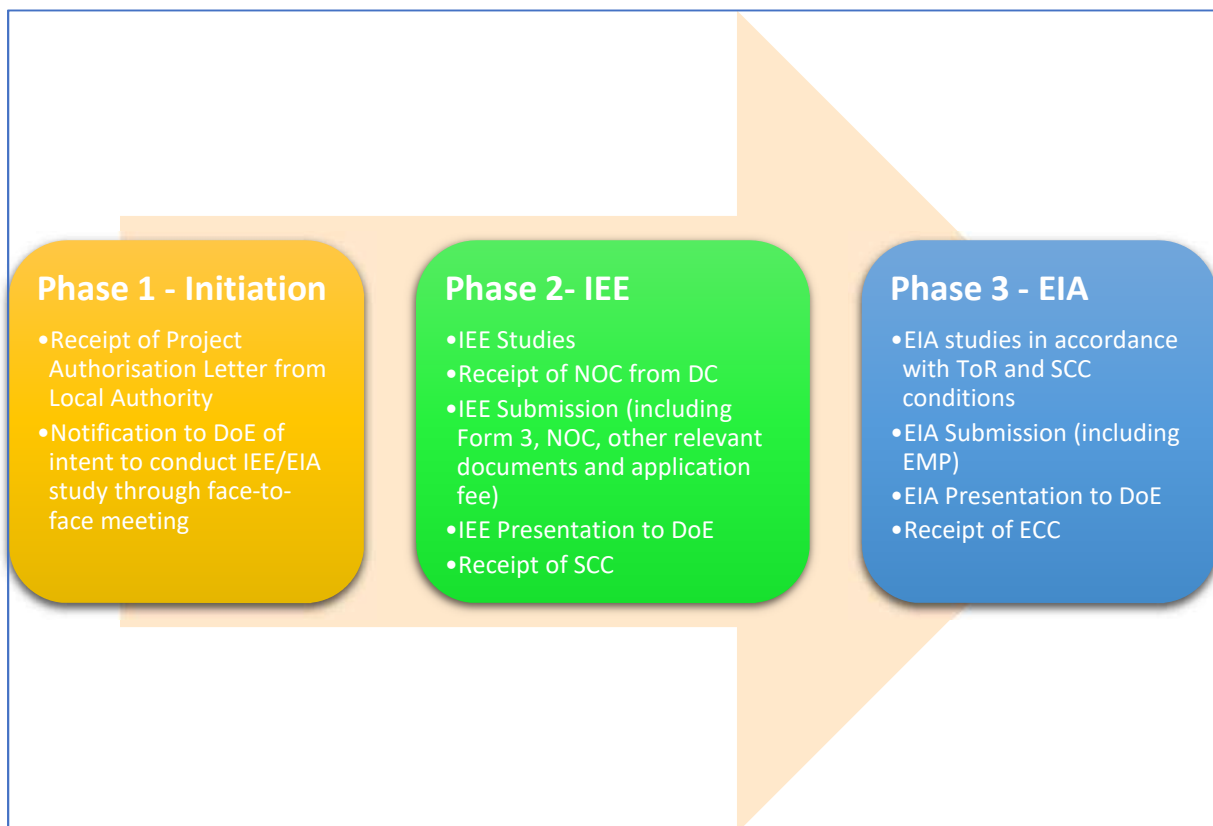


Figure 2 Environmental approval framework

23 **Table 1** provides an overview of key Bangladesh legislative approvals requirements which are relevant to the Project, and the permissions required under this legislation in order to undertake the subproject works.

Table 1 Required Permissions for Project under Bangladesh Legislation

| Legislation | Permission Required | Purpose | Permission Given By |
|--|------------------------------|--|---|
| Environment Conservation Act (1995) Environment Conservation Rules (1997) | SCC and ECC | DoE will issue an SCC to allow for a detailed EIA as per Section 12 (ECA), Rule- 7 and Form -3 of the ECR. | Director General of the Bangladesh DoE |
| Acquisition and Requisition of Immovable Property Act (1982) | Application required | To acquire and compensate for any Project land | Ministry of Land and Deputy Commissioner |
| Bangladesh Electricity Act (1910) and Regulations | Permission /licence required | Laying down or placement of electricity supply lines. | Rural Electrification Board/Power Development Board |

24 Rule 7 of ECR indicates the procedure and requirements for the issuance of an ECC. The corresponding requirements per category are described below:

Green category projects:

- i. completed application for ECC, and the appropriate fee (shown in Schedule 13);
- ii. general information about the project;
- iii. exact description of the raw materials to be used, and the product to be manufactured (where relevant); and
- iv. No-objection certificate from the local authority.

Orange-A category projects:

Same requirements as green category projects, plus the following:

- i. process flow diagram;
- ii. layout plan (showing location of effluent treatment plant or ETP);
- iii. effluent discharge arrangement; and
- iv. outlines of the plan for relocation and rehabilitation (if applicable).

Orange-B category projects:

- i. completed Application for ECC, and the appropriate fee;
- ii. report on the feasibility of the project;
- iii. report on the IEE for the project, plus process flow diagram, and in the case of an industrial project, layout plan (showing ETP) and ETP design;
- iv. report on the environmental management plan (EMP);
- v. no objection certificate from the local authority;
- vi. emergency plan relating to adverse environmental impact and plan for mitigation of the effect of pollution; and
- vii. outline of the relocation and rehabilitation plan (where applicable).

Red category projects:

Same requirements as Orange Category B, except that Item 3 (IEE) is amended to read as follows:

- i. report on the IEE for the project, and terms of reference for the EIA; or EIA report prepared based on ToR previously approved by DOE;
- ii. in the case of an industrial project, layout plan showing location of ETP, process flow diagram, design, and time schedule of the ETP.

2.3 NATIONAL RELEVANT POLICIES AND STRATEGIES

25 This section summarizes the National Laws and describes the procedure for obtaining environmental permits to allow project implementation. Over the years the Government of Bangladesh has enacted environmental acts, rules, policies and regulation toward imposing restrictions facilitating minimization / mitigation of likely impacts due to development projects. The most important Act is Environmental Conservation Act, 1995 (ECA, 1995) and Environmental Conservation Rules (ECR, 1997).

2.3.1 National Environmental Policy

26 The National Environmental Policy was adopted in 1992 and is now under revision. It embraces different sectors related to agriculture, forest, power, health, transport, housing etc. The central theme of policy is to ensure protection and improvement in environment. The policy gives a thrust to sustainable development and long-term use of natural resources. The National Environment Policy contains policy statements and strategic options with regard to population and land-use management, management and utilization of natural resources and other socio-economic sectors, as well as the necessary arrangements for the implementation of the policy. The policy enables:

- the country to strike a dynamic balance between population and resources while complying with the balance of ecosystems;
- to contribute to sustainable and harmonious socio-economic development such that, both in rural and urban areas, and well-being in a sound and enjoyable environment; and
- To protect, conserve and develop natural environment.

2.3.2 National Water Policy (NWP)

27 The National Water Policy 2004 (NWP) aims for sustainable management of water. The Policy also integrates the environmental impact assessment for water development projects. The policy stresses on issues related to climate change such as:

- Augmentation of dry season flows;
- Awareness raising in consumptive use of surface and ground water;
- Structural and non-structural mitigation measures (early warning systems).

2.3.3 National Forest Policy (NFP 1994)

28 National Forest Policy (NFP) was established in 1994. Under this policy it is proposed to increase the forest cover and to promote and oversee forestry activities. The policy fixed the target of forest cover at least 20% of geographic area by the year 2015. Tree plantation on the roadside verges courtyards of rural organization such as Union Parishad, school, Eidgah, mosque-Moktob, temple, club, orphanage home, madrassa etc. and other fallow lands around will be encouraged. The government will encourage this type of initiative and extend technical and other supports.

2.3.4 Bangladesh Climate Change Strategy and Action Plan (BCCSAP 2009)

29 The Bangladesh climate change strategy and action plan was approved in 2009. The climate change plan is built on six pillars namely i) food security, social protection and health; ii) Comprehensive Disaster Management; iii) infrastructure; iv) research and knowledge management; v) Mitigation and low carbon development; and vi) capacity building and institutional. The strategy and action plan emphasize on ensuring existing assets (e.g., coastal and river embankments) are well maintained and fit for purpose and that urgently needed infrastructure is put in place to deal with the likely impacts of climate change. - enhance the capacity government ministries, civil society and private sector to meet the challenge of climate change.

2.2 LEGAL INSTRUMENTS

30 The Ministry of Environment and Forests (MoEF) prepare the environmental policies. MoEF also has formulated regulation toward clearance of projects from environmental angles based on environmental impact assessment report. The Department of Environment (DoE) is responsible for environmental issues while forest issues are looked after Department of Forests. Over the years the MoEF has adopted number

of legal instrument in the form Acts for the protection and conservation of the environment. **Table 2** summarizes the Environmental Legislation applicable to the sub-project.

Table 2 Summary of Environmental Legislations Applicable to the Proposed Project

| No. | Environmental Legislation / Act | Objective | Relevance to the Project | Responsible Institution |
|-----|---|--|---|---|
| 1 | National Environmental Policy, 1992 | Ensure that development components do not pollute the environment or degrade resources. It sets out the basic framework for environmental action together with a set of broad sectoral action guidelines. | Restriction on operations which can not be initiated in ecological critical areas Regulation on vehicles emitting smoke which is harmful to the environment Follow standards on quality of air, water, noise and soil Sets limits for discharging and emitting waste | Ministry of Environment and Forests, and Climate Change |
| 2 | National Environmental Management Action Plan (NEMAP), 1995 | An action plan to identify key environmental issues affecting Bangladesh, identifies actions for reducing the rate of environmental degradation and improve quality of life. | Sectoral agencies to coordinate with MoEFCC in preparing environmental guidelines | Ministry of Environment and Forests, and Climate Change |
| 3 | Environment Court Act, 2000 and subsequent amendments in 2003 | Establishment of Environment Court for trial of an offence or for compensation under environmental law, such as environment pollution. | Option to affected persons for grievances related to environment safeguards. | Ministry of Environment and Forests, and Climate Change |
| 4 | The Forest Act (1927) and Forest (Amendment) Act (2000) | An act to control trespassing, illegal resource extraction and provide a framework for the forestry revenue collection system; | Requires clearances for any project within forest areas and clearances for any felling, extraction, and transport of forest produce. | Department of Forests |
| 5 | National Forest Policy (1994) | To conserve existing forests and bring about 20% of the country's land area under the Forestation Programme and increase reserved forests by 10% per year until 2015 | Incorporate tree planting in the subproject Clearance for any felling, extraction, and transport of forest produce | Department of Forests |
| 6 | The Bangladesh Wildlife (Conservation & Security) Act, 2012 | To conserve and protect wildlife in Bangladesh including designation of protected areas. Protection of wildlife is provided with lists of species with four schedules: first, second, third and fourth schedule. The fourth schedule species have the highest level of protection. | Consultation and necessary permits required if the project will pass through the wildlife sanctuaries and other protected areas. | Department of Forests |
| 7 | National Safe Drinking Water Supply and Sanitation Policy of 1998 | Ensures access to safe water and sanitation services at an affordable cost | Pourashavas and water sanitation authorities will take actions to prevent wastage of water. They will take necessary steps to increase public awareness to prevent misuse of water | Ministry of Local Government, Rural Development, and Cooperatives |

| | | | | |
|----|---|--|--|----------------------------------|
| | | | Pourashavas shall be responsible for solid waste collection, disposal and their management | |
| 8 | National Water Act 2013 | Ensures Bangladesh water sources are free from any type of pollution. Pollution from water in urban outfalls and reservoirs, e.g. lakes, canals, ponds and ditches may result in amenity losses, fisheries depletion, health problems and fish and aquatic species contamination. | Secure clearance certificate on water resource development subprojects | Ministry of Water Resources |
| 9 | Wetland Protection Act 2000 | Advocates protection against degradation and resuscitation of natural water-bodies such as lakes, ponds, beels ³ , khals, tanks, etc. affected by man-made interventions or other causes. Prevents the filling of publicly-owned water bodies and depressions in urban areas for preservation of the natural aquifers and environment. Prevents unplanned construction on riverbanks and indiscriminate clearance of vegetation on newly accreted land. | In case of diversion of water from Naf river, detailed assessment will be done | Ministry of Water Resources |
| 10 | Bangladesh Labor Law, 2006 | It is a comprehensive law covering labour issues such as: conditions of service and employment, youth employment, benefits including maternal benefits, compensation for injuries, trade unions and industrial relations, disputes, participation of workers in company's profits, regulation of safety of dock workers, penalty procedures, administration and inspection. This Act pertains to the occupational rights and safety of factory workers and the provision of a comfortable environment for working. It also includes rules on registration of labourers, misconduct rules, income and benefits, health and fire safety, factory plan | Compliance to provisions on employment standards, occupational health and safety, welfare and social protection, labor relations and social dialogue, and enforcement. Prohibition of employment of children and adolescents. | Ministry of Labor and Employment |
| 11 | Bangladesh Labor Rules, 2015 | Includes rules on registration of laborers, misconduct rules, income and benefits, health and fire safety, factory plan | Contractors to implement occupational health and safety measures Contractor will be liable for compensation for work-related injuries | Department of Labor |
| 12 | The Pourashava Act 2009 / Ordinance issued for the amendment of local government (municipality) ordinance, 2009 and 2010; The | Provides guidance for subproject integrated community and workers health and hygiene at the construction and operation and maintenance stages of the project | Coordinate with pourashava committees on disaster management measures, water and sanitation and waste management | Local Authorities |

³ A beel is a billabong or a lake-like wetland with static water (as opposed to moving water in rivers and canals - typically called khaals), in the Ganges - Brahmaputra flood plains of the Eastern Indian states of West Bengal, and Assam and in the country of Bangladesh.

| | | | | |
|----|--|---|--|---|
| | Pourashava Ordinance, 1977; Municipal Administration Ordinance, 1960 | | | |
| 13 | Bangladesh Climate Change Strategy and Action Plan of 2009 | Enhances the capacity of government ministries, civil society and private sector to meet the challenges of climate change | Integrate adaptation measures for buildings in consideration of extreme climatic events | Ministry of Environment, Forests and Climate Change |
| 14 | Building Construction (Amendment) Act and Building Construction Rules, Bangladesh National Building Code | Regulates technical details of building construction and to maintain standards of building construction | Follow specifications to ensure structural integrity of buildings | Ministry of Housing and Public Works |
| 15 | Electricity Act, 1910 and Electricity Rules 1937 | Requires compensation for any damage, detriment or inconvenience caused by the project; Requires precautionary measures in laying down electricity supply lines near or where any metallic substance or line crosses to avoid electrocution | Secure permission to supply energy and lay down or place electricity supply lines for the conveyance and transmission of electricity from respective authorities prior to any works Give full compensation for any damage, detriment or inconvenience caused by him or by anyone employed by him Take precautions in laying down electricity supply lines near or where any metallic substance or line crosses in order to avoid electrocution | Ministry of Power, Energy and Mineral Resources |
| 16 | The National Energy Policy (1996 and Updated 2004) | Ensures environmentally sound sustainable energy development programs causing minimum damage to the environment, to encourage public and private sector participation in the development and management of the energy sector and to bring the entire country under electrification. | Public and private sector participation in the development and management of the energy subprojects. Provides guidelines for renewable energy subprojects | Ministry of Power, Energy and Mineral Resources |
| 17 | Standing Order on Disaster, 1999 (Updated 2010) | Enhances capacity at all tiers of government administrative and social structures for coping with and recovering from disasters | Geographical information system (GIS) technology will be applied at the planning stage to select location of cyclone shelter considering habitation, communication facilities, distance from the nearest cyclone center, etc Advice from the concerned District Committee should be obtained prior to final decision | Ministry of Disaster Management and Relief |
| 18 | National Disaster Management Act of 2012 | Establishes a framework for managing disasters in a comprehensive way. | Setting-up emergency response procedures | Ministry of Disaster and Relief |

2.4 APPLICABLE INTERNATIONAL AGREEMENTS

31 Aside from the legal framework on environment, Bangladesh is also a party to several international conventions, treaties and protocols related to environmental protection. The applicable international conventions, treaties and protocols are described in **Table 3**.

Table 3 Applicable International Conventions, Treaties and Protocols

| | Conventions | Signed | Ratified/ Accessed(AC)/Accepted(AT) | Relevance |
|---|---|------------|--|---|
| 1 | International Plant Protection Convention (Rome, 1951) & Plant Protection Agreement for SE Asia and Pacific (1999 Revision) | | 01.09.1978 04.12.1974 (AC) | Ensures that component work or construction materials do not introduce plant pests |
| 2 | Convention on Wetlands of International Importance, 1971 (Ramsar Convention) | | 20.04.1992 (ratified) | Protection of significant wetland and prevention of draining or filling during construction |
| 3 | Convention Concerning the Protection of World Cultural and Natural Heritage (Paris, 1972) | | 03.11.1983 (ratified) | Prevention of damage or destruction of culturally and/or historically significant sites, monuments, etc. |
| 4 | Convention on Biological Diversity, 1992 (Rio de Janeiro) | 05.06.1992 | 03.05.1994 | Protection of biodiversity during construction and operation. |
| 5 | Convention on Persistent Organic Pollutants, 2001 | 23.05.2001 | In process | Restriction of use of pesticides and herbicides |
| 6 | United Nations Framework Convention on Climate Change, 1997 | 11.12.1997 | 22.10.2001 13.11.2003 (amended) | Reduce greenhouse gas concentrations in the atmosphere to a level that would prevent dangerous anthropogenic interference with the climate system |

2.5 ENVIRONMENTAL CATEGORIZATION AND STANDARDS

2.5.1 Environmental Category: Bangladesh

32 For the purpose of issuance of Environmental Clearance Certificate, the industrial units and projects shall, in consideration of their site and impact on the environment, be classified into the following four categories: (a) Green; (b) Orange – A; (c) Orange – B; and (d) Red. The Industries and projects included in the various categories are specified in sub-rule (1) have been described in Schedule – 1. The ECA indicates that all industrial units or projects must obtain a Location Clearance Certificate (LCC) and Environmental Clearance Certificate (ECC) from the Department of Environment (DoE). No industrial unit or project shall be established or undertaken without obtaining environmental clearance from DoE in the manner prescribed by the rules.

33 The environmental category of the sub-project is not listed in Schedule – 1 of ECR. However, the construction of School cum cyclone shelter is relevant to the transmission line proposed and the subproject is listed in Schedule – 1 of ECR and falls in Orange B. **Table 4** describes DoE classification for cyclone shelter.

Table 4 DoE Classification of construction project according to ECR 1997

| Sl.No | Components | Items in Schedule-1 of ECR | DOE Classification |
|-------|--|----------------------------|--------------------|
| 1 | Hotel, multi-storied commercial and apartment building | No. 8 | Orange-B |

Source: ECR 1997

2.5.2 Environmental Category: ADB

34 The Safeguards Policy Statement (SPS 2009) of ADB provides guidance on the environment category of projects based on the degree of anticipated environmental impacts. ADB environmental safeguards objectives are: (i) to ensure the environmental soundness and sustainability of projects and (ii) to support the integration of environmental considerations into the project decision-making process. ADB environmental safeguards are triggered if a project is likely to have potential environmental risks and impacts. The initial process of categorization involves filling out a sectoral Rapid Environmental Assessment (REA) checklist. A project is classified as one of the four environmental categories (A, B, C, or FI) based on the most environmentally sensitive component. Categories are as follows:

Category A: Project that is likely to have significant adverse environmental impacts which are irreversible, diverse, or unprecedented. These impacts may affect an area larger than the sites or facilities subject to physical works. An environmental impact assessment (EIA), including an environmental management plan (EMP), is required.

Category B: Project with potential adverse environmental impacts that are less adverse than those of category A projects. These impacts are site-specific, few if any of them are irreversible, and in most cases mitigation measures can be designed more readily than for category A projects. An initial environmental examination (IEE), including an EMP, is required.

Category C: Project that is likely to have minimal or no adverse environmental impacts. An EIA or IEE is not required, although environmental implications need to be reviewed.

Category FI: Project is classified as category FI if it involves the investment of ADB funds to, or through, a financial intermediary.

35 The project has been categorized as B for environment under the ADB's Safeguards Policy Statement 2009 (SPS).

2.6 INSTITUTIONAL CAPACITY

36 The Refugee Relief and Repatriation Commission (RRRC) is proposed to act as the coordinator on behalf the government to execute all interventions. RRRC and ADB will conduct regular coordination meetings involving all Implementing Agencies (IAs), relevant stakeholders including deputy commissioner (DC), Cox's Bazar, other development partners and agencies. ADB plans to establish extended mission office in Cox's Bazar for close coordination, facilitation of sub-projects development and implementation. A steering committee comprising higher officials from relevant ministries coordinated by ERD will be formed to provide necessary guidance to expedite the sub-project development and implementation. The steering committee will have a safeguards focal person.

37 The Local Government Engineering Department (LGED), the Department of Public Health Engineering (DPHE), the Roads and Highways Department (RHD), and the Bangladesh Rural Electrification Board (BREB) will be the executing agencies and implementing agencies. responsible for project oversight and coordination. There will be a safeguards focal person in the EA/IA. The EA/IA will be assisted by PMCs. The EAs/IAs will form project implementation units (PIU). The PIUs will identify a focal person for environmental safeguards. The focal person will be assisted in the conduct of the environmental assessment, the development and implementation of EMPs, and compliance monitoring by project consultants. All the implementing agencies are currently implementing ADB projects under this institutional arrangement (further defined in Section VI). ADB also conducts safeguards training for project executing and implementing agencies. Thus, the government has sufficient capacity in implementing ADB

requirements and strengthening of capacity, other than through the course of the consultant's work with local counterparts, is not required. ADB will continue to conduct capacity building programs during implementation.

3 Description of the project

3.1 INTRODUCTION

38 This report is on the Initial Environmental Examination (IEE) of the Cyclone shelter Package. The package title reads “BANGLADESH: Emergency Assistance Project - Construction of 3 nos. school cum cyclone shelter for affected people, 3 story LGED Prototype, in Teknaf”. The package include 3 cyclone shelters.

39 The cyclone shelters are located in three locations in Teknaf namely: Baradeil, Nhila and Uluchamary. Of these locations, Baradeil is close to the Teknaf beach of Bay of Bengal. The rest are located near the Naf River at the Myanmar Border. Uluchmaray is placed about 3km south of Nhila. Baradeil is located inside the Teknaf wildlife sanctuary. See **Figure 3** for a location map.



Figure 3 Location of the cyclone shelters

40 Tentative Technical Specification of the Primary School cum Cyclone Shelter (LGED Design Type –II) :

- Plinth area: 220-230 square meter per floor
- Land area: Approximately 10 decimal of an acre
- Capacity: Approximately 800 persons per floor from the second floor

41 The shelter to be constructed with the foundation for at least three stories shall have four rooms and RAMP facilities up to the first floor. A reasonably sized room should be kept reserved for the disabled & the helpless and the rest of the first floor should be kept open for domestic animals.

42 The proposed cyclone shelter follows the tentative design of the LGED prototype cyclone shelter cum primary school. However, some design aspects have been adopted to make it area specific. The scope of work of the proposed cyclone shelter is shown in **Table 5** below.

Table 5 Sub-Project EAP/LGED/W8 proposed scope of work

| Sl No | Feature | Specification |
|-------|-----------------------|---|
| 01 | Ground Floor: | FLOOR AREA=289.54 Sqm, RAMP AREA =74.50 Sqm, 31.050 x 2.400m |
| | | 5 entries including 1 large ramp for disabled, cattle, each entry with small ramps |
| | | 1 stair case to access 1 st floor |
| | | 1 raised platform 2.400 x 3.000m with ramp |
| | | Open space with columns |
| 02 | 1 st floor | Large Ramp from Ground floor to 1 st Floor 28.300 x 2.400m, for disabled, cattle |
| | | Two tube wells |
| | | Large open space about 289 sqm. |
| | | Water taps, drains |
| | | Staircase |
| 03 | 2 nd floor | 3 classrooms, 1 teacher's room, 1 storage |
| | | 1 pregnant women care room |
| | | 03 female toilet, 03 male toilet |
| | | 1 tube well, 2.5m wide passage |
| | | Staircase |
| 04 | Roof | Staircase |
| | | 04 1000ltr plastic tanks |

43 The Primary school cum cyclone shelters will be built in various locations of Teknaf Upazila. Aerial photographs of the proposed cyclone shelters and their physical environment are presented in **Figure 4**, **Figure 5** and **Figure 6**.



Figure 4 Location map of the proposed primary school cum cyclone shelter at Nhila Burmese School



Figure 6 Location map of the proposed primary school cum cyclone shelter at Uluchamary GPS



Figure 5 Location map of the proposed primary school cum cyclone shelter at Dakkhin Bara Dail GPS

3.2 CONSTRUCTION OF MULTIPURPOSE CYCLONE SHELTER

44 Cyclone shelters proposed in this project are likely to follow Option 1 LGED Proto type Multipurpose Cyclone Shelter. Usually this option follows a 3-story building with the ground floor being open for entrance. The 1st floor is usually kept open but bounded with wall for shelter of cattle. The 2nd floor is designed to be used for classrooms, teacher's room and separate male female toilets with spaces for pregnant women. These spaces are used as shelter during cyclonic storm events. **Figure 7** presents a general drawing of arrangements of ground floor for the proposed Multipurpose cyclone Shelters. **Figure 8** presents the drawing for 1st floor and **Figure 9** presents the drawing for 2nd floor.

45 The proposed cyclone shelters have a designated roof plan with sloping and storage tanks. The main staircase connects to the roof and the roof is bounded with wall. The entire cyclone shelter cum school will be plastered with anti-salinity and dam proofing admixture. The roof plan is presented in **Figure 10**.

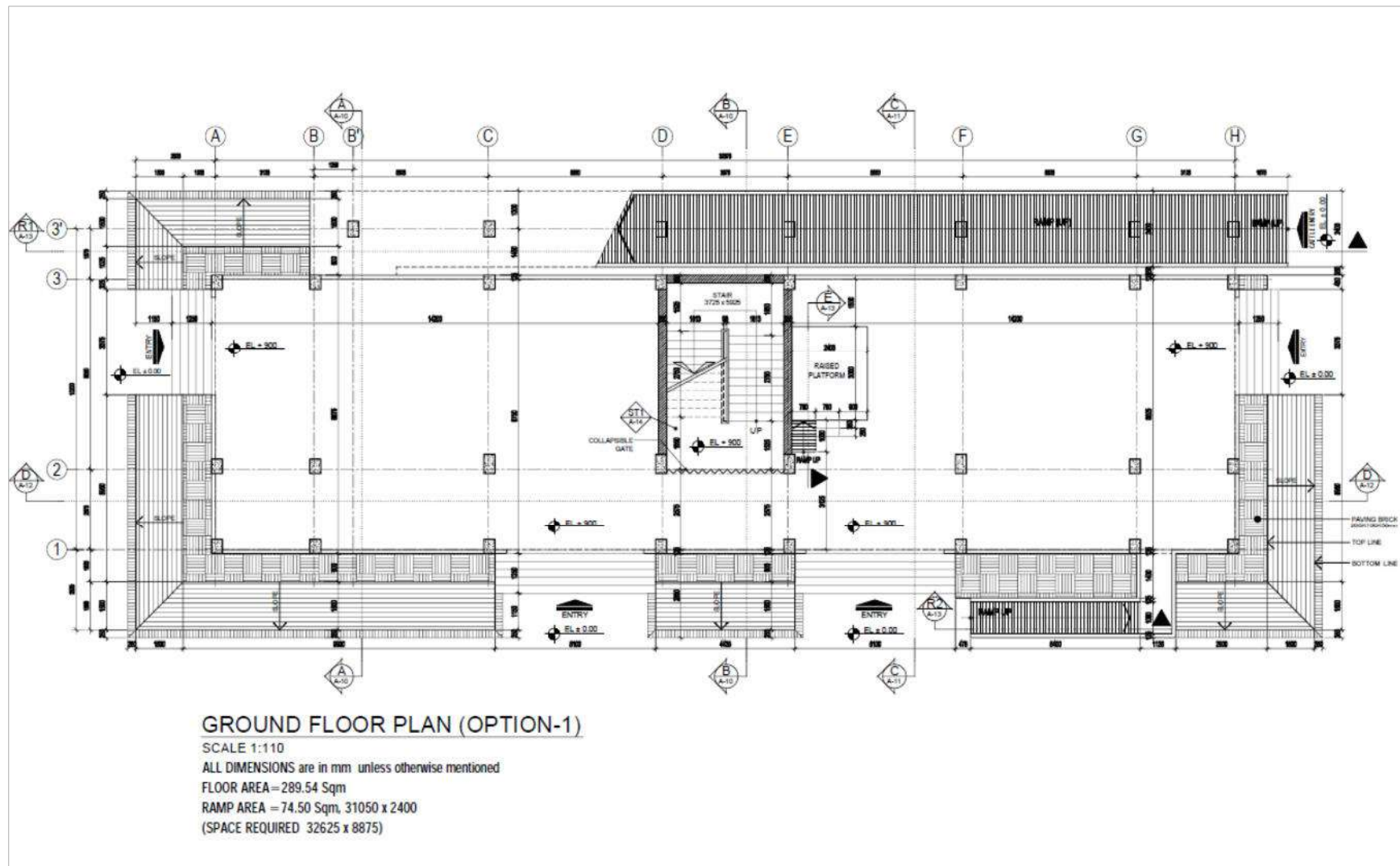


Figure 7 General arrangements of the ground floor

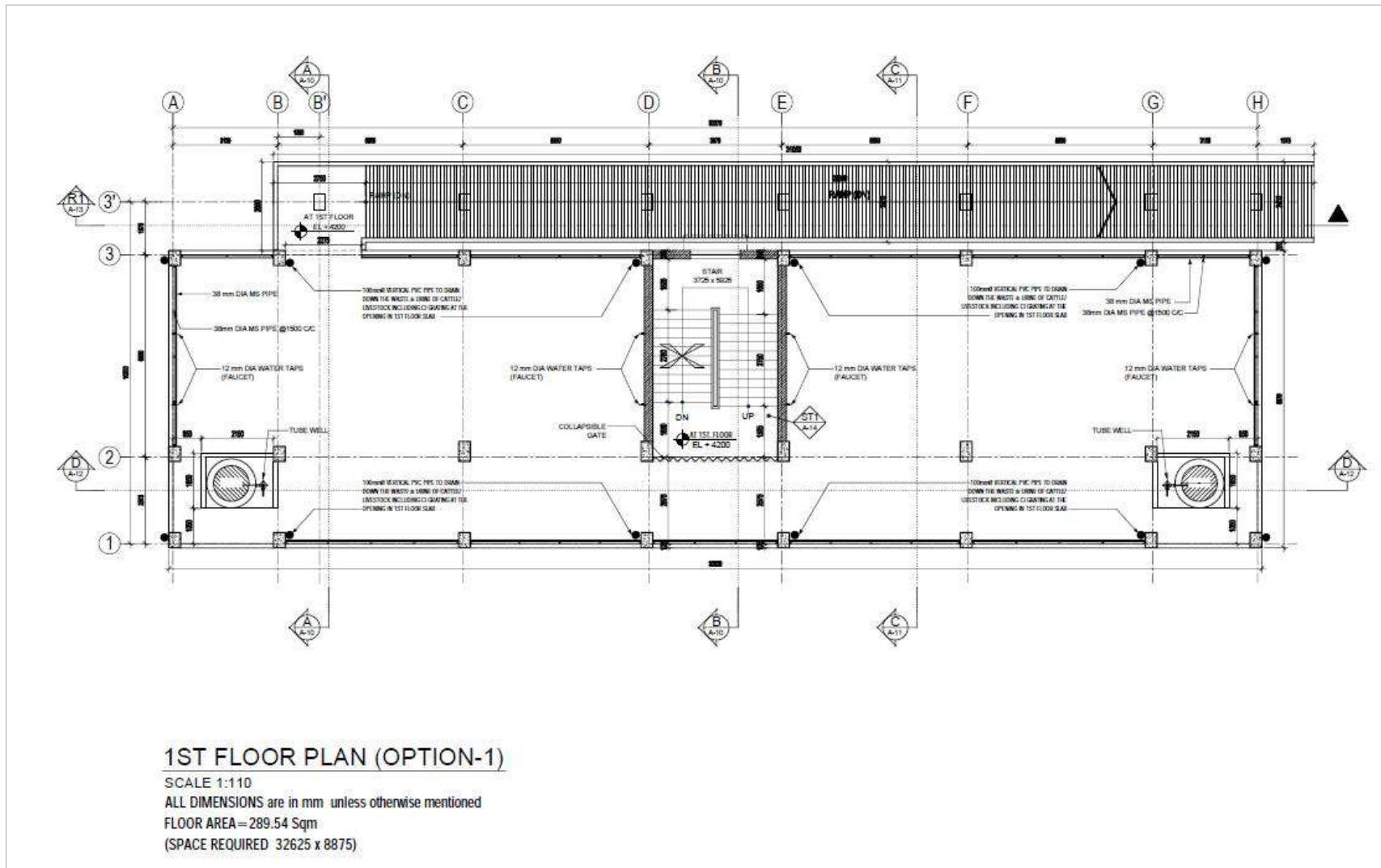


Figure 8 General arrangements of the 1st floor

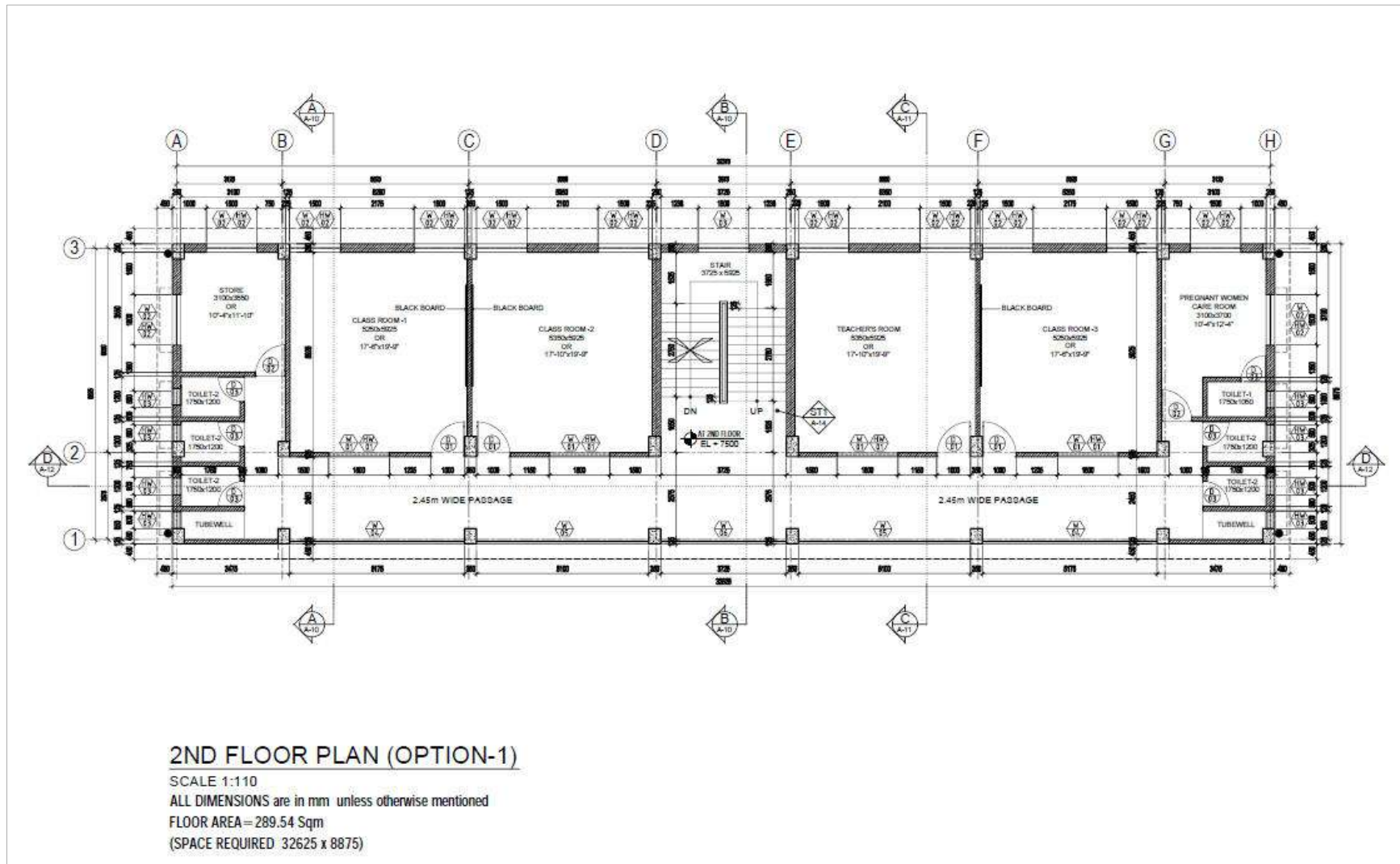


Figure 9 General arrangements of the 2nd floor

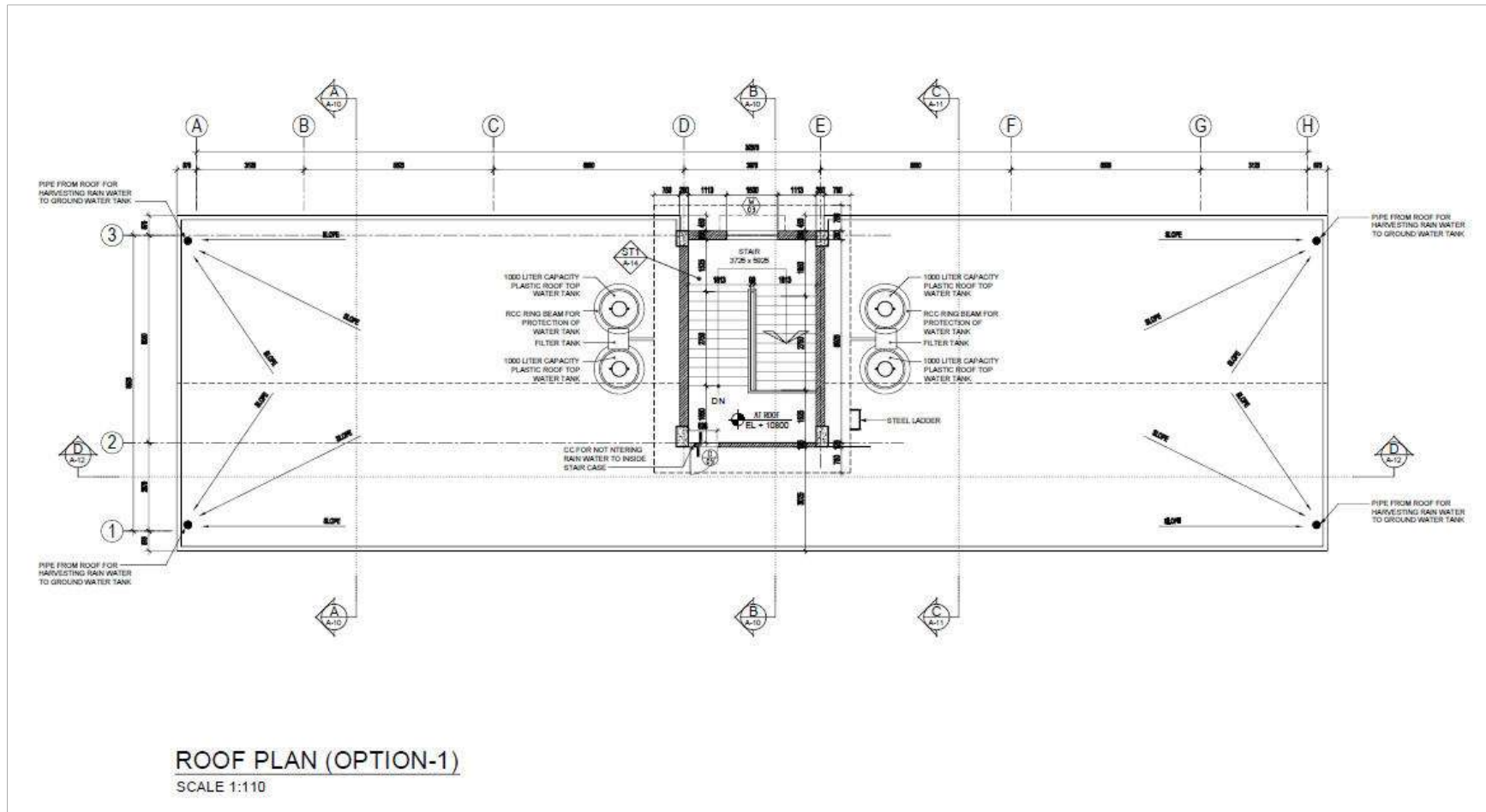


Figure 10 General arrangements of the roof

4 Analysis of alternatives

4.1 PRELUDE

46 The primary objective of the “analysis of alternatives” is to identify the location/technology for a particular sub-project that would generate the least adverse impact, and maximize the positive impacts. The preliminary assessment of the project included an analysis of alternatives, addressing the optimal match between required technical specifications and site conditions, as well as addressing any concerns for environmental, social, and economic features in each location.

4.2 CURRENT PROPOSAL

47 A transect walk along the proposed cyclone shelter were done in the early August 2018 around the three proposed school cum cyclone shelters. The proposed sites are in the existing Government Primary schools. The school compounds have ample space for constructing another building so that the existing structure do not have to be demolished. Based on the Rapid Environmental Assessment (REA) Checklist provided in the Environmental Assessment and Review Framework (EARF) of ADB for this Emergency Assistance Project (EAP), it was found that the current proposal will have the minimal effect on environment and society. Summary of the impacts of current proposal is given in **Table 6**.

Table 6 Impact of current proposal on environment and society

| Sector | Impact |
|---|--|
| Presence Important features along the route | No |
| Land (Government-owned land are to be given priority) | Yes (proposed cyclone shelter will be built on the existing primary school area) |
| Presence Agricultural/cropped land | Close by, no impact will occur if EMP is followed |
| Village affected | No |
| Families affected | No |
| Loss of structures | No |
| Impact on Common properties | No |
| Trees to be chopped down | No |
| Presence of sensitive ecosystem | No |
| Presence of waterbody | None |
| Tribal population affected | No |

4.3 ‘DO NOTHING’ OPTION

48 The “do nothing” or “without the project” option is not viable since the consultant learned from the school authorities and school going children that the current school facilities are not enough to accommodate the current number of students. Furthermore, there is no cyclone shelter nearby that can be used in time of disaster.

5 Description of baseline environment

5.1 LOCATION SETTING AND EXTENT

49 Teknaf is an Upazila of Cox's Bazar District in the Division of Chittagong, Bangladesh. It forms the southernmost point in mainland Bangladesh (St. Martin's Island is the southernmost point). The name of the region comes from the Naf River which forms the Eastern boundary of the upazila⁴. It shares the border with Myanmar. Teknaf Upazila with area of 388.68 sq km, is located in between 20°23' and 21°09' north latitudes and in between 92°05' and 92°23' east longitudes. It is bounded by ukhia upazila on the north, the Bay of Bengal on the south, arakan state of Myanmar on the east, the Bay of Bengal on the west. Teknaf upazila, located on the south east extremity of Bangladesh, is 86 km on the south of Cox's Bazar Town. See **Figure 11** for details.

50 Teknaf at a glance:

Area: 388.68 sq. km

Population (around): 160,000

Population Density: 393 per sq. km

Total Unions: 6

Total Mouzas: 12

Villages: 133

Rivers: Naf

Literacy rate: 21.9%

Colleges: 3

High Schools: 4

Govt. Primary Schools: 34

Hat Bazaars: Sabrang hat, Hoaikyong bazar, Qila Bazar, Shah Parir Dvip hat, etc.

Main crops: Paddy, betel nut, potato, etc.

Sources of drinking water: Tube-well 81.78%, tap 0.96%, pond 9.61% and others 7.65%.

Sanitation: 36.15% (rural 29.20% and urban 66.44%) of dwelling households of the upazila use sanitary latrines and 38.95% (rural 43.83% and urban 17.68%) of dwelling households use non-sanitary latrines; 24.90% of households do not have latrine facilities.

Health centers: Upazila health complex 1, satellite clinic 2, family planning center 3, cholera hospital 1⁵.



Figure 11 Location map of the subproject

Source: http://en.banglapedia.org/index.php?title=Teknaf_Upazila

⁴ https://en.wikipedia.org/wiki/Teknaf_Upazila

⁵ http://en.banglapedia.org/index.php?title=Teknaf_Upazila

5.2 EXISTING CONDITION

51 **Dakkhin Baradail Government Primary School:** The proposed school cum cyclone shelter site is next to Cox's Bazar Marine drive with a HBB access road about 50 meters from Marine drive. The proposed area is predominantly surrounded by agricultural land and has two existing school buildings, one very old and damaged. **Figure 12** presents a photographic view of the project location.



Figure 12 Existing condition at the Dakkhin Baradail site

52 **Uluchamary Government Primary School:** The proposed school is located within the agricultural region of Naf river basin. To east of the proposed site lies the hilly region. The access road to this site is quite important and busy with local motor vehicle. A large pond is nearby. The site is surrounded by agricultural land to the east and to the west, and surrounded by hilly vegetation to the north and to the south. **Figure 13** presents a photographic view of the project location.



Figure 13 Existing condition at the Uluchamary GPS site

53 **Nhila Burmese School:** The proposed site is next to Naf River and often flooded during high tide at monsoon. The site is surrounded by agricultural low land. Some area on the front of the scexisiting school building becomes waterlogged during rains. The access road is 3m wide on average and in good HBB condition. **Figure 14** presents a photographic view of the project location.



Figure 14 Existing condition at the Nhila Burmese school site

5.3 PHYSICAL ENVIRONMENT

5.3.1 Landform and ecology

54 Teknaf Peninsula is one of the longest sandy beach ecosystems (80 km) in the world. It represents a transitional ground for the fauna of the Indo-Himalayan and Indo-Malayan ecological sub-regions. Important habitats at the site include mangrove, mudflats, beaches and sand dunes, canals and lagoons and marine habitat. Mangrove forest occurs in Teknaf peninsula both as natural forest with planted stands and mostly distributed in the inter-tidal zone. The Teknaf peninsula mangroves supports the habitat of 161 different species of fish⁶. Teknaf reserved forest is one of the oldest reserved forests in Bangladesh.

55 The hill area covers 14,602 ha, accounting for 41.8% of the total area. According to its height and morphology, the hill area can be divided into two types: medium-high hills and medium-low hills. The area of medium-high hills is approximately 6940 ha, and the heights of the hills range from 150 to 300 m. The slopes of these hills range from steep (30–50% slopes) to excessively steep (>70% slopes). The hill ranges, which are interrupted by streams and valleys, are oriented from north to south, and they developed over sedimentary rocks. The area of medium-low hills, which developed over soft sedimentary rocks, is 7436 ha, and the hill heights are less than 150 m. The slopes range from excessively steep by steep to slightly steep (<5% slopes). Erosion is very common in steep to very steep areas, while it is less common in flatter

⁶ Chowdhury, N. Shah Nawaz; Hossain, M. Shahadat; Das, Nani Gopal; Barua, Prabal (2010-09-25). "Environmental variables and fisheries diversity of the Naaf River Estuary, Bangladesh". *Journal of Coastal Conservation*. 15 (1): 163–180. doi:10.1007/s11852-010-0130-3. Retrieved 2011-01-01.

areas. Deep soils only developed in flatter areas. Narrow and broad ridges are found alongside the low hills⁷.

56 Historically, the main uses of the land of the region were small-scale agricultural crop production, betel nut/leaf cultivation and another homestead agroforestry (UNDP 2018)⁸. Along with settlement, the clearing of the native vegetation has had one of the greatest impacts on the natural reserve forests in this

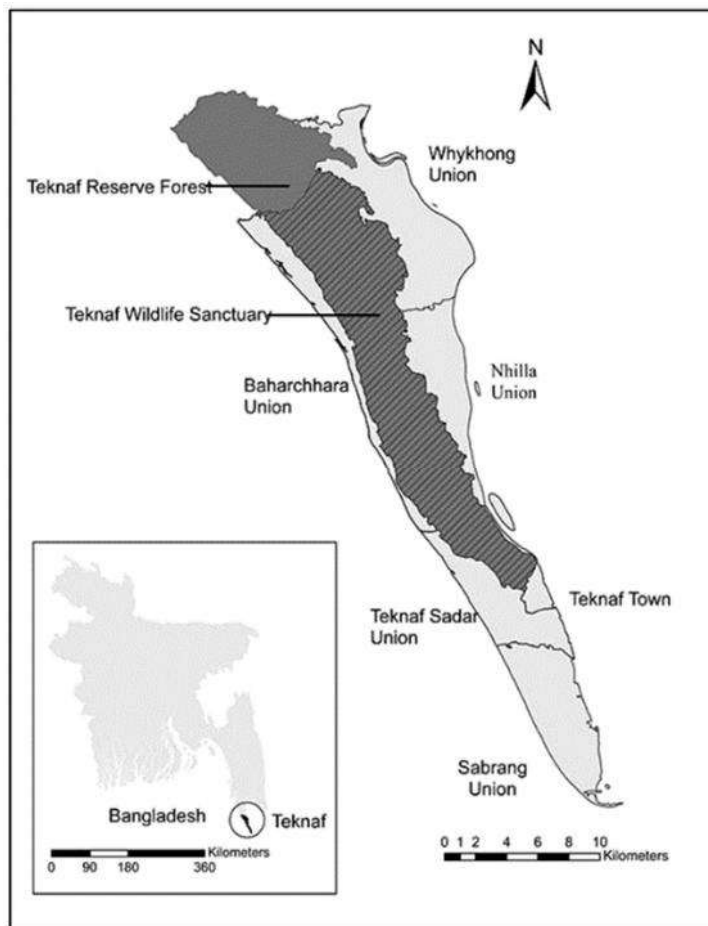


Figure 15 Ecologically critical areas around Teknaf

Source: Tani M and Rahman MA (2017) *Chapter 1 Introduction*, in Teknaf in Deforestation in the Teknaf Peninsula of Bangladesh, Masakazu Tani and Md. Abiar Rahman (eds.)

region. Currently, the main use of the land includes site for the construction of hotels and resorts, the development of urban and tourism facilities, agriculture, aquaculture and salt farming, human settlement, shrimp hatcheries, fishing and dry fish processing.

57 The region, now a degraded forest land, includes three Ecologically Critical Areas (ECAs)—the western, coastal zone of Teknaf Peninsula, St Martin's Island, and Sonadia Island, and two Protected Areas (PA) – the Himchari National Park and the Teknaf Wildlife Sanctuary (TWS). The Inani National Park, proposed as a protected area but not officially established as one, is considered a key biodiversity area and should be treated as a critical habitat. **Figure 15** presents the ecologically critical and conserved areas around the region.

5.3.2 Disasters

58 The most of the areas of Cox's Bazar district surrounded by hills, rivers and being adjacent to the Bay of Bengal, natural disaster visited the district every year. Subsequently, the inhabitants of the district suffer much by the disaster. Adding this, climate change effect has speed up the frequency natural disaster like, cyclone, tidal

surge, flesh flood, excesive rainfall, rising temperature, increase salinity, land slide, erosion of river banks, thunder storm, earth quake etc. and these are the major disaster for Cox's Bazar district. As part of history of natural disaster for the region there are few events are most remarkable and historic.

59 The most historic and destructive cyclone of 1991 severely affected the whole Cox's Bazar district. All the 8 Upazilas of the district hit by the cyclone. Mostly St. Martin, Kutubdia, Materbari, Dhalghat, many parts of Moheshkhali and Teknaf was severely affected. In an average the tidal surge by the wind speed rise

⁷ A.Z.M. Moslehuddin, Md. Abiar Rahman, S.M.A. Ullah, M. Moriyama, and Masakazu Tani (2017) *Chapter 2 Physiography, Forests, and People* in Teknaf in Deforestation in the Teknaf Peninsula of Bangladesh, Masakazu Tani and Md. Abiar Rahman (eds.)

⁸ UNDP Bangladesh and UN WOMEN Bangladesh 2018. Report on Environmental Impact of Rohingya Influx. Dhaka, Bangladesh, p 106. Springer.

from 20 to 30 feet, and 72 hours continuous water stagnated by the high tide of the sea. There were cyclone in 1994 and 1997 too which were also affected the overall resources, community life, household, cattle head, crops, infrastructure, green trees, communication system etc.

60 The following areas are identified by the Cox's bazar District Disaster management Plan⁹: Under Ukhia-Jaliapalong, Sonarpara, Dailpara, Lamburipara, Sonaichari, Nidania, Inani, Shafir bil, Ruppoti, Bailyakhali, Imamerdail, Sepotkhali, Maderbonia, Monkhal, Nalbila, Balukhali, Goalmara, Thainekhali and Rahmoter bil. **Figure 16** presents a Hazard Calendar of the upazila.

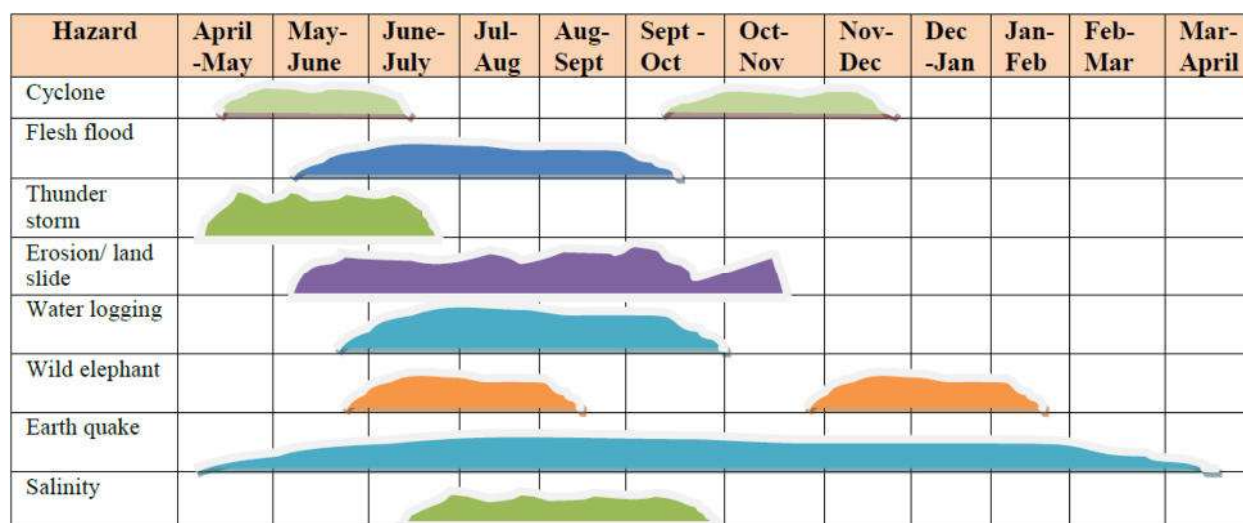


Figure 16 Hazard Calendar of the Upazila

5.3.3 Geology, Topography, and Soils

61 The Teknaf piedmont plain covers 3034 ha (8.6% of the total area). It is situated alongside the hills, mainly on their western side, but is found sporadically on the eastern and south sides of the hills. The landscape is a nearly level high ridge, which is subject to flash floods during the rainy season.

62 The tidal floodplain, which runs from north to south through the peninsula, comprises 6838 ha of land (19.57% of the total area). This is located between the hills and the Naf River (on the eastern side of the hills). The area consists of broad, high, and low ridges and depressions. Numerous canals divide the landscape, some of which are subjected to tidal flooding. During the rainy season, most of the areas become mildly inundated with rainwater and occasionally suffer flash floods during heavy rainfall.

63 Beaches cover 9.03% (3155 ha) of the total area, and they lie on the west side of the peninsula along the sea. The landscape is mostly flat with some undulating relief consisting of sandy soil. The coral beach is a minor area (1%) that is located approximately 12 km from the mainland. It is located on St. Martin's Coral Island. The landscape consists of very gently undulating old beach ridges and inter-ridge depressions, which are surrounded by sandy beaches.

64 There are four main soils or physiographic units can be recognized, viz. 1) The higher hill ranges occupy a narrow belt: the most common soils are strong brown, friable, silty clay loams and silty clays,

⁹ Development of District Disaster Management Plan District: Cox's Bazar, District Disaster Management Committee, Cox's Bazar. August 2014. Government of Bangladesh.

which grade into broken shale rock at 2-4 feet. All soils are strongly acid in reaction. II) The lower hill ranges are developed in unconsolidated sands and clays. Soils are mainly deep red, friable, clay loams to clays. All the soils are strongly acid and sandy soils are droughty. III) The coastal plains are underlain by heavy marine or tidal clays characterized by more sandy and silty deposit near the foot of the hills and along the course of rivers and streams which cross the plains. Near the coast, some of these soils become saline at the end of the dry seasons. IV) The tidal mangrove swamps are most extensive at the mouth of the Matamuhuri River Here the soils are grey clay flooded twice daily by saline water and unsuitable for agriculture. According to Geological Survey Bangladesh (GSB, 1978) the falls in medium intensity seismic zone (Zone-II, Basic Seismic Coefficient 0.05g).

65 The major soil types are red, alluvial, muddy and sandy soil. The soils of the Dupitila formations were formed on unconsolidated and compact rocks, moderately well to excessively drained and probably the oldest of the area. See **Figure 17** for details.

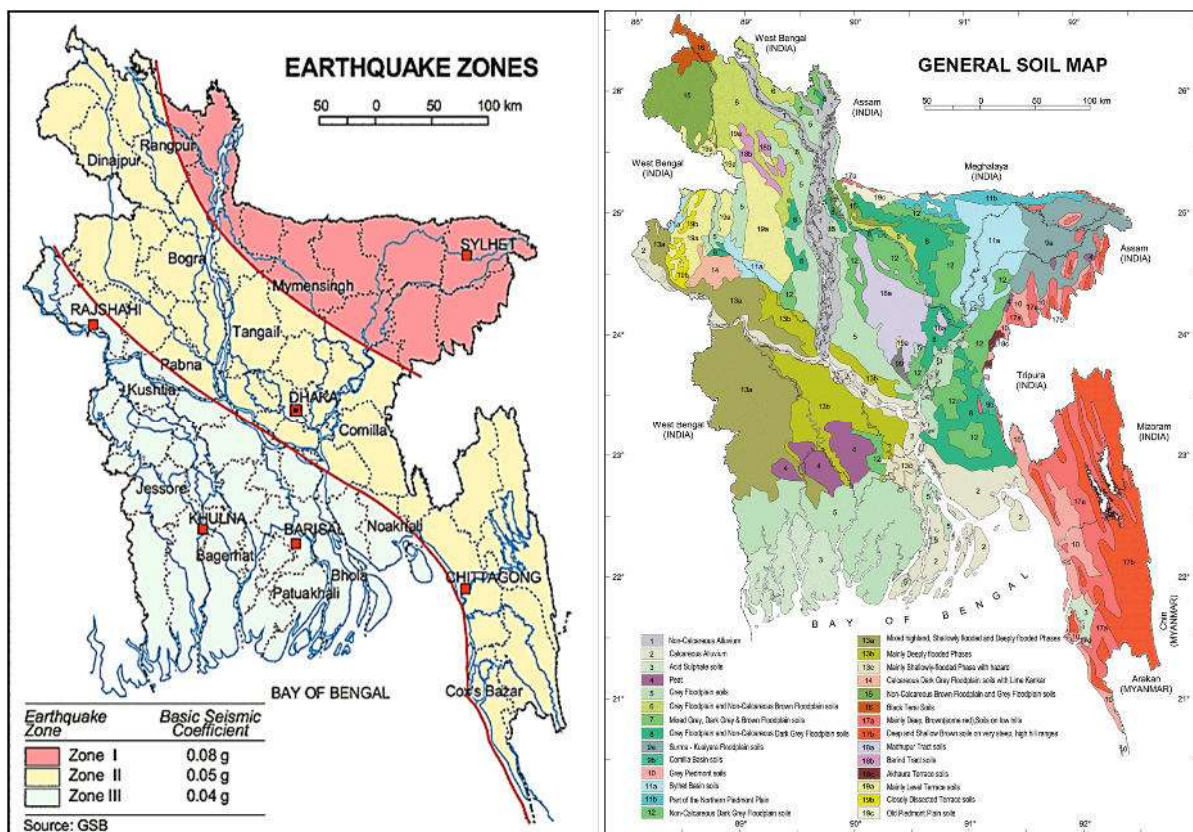


Figure 17 Earthquake zone and general soil map of Bangladesh

5.3.4 Climate and Meteorology

66 Generally, maximum temperature in the year reach between the last week of March and end of May. Temperature data is recorded at station Cox's Bazar. As dis discussed above, Teknaf is a upazilla (subdistrict) of the Cox's Bazar zilla (District). The average maximum temperature in Cox's Bazar is 31.28°C in April and minimum is 22.0°C in January (Data from BMD 2016). See **Error! Reference source not found.** for details¹⁰.

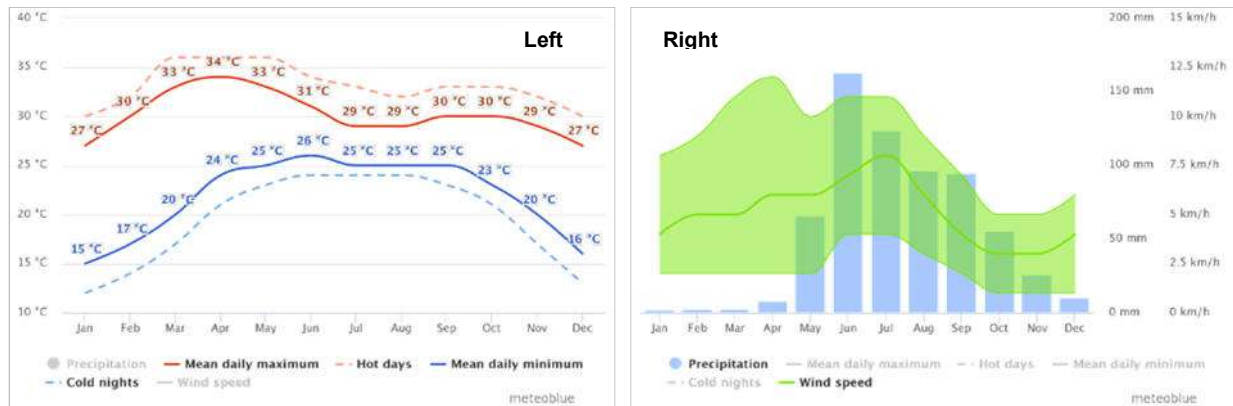


Figure 18 Left: Temperature pattern in Cox's Bazar; Right: Rainfall pattern in Cox's Bazar

67 The trend of rainfall of Cox's Bazar district was as usual and normal before 1991, however, radical changes have been observed in the recent years, in particularly after the year 2000. Once, the rainfall and its continuation was steady according to the seasons of the year. Interestingly, 1994 a remarkable change in rainfall has observed. In general there was no much rain during the month of January to April, and it happened during from April to June of the year. On the contrary, sometime rainfall occurs during the month

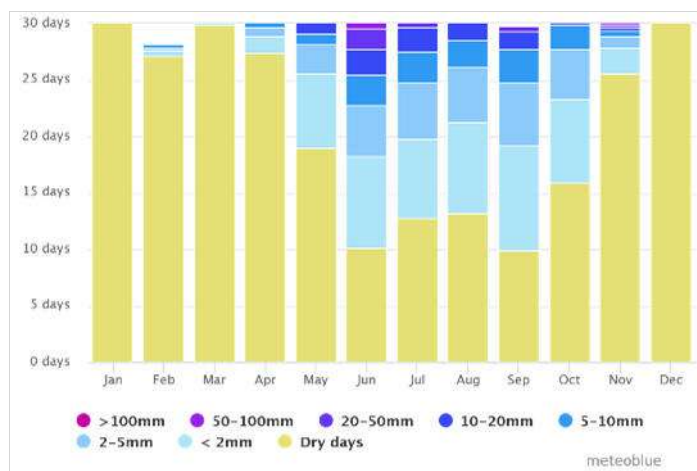


Figure 19 Rainfall analysis (amount) for Cox's Bazar station

¹⁰ Source: <https://weather-and-climate.com/average-monthly-Rainfall-Temperature-Sunshine-cox-s-bazar,Bangladesh> Date Accessed: 7 Nov 2018

of December which creates flooding. The variation in the precipitation between the driest and wettest months is 401 mm. See **Figure 19** for details¹¹.

68 The humidity is high throughout the year. March and April are the least humid months in the region. The relative humidity is found over 80% during June, July, August and September. The least humid month in the area is January, February and March. Lowest average humidity is recorded 62% at Cox's Bazar.

5.3.5 Hydrology (Surface Water and Ground water)

69 The Moheshkhali Channel, Baak Khali and Naf rivers and Bay of Bengal are the main waterways of the region. The Moheshkhali Channel flows into the Bay of Bengal near Cox's Bazar and passes the north western boundary of the area of influence. The Bakkhali River originates from the Chittagong Hill Tracts and flows into the Bay near Cox's Bazar. Five other canals run through the hilly hinterland. They are the Reju, Inani, Mankhali, Rajachora and Mathabanga canals. In addition, a stream network runs through the camp area.

70 Naf It flows along the southernmost border line of the country. It originates in the northern hills of Myanmar and enters Bangladesh near Palong Khali of Ukhia upazila of Cox's Bazar district. The river flows through Ukhia and Teknaf and discharges into the Bay of Bengal near Sabrang (Teknaf upazila, Cox's Bazar). Most of the downstream reach of the river demarcates the Myanmar-Bangladesh border. The river is 62 km long. BWDB has one hydrometric station on the river at Teknaf and data from 1968 are available.

71 There are 14 canals in the Upazila, which flow throughout the Upazila. Reju Canal-starting from Rejur mukh crosses painnasia, sonaichoara, sonarpara, chorpara, jummapara and lamburi para. It has length of 7 kilometres. Monkhali Canal-starting from Monkhali mouth up to Nuton Chaka para. It is 8 kilometres. Sowankhali Canal- it is 8 kilometre long started from Swankhali area and stretched upto Bay of Bengal. Chepokhali Canal-It is 10 kilometre long started from Madarbonia and arrives to Chepotkhali. Inani Canal-it is 15 kilometre long started from Chenchuli to Inani. Inani Choto Canal-It is 20 kilometre long started from Chenchuli to Inani. Paglir Canal- 8 kilometre long canal started from Guarerdeep and stretches to Patabari area. Duchori Canal-the canal is 15 kilometre long started from Tuturbil to Madhurghona. Goyalmara Canal-it is 18 kilometre long starting from Tuturbil and upto Modhurghona. Balikhali Canal-the canal starting from Modhurchara and reached to the Naf river covering a length of 7 kilometre. Thiankhali Canal-It is 8 kilometre long starting from Achortoli to Naf river crossing through Tarulapara and Fashiakhali. Palongkhali Canal- This is 14 kilometre long starting from Nojumora falls into Naf river crossing different parts of Ukhia and Teknaf Upazila. Balukhali Canal: a 6 kilometre long started from Madhuchara reaches

¹¹ Same as 6.

to the Naf river crossing through BGB camp, Chowdhur para and Barua para. **Figure 20** represents the stream network in the region.

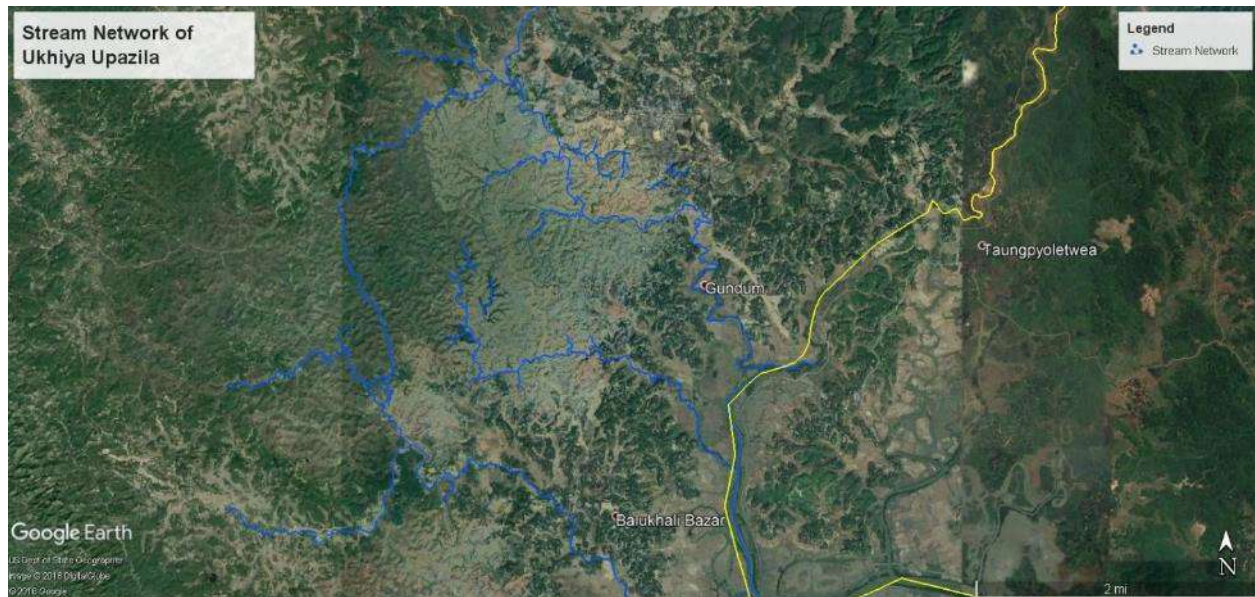


Figure 20 Stream network in the Sub-project area

72 **Reju Khal:** The khal has originated from Arakan boarder of Myanmar and Wading hills, it has flowed through Nihongchoriupazila of Bandarban entering into Holodiapalong of Ukhia Upazila and Khunia union of Ramu Upazila. It has finally entered Jaliapalong of Ukhia and arrives at Bay of Bengal. It is about 20 kilometres long within Bangladesh.

73 Bangladesh is considered rich in ground water resources. Properties of ground water storage reservoirs and volumes of annual recharge determine ground water resources. In this region, ground water level is shallow, usually ranges between 5-7m¹².

¹² BARC, Bangladesh agricultural research council, September 2015. URL: <http://www.barc.gov.bd/>

5.3.6 Flooding, Water Logging and Drainage Pattern

74 Eastern side of the upzila comprising high land and gradually down towards the western side. Matamuhuri River is flowing beside the upzila in north-east and north-west direction. Several natural streams act as the natural drainage system of the region. The mainland surrounding the upzila is generally high from the level of tide. As a result, most of the area is free from flood. Waterlogging problem has not been reported. However, there exist erosion and instability problems in the hilly and elevated areas. **Figure 21** shows a flood affected area map of the study region.

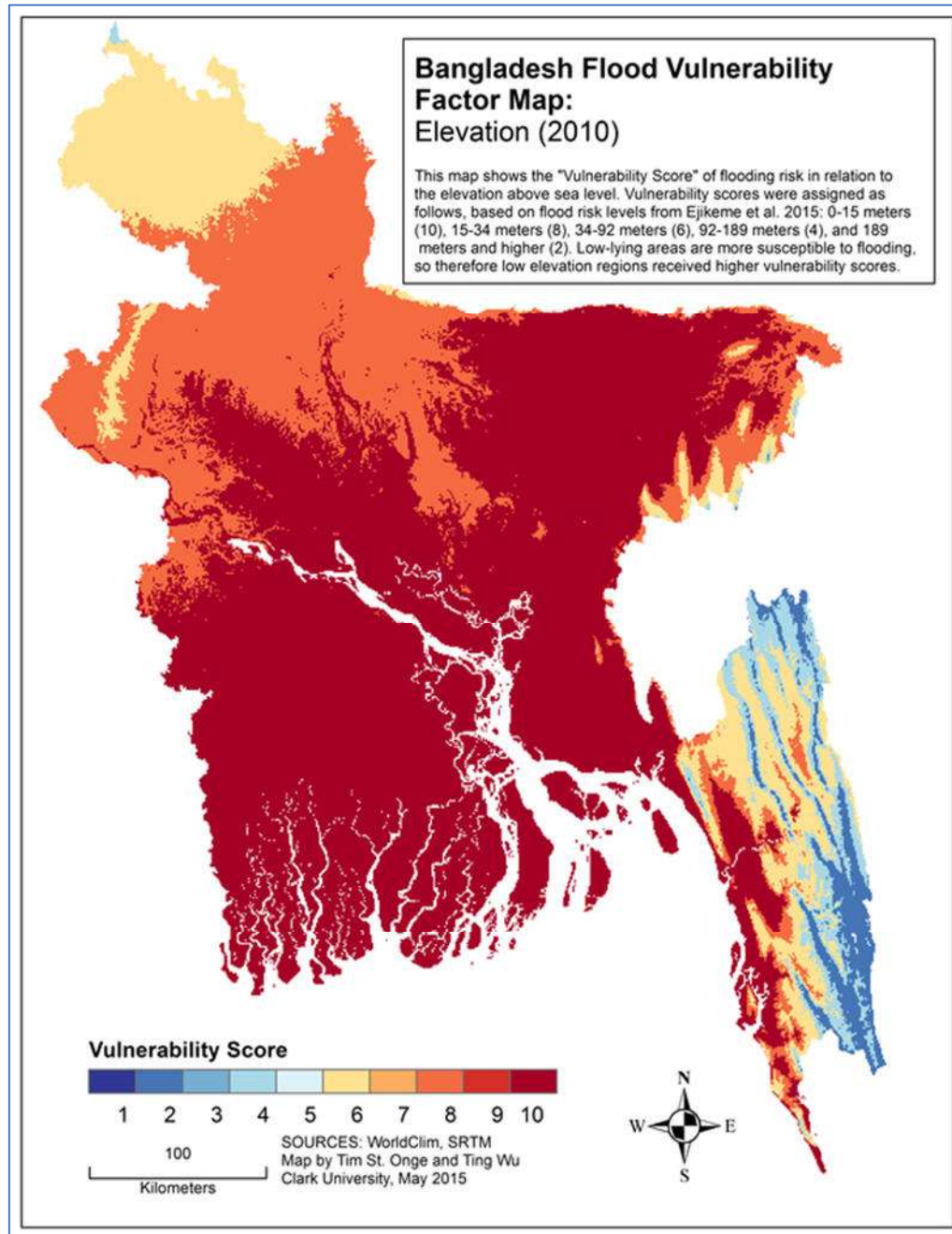


Figure 21 Flood vulnerability map of Bangladesh

5.3.7 Land Slides and erosion

75 The region, especially the Kutupalong camp area is prone to land slide and erosion. In fact, land slide is a major problem in the Cox's Bazaar and Teknaf mountain zones, of Bangladesh by killing people every year besides damaging the properties and blocking the public utilities. **Figure 22** shows the landslide prone areas around the subproject area.

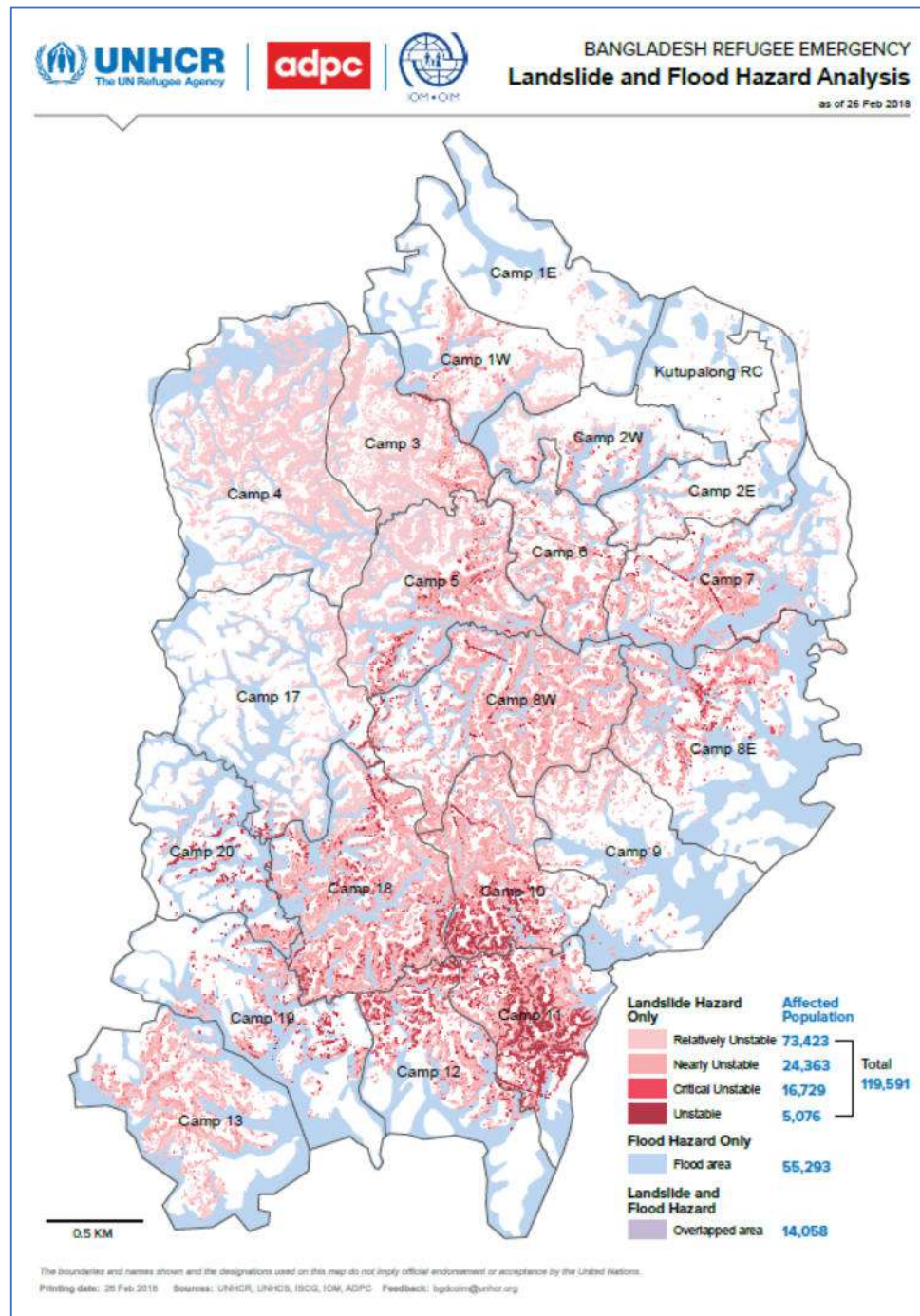


Figure 22 Landslide vulnerability areas around the subproject

5.3.8 Air Quality and Dust

76 As there are no major industries in subproject area as well as Teknaf Upazila, the main sources of air pollution are vehicles movement and non-point sources such as open burning and black smoke emission from vehicles. During dry season the windblown dust also degrades the air quality.

5.3.9 Noise Level

77 Noise level data is not available for the region. The major causes for noise in the subproject area are the vehicle movement (motor cycles, pick-up, mini-trucks, CNG rickshaw and auto-rickshaws), playing of loud-speaker and mass people gathering (for advertising of products and political, social and religious aspects) and local market. This is a common experience of the peri-urban population that noise poses a threat to the ill / physically weak people health and nerves.

5.3.10 Health and Sanitation

No reliable data available on health and sanitation.

5.3.11 Solid Waste Management

78 With the increase population and rapid urbanization, it is natural that generation of solid waste will also increase. If these wastes are not properly managed, it can have detrimental effects on the environmental quality. So, collection and management of solid waste is a great challenge for the Teknaf Upazila. No specific information on the Upazila is available. However, some information on Cox's Bazar solid waste management is available in the form of literatures, especially focusing on Kutupalong Rohingya Refugee camp. Cox's Bazar district has limited infrastructure for solid waste management. This is particularly the case within the rural communities near to the Kutupalong Camp. There are currently no landfill sites available for the camp or host communities and Bangladesh has banned the use of waste incinerators. There are a number of solid waste management projects either proposed or planned by the government of Bangladesh and other agencies including landfill construction and waste collection.

5.4 BIOTIC ENVIRONMENT

5.4.1 Flora

79 This subproject area is full of natural vegetation. Plant species found on road sides within 5km radius of the subproject are: mehgani, arjun, pitali, eucalyptus, bot, jam, akashmoni, auricoliformis, am, kadam, shisoo, koroi, krishna chura, babla, ipil-ipil, shimul, shirish, etc (**Figure 23**). Among crop-field vegetation, aman is grown during summer rains and boro (winter rice) cultivated by irrigation in winter. Rabi crops like mustard and lentils are also grown.

80 The forestland in the Teknaf upazila is covered by tropical evergreen and semi-evergreen forests dominated by Garjan (*Dipterocarpus* spp.) occurring in deep valleys and shaded slopes. Human activities have denuded most parts of the hills which have been re-occupied by sungrass, herbs and shrubs. Still, the area houses rich biodiversity, especially within the protected areas (PA). A list of naturally grown seedling are provided below (**Table 7**).

Table 7 List of naturally grown seedlings in the area

| Sl. No. | Family | Scientific name | Local name |
|---------|--------------|-----------------------------------|------------|
| 1 | Apocynaceae | <i>Holarrhena antidysenterica</i> | Kuruch |
| 2 | Bignoniaceae | <i>Stereospermum chelonoides</i> | Darmara |

| | | | |
|----|---------------|--|----------------------|
| 3 | Burseraceae | Bursera serrata | Gutgutia |
| 4 | Combretaceae | Terminalia bellirica | Bohera |
| 5 | Dilleniaceae | Dillenia pentagyna | Hargaza |
| 6 | Euphorbiaceae | Macaranga denticulate Phyllanthus emblica | Bura Amloki |
| 7 | Lauraceae | Beilschmiedia Pseudomicrocarpa | Tuangiri |
| 8 | Leguminosae | Erythrina variegata | Madar |
| 9 | Meliaceae | Toona ciliate | Toon |
| 10 | Moraceae | Ficus hispida Ficus racemosa | Dumur Joggi Dumur |
| 11 | Musaceae | Musa textiles | Pahari kola |
| 12 | Myrtaceae | Syzygium fruticosum | Puti Jam |
| 13 | Sterculiaceae | Abroma augusta | Ulat kombol |
| 14 | Tiliaceae | Microcos paniculata | Achargula |
| 15 | Verbenaceae | Callicarpa macrophylla | Bormala |

81 Near to the settlements, the most common trees are the raintree (*Albizia saman*), mango (*Mangifera indica*), coconut (*Cocos nucifera*), mahogany (*Swietenia mahogany*), gogon siris (*Albizia richardiana*), betel palm (*Areca catechu*) and guava (*Psidium guajava*) plus banana (*Musa sp.*). Sessile joy weed (*Alternanthera sessilis*), thorny amaranth (*Amaranthus spinosus*), bermuda grass (*Cynodon dactylon*), smartweed (*Polygonum sp.*), creeping oxalis (*Oxalis corniculata*), etc., are the common weed species. See **Figure 23** for photos of vegetation in the region.



Figure 23 Terrestrial flora around the site

5.4.2 Fauna

82 There are some nearby wetland areas to the west of the subproject area which provide habitat for common coastal wading birds including heron, dahuk, ibis and stork, as well as various gulls and terns. Common bird species noted in the Project corridor were Asian crow, myna, cuckoo, kingfisher, pigeon and dove satara, drongo, weaver bird choroi, babui, and dahuk. The mammals include shial, monkey, begi, bhojar, heza, various rodents, guishap, baghdash, and badur. There are also several species of frog, lizard, and snake.

83 Apart from the degradation, this forest area still houses rich biodiversity including megafauna like the Asian elephant (*Elephas maximus*) and many different bird species. It has been confirmed that more than 50% of the country's wildlife species are living in the forests of Ukhia, Teknaf, Inani and Himchari within the Cox's Bazar South Forest Division.

5.4.3 Fisheries

84 Local villagers reported catching fish in all the water bodies in the Project area. Major fishes in the rivers and canals in the Project area are carps (rui, catla, mrigal, ghania, kalbaus, and kalia), catfish (boal, pangas, silon, ayeir, and bacha) and snake head (shol, gazar, and taki), freshwater shrimp and several other tropical whitefish species. These species are well adapted to the silt-load extreme water temperature oxygen conditions in the subproject waterbodies.

5.4.4 Asian Elephants

85 The Asian elephant is an endangered species in the South and SE Asian countries they occur in. It is listed as endangered in IUCN's Red List and well as in Bangladesh's red list. There are likely less than 300 animals remaining in the country with about 200 resident (i.e., not crossing international borders) and 100-150 having a transboundary range with India and Myanmar, and about 40,000 animals in the world, with the greatest populations found in Myanmar and India. The presence of elephant in an area is an indicator of a healthy ecosystem, and also one of the key drivers in maintaining a diversity of habitat and inhabitants.

86 There is evidence of presence of elephants in the subproject area. A few incidents of human-elephant conflict has been reported in 2018. The IUCN has conducted a study on such conflict and suggested a few mitigation measures to reduce such conflicts. **Figure 24** presents a map of recent human-elephant conflicts prepared by the IUCN.

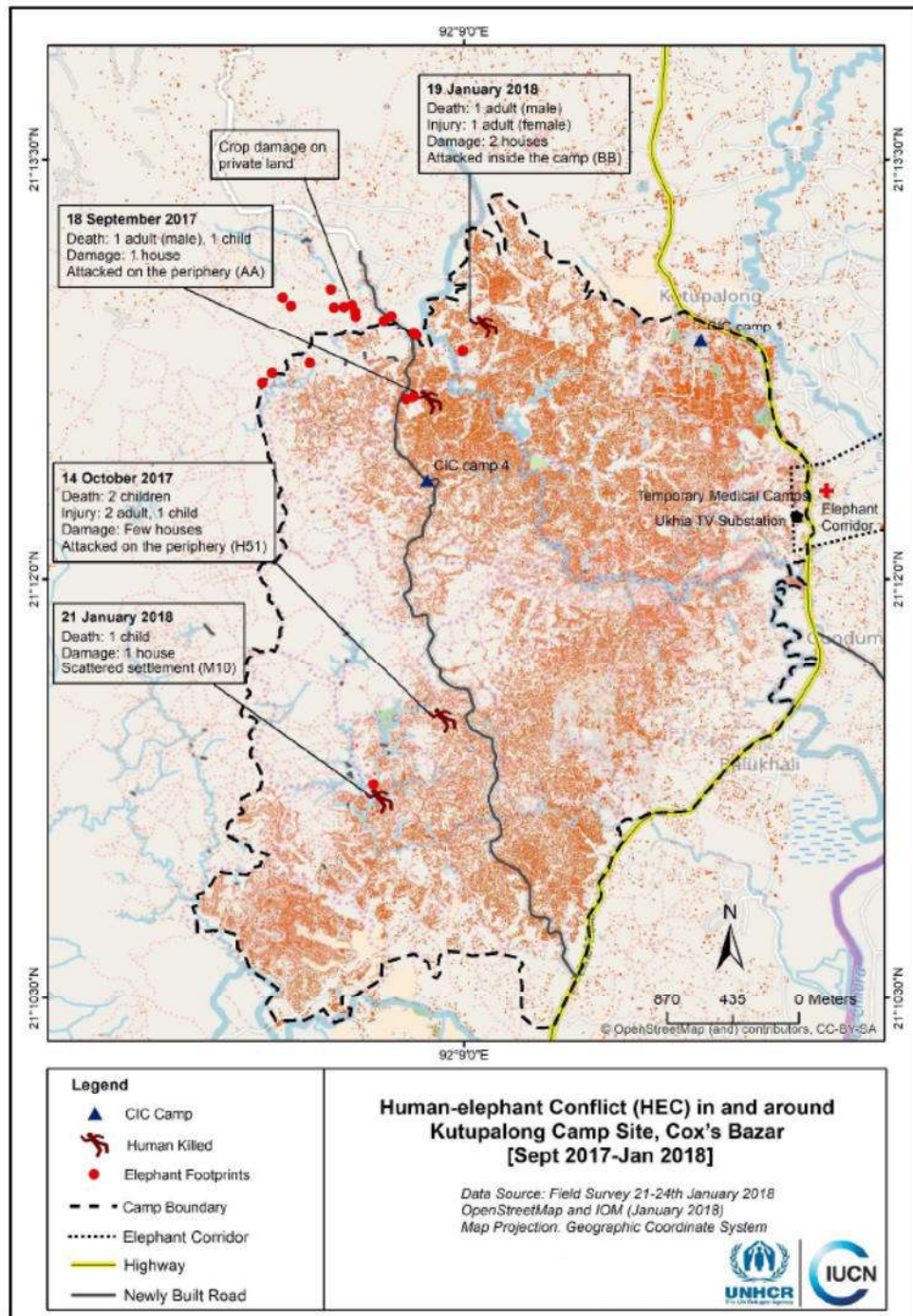


Figure 24 Human-Elephant conflict map around the sub-project area

5.5 SOCIO-ECONOMIC AND SOCIO-CULTURAL ENVIRONMENT

5.5.1 Land Use Pattern, Status of Housing and Built-up Infrastructure

87 The subproject areas are mixed zone of urban and peri-urban area with residential and agricultural zone. The road side infrastructures are mainly residential houses (pucca, semi-pucca, tin shed and katcha), shops, bazars, educational and religious institutes (**Figure 25**).

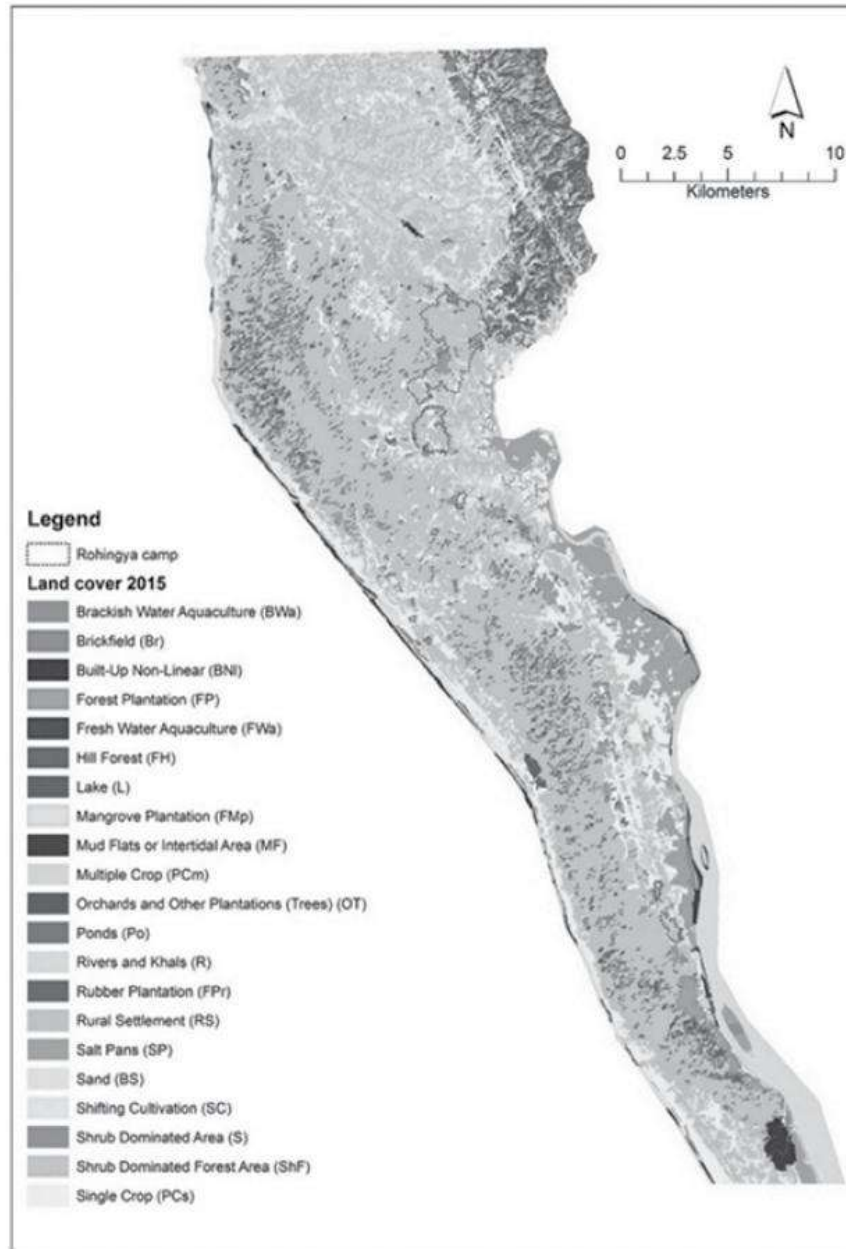


Figure 25 Land use map of Teknaf

6 Potential Impacts

6.1 METHODOLOGY

91 This section identifies the potential impacts that the various elements of the proposed Project may have on aspects of the physical, biological and socio-economic environment. The identification of the potential impacts will be considered for the two distinctive Project stages (construction and operation) as detailed in **Section 3**. The activities undertaken during each of these Project stages form the basis for potential impact identification and analysis.

92 Assessment of potential impacts requires a multi-disciplinary approach in which a wide range of issues are taken into consideration to identify and determine which potential Project impacts may be significant and therefore require the application of reasonable and effective management and/or mitigation. Most projects result in positive and negative potential impacts on the environment, society and economy, all of which are identified and assessed in this section.

93 Certain impacts identified in this section have the potential to be significant. The determination of whether a given potential impact is significant depends on several factors:

- The potential for on-site and off-site impacts;
- The potential for direct and indirect impacts;
- The frequency and duration of a potential impact;
- The geographic area affected by a potential impact
- The period of time affected by any potential impact;
- The sensitivity of the receiving environment; and
- The degree of confidence with which the potential impacts of the action/activity are known and understood.

94 Measures of potential impact significance as part of the Project planning and assessment phase presented in this IEE have been determined using a risk based model. The risk based model is a two dimensional matrix of 'magnitude of impact' and 'likelihood'. Both are assigned score between 1 and 5 based on severity or probability and multiplied to obtain the 'risk band'.

95 The 'magnitude of impact' is a 5 point based scale set by expert's judgement. The scale and its explanation is given in **Table 8**.

Table 8 Explanation and assignment of scores to 'magnitude of impact'

| Colour Band | Incidental | Minor | Moderate | Major | Severe/catastrophic |
|-------------|---|--|---|--|---|
| Score | Score: 1 | Score: 2 | Score: 3 | Score: 4 | Score: 5 |
| Explanation | Impacts such as localized or short-term effects on habitat, species or environmental media. | Localized, long term degradation of sensitive habitat or widespread, short-term impacts to habitat, species or environmental media | Impacts such as localized but irreversible habitat loss or widespread, long-term effects on habitat, species or environmental media | Widespread and persistent changes in habitat, species or environmental media | Persistent reduction in ecosystem function on a landscape scale or significant disruption of a sensitive species. |

The 'likelihood' is also a 5 point based scale set by expert's judgement. The scale and its explanation is given in **Table 9**.

Table 9 Explanation and assignment of scores to 'likelihood'

| Colour Band | Rare | Unlikely | Seldom | Occasional | Likely |
|-------------|--------------------|--|--|--|---|
| Score | Score: 1 | Score: 2 | Score: 3 | Score: 4 | Score: 5 |
| Explanation | Rare or unheard of | Reasonable to expect that the consequence will not occur during this project though has occurred several times in industry | Exceptional conditions may allow consequences to occur within the project lifetime | Conditions may allow the consequence to occur during the project lifetime, or the event has occurred within similar projects | Consequence can reasonably be expected to occur in life the project |

96 Therefore, "Risk" factor is derived from the following equation:

$$\text{Risk} = \text{Magnitude} \times \text{likelihood} \quad (1)$$

97 The score of 'Risk' ranges from 1 to 25. The score is classified in 3 classes. The explanation is given in **Table 10**. The score matrix for risk assessment has been used to identify the priority environmental impact and their mitigation plan.

Table 10 Two dimensional risk assessment matrix

| | | | MAGNITUDE OF IMPACT | | | | |
|------------|------------|----------|---------------------|----------|----------|----------|--------------|
| | | | Incidental | Minor | Moderate | Major | Severe/cats. |
| | | | Score: 1 | Score: 2 | Score: 3 | Score: 4 | Score: 5 |
| LIKELIHOOD | Rare | Score: 1 | 1 | 2 | 3 | 4 | 5 |
| | Unlikely | Score: 2 | 2 | 4 | 6 | 8 | 10 |
| | Seldom | Score: 3 | 3 | 6 | 9 | 12 | 15 |
| | Occasional | Score: 4 | 4 | 8 | 12 | 16 | 20 |
| | likely | Score: 5 | 5 | 10 | 15 | 20 | 25 |

6.2 DISCUSSION ON POTENTIAL IMPACTS

6.2.1 Sector where no significant impact envisaged

98 Some aspects of the environment that are not expected to be significantly affected by the construction process have been screened out and will not be mentioned further in assessing the impacts of the construction process (**Table 11**).

Table 11 Sectors where no significant impacts envisaged

| Field | Rationale |
|------------------------|---|
| Climate | Short-term production of dust is the only effect on atmosphere |
| Geology and seismology | Excavation will not be large enough to affect these features |
| Industries | There are no major industries in any areas to be affected by the project |
| Tourism | Tourists mostly drive by the villages located as these are located on the highway |
| Community | Construction will not affect population numbers, location or composition |

6.2.2 Impacts during Planning Phase

99 Site clearance: Failure to obtain necessary consents, permits, NOC's can result in design revisions and/or stoppage of the Works. Failure to obtain No Objection Certificate from the local authority can hamper the entire project, even stop the construction project. In this case, the subproject's land is already available to the authority as it is government owned land.

100 Landscape and existing utilities: Often construction of structure may disrupt the existing utilities installed underneath the soils. In this case, the proposed structures are within the existing building complex. It is possible that the new construction will interrupt the existing utilities. Therefore, investigation before construction and formulation of plan of restoration of existing utilities within shortest time is recommended. The plan must be formulated with coordination with LGED, contractor and the field level construction supervisor. The plan must be shared with the school committees and approved by them.

101 EMP Implementation Training: Often lack of proper training to implement the Environmental Management Plan (EMP) stipulated in the Bid document leads to mismanaged environmental safeguards. Therefore, EMP training for the contractors, workers and implementing agency is necessary before construction goes on-board. A training needs to be arranged before construction starts with all involved parties: contractor, workers and representatives from Implementing Agency to implement the EMP and therefore is necessary.

102 Timing of construction activities: The existing primary schools are active. Therefore, noise and traffic movement from construction activities may hamper daily school activities like teaching

6.2.3 Impacts and mitigation measures during Construction Phase

103 Top soil loss followed by soil erosion: For the school cum cyclone shelters, four parameters have been considered for screening of ecological impacts during construction phase; these include access road, felling of trees, clearing of vegetation, and impact on aquatic (water) habitat. Significant excavation, cut and fill is expected. 3-story building will also need concrete mixing, although the extent of time may not exceed couple of weeks. The proposed sites are on relatively flat land on the Basin of Naf River. Therefore, significant soil erosion is not expected.

104 However, waterlogging is evident in the Nhilla Burmese school site. Therefore, a drainage system is necessary for the site. Since the proposed construction of a school cum cyclone shelter involves no felling/clearing of any number of trees/vegetation, the impact is classified as "none" or "minimal". There is no water body (e.g., khal, pond) located close to the proposed cyclone shelter location, so construction of the cyclone shelter is not expected to generate adverse impact (e.g., through discharge of waste/ wastewater from sub-project activities, spills and leaks of oil/ chemical) on the aquatic habitat (in the absence of any mitigation/management).



Figure 27 Proposed siting of the Nhila Burmese School

105 **Impact water and air quality:** The Nhila Burmese school site is the most vulnerable site for water pollution or contamination from stock pile materials and construction waste. There is no water body (e.g., khal, pond) located close to the proposed cyclone shelter locations, therefore the potential adverse impact (e.g., through discharge of waste/ wastewater from sub-project activities, spills and leaks of oil/ chemical) on water quality (in the absence of any mitigation/management) could to be classified as “none”. The location of the proposed cyclone shelter sites are on elevated land and well above flood level, therefore the construction works is not expected to obstruct the flow of natural drainage water, and therefore impact on drainage would most likely be “minor”.

106 Possible air pollution from activities involved in cyclone shelter construction is likely to be significant, and may be classified as “moderate”, since it is close to sensitive receptor like the school complex. The impact of air pollution is expected to be localized since the vehicles and other machineries are expected to be involved in construction on the roadside.

107 **Impact on noise:** The parameters considered for screening of noise impacts during construction phase of a school cum cyclone shelter include intensity of involvement of heavy machineries, type of heavy machineries, type of activities and proximity of the work area to school compound. Construction of the cyclone shelter involves use of equipment/machines producing significant noise (e.g., generators, pile driver). The proposed site is in the existing school complex. Therefore, noise pollution would be significant (in the absence of mitigation measures). Similarly, use of stone crushers, excavation works and movement of vehicle would generate air pollution. Involve the community in planning the work program so that any particularly noisy or otherwise invasive activities can be scheduled to avoid sensitive times. **Expect the existing schools, no sensitive receptors are nearby in Dakkhin baradail and Uluchamary site. There is a Buddhist temple near the Nhilla Burmese school site. Construction noise may impact the temple’s devotees.**

108 Planning activities in consultation with Local Authority is suggested so that activities with the greatest potential to generate noise are conducted during periods of the day, which will result in least disturbance. Use of high noise generating equipment shall be stopped during nighttime.

109 **Dust and Vibration:** Dust and vibration could result from a wide range of construction activities, including movement of vehicles (carrying equipment/material to and from site), operation of construction equipment and generators. Significant dust is generated from operation of pile drivers, bulldozers, dump

trucks, compactors, mixing machines, and generators, etc. According to US EPA Compilation of Air Pollution Emissions Factors (1977): *"The level of dust dispersion normally depends on working characteristic, soil humidity, wind speed, and construction period. On-site construction with medium activities, 30% of silt and 50% of Precipitation Evaporation Index generates 1.2 tons/acre/month of dust dispersion on average (or 98.8 kg/hectare/day). Particles greater than 10 microns will disperse with the wind and will fall out (settle) within a distance of 6-9 meters from the construction site"*. The site requires 0.04ha of area, which would mean the estimated emission of dust will be 3.952 kg per day which is negligible. Noise pollution is particularly important for sensitive establishments. e.g., hospitals, educational/religious institutions. The construction work of cyclone shelters will take place in the existing school complexes. Therefore, current students are likely to be exposed to dust and vibration during construction and thus the impact can be classified as "moderate". Construction schedule needs to be harmonized with the school schedule so that such impacts can be minimized. However, Dust and vibration from the subproject is expected to be short lived; therefore no significant impact is envisaged.

110 Impact on Vegetation: The sites are vegetated. However, the proposed constructions do not concur with the vegetation cover. Therefore, it is highly unlikely that vegetation will be disrupted due to the construction of a cyclone shelter. However, the sites are located on elevated land. The lands are erosion prone. Therefore, it is suggested that the slopes of the elevated land should be planted to prevent erosion and sedimentation on the foothills area. **Only Nhila Burmese school site has paddy field right next to the site.**

111 Water Pollution from sewage: Untreated sewage from the pit latrines could have the potential to enter surface water if not adequately designed and positioned to reflect the local hydrological and hydrogeological patterns. Periods of high rainfall could lead to the overflow of the pit and overland flow, or rapid through-flow of the effluent to surface water prior to its full digestion in the soil. Raw sewage can potentially impact surface water quality by promoting the growth of algae and delivering pathogens may be harmful to human and ecological receptors. Use of toxic materials such as solvents and vehicle maintenance fluid (oil, coolant) and diesel fuel may contaminate surface and groundwater if these are disposed of directly into the ground or washed into the streams. Human waste from construction workers may also contaminate surface water and groundwater if there are no adequate sanitary facilities. In this case, there is not surface water or ground water sources nearby. Therefore, contamination of surface and ground water is unlikely.

112 Disturbance in wildlife: Clearing of existing vegetation may result in loss of associated ecological habitats and their fauna. Noise, vibrations, and intrusive activities related to construction works may scare away animals remaining onsite after vegetation clearance. Elephant-human conflicts may arise if elephant movement pathways are disrupted. Wildlife may be impacted by vegetation clearance and the temporary loss of small habitat locations at pole sites. However, subproject area is located in the sites where open spaces are already provided with existing school buildings, which are devoid of any wildlife, vegetation or elephant. Therefore, no impact is predicted.

113 Hazardous Materials and Waste: Similarly, waste management facilities, if improperly managed, may result in potential impacts to surface water by the introduction of harmful substances during runoff events. Of particular importance are the potential impacts from chlorides, nutrients such as nitrates and phosphates, and pathogens such as E. coli or Typhoid, all of which are present in typical domestic waste. Chlorides can have acute effects on aquatic biodiversity, as well as longer-term effects such as inhibition of plant growth and interruption of invertebrate reproductive cycles. Nutrients such as phosphates or nitrates can also be immediately toxic to aquatic fauna, but may also result in algal blooms (also known as eutrophication) or excessive growth of undesirable plant species. The proposed site does not have proper disposal site or facilities to dump solid waste; rather the solid waste is dumped in nearby lowlands. It would

be important to establish formal solid waste management strategy to properly handle solid waste generated in these sites.

114 **Construction Camp:** Poor siting and improper management of construction camps may lead to several adverse impacts on environment: (i) loss of vegetation due to use of wood as fuel source for cooking, (ii) deterioration of nearby surface water quality, (iii) compaction and contamination of soil due to uncontrolled disposal of solid waste, (iv) increase in generation of domestic solid waste; (v) temporary air and noise pollution from machine operation; and (vi) poor sanitation resulting to transmission of communicable diseases. In the subproject area, construction camp is suggested to be established outside of the camp area to avoid the predicted impacts.

115 **Traffic disruptions:** The proposed sites are adjunct to nearby main roads. However, an earthen uphill road of approx. 50m of length connects the NI Chowdhury site with the main road while the other two sites are adjacent to the main road. Given the main road's traffic volume, it is expected that during peak construction time when heavy vehicles and machineries will be transported at full scale, the extra traffic movement will disrupt the normal traffic at a moderate significance. Especially at Falipara Primary School road, a traffic plan needs to be devised before construction goes onboard.

116 **Impacts on Existing Utility Infrastructure:** Existing utility infrastructure may need to be repositioned. Service delivery of existing infrastructure may be disrupted during construction. The subproject area is a built up area. Therefore, there are no existing utilities/infrastructures in the area and no impact is envisaged.

117 **Occupational, Health, and Safety Risks:** Occupational hazards may arise if not properly managed (risk of fall and electrocution, etc). Increase in dust may cause health problems to workers. Insufficient supply and improper use of personal protective equipment (PPE) and lack of safety procedures may cause injuries or fatal accidents. For safety, there will be a need to interrupt electricity supply to existing businesses while new poles, conductors and other installations are put in place. This needs to be done in a phased manner allowing small sections of lines to be reconnected to the network, keeping down time to a minimum for existing users. Close contact with persons afflicted with diseases and lack of sanitation in workers camps may also pose health risks. Outbreaks of diseases like diphtheria and measles can be avoided by observing proper sanitation facilities and observing good personal hygiene habits.

118 **Community Health and Safety Hazards:** Community hazards may arise during construction (dust, air quality, noise, electrocution etc.). Traffic accidents and vehicle collision with pedestrians during material and waste transportation may occur if no proper signage are placed.

119 **Social and Cultural Resources:** Ground disturbance can uncover and damage archaeological and historical remains. In the subproject area, such possibilities are limited, but should be accounted for.

6.2.4 Impacts and mitigation measures during Operation Phase

120 **Top soil loss and erosion:** Not much erosion is expected. **However due to poor drainage, sedimentation may occur. Silt curtains around the construction area is a must.**

121 **Noise Impacts on environment and schoolchildren:** Involve the school committees in the planning process of construction work. A plan needs to be devised before construction to avoid peak construction noise during school hours. One very effective method is to discuss with the school authority and settle for a time for heavy machinery usage.

122 In Nhila Burmese school site, heavy construction machineries should be used in agreements with the Temple committee to find out the best time for using noise generating equipment.

123 **Water Pollution:** The Nhila Burmese School Site is prone to water logging. Therefore, the stockpile materials and waste from construction should be cordoned by a silt curtain to prevent leakages. The Uluchamary site is well drained. However, the site is located adjacent to a paddy field behind access road. A silt curtain may be placed at that site to prevent waste materials moving towards the paddy field. Dakkhin Baradail site is devoid of such waterlogging or slope issues.

124 **Air quality:** All the proposed sites except Uluchamary are at >100m distance from the main road. Uluchamary is also located beside a merely busy road. Therefore, air pollution is expected only from construction works and construction vehicles. Provide dust-proof measures like construction barrier at concrete mixing station, or mix concrete inside building to effectively control dust pollution.

125 **Worker's health and safety:** The following Generic Mitigation measures are advised: Comply with requirements of Government of Bangladesh Labour Law of 2006 (amended in 2013) and all applicable laws and standards on workers' health and safety (H&S). Ensure that all site personnel have a basic level of environmental awareness training. If necessary, the environmental management specialist and/or a translator shall be called to the sites to further explain aspects of environmental or social behavior that are unclear. Produce and implement a site H&S plan which include measures as: (i) excluding the public from worksites; (ii) ensuring all workers are provided with and required to use personal protective equipment (reflectorized vests, footwear, gloves, goggles and masks) at all times; (iii) providing H&S training for all site personnel; (iv) documenting procedures to be followed for all site activities; and (v) maintaining accident reports and records.

126

7 Environmental Management Plan (EMP)

7.1 PURPOSE OF THIS EMP

127 The objective of this Environmental Management Plan (EMP) is to formulate measures, which will:

- Mitigate adverse impacts on various environmental components, which have been identified during observation;
- Protect environmental resources where possible;
- Enhance the value of environmental and social components where possible.

128 The EMP also includes a monitoring plan to enable evaluation of the success or failure of environmental management measures, and to carry out reorientation of the plan if found necessary. It is emphasized that many of the protective and enhancement measures can be implemented by adopting suitable planning and design criteria for construction of the project. This EMP is also made site specific with guidelines for the contractors to be able to operate according to the Bangladesh Government and ADB requirements to comply with their relevant policies.

7.2 SUMMARY OF PRIMARY OBSERVATION ON ENVIRONMENT

A summary environmental observation of the proposed cyclone shelter package, the basis of this EMP, is presented in **Table 12**.

Table 12 Summary observation of Environment

| SL. No | Sector | Summary Description |
|--------|-------------------------|--|
| 1 | Topography and landform | Soil: Brown Hill soil, magnesium rich; topography: hilly, erosion prone |
| 2 | Hydrology and drainage | Above flood level |
| 3 | Water quality | Not known |
| 4 | Flora and fauna | The project area is not vegetated. Grass and shrubs are commonly found. No medicinal plant or plant of significant conservation value was found. |
| 5 | Air quality | No data available. |
| 6 | Land use | Elevated, vegetated, used for building complexes |

7.3 ENVIRONMENTAL MANAGEMENT PLAN (EMP)

129 The EMP is necessary on the grounds that it will manage the environment by off-setting the negative impacts with possible mitigation measures and enhancing the positive impacts within the allocated fund from the project. Thus, the main objectives of the EMP for the construction of the access road project are:

- Define the responsibilities of the project proponents in accordance with the three project phases (design, construction and operation);
- Facilitate the implementation of the mitigation measures by providing the technical details of each project impact, and proposing an implementation schedule of the proposed mitigation measures;
- Define a monitoring mechanism and identify monitoring parameters to ensure that all proposed mitigation measures are completely and effectively implemented;

- Identify training requirements at various levels and provide a plan for the implementation of training sessions;
- Identify the resources required to implement the EMP and outline corresponding financing arrangements; and Providing a cost estimate for all proposed EMP actions

130 The Environmental Management Plan (EMP) presented in **Table 13**. Only the prioritized risks are presented in the EMP for specific measures.

7.3.1 List of mitigation measures

131 **Site Screening:** The School cum cyclone shelters will built on the existing School areas. The school areas already have adequate space for building new school building cum cyclone shelter.

132 **Timing of construction:** The LGED and the contractor should sit with the existing school authorities to discuss their time schedules and according adjust the construction schedule. The peak noise hours should not conflict with the active teaching hours.

133 **Topography and landform:** Excavation cannot be avoided for construction / road improvement. Excavated materials cannot be stored on roadside part of the proposed cyclone shelter. Excavated materials should be carried away during night-time to avoid traffic congestion.

134 **Water quality:** Prioritize re-use of excess spoils and materials in construction activities. If spoils will be disposed, consult with Local Authority on designated disposal areas. All earthworks must to be conducted during dry season/dry spell to maximum extent possible to avoid the difficult working conditions that prevail during monsoon season such as problems from runoff.

135 **Air quality:** Damp down exposed soil and any sand stockpiled on site by spraying with water during dry weather; Use tarpaulins to cover soils, sand and other loose material when transported by trucks. Unpaved surfaces used for haulage of materials within settlements shall be maintained dust-free.

136 **Noise pollution:** Involve the community in planning the work program so that any particularly noisy or otherwise invasive activities can be scheduled to avoid sensitive times. Plan activities in consultation with Local Authority so that activities with the greatest potential to generate noise are conducted during periods of the day, which will result in least disturbance.

137 **Flora and fauna:** Trees, especially native hill area species can be planted on the hill side at a safe distance from the sites (at least 10m). The trees needs native in nature and deep rooted so that they can prevent soil erosion.

138 **Post construction clean-up:** The following generic measures should be taken: Remove all spoils wreckage, rubbish, or temporary structures (such as buildings, shelters, and latrines) which are no longer required; All excavated roads shall be reinstated to original condition; All disrupted utilities restored;

139 The full fledged EMP with mitigation plan in given in **Table 13** and **Error! Reference source not found..**

Table 13 Environmental Management Plan (EMP) for the Subproject (Generic)

| Ref. No. | Impact/Issue | Magnitude | Likelihood | Risk Factor | Measure |
|---|--|-----------|------------|-------------|--|
| 1.0 Pre-construction (site screening and design) phase | | | | | |
| 1.1 | Obtaining of SSC/NOCs Failure to obtain necessary consents, permits, NOC's can result in design revisions and/or stoppage of the Works. | 4 | 1 | 4 | <ul style="list-style-type: none"> All the sites have own land available to the School Management Committee. LGED will contact the School Committees for land records and other necessary papers that are required for clearance for construction. The School Committees will issue the NOCs to LGED. |
| 1.2 | Existing utilities: Disruption of services | 4 | 1 | 4 | <ul style="list-style-type: none"> Drawing from the consultant's visit, there was no utility or services found. Therefore, disruption in services is not expected. There are no vegetation alongside the main road and proposed site. In addition, there is no waterbody nearby. No impact is expected on flora and fauna. |
| 1.3 | Timing of construction activities The existing primary schools are active. Therefore, noise and traffic movement from construction activities may hamper daily school activities like teaching | 3 | 2 | 6 | <ul style="list-style-type: none"> All the sites are located at flat land with exiting building and open spaces around. Therefore, it is possible to locate the site office and labour camps away from the proposed sites. In this way, impact zone will be reduced and pose less impact on the school activities. Both Dakkhin Baradail and Nhilla Burmese school sites have ample space for locating hot mixing plant at least 100m from the proposed site. However, in such cases, if the hot mix plants are to be placed on private land (open land) nearby, appropriate permissions should be sought before construction goes on board. |
| 1.4 | EMP Implementation Training: If the contractors and construction supervision engineers are not aware about the implementation of this EMP, the project may not proceed and comply with ADB and GoB environmental policies. | 3 | 2 | 6 | <ul style="list-style-type: none"> Project manager and all key workers will be required to undergo EMP implementation including spoils management, Standard operating procedures (SOP) for construction works; health and safety (H&S), core labour laws, and applicable environmental laws. |
| 2.0 During Construction Phase | | | | | |
| 2.1 | Top soil loss followed by soil erosion <ul style="list-style-type: none"> Significant excavation, cut and fill is expected. 3-story building will also need concrete mixing, although the extent of time may not exceed couple of weeks. The proposed sites are on relatively flat land on the Basin of Naf River. Therefore, significant soil erosion is not expected. | 3 | 4 | 12 | <ul style="list-style-type: none"> Not much erosion is expected. However due to poor drainage, sedimentation may occur. Silt curtains around the construction area is a must. Utilize readily available sources of materials. If contractor procures materials from existing borrow pits and quarries, causing less cut and fill that leads to top soil loss. Borrow areas and quarries (If these are being opened up exclusively for the subproject) must comply with environmental requirements, as applicable. No activity will be allowed until formal agreement is signed between Project Implementation Unit (PIU), landowner and contractor. |

| Ref. No. | Impact/Issue | Magnitude | Likelihood | Risk Factor | Measure |
|----------|--|-----------|------------|-------------|---|
| | <ul style="list-style-type: none"> The impacts are negative but short/medium term, site-specific within a relatively small area and reversible by mitigation measures. | | | | |
| 2.2 | Noise Impacts on Environment and school children <ul style="list-style-type: none"> Construction noises may hamper every day educational activities of the students and teachers. Expect the existing schools, no sensitive receptors are nearby in Dakkhin baradail and Uluchamary site There is a Buddhist temple near the Nhilla Burmese school site. Construction noise may impact the temple's devotees. Temporary increase in noise level and vibrations may be caused by excavation equipment, and the transportation of equipment, materials, and people. Noise Impact on construction workers The impacts are negative but short-term, site-specific within a relatively small area and reversible by mitigation measures. | 3 | 1 | 3 | <ul style="list-style-type: none"> Involve the school committees in the planning process of construction work. A plan needs to be devised before construction to avoid peak construction noise during school hours. One very effective method is to discuss with the school authority and settle for a time for heavy machinery usage. In Nhilla Burmese school site, heavy construction machineries should be used in agreements with the Temple committee to find out the best time for using noise generating equipment. Involve the community in planning the work program so that any particularly noisy or otherwise invasive activities can be scheduled to avoid sensitive times. Use of pneumatic impact equipment shall be restricted 100m from noise sensitive locations such as the Buddhist Temple. Instead of pneumatic hammers electric, hydraulic hammers could be used. If it is not practicable to reduce noise levels to or below noise exposure limits, the contractor must post warning signs in the noise hazard areas. Workers in a posted noise hazard area must wear hearing protection. Reasonable and scientific construction site layout is a major way in reducing construction noise. Place the fixed noise sources on the construction site collectively to reduce the scope of noise impact. Utilize modern vehicles and machinery with the requisite adaptations to limit noise and exhaust emissions, and ensure that these are maintained to manufacturers' specifications at all times. All vehicles and equipment used in construction shall be fitted with exhaust silencers. Use silent-type generators (if required). |
| 2.3 | Water Pollution The Nhila Burmese school site is the most vulnerable site for water pollution or contamination from stock pile materials and construction waste. Excavation, run-off from stockpiled materials, and chemical contamination from fuels and lubricants may | 2 | 3 | 6 | <ul style="list-style-type: none"> The Nhila Burmese School Site is prone to water logging. Therefore, the stockpile materials and waste from construction should be cordoned by a silt curtain to prevent leakages. The Uluchamary site is well drained. However, the site is located adjacent to a paddy field behind access road. A silt curtain may be placed at that site to prevent waste materials moving towards the paddy field. Dakkhin Baradail site is devoid of such waterlogging or slope issues. |

| Ref. No. | Impact/Issue | Magnitude | Likelihood | Risk Factor | Measure |
|----------|---|-----------|------------|-------------|---|
| | result to silt-laden runoff during rainfall, which may cause siltation and reduction in the quality of adjacent bodies of water. | | | | <ul style="list-style-type: none"> The Contractor of the Project shall make simple processing to muddy water like filtering and sedimentation, and direct discharge is prohibited; the Owner shall strengthen construction management to perform civilized construction. Domestic waste, construction waste, maintenance garbage would produce pollution if directly discharged into the water body, therefore, they shall be recycled, sorted, stored and treated. The usable materials like most paper, wood, metal and glass wastes shall be reused or sold to garbage buyer, and the unusable shall be handed over to environmental health department for harmless treatment, incineration, landfill, stockpiling, etc. Residual and waste oils produced in construction shall be collected, recycled and disposed with different vessels; aggregate wash water and concrete batch plant wash water produced in subgrade construction after sedimentation and treatment shall be reused for watering the construction site to reduce dust. |
| 2.4 | Air Quality: <ul style="list-style-type: none"> Conducting works at dry season and moving large quantity of materials may create dusts and increase in concentration of vehicle-related pollutants (such as carbon monoxide, sulphur oxides, particulate matter, nitrous oxides, and hydrocarbons) which will affect people who live and work near the sites. The impacts are negative but short-term, site-specific within a relatively small area and reversible by mitigation measures. | 3 | 4 | 12 | <ul style="list-style-type: none"> All the proposed sites except Uluchamary are at >100m distance from the main road. Uluchamary is also located beside a merely busy road. Therefore, air pollution is expected only from construction works and construction vehicles. Provide dust-proof measures like construction barrier at concrete mixing station, or mix concrete inside building to effectively control dust pollution. Water in due time the construction site on non-rainy days, including the road section in construction and major transportation road. Watering frequency shall be determined by the site supervision personnel according to the actual situation. Powder material like cement, lime shall be packed in tanks or bags, bulk transportation of such material is prohibited, dust scattering in transportation is prohibited; while in storage, they shall be stored in warehouse or covered with tarpaulin. <ul style="list-style-type: none"> Provide dust-proof mat at exits of construction site; clean the body and tires of transport vehicles out of the construction site. Forbid overload of soil, sand, stone; the loading height shall not exceed that of the carriage plate and the loaded material shall be covered with tarpaulin to prevent them from falling along the way. |
| 2.5 | Biodiversity- Flora and Fauna: The sites are devoid of trees. Only Nhila Burmese school site has paddy field right next to the site. | 4 | 1 | 4 | <ul style="list-style-type: none"> No storm water drainage, wastewater should be allowed to the paddy field. |
| 2.6 | Community Health and Safety: | 4 | 3 | 12 | The following Generic Mitigation measures are advised: |

| Ref. No. | Impact/Issue | Magnitude | Likelihood | Risk Factor | Measure |
|----------|---|-----------|------------|-------------|--|
| | <ul style="list-style-type: none"> Exposure to physical hazards from use of heavy equipment and cranes; trip and fall hazards; Exposure to dust and noise; falling objects; work in confined spaces; Exposure to hazardous materials; Exposure to electrical hazards from the use of tools and machinery. Construction works will impede the access of residents and businesses in limited cases. The impacts are negative but short-term, site-specific within a relatively small area and reversible by mitigation measures. | | | | <ul style="list-style-type: none"> Contractor's activities and movement of staff will be restricted to designated construction areas. Consult with the Local Authority on the designated areas for stockpiling of, soils, gravel, and other construction materials. If the contractor chooses to locate the work camp/storage area on private land, he must get prior permission from the environment management specialist and landowner. Use small mechanical excavators to attain faster excavation progress. For rock and concrete breaking, use non-explosive blasting chemicals, silent rock cracking chemicals, and concrete breaking chemicals.¹³ Under no circumstances may open areas or the surrounding bushes be used as a toilet facility. Recycling and the provision of separate waste receptacles for different types of waste shall be encouraged. A general regard for the social and ecological well-being of the site and adjacent areas is expected of the site staff. Workers need to be made aware of the following general rules: (i) no alcohol/drugs on site; (ii) prevent excessive noise; (iii) construction staff are to make use of the facilities provided for them, as opposed to ad hoc alternatives (e.g. fires for cooking, the use of surrounding bushes as a toilet facility); (iv) no fires permitted on site except if needed for the construction works; (v) trespassing on private/commercial properties adjoining the site is forbidden; (vi) other than pre-approved security staff, no workers shall be permitted to live on the construction site; and (vii) no worker may be forced to do work that is potentially dangerous or that he/she is not trained to do. Interested and affected parties need to be made aware of the existence of the complaints book and the methods of communication available to them. The contractor must address queries and complaints by: (i) documenting details of such communications; (ii) submitting these for inclusion in complaints register; (iii) bringing issues to the environment management specialist's attention immediately; and (iv) taking remedial action as per environment management specialist's instruction. The contractor shall immediately take the necessary remedial action on any complaint/grievance received by him and forward the details of the grievance along with |

¹³These products come in powder forms, and once mixed with water (being the catalyst) simply expand, and crack the rock from hole to hole. This product is environmentally friendly and can be washed away after it has been used.

| Ref. No. | Impact/Issue | Magnitude | Likelihood | Risk Factor | Measure |
|----------|---|-----------|------------|-------------|---|
| | | | | | <p>the action taken to the environment management specialist within 48 hours of receipt of such complaint/grievance.</p> <ul style="list-style-type: none"> Create traffic regulation and diversion zones during construction work. The proposed site is on the main road, and it is expected that heavy vehicle movements can cause traffic nuisance. Therefore, traffic regulation and diversion will be important to avoid traffic nuisance. |
| 2.7 | <p>Worker's health and safety:</p> <ul style="list-style-type: none"> There is invariably a safety risk when construction works such as excavation and earthmoving are conducted in populous areas. Workers need to be mindful of the occupational hazards, which can arise from working in height and excavation works. Potential impacts are negative and long-term but reversible by mitigation measures. | 4 | 3 | 12 | <p>The following Generic Mitigation measures are advised:</p> <ul style="list-style-type: none"> Comply with requirements of Government of Bangladesh Labour Law of 2006 (amended in 2013) and all applicable laws and standards on workers' health and safety (H&S). Ensure that all site personnel have a basic level of environmental awareness training. If necessary, the environmental management specialist and/or a translator shall be called to the sites to further explain aspects of environmental or social behavior that are unclear. Produce and implement a site H&S plan which include measures as: (i) excluding the public from worksites; (ii) ensuring all workers are provided with and required to use personal protective equipment (reflectorized vests, footwear, gloves, goggles and masks) at all times; (iii) providing H&S training ¹⁴ for all site personnel; (iv) documenting procedures to be followed for all site activities; and (v) maintaining accident reports and records. Arrange for readily available first aid unit including an adequate supply of sterilized dressing materials and appliances Maintain necessary living accommodation and ancillary facilities in functional and hygienic manner in work camps. Ensure (i) uncontaminated water for drinking, cooking and washing, (ii) clean eating areas where workers are not exposed to hazardous or noxious substances; and (iii) sanitation facilities are available at all times. Provide medical insurance coverage for workers; Provide H&S orientation training to all new workers to ensure that they are apprised of the basic site rules of work at the site, personal protective protection, and preventing injuring to fellow workers; |

¹⁴Key areas that are to be covered during training shall be in compliance with the Health and Safety Manual according to site specific requirements and shall be conducted by the Supervision consultants

| Ref. No. | Impact/Issue | Magnitude | Likelihood | Risk Factor | Measure |
|------------------------------------|--|-----------|------------|-------------|---|
| | | | | | <ul style="list-style-type: none"> Provide visitor orientation if visitors to the site can gain access to areas where hazardous conditions or substances may be present. Ensure also that visitor/s do not enter hazard areas unescorted; Ensure the visibility of workers through their use of high visibility vests when working in or walking through heavy equipment operating areas; Ensure moving equipment is outfitted with audible back-up alarms; Mark and provide sign boards for hazardous areas such as energized electrical devices and lines, service rooms housing high voltage equipment, and areas for storage and disposal. Signage shall be in accordance with international standards and be well known to, and easily understood by workers, visitors, and the general public as appropriate; and - Disallow worker exposure to noise level greater than 85 dBA for a duration of more than 8 hours per day without hearing protection. The use of hearing protection shall be enforced actively. |
| 2.8 | Physical and cultural heritage: The construction will take place on built-up area, however the opportunity of chance find is quite low. | 4 | 1 | 4 | <ul style="list-style-type: none"> All fossils, coins, articles of value of antiquity, structures and other remains of archaeological interest discovered on the site shall be the property of the government. Prevent workers or any other persons from removing and damaging any fossils, coins, articles of value of antiquity, structures and other remains of archaeological interest. Stop work immediately to allow further investigation if any finds are suspected. Chances are limited but need to be careful about any finding in the site. |
| 2.9 | Traffic disruption The sites are not busy premises. The only expected impact may rise from traffic movement (heavy vehicles) during construction works | 4 | 2 | 8 | <ul style="list-style-type: none"> Warning lights should be set up along the construction road sections, guiding the access of vehicles. |
| 2.10 | Disturbances in Ecological setting - The campsites are devoid of vegetation, birds or local fauna. No impact is expected during construction or operation | 4 | 1 | 4 | <ul style="list-style-type: none"> No impact on local ecology is expected |
| 3.0 Post-construction phase | | | | | |
| 3.1 | Post-construction clean-up: Damage due to debris, spoils, excess construction materials. | 4 | 4 | 16 | <p>The following generic measures should be taken:</p> <ul style="list-style-type: none"> Remove all spoils wreckage, rubbish, or temporary structures (such as buildings, shelters, and latrines) which are no longer required; |

| Ref. No. | Impact/Issue | Magnitude | Likelihood | Risk Factor | Measure |
|-------------------|---|-----------|------------|-------------|---|
| | | | | | <ul style="list-style-type: none"> All excavated roads shall be reinstated to original condition; All disrupted utilities restored; All affected structures rehabilitated/compensated; The area that previously housed the construction camp is to be checked for spills of substances such as oil, paint, etc. and these shall be cleaned up; All hardened surfaces within the construction camp area shall be ripped; All imported materials removed and the area shall be top soiled and regressed using guidelines set out in the re-vegetation specification that forms part of this document; The contractor must arrange the cancellation of all temporary services; Request PIU to report in writing that worksites and camps have been vacated and restored to pre-project conditions before acceptance of work. |
| 4.0 Others | | | | | |
| 4.1 | Submission of EMP implementation Report: Unsatisfactory compliance to EMP | 3 | 1 | 3 | <ul style="list-style-type: none"> Appointment of Supervisor to ensure EMP implementation; Timely submission of monitoring reports including pictures. |

8 Environmental Monitoring Plan

8.1 ENVIRONMENTAL MONITORING PLAN

140 Monitoring points have been selected based on the sensitivity of the location with respect to sensitive receptors. The following areas should be monitored to check if the proposed project is having any impact:

A. Forest Area and Tree Plantation

The proposed sites are covered with more or less thick vegetation. Hilly vegetation is sensitive to erosion and running polluted water. The adjacent forest areas need to be monitored to detect any changes due to the implementation of the project. Tree plantation is also suggested in the EMP and need to be monitored when planted so that the planted vegetation survives.

B. Soil Erosion and Drainage Congestion

This another important issue that needs be monitored during project implementation. The entire area around the site is prone to erosion. Also a hilly streams runs around the area. Therefore, monitoring soil erosion around the project site will be a major task to undertake. Any change in stability at the adjacent hill or hint of erosion needs to be noted and information must be sent to the Environmental Officer in charge for further action.

C. Air and Noise Quality

Due to the variability of the construction activities, namely changes in batch composition, type of construction activity and other anthropogenic influences, the ambient air quality of the project area may change. If the air quality with respect to any parameter exceeds by more than 25% of its last monitored value, the monitoring frequency shall be doubled and cause of the increase investigated. If the construction activities are found to be the reason for this increase, suitable measures should be adopted.

Similarly, due to the variability in traffic movement, namely changes in traffic volume, traffic compositions and other anthropogenic influences, the noise quality in the project area is likely to change. If the noise quality exceeds by 20% of the applicable ambient noise quality standard or 5% of its last monitored value, the monitoring frequency shall be increased and the cause of the increase investigated. If the construction activities are found to be the reason for this increase, suitable measures should be adopted.

141 The full-fledged Environmental Monitoring Plan with frequency and responsibilities is detailed in **Table 14**.

Table 14 Environmental Monitoring Plan for the subproject

| No | Environmental Issues | Significant Impact | Purpose of the Monitoring | Monitoring Method | | | Responsibility | |
|------------------------|----------------------------------|--|--|--|-----------------------------------|---------------------------------------|----------------|---|
| | | | | Method of Collecting and Reporting Data | Location | Duration and Frequency | Implementation | Supervision |
| Pre-Construction Phase | | | | | | | | |
| 1.1 | Paddy field | No tree cutting is expected due to the construction of cyclone shelter. There is possibility that at Nhila Burmese School Site, construction activities may encroach the paddy field nearby and do significant damage to crop. | <ul style="list-style-type: none">Confirm that the construction activities do not encroach the paddy field. | Visual inspection | In the site | During the pre-construction period | Contractor | LGED |
| 1.3 | EMP Implementation Training | Better understanding of environmental safeguards and how they are to be implemented is needed. LGED needs to provide this briefing to the contractor | Implementation of EMP | Obtain record of presentation | At LGED Office | Prior to contractor mobilization | LGED | LGED |
| Construction Phase | | | | | | | | |
| 2.1 | Topography and Landscape Changes | Excavation along the edge of the building alignment will leave large unsafe holes. | <ul style="list-style-type: none">Restoration of changes due to construction activitiesVisual amenity | Inspection/consultation with adjacent households and LGED authority to get opinion on work being completed | In the work site | Construction stage/ Weekly inspection | Contractor | Construction Supervision Engineer, LGED |
| 2.2 | Air Quality | <ul style="list-style-type: none">Dust resulting from construction workExhaust gas from construction machinery and vehicles used for mobilization of equipment | Evaluation of effect of the mitigation measure towards air pollution | Visual inspection is suggested since no sensitive areas nearby | In the work site | Daily | Contractor | Construction Supervision Engineer, LGED |
| 2.3 | Wastes and drainage congestion | <ul style="list-style-type: none">Construction waste from construction workDomestic waste from workersHazardous waste such as dry batteries, etc. | Evaluation of effect of the mitigation measure for waste | Record of kinds and quantity of waste, and the disposal method | In the work site and Workers camp | Daily | Contractor | Construction Supervision Engineer, LGED |

| No | Environmental Issues | Significant Impact | Purpose of the Monitoring | Monitoring Method | | | Responsibility | |
|------------------------|--|--|--|--|---|------------------------|---------------------------------|---|
| | | | | Method of Collecting and Reporting Data | Location | Duration and Frequency | Implementation | Supervision |
| 2.4 | Disturbance to Existing Social Infrastructure and Services | <ul style="list-style-type: none"> ▪ Increase in traffic Jam is expected to be low ▪ Increased road traffic may disturb the local residents ▪ Traffic jams caused by increased vehicles during construction | Evaluation of effect of construction schedule | Record of numbers construction vehicles | Project site | Continuous Record | Contractor | Social Safeguards Expert, LGED |
| 2.5 | Infectious Diseases such as HIV/AIDS | Temporary influx of migrant labor during construction may increase risk of infection | Evaluation of sanitation for labor | Labor health record | Related institutions | Twice a year | Contractor | Social Safeguards Expert, LGED |
| 2.6 | Work condition (including work safety) | Labor accidents | Evaluation of effect of the work safety plan | Record of accidents | Contractor's office | Continuous Record | Contractor | Social Safeguards Expert, LGED |
| 2.7 | Accidents | Traffic accidents | Evaluation of effect of traffic schedule | Record of accidents | Contractor's office | Continuous Record | Contractor | Social Safeguards Expert, LGED |
| 2.8 | Disturbance to Community traffic and installation of proper road signage | Traffic accidents, number of events are expected to be low | Evaluation of effect of the work safety plan, Evaluation of effect of traffic schedule | Records of road signage implemented, visual inspection | Along the approach road | Continuous record | Contractor | Environmental /social safeguards specialist, LGED |
| Operation Phase | | | | | | | | |
| 3.1 | Air Quality | <ul style="list-style-type: none"> ▪ Exhaust gas from vehicles used for mobilization of equipment and workers ▪ Dust from road | Evaluation of effect of the mitigation measure towards air pollution | Visual inspection | Residential area around the cyclone shelter | Daily | LGED/ Environmental Consultant | LGED |
| 3.2 | Noise and vibration | <ul style="list-style-type: none"> ▪ Noise caused by vehicles moving along the road carrying passengers and goods. | Evaluation of effect of the mitigation measure towards noise level | Visual inspection | Along the cyclone shelter and Forest area | Daily | LGED / Environmental Consultant | LGED |
| 3.3 | Accidents | <ul style="list-style-type: none"> ▪ Traffic accidents | Evaluation of effect of the work safety plan | Record of accidents and fire | Along the cyclone shelter | Continuous Record | LGED | LGED |

8.2 EMP IMPLEMENTATION COST

| Sl. No | Monitoring and Management Issue | Monitoring Frequency | Unit cost (BDT) | Calculation | Cost (BDT) |
|--------|--|---|--|-------------------------------------|------------|
| 1 | Water logging and drainage congestion monitoring around the construction area Method: Visual inspection | Continuous, bi-monthly, over construction period | Lump sum, BDT 20,000 per site over construction period | 3 sites @ 2,000 | 6,000 |
| 2 | Tree plantation around cyclone shelters - Tree plantation is required around all proposed cyclone shelters since there is space, especially in the Dakkhin Baradail and Nhila Burmese school sites Method: Visual Inspection | - Grass turving Before construction - Tree plantation during construction, including protective case, use of compost fertilizer and daily watering | BDT 800 per tree BDT 30 per square meter | 2 sites @10 plants @BDT800 = 16,000 | 16,000 |
| 3 | Installation of silt curtains in Nhila Burmese school site along the boundary of the paddy field Method: Visual Inspection | Check bi-monthly | Lump Sum | 10,000 | 10,000 |
| 4 | Debris disposal and waste management on site Method: Visual Inspection | Continuous over construction period, weekly | Lump sum | 3 sites @ BDT 10,000 | 30,000 |
| 5 | Dust suppression measures Method: Visual Inspection | Continuous over construction period, daily | lump sum | 3 sites @ BDT 10,000 | 30,000 |
| 6 | Labor camp establishment, soak pit establishment, water supply establishment, electrification, first aid box. All the sites have existing building facilities and water supply that may reduce labour camp cost Method: Visual Inspection | Once before construction | Lump sum | 3 sites @ BDT 100,000 | 300,000 |
| 7 | Traffic management during construction, equipment for traffic management, signs, safety ribbons, posts Method: Visual Inspection | Daily, over construction period | Lump sum | 3 sites @ BDT 5,000 | 15,000 |
| 8 | Worker Health and safety - Safety gears - Water quality at labor camp - Solid waste management at labor camp - Mobile emergency treatment equipment at labor camp Method: Visual Inspection | Once before construction, then bi-monthly | Lump sum | 3 sites @ 10,000 | 30,000 |
| 9 | Health and safety for community - Warning signs - Project Information Signboard - Safety around construction work Method: Visual Inspection | Continuously over construction period | Lump sum | 3 sites @ 5,000 | 15,000 |
| 10 | Site clearance and preparation - Excavation, clearance of vegetation - Carry away debris | Once before construction | Included in civil works | | 0 |

| | | | | | |
|--------------|--|---|----------|------------------|----------------|
| | - Community contact before excavation Method: Visual Inspection | | | | |
| 11 | EMP Training - Contractors and workers | Once combined training for 3 sites, before construction | Lump Sum | 1 sites @ 15,000 | 15,000 |
| TOTAL | | | | | 467,000 |

The EMP implementation cost stands at BDT 467,000.

8.3 INSTITUTIONAL RESPONSIBILITIES

8.3.1 Oversight Body

142 The RRRC is proposed to act as the coordinator on behalf the government to execute all interventions. RRRC and ADB will conduct regular coordination meetings involving all EA/IAs, relevant stakeholders including deputy commissioner (DC), Cox's Bazar, other development partners and agencies. ADB plans to establish extended mission office in Cox's Bazar for close coordination, facilitation of sub-projects development and implementation.

143 A steering committee comprising higher officials from relevant ministries coordinated by ERD will be formed to provide necessary guidance to expedite the sub-project development and implementation. An organogram of the institutional arrangements is presented in **Figure 28**.

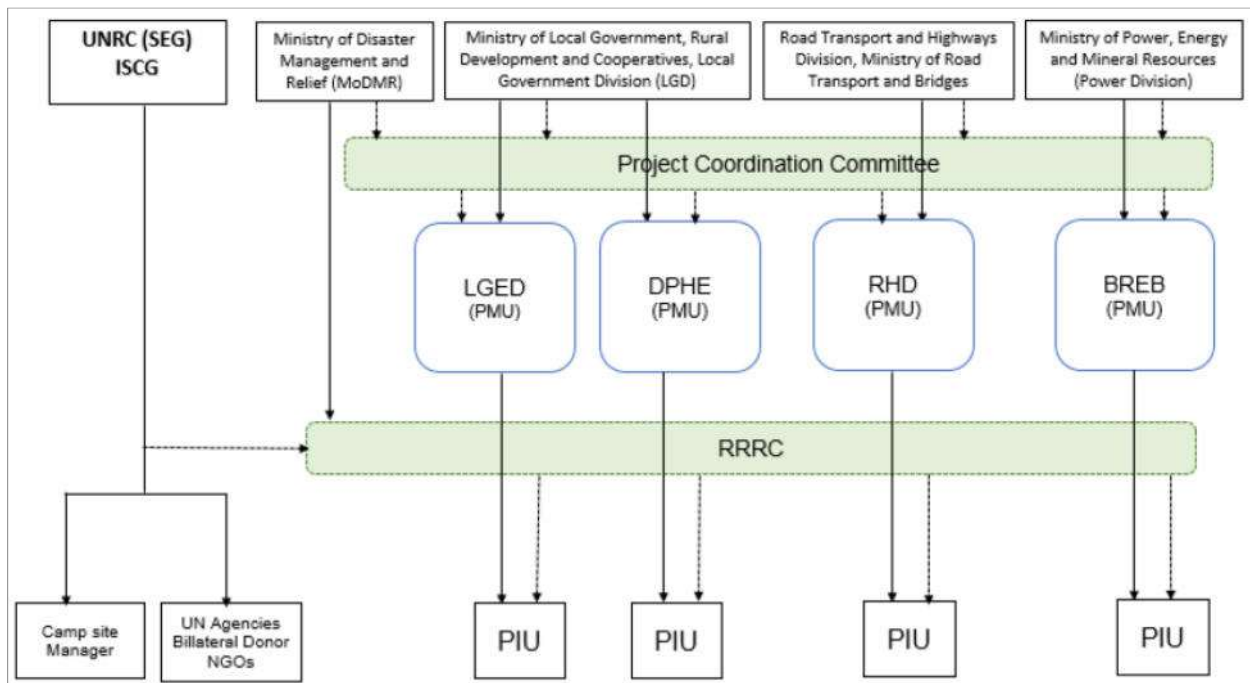


Figure 28 Project Organization Structure

8.3.2 Executing Agency / Implementing Agency

144 The Local Government Engineering Department (LGED), the Department of Public Health Engineering (DPHE), the Roads and Highways Department (RHD), and the Bangladesh Rural Electrification Board (BREB) will be the EA/IA for the Project. The EA/IA will coordinate environment safeguards planning and implementation and ensure that the environmental assessment and review framework is followed during subproject implementation. There will be a safeguards focal person in the EA/IA. The EA/IA will be assisted by PMCs. Consultants will include an Environment Specialist engaged during project implementation.

8.3.3 Project Implementing Unit (PIU)

145 PIUs will be formed in each of the IAs, with a dedicated safeguards focal person. PIUs will be assisted by DSC. Consultants will include Environment Specialists engaged during project implementation.

8.3.4 Design and Supervision Consultants (DSC)

146 The DSCs together with the PIU, will assist in developing and updating IEEs through the conduct of the DMS in a participatory and transparent way and consistent with the ADB's environment principles and the environmental assessment and review framework. Once approved by the PMU and reviewed and concurred by ADB, the DSC will provide technical advice in the implementation of the approved IEE and EMP. The DSC will likewise provide capacity-building orientation and skills training, as needed, to concerned personnel of the PMU and PIU.

147 Together with the EA/IA and PIU, the DSC will supervise civil works activities to ensure that the contractors adhere with the terms of their contract relative to avoiding and/or minimizing environmental impacts, in addition to ensuring that contractors provide the necessary compensation and/or assistance to the affected households prior to and/or during construction activities. The DSC will assist the PIU in regular monitoring of EMP implementation

8.4 MONITORING AND REPORTING

148 The PIUs, will monitor and measure the progress of EMP implementation. The monitoring activities will be corresponding with the project's risks and impacts and will be identified in the IEEs. Appendix 10 provides a content outline for monitoring reports. In addition to recording information of the work, deviation of work components from original scope, the PIUs will undertake site inspections and document review to verify compliance with the EMP and progress toward the final outcome.

149 DSCs will submit monthly monitoring and implementation reports to the PIUs, who will take follow-up actions, if necessary. PIUs will submit the quarterly monitoring and implementation reports to the EAs/IAs. The EAs/IAs will submit semi-annual monitoring reports to ADB. Project budgets will reflect the costs of monitoring and reporting requirements. Monitoring reports will be posted in a location accessible to the public.

150 The EAs/IAs will document monitoring results, identify the necessary corrective actions, and reflect them in a corrective action plan. The EAs/IAs, in each quarter, will study the compliance with the action plan developed in the previous quarter. Compliance with grant covenants will be screened by the executing agency.

151 ADB will review project performance against the executing agency's commitments as agreed in the legal documents. The extent of ADB's monitoring and supervision activities will be commensurate with the

Project's risks and impacts. Monitoring and supervising of environmental safeguards will be integrated into the project performance management system. ADB will monitor projects on an ongoing basis until a project completion report is issued. ADB will carry out the following monitoring actions to supervise project implementation:

- (i) conduct periodic site visits for projects with adverse environmental impacts;
- (ii) review the periodic monitoring reports submitted by the executing agency to ensure that adverse impacts and risks are mitigated as planned and as agreed with ADB;
- (iii) work with executing agency to rectify to the extent possible any failures to comply with their safeguard commitments, as covenanted in the legal agreements, and exercise remedies to re-establish compliance as appropriate; and
- (iv) prepare a project completion report that assesses whether the objective and desired outcomes of the safeguard plans have been achieved, taking into account the baseline conditions and the results of monitoring.

9 Grievance Redress Mechanism

152 The objective the grievance redress mechanism (GRM) is to resolve complaints as quickly as possible and at the local level through a process of conciliation; and, if that is not possible, to provide clear and transparent procedures for appeal. A well-defined grievance redress and resolution mechanism will be established to resolve grievances and complaints in a timely and satisfactory manner. All affected persons will be made fully aware of their rights, and the detailed grievance redress procedures will be publicized through an effective public information campaign. The grievance redress process includes three levels:

9.1 FIRST LEVEL OF GRM

153 The first level and most accessible and immediate contact for the fastest resolve of grievances are the contractors, with assistance from DSC on site. Prior to construction of any works, the PIU will ensure local community meetings are held to notify residents and businesses of any temporary disturbances, and to inform them of the Project and the GRM. If any complaints arise, the contractors, with assistance from DSC can immediately resolve the complaint on site. The contractor's and DSC's office phone number will be posted in public areas within the subproject areas and construction sites. Any person with a grievance related to the project works can contact the project to file a complaint. The contractor may seek the assistance of the DSC safeguards specialists (the environmental specialist or social safeguards specialist) to resolve the issue. The DSC safeguards (environment and resettlement) focal person will immediately address and resolve the issue with the contractor within 1-2 days, if the complaint remains unresolved at the field level. The DIU safeguards focal person will fully document the following information: (i) name of the person; (ii) date complaint was received; (iii) nature of complaint; (iv) location, and (v) how the complaint was resolved.

9.2 SECOND LEVEL OF GRM

154 Should the grievance remain unresolved; the contractor with assistance from DSC will forward the complaint to the PIU safeguards focal person. The person filing the grievance will be notified by DSC safeguards focal person that the grievance was forwarded to the PIU safeguards focal person. The PIU will address the grievance. Grievances will be resolved through continuous interactions with affected persons, and the PIU will answer queries and resolve grievances regarding various issues including environmental or social impacts. Corrective measures will be undertaken at the field level by the PIU safeguards focal person within 7 days. He/she will fully document the following information: (i) name of the person; (ii) date complaint was received; (iii) nature of complaint; (iv) location and (v) how the complaint was resolved.

9.3 THIRD LEVEL OF GRM

155 Should the grievance remain unresolved, the PIU's project director will activate the third level of the GRM by referring the issue (with written documentation) to a Grievance Redress Committee (GRC), which will, based on review of the grievances, address them in consultation with the PIU, contractor, DSC, and affected persons. The GRC will consist of Refugee Relief and Repatriation Commission (RRRC), as chairperson, EA/IA representative, camp-in-charge, and other relevant stakeholders. A meeting will be called with the GRC, if necessary, where the affected person can present his/her concern and issues. The process will promote conflict resolution through mediation. The GRC will meet as necessary when there are grievances to be addressed. The GRC will suggest corrective measures at the field level and assign clear responsibilities for implementing its decision within 15 days. The functions of the GRC are as follows:

(i) to provide support to affected persons on problems arising from environmental or social disruption, asset acquisition (where required), and eligibility for entitlements, compensation, and assistance; (ii) to record grievances of affected persons, categorize and prioritize them, and provide solutions within 15 days; and (iii) to report to the aggrieved parties' developments regarding their grievances and decisions of the GRC. The EA/IA safeguards focal person will be responsible for processing and placing all papers before the GRC, recording decisions, issuing minutes of the meetings, and taking follow-up action to see that formal orders are issued, and the decisions carried out.

156 Safeguard monitoring reports will include the following aspects pertaining to progress on grievances: (i) number of cases registered with the GRC, level of jurisdiction (first, second, and third levels), number of hearings held, decisions made, and the status of pending cases; and (ii) lists of cases in process and already decided upon may be prepared with details such as affected person, date of notice, date of application, date of hearing, decisions, remarks, actions taken to resolve issues, and status of grievance (i.e. open, closed, pending).

157 All costs involved in resolving the complaints (meetings, consultations, communication and reporting / information dissemination) will be borne by the EA/IA.

158 Where an affected person is not satisfied with the outcomes of the 3 levels of the Project GRM, the affected person should make good faith efforts to resolve issues working with the South Asia Regional Department through ADB's Bangladesh Resident Mission. As a last resort, the affected person can access ADB's Accountability Mechanism (ADB's Office of Special Project Facility or Office of Compliance Review).¹⁵ ADB's Accountability Mechanism, including information on how to file a complaint, will also be explained to affected households.

159 The grievance redress mechanism and procedure are depicted in **Figure 29**.

¹⁵ Contact information on ADB's Bangladesh Mission is in <https://www.adb.org/countries/bangladesh/main>. Information on ADB's Accountability Mechanism is in www.adb.org/site/accountability-mechanism/main.

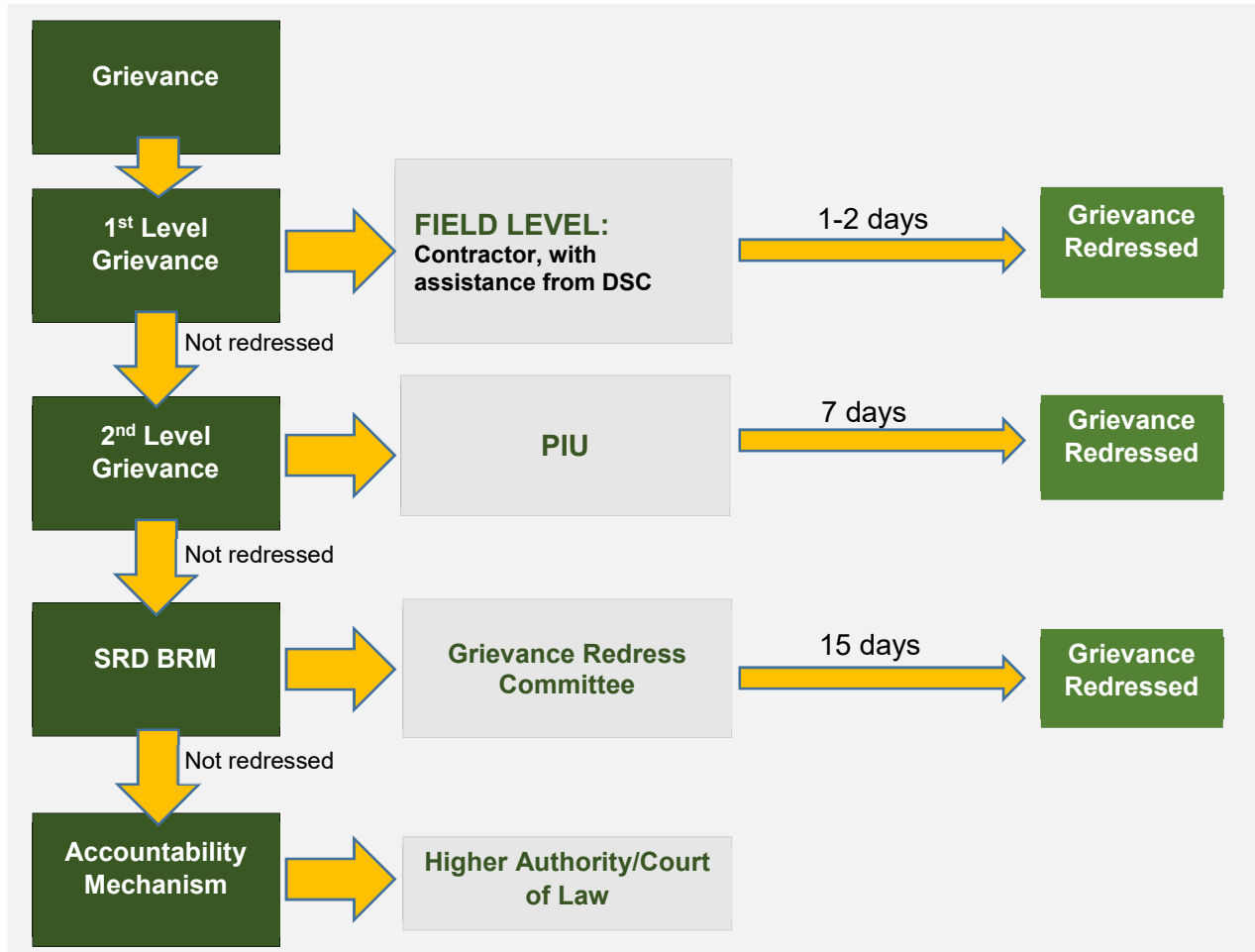


Figure 29 Grievance redress process

10 Stakeholder consultation and information disclosure

10.1 STAKEHOLDER CONSULTATION

160 Meaningful stakeholder consultation and participation is part of the project preparation and implementation strategy. Consultation, participation and will ensure information is provided and feedback is obtained and considered on the implementation of subprojects. Affected persons will be consulted at various stages of subproject preparation to ensure: (i) incorporation of views/concerns of affected persons, particularly the vulnerable, on environmental impacts and mitigation measures; (ii) identification of any help required by affected persons during rehabilitation; and (iv) avoidance of potential conflicts for smooth project implementation.

161 It will also provide adequate opportunities for consultation/participation of all stakeholders and inclusion of the vulnerable in subproject process. Relevant information on any major changes to the Project or subproject scope will be shared with beneficiaries, affected persons, vulnerable groups, and other stakeholders.

10.1.1 Stakeholder consultation Strategy for Emergency Assistance Project

162 At minimum, stakeholders will be consulted regarding the scope of an impact assessment before work is commenced and they will be informed of the likely impacts of the subproject and proposed mitigation once the draft IEE and EMP documents are prepared. The safeguards documents will record views of stakeholders and indicate how these have been taken into account in subproject development. Consultations will be held with a special focus on vulnerable groups.

10.1.2 Key target stakeholders

163 The key stakeholders to be consulted during subproject preparation, EMP implementation and subproject implementation include:

- (i) Beneficiaries;
- (ii) Elected representatives, community leaders, religious leaders and representatives of community based organizations;
- (iii) Local non-government organizations (NGOs);
- (iv) Local government and relevant government agency representatives, including local authorities responsible for land acquisition, protection and conservation of forests and environment, archaeological sites, religious sites, and other relevant government departments;
- (v) Residents, shopkeepers, business persons, and farmers who live and work alongside transport and education/district infrastructure which will be rehabilitated;
- (vi) Executing agency, implementing agency, PIU, staff and consultants; and
- (vii) ADB and Government.

10.1.3 Public Consultation History

164 Initial Public consultation has been carried out in the project area with the objectives of minimizing probable adverse impacts of the project and to achieve speedy implementation of the project through

bringing in awareness among the community on the benefits of the project. As part of the project consultations, efforts were made to consult with the public as well as a number of local authorities, to determine their thoughts, opinions and feedback on the impact of the proposed Shelter in their respective locations. Information and comments collected from the public early in the study process were of use.

165 Different stakeholders were consulted to give them the opportunity to express their views and concerns. As part of the process, they were also provided with relevant and sufficient information on the project prior to its start-up. These stakeholders include the central and local authorities, as well as the local population to determine their thoughts, opinions and feedback on the impact of the project. Attendees in the consultation meeting were apprised of the processes through which the project was to proceed toward implementation and the environmental impacts to arise out of such processes along with the steps to be taken toward mitigating the impacts. They were told about the impacts all of which could be easily mitigated. The audience expressed satisfaction of such mitigation measures (**Figure 30**). The public consultations were held during field visit in 22 September 2018.



Figure 30 Public consultation for the cyclone shelter Subproject

10.1.4 Findings of the Public Consultation

166 The people in the area Refugee Camp Dwellers. Most of the people were keen to know the possibility of employment in the project. There is a requirement of about 20 people during the peak period of the project. The employment is largely depending on the types of job and will be assessed on a case-to-case basis by the contractor according to needs. Findings of the public consultation summarized below (**Table 15**).

Table 15 Summary of the public consultation

| Sl no. | Question | Answer |
|--------|---|---|
| 01 | During labour recruitment, should the locals be given priority during construction? | <ul style="list-style-type: none"> This largely depends on the types of job and will be assessed on a case-to-case basis by the contractor according to needs. |
| 02 | Where you are going to put new building? | <ul style="list-style-type: none"> The consultants and LGED representatives showed the map of proposed building and explained |
| 03 | Are you going to demolish the existing building? | <ul style="list-style-type: none"> The consultants explained that no existing building will be demolished |
| 04 | Priority for jobs should also consider women; women can do the same work. | <ul style="list-style-type: none"> Priority will include women and there will not be any discrimination as far as possible depending on the nature of the job. |

| | | |
|----|---|---|
| 05 | People present at site suggested that the local people should be the first ones to be employed in the subproject. | <ul style="list-style-type: none">The consultant team explained that local people would be employed accordingly to job requirement. |
| 06 | Wishes to speed up the subproject. | <ul style="list-style-type: none">It was explained that implementation would take place immediately after the rainy season. |

10.1.5 Information disclosure

167 Information is disclosed through public consultation and making available relevant documents in public locations. The following documents will be submitted to ADB for disclosure on its website:

- (i) IEEs (including subproject EMP);
- (ii) Updated IEEs (including EMP) and corrective action plan prepared during project implementation, if any; and
- (iii) Environmental monitoring reports.

168 The EAs/IAs will send a written endorsement to ADB for disclosing these documents on the ADB website. The PIUs will provide relevant safeguards information in a timely manner, in an accessible place and in a form and language understandable to affected people and other stakeholders. For illiterate people, other suitable communication methods will be used. Disclosure will follow ADB's Public Communication Policy, 2011.

11 Annex I List of Participants in FGD

Emergency Assistance Project
Focused Group Discussion (FGD)

Package Name: Construction of 3 nos. school cum cyclone shelter for affected people, 3 story
LGED Prototype, in Teknaf

Date: 22 Sept 2018 Time: 2:40 PM

Location: Dakkhin baradail GPS

GPS Coordinates:

| Sl no. | Participant's name | Age | Occupation | Phone no. | Signature |
|--------|--------------------|-----|----------------------|-------------|-----------|
| 1 | Kabir Ahmed | 57 | Retired Army captain | 01818222513 | |
| 2 | MURUNABI | 42 | Business | 01815915016 | |
| 3 | SYED JAMAN MUNSI | 55 | Writer | 01819514240 | |
| 4 | NUR KOBIR | 54 | Farmer | 01819909263 | |
| 5 | NURDL AMIN | 50 | DO | 01819653770 | |
| 6 | MOLIBI ABU TALEB | 53 | IMAM | 01825095005 | |
| 7 | MD. JAHIR | 47 | Business | 01822291270 | |
| 8 | MD. RASED | 29 | Employer | 0185048612 | |
| 9 | JAFOR MISTRI | 45 | Carpainter | 01820296124 | |
| 10 | ALA UDDIN | 45 | Business | 01854901339 | |
| 11 | NURD CHABA | 35 | House wife | 01874452958 | |
| 12 | SAMSUN NAHAR | 32 | DO | 01630493216 | |
| 13 | MD. SOHEL | 32 | Business | 01813171159 | |
| 14 | SAYED ALAM MISTRI | 45 | Carpainter | 01851342637 | |
| 15 | DOCTOR KHALIL | 42 | DOCTOR | 01811208159 | |
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