

Environment and Social Compliance Audit Report

Project Number: 56027-001
August 2022

Bangladesh: Envoy Sustainable Backward Integration Project

Prepared by PricewaterhouseCoopers Pvt. Ltd. for Envoy Textiles limited and the Asian Development Bank.

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Envoy Textiles Limited: Environmental and Social Audit Report

Final Report

26 August 2022



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To

Honourable Chairman

Envoy Textiles limited (ETL)

Subjects: Submission of Final Report of “Envoy Textiles Limited - Corporate Audit and Compliance Audit of ESMS”

Attention: Asian Development Bank (ADB)

Dear Sir,

We, PricewaterhouseCoopers Pvt. Ltd. (PwC) has been engaged by your company, Envoy Textiles limited (ETL) as a consultant to develop a Corporate Audit and Compliance Audit of ESMS report for Envoy Textiles Limited.

This report is revised on the basis of additional information provided by ETL, information available in public domain from credible sources such as ADB standards, and data from PwC’s own internal sources. The content of the report is provided for consideration of ETL and should not be construed as making any management decision on behalf of ETL. PwC does not take any responsibility or liability of any loss or damage to any property based on their reliance on this report.

We look forward to working with you.

Thanking you,

Yours sincerely,

Ashok Varma
Partner, PricewaterhouseCoopers Private Limited
18th Floor, Building 10, Tower C, DLF Cyber City, Gurgaon, Haryana 122002, India
Email: ashok.varma@pwc.com

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Executive Summary

Envoy Textiles limited (ETL) is a Bangladesh-based conglomerate having a large footprint in the ready-made garments and textile manufacturing industry in the country. ETL currently has three different units operating within its premises in Bhaluka, Mymensingh- Denim Fabric Unit, Dyed Yarn Unit (Knit Unit), and Spinning (Yarn) Manufacturing Unit. Asian Development Bank (ADB) will be disbursing a loan to the facility to expand its spinning operations by procuring and installing spinning machines and associated equipment to increase the annual yarn production capacity by 3,850MT per annum in addition of its current spinning production capacity of 23,000MT per annum. This is aimed at reducing ETL's annual yarn imports by almost \$10million. As a condition to proceed with ADB's first disbursement, ETL must improve its existing ESMS (or develop one if an ESMS is not yet established) to meet the SPS requirements. PwC was engaged to conduct an assessment to review their existing ESMS and the company's current E&S performance by conducting multiple interviews within the factory premises. All the gaps identified from the assessment are addressed for improvements in the Corrective Action Plan (CAP).

Corporate Assessment Findings

The following table is a summary of the findings and gaps:

SL.	Component	Summary of Area of Concern
1.	Corporate ESMS and Policies	No screening and categorization procedures as per ADB.
2.	Regulatory Compliance	No Area of Concern
3.	Land Acquisition and Ethnic Minorities	Lack of involuntary resettlement and indigenous people safeguard in social policy and procedures.
4.	Stakeholder Engagement	Lack of Stakeholder Management Plan
5.	Gender and Development	No Area of Concern
6.	Labour and Grievance Management	E&S policies/procedure for contracted workers and supply chain workers No Retrenchment Policy
7.	Corporate Social Responsibility	No Area of Concern
8.	Environmental and Social Performance Monitoring	An Environment and Social Performance Monitoring Plan to be developed.

The EMS document of ETL sets out specific targets on water consumption, energy consumption, renewable energy adoption, GHG emission reduction, wastewater treatment, reduction of hazardous chemical usage through adoption of ZDHC, reduction of waste generation, etc. ETL monitors performance of these indicators on an annual basis and records them periodically as part of their EMS renewal process. After reviewing the ESMS document, it was observed that no policies related to involuntary

resettlement, and gender policies were included within the E&S Policies. The existing ESMS policy does not include any procedure for screening, risk identification, and project categorization. Moreover, documentations of procedures for project evaluation and risk mitigation were also not observed. Even though safeguard policies and procedures exist for the capacity enhancement of the E&S team, currently it does not comply with the standards of ADB and other lenders.

In terms of organizational staffing and structure, the company has a well-structured E&S team with strong leadership (comprising of a Management Review Committee and a Management Representative), leading the Risk Assessment, Documentation Development, Internal Audit, T&D, Monitoring, Injury/Disease Reporting, and Emergency Response Teams. The leadership team reports back to the Chief Executive Officer.

When inspected for regulatory compliances, it was found that ETL complies with all applicable national and local laws and regulations. All the licenses and permits obtained as per the laws were all up to date during the time of the assessment. ETL also does not have a “Land acquisition and Resettlement Safeguards” policy or procedure. It is recommended that ETL adopts an “Involuntary Resettlement” policy and procedure as per SP2 to safeguard future operations of ETL. Moreover, ETL also does not have a safeguard policy for indigenous/ethnic communities. Even though, there is no evidence of substantial impact on indigenous communities, it is recommended that a safeguard policy be adopted in accordance with ADB SPS 2009.

ETL does not have a stakeholder engagement plan in place to effectively communicate with their stakeholders. To comply with ADB standards, a stakeholder management plan must be prepared in accordance with ADB requirements. The company has a list of relevant stakeholders (both internal and external) along with their contact points’ information, impact and influence levels, importance, responsibilities, and strategies for proper engagement. However, ETL being a public listed company has not included its shareholders in their list. Even though there is an existing policy for confidentiality and company information, ETL does not have a well-defined Information Disclosure Policy. In addition to that, the company also does not have a proper mechanism to communicate with their stakeholders, reporting to them, involve the affected stakeholders in project monitoring, and manage engagements, track commitments and report back to the respective stakeholders for progress. Grievance boxes are installed within and outside the main entrance of the facility for stakeholders to file complaints, but the policies and procedures associated with Grievance Management is not well communicated among the stakeholders. Verbal complaints can also be made by the employees of ETL through messages or phone call to the division chief.

The company has an Anti-Harassment Policy and hold regular trainings to ensure that these policies are well communicated with employees. There is also a Sexual Harassment Committee that works to prevent and address cases of gender-based violence. ETL performs CSR activities with a prime focus on children and public health.

The company maintains Business Social Compliance Initiative (BSCI) standards¹ to manage labor related issues within their facilities. ETL has received an overall rating of ‘A’² in amfori social audit. Some gaps in the Social Policies and Procedures are- mentioning the need of maintaining personal files in the Recruitment Policy

Even though ETL has an Environmental Clearance Certificate covering all the wet processes and the captive power plants, no Environmental and Social Impact Assessment Report were found in ETL’s records. The environmental clearance procedures as per local regulations stipulates the submission of Environmental Impact Assessment (EIA) reports and associated Environmental Management Plan for Red Category Industries like ETL. Therefore, the EMP monitoring implementation performance was not reviewed as part of the assessment.

Compliance Assessment Findings

During the assessment, it was observed that a few workers were not complying to wearing safety gears such as ear plugs in units which were noisy. Even though the worker not wearing ear plugs was cleaner (who usually spends a short period of time in the unit, hence short exposure), it is recommended that all workers wear safety gears at all times and the supervisors must adequately inform them about the health impacts associated with not using them properly.

¹ The BSCI (Business Social Compliance Initiative) is a European social monitoring system for ethical sourcing initiated by the Brussels-based Foreign Trade Association (FTA). It is a business-driven initiative for companies committed to improving working conditions in the global supply chain. BSCI unites hundreds of companies around one common Code of Conduct and supports them in their efforts to build an ethical supply chain by providing them with a step-by-step development- oriented system, applicable to all sectors and all sourcing countries. (<https://www.isocertificationconsultants.co.in/pages/bsci-certification>)

² Rating “A” refers to “Outstanding” which is valid up to two years.

Envoy employs few worker groups such as cleaners and security officials from third-party organizations as contracted workers. When their records were reviewed, it was found that it violates a few labour laws. No documentation related to sick leaves were found. Additionally, no E&S clause was found for transportation service providers. ETL provides shuttle services to the workers for their transportation to the project site. It is recommended that a strict screening and monitoring process for onboarding contracted workers must be followed and revised contracts must be offered to the contracted workers.

1. Introduction

1.1. Background

Envoy Textiles Limited (ETL, the Company), a Bangladesh-based flagship company of the Envoy Group, is a diversified conglomerate engaged mainly in ready-made garments (RMG) and textile manufacturing, and has interests in hospitality, freight forwarding, and meat processing. ETL was publicly listed in the Dhaka and Chittagong Stock Exchanges since 2012.

Asian Development Bank (ADB) is considering to fund ETL's expansion plans to procure and install spinning machines and associated equipment that will aim to increase their annual yarn production capacity by 3,850MT per annum in addition of its current spinning production capacity of 23,000MT per annum. Moreover, the aim is to reduce ETL's annual yarn imports by almost \$10million.

In order to evaluate ETL's capability to meet the relevant ADB SPS (2009) requirements and Good International Industry Practice (GIIP), before the final review by ADB's Investment Committee, ETL has commissioned PricewaterhouseCoopers (PwC) to conduct a corporate assessment on the company's Environmental and Social Management System (ESMS). PwC has also **conducted a corporate assessment** on ETL's past and present environmental and social compliance against the objectives, principles, and requirements of ADB, **prepared and agreed with ETL** on a Corrective Action Plan (CAP) to address the E&S issues identified during the assessment. As per condition precedent (CP), ETL is required to improve its current ESMS to meet SPS requirement before ADB's first disbursement. The CP will include selected items in the CAP for ETL to comply with national laws, regulations, and ADB SPS. The rest of the CAP can be implemented after ADB's first disbursement.

1.2. Objective of the assignment

PwC was assigned by Envoy Textiles Limited to conduct an assessment to ensure that the project complies with ADB's policies, strategies, and operations manual such as ADB's Safeguard Policy Statement (2009), Social Protection Strategy (2011), Gender and Development Policy (1998), Access to Information Policy (2018), IFC's EHS Guidelines and applicable laws and regulations pertaining to environment, health, safety, social³, and labor in Bangladesh. Additionally, the firm was also designated to ensure the project's compliance with relevant international treaties such as UN Declaration on rights of Indigenous Peoples, International Covenant on economic, cultural, and social rights, and ILO Labor Standards Conventions. An environmental and social assessment of ETL's ESMS, existing manufacturing facilities, land acquisitions, review the E&S aspects of the project and activities undertaken so far, assess the shortcomings against reference framework, and propose plans to meet the objective of the assignment. Additionally, after the review and approval of the report, PwC will support ETL in updating the existing ESMS.

2. Project Description

2.1. Introduction

2.1.1. Brief Overview and Location of the Project Site

³ In this context, "social" refers to indigenous people and resettlement. In Bangladesh, indigenous people are known as "ethnic minorities".

Envoy Textiles Limited (ETL) is a LEED Certified Platinum⁴ Manufacturing Facility located at Bhaluka, Mymensingh. It is an export oriented manufacturing company which started its operations in the year 2008 and became a Public Limited Company in 2012. Additionally, ETL is the first Denim Facility in Bangladesh to use Rope Dyed Technology. Major buyers of ETL include popular global brands such as Marks & Spencer, H&M, Walmart, Carrefour, ZARA, GAP, etc. ETL operates on **sustainable** production processes, such as fibres from sustainable sourcing such as organic, PCW, BCI, etc., ozone finishing process which reduces environmental impact, aero finish to enhance fabric stretching with durability, and many other sustainability initiatives to make the facility more environment friendly.

Figure 1 Geographical Location of Envoy Textiles Limited



⁴ Platinum is the highest level of LEED (Leadership in Energy and Environmental Design) Certification, requiring at least 52 of the available LEED points.

Figure 2 Map showing ETL and nearby community consulted



The project is located at Jamirdia, Bhaluka, Mymensingh, which is primarily an industrial area. The area is approximately 65 km from the airport and takes 2.5 hours of travel time by road. The main and axillary road is 100ft to minimum 20 ft wide and approximate 10% of the factory land is used for internal road transportation purpose. The nearest community from the project site is located approximately 0.8km away as shown in **Fig. 2**.

2.2. Details of the Factory and its Operations

Envoy Textiles Limited manufacturing facilities is spread over **approximately 36 Acre** of land with a solid wall boundary and proper fencing protection. It has three different operational units- **denim fabric unit, dyed yarn unit and yarn manufacturing unit**.

Figure 3 Different Industrial Units at ETL



Overall, only the production floor is **8,52,715 sqft**, comprising of the following units:

- Denim-1 Unit= 2,70,720 sqft
- Denim-2 Unit= 2,20,379 sqft
- Denim Weaving-3 = 20,772 sqft
- Spinning Unit= 2,34,578 sqft
- Knit winding = 35,979 sqft
- Recycling Plant= 10,287 sqft

On the other hand, the Warehouse Area is **1,53,518 sqft**, comprising of the following units:

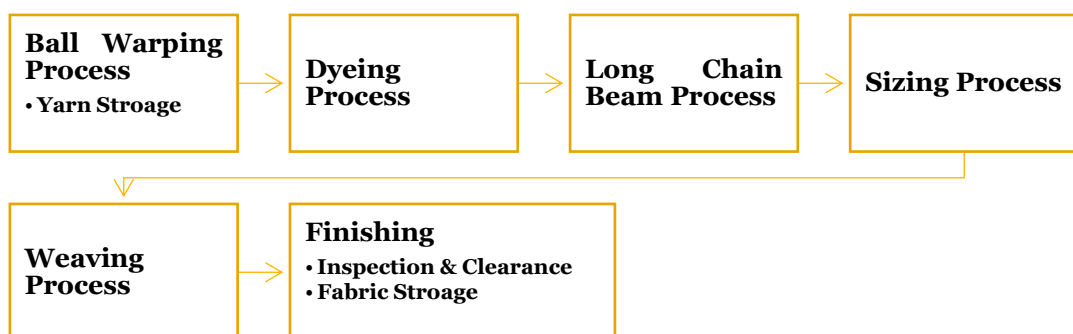
- Cotton warehouse 56,100 sqft
- Yarn warehouse 31,157 sqft
- Fabric warehouse 28,600 sqft
- Waste warehouse 10,736 sqft
- Chemical warehouse 25,300 sqft
- Sludge warehouse 960 sqft
- Salt storage area 665 sqft

Details of the Standard Operating Procedures for Warehouses/Store is attached in **Annexure A.4**.

Along with the production floors and utilities building, the premise has employee's dormitory facilities for bachelor's and family quarter as well. The Dormitories cover an Area of **275,016 sqft** and other Utilities building which add up to **111,733 sqft**. The **Master Plan** of the facility have been attached in **Annexure A.8**.

2.2.1. Denim manufacturing unit

The denim manufacturing unit has 06 process as illustrated in the following diagram:



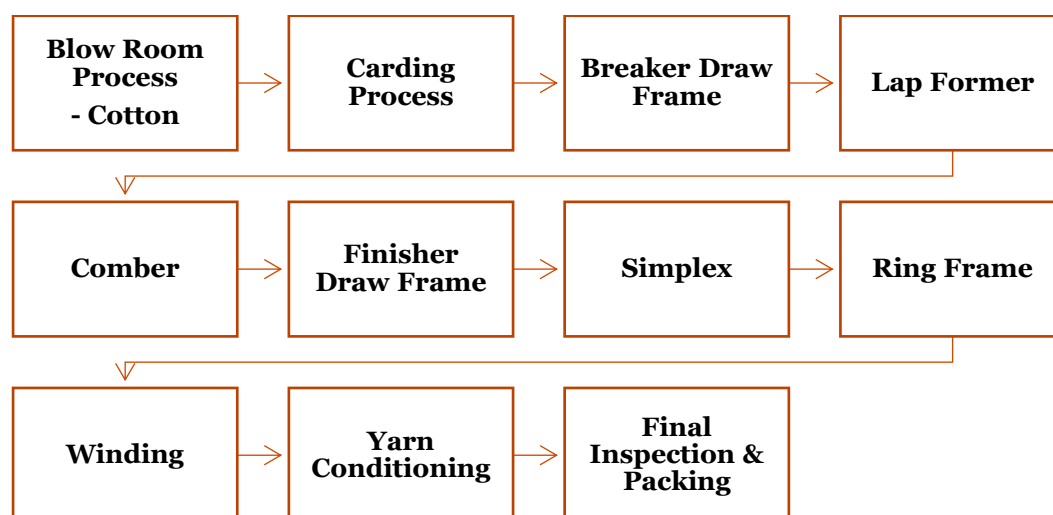
In the Denim Manufacturing process, the yarns are brought together from the yarn storage to be condensed into a rope before being wound onto a short cylindrical barrel. Most denim products are

colored in the characteristic blue indigo color. The threads are dipped in large tubs with the color 'indigo' and pulled up in the air on large drums. When the color 'indigo' reacts with oxygen, it turns blue and the threads are repeatedly dipped in the tubs for a darker shade. The color creates a coating around the thread but it is still white inside giving denim a characteristic faded which look when worn.

Next, in the Long Chain Beam Process, the dyed rope is converted into individual ends of the same rope. The main purpose of the long chain beamer is to convert the rope into a sheet form of yarn and wind onto a warper beam which is then transferred to the sizing machine. The sizing process chemically binds the fibres with each other and also improves its friction resistance capacity by chemically coating the surface of the yarn. Improvement in strength and frictional resistance is essential since the yarn has to undergo severe strain and stress during the weaving process.

Weaving involves interlacing two sets of yarn to make fabric. The blue threads and white threads are pulled up and down in the weaving machine in a 3:1 ratio (Blue: 3, White: 1). The Finishing process is the last stage in the production of denim. Before the denim leaves the mill, it undergoes a strict quality control to identify any defects or variations in color.

2.2.2. Spinning [Yarn] manufacturing Unit:



Blow Room Process: In the Blow Room Process, the compressed bales are opened, cleaned and blended/mixed according to particular length to form a specific size of lap.

Carding: Carding is known as the heart of spinning process as it defines the concluded features of yarn. It is a mechanical process that disentangles, cleans, and intermixes fibres to produce a continuous web for subsequent processing.

Breaker Draw Frame: Drafting and Drawing are carried out in the Draw Frame device. The process called 'doubling' feeds several intermediate strands into a singular strand. The process of 'drafting' is carried out to reduce fiber laps to silvers. The carded silver is drafter between roller to produce drawn silver.

Lap Former: A Lap Former machine is used for creating laps once the blowroom operations are finished. The machine generates compact laps from pulled silver to feed the comber machine.

Comber: The combing process eliminates the short fibres, impurities, naps, immature fibres from the silver, straightens the fibres and make them parallel along the silver length. This produces smoother, finer, stronger, and more uniform yarn.

Finisher Draw Frame: The Finisher Draw Frame gives further strength and stability to the silver. The drawn silver from the breaker draw frame is drawn again in the finisher draw frame.

Simplex: Next, the simplex process minimizes the silver weight to a suitable size for spinning into yarn and inserts twist to maintain the integrity of the draft strands.

Ring Frame: After the Simplex process, the roving (silver) is converted into desired yarn count in a machine called the ring frame. Three actions (drafting, twisting, and packaging formation) are performed simultaneously and continuously in this process.

Winding: Winding is the process of creating large yarn packages called ‘cone’ from a number of small yarn packages in order to make use of the yarn in the subsequent machineries. In addition to making bigger yarn packages, the winding process also mends faults in the earlier processes like neps, hairiness, and waxes.

Yarn Conditioning: High speed machines in the spinning process generates a lot of friction, giving more additional heat. The heat vaporizes the moisture content of the yarn. The Yarn Conditioning machine is used to retain the lost moisture.

Final Inspection and Packing: The finished yarn is inspected for quality and packaged accordingly.

2.2.3. Dyed Yarn Unit [Knit Winding]



Ball Warping: Process where yarn is wound onto a spindle device to prepare log for the rope dyeing machine.

Dyeing: The dyeing process adds the desired color to the yarn.

Long Chain Beaming: In the Long Chain Beam Process, the dyed rope is converted into individual ends of the same rope, to convert it into a sheet form

Knit Winding: Winding is the process of creating large yarn packages called ‘cone’ from a number of small yarn packages in order to make use of the yarn in the subsequent machineries. In addition to making bigger yarn packages, the winding process also mends faults in the earlier processes like neps, hairiness, and waxes.

Packaging: The finished product is inspected for quality and sent for packaging.

2.2.4. Captive Power Plant

The Captive Power Plant is powered by natural gas, possessing a 16 MW-capacity and was constructed in the year 2006 and started its operation in 2008. It covers the energy demand for all the units within ETL- all spinning and denim operations. The second source of power is from the Rural Electrification Board (REB) that allocates 10MWh power if the captive power plant is shut due to unavoidable reasons. The source of the natural gas is coming from and the tapping point is connected to the main transmission line. The license of the Captive Power Plant is valid till 30th June 2023. The captive power plant operates by a dedicated unit/department is responsible for the operation and maintenance.

2.2.5. Effluent Treatment Plant (ETP)

ETL's Effluent Treatment Plant conducts biological treatment with a capacity of 4320 cubic meter per day. The average inlet water into the ETL is 2880 cubic meter per day and it discharges approximately 2000 cubic meter per day. The treated effluent is finally discharged to the municipal sewage network which leads to the Bilaichari Khal (which is approximately 1km north from the project site). Among the total, 300 cubic meter worth of water is reused for hydrant and toilet flush. ETL has an agreement with Geocycle, who is licensed to manage sludge in Bangladesh.

Figure 4 Layout of Effluent Treatment Plant

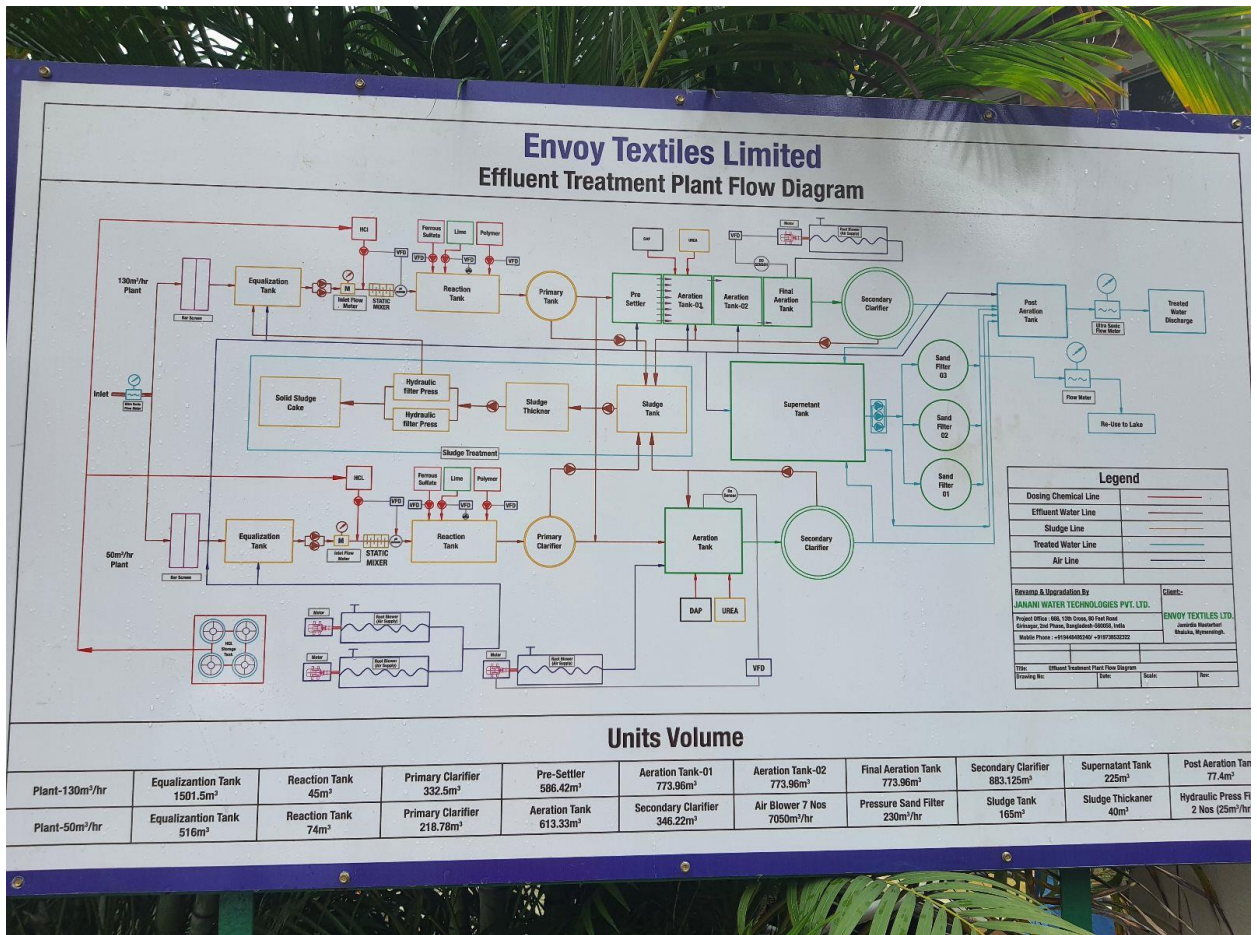


Figure 5 Effluent Treatment Plant of ETL



2.2.6. Green Areas and Open Spaces

ETL has a lot of plantation and greenery in their premises. According to ETL, approximately 25% of their industry area are allotted to green areas. Moreover, there is an artificial lake (which is approximately 3 acres as per discussion with ETL) which enhances the aesthetics of their premises and also serves as a reservoir for their hydrant system. The source of this stagnant waterbody is mainly groundwater or rainwater. In case of heavy rainfall, ETL pumps out excess water to the municipal drainage system to avoid overflow. This lake is not connected to any other systems (such as the ETP) or any other waterbodies.

For internal consumption, the lake is also used to harvest and grow different types of fish (*koi, rui, catfish, etc.*).

2.2.7. Expansion Plans of the Industry

ETL plans to procure and install spinning machines and associated equipment that would aim to increase the annual yarn production capacity of ETL by 3,850MT per annum in addition of its current spinning production capacity of 23,000MT per annum. The expansion is aimed at reducing ETL's annual yarn imports by almost \$10million. The project is also expected to reduce production timelines that would enable ETL to deliver the denim fabrics to apparel manufacturers in a shorter period of time.

The additional spinning mill is likely to be spread over an area of of 1,47,289 square ft on the second floor of building no. 20. The specifications of the machines to be purchased and installed are not finalised yet by ETL. The expanded unit should follow similar pollution prevention mechanisms (dust suppression technologies, and other health and safety protocols similar to the existing facilities). Details of the expansion layout has been attached in **Annexure A.8**.

3. Scope, Approach and Methodology

3.1. Approach and Methodology

To undertake the E&S review of Envoy Textiles Limited, our approach was to develop an understanding of the **regulatory environment, ETL's business operations, E&S management process and practice which was assessed through document review, on-site assessment, and stakeholder consultation** to provide constructive feedback in form of corrective actions to bridge the gap with ADB's Safeguard Policy Statement (2009), Social Protection Strategy (2011), Gender and Development Policy (1998), Access to Information Policy (2018), IFC's EHS Guidelines and applicable laws and regulation pertaining to environment, health, safety, social, and labor in Bangladesh. The reference frameworks are discussed in **chapter 4** of this document.

The assignment was conducted in the following two phases:

Phase 1: Corporate Review of the Company's ESMS and E&S review of company's existing facilities resulting in the preparation of a corrective action plan (CAP)

Phase 2: Revision/Updating Environmental and Social Management System.

Our approach and methodology for the assessment is described activity wise in the following sections.

Phase 1: Corporate Review of the Company's ESMS and E&S review of company's existing facilities resulting in the preparation of a corrective action plan (CAP)

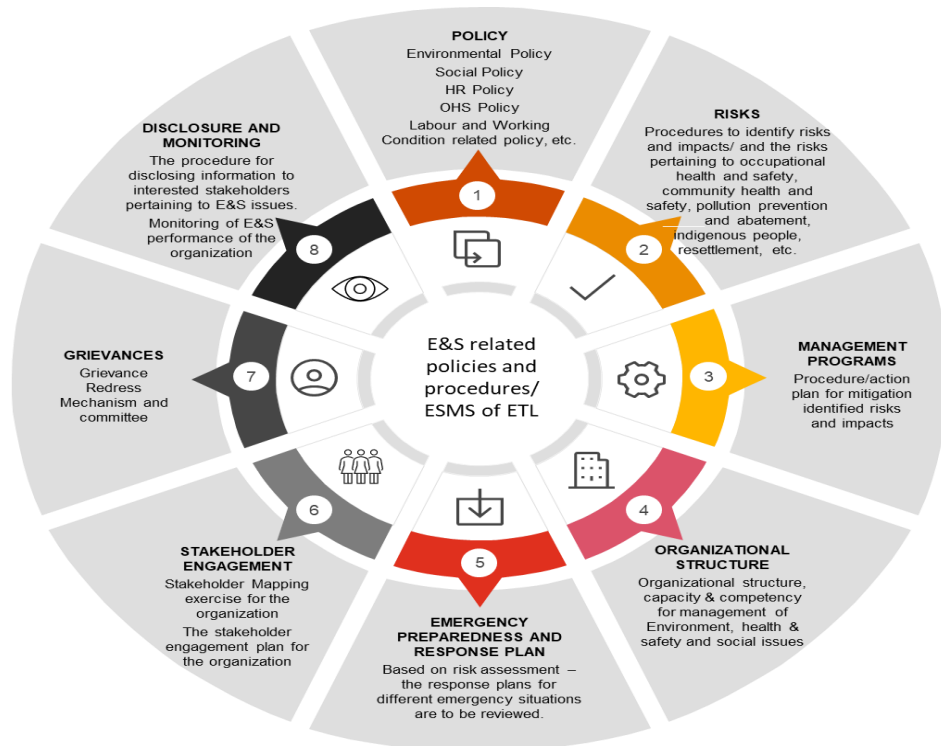
a. Corporate Review of the Company's ESMS

The existing ESMS of ETL has been assessed against Asian Development Bank's Safeguard Policy Statement (2009) SR 1-4 along with reference frameworks suggested in the Terms of Reference.

The corporate ESMS assessment was carried out in the following steps:

- i. **Desk review:** As part of the proposal, a list of required documents was shared with the client. The client shared those documents with PwC during the project kick-off. Based on the study of the initial documents received, a further granular detailed list of required documents was shared with client which was later collected from ETL. These documents were reviewed for the following thematic areas to understand the existing systems and procedures in ETL:

Figure 6: Indicative Assessment Parameters for ETL's ESMS



The plant documents (such as process flow documents, etc.) was assessed to conduct a) an independent Risk Assessment, b) Stakeholder Mapping Exercise and c) E&S Regulatory Analysis. The objective of this exercise was as follows:

- a. To understand the suitability of the Risk Identification and stakeholder engagement plan done by ETL
- b. Applicable E&S regulations to ETL's operations
- c. In absence of risk assessments or stakeholder mapping, assess whether mitigation measures/action plans/stakeholder engagement undertaken by the company is adequately meeting the requirements.

- ii. **Capacity Assessment:** Interviewed resources involved in ESMS/Safeguard implementation of ETL to understand the following:
 - a. Understanding about local regulations and different international standards like ADB's SPS 2009.
 - b. Academic background/professional experience in safeguarding E&S issues
 - c. Involvement in management and operational decisions
 - d. Understanding about E&S risks in their operations
 - e. Validating risk identification process, grievance redress mechanism, disclosure, stakeholder engagement procedure, reporting and monitoring framework followed by ETL.

The objective of this exercise was to a) to understand the capability and understanding of ETL's safeguard responsible persons in preparing E&S documents complying with ADB's standards and other internationally recognized standards and b) training or capacity development requirement for the ETL staff.

- iii. **Corrective Action Plan:** The findings of gap assessment (in form of draft CAP) were shared and discussed with ETL. The potential corrective action plans were discussed with ETL before sharing with client.

b. Environmental and Social Compliance Review of Company's Existing Facilities

Post corporate level assessment, an Environmental and Social Compliance Review of ETL’s existing facility (at Bhaluka) was undertaken to understand ETL’s past and present activities, associated risks and impacts on the environment, involuntary resettlement, indigenous people, and labour and gender aspects as per the ADB’s Safeguard Policy Statement (2009), Social Protection Strategy (2011), Gender and Development Policy (1998), Access to Information Policy (2018), IFC’s EHS Guidelines and applicable laws and regulations pertaining to environment, health, safety, social⁵, and labor in Bangladesh. This activity was carried out in the following steps:

- i. **Development of Assessment Checklist:** An E&S assessment checklist was developed to understand the compliance levels of ETL’s operations. The outcome of this assessment helped develop our understanding of the E&S practice in the facility. The checklist gave coverage to all the practices within the facility. The list of documents reviewed are attached in **Annexure A.4**.
- ii. **On-site assessment:** The team carried out an on-site assessment based on the developed checklist. The on-site assessment was carried out in the following manner:

Figure 7 E&S Review Process



- iii. **Stakeholder Consultations:** In addition to the worker and community consultations, the relevant stakeholders identified during stakeholder mapping exercise was consulted to identify past or present environmental or social issues pertaining to ETL’s operation. Relevant stakeholders such as local government, department of public health, hospitals, NGOs, etc. The team conducted 4 institutional consultations, 10 workers and 3 community interviews and these stakeholder consultations were limited to the organizations/departments located in Bhaluka, Mymensingh (location of ETL factory). See **Annexure A.1**. for more details.

⁵ In this context, “social” refers to indigenous people and resettlement issues. In Bangladesh, indigenous people are synonymously used as “ethnic minorities”.

- iv. **Gap Assessment:** The findings of the assessment checklist, stakeholder consultation and documents reviewed were benchmarked against the reference frameworks including ADB's SPS 2009.
- v. **Corrective Action Plan:** The recommendation on findings of gap assessment (in form of draft CAP) was shared and discussed with ETL. The feedback received from ETL and ADB were incorporated and finalized in the CAP.

4. Summary of Applicable Laws and Regulations, Certifications, Permits, and Licenses

4.1. Environmental Regulations relevant to the Textile Industry

Various existing environment policies, legislations applicable to the textile sector was identified through focused secondary research and literature review. Following is the list of environmental laws and regulations relevant to the textile sector in Bangladesh. Following table provides mapping of policies as per parameters:

Table 1 Environmental Regulations relevant to the Textile Industry

SL.	Parameter	Policy
1.	Water usage	National Water Act, 2013 National Water Rule, 2018
2.	Air pollution	Environment Conservation Act 1995 Environmental Conservation Rule, 1997
3.	Effluent discharge	Environment Conservation Act 1995 Environmental Conservation Rule, 1997
4.	Solid waste	Bangladesh Standards and Guideline for sludge management, 2015 Solid Waste Management Rule, 2021
5.	Hazardous waste	Bangladesh Standards and Guideline for sludge management, 2015
6.	Chemical usage	Acid Control Act, 2003 Petroleum Act, 2016
7.	Energy	Renewable Energy Policy of Bangladesh, 2008 National Energy Policy, 1996
8.	Labor Management	Labor Act, 2006 Labor Rule, 2015

Table 2 Details of the Applicable National Regulations

SL	Environmental Acts	Brief Description	Applicability	Applicable Certifications and Permits
2.	<i>Environmental Conservation Act 1995 (ECA)</i>	ECA was promulgated for “conservation, improvement of quality standards, and control through mitigation of pollution of the environment” (Environmental Conservation Act, 1995). The important sections that are applicable to textile industry are: 1. Section 6A of ECA provisions restrictions on manufacture, sale etc. of articles injurious to environment 2. Section 9 of ECA holds person responsible for excessive discharge of pollutants responsible to control and mitigate the environmental pollution	Considering ETL is a manufacturing facility with potential environmental impacts, ECA is applicable. Non-compliance to ECA provisions would result in penalization.	-
3.	<i>Environmental Conservation Rules 1997 (ECR), revised 2017, Environmental Quality Standards</i>	The 1997 Environment Conservation Rules made in accordance with the 1995 Act provide additional guidance for specific components of the ECA, 1995. The following schedules (which prescribe standards) from ECL are applicable to textile sector as a whole: 1. Schedule 8 for odour 2. Schedule 10 for waste from industrial units or projects waste 3. Schedule – 11 Standards for Gaseous Emission from Industries or Projects 4. Schedule 12 for water effluent (textile)	ETL’s Yarn Dyeing, Fabric Dyeing, Finishing and Washing (wet process) unit and Captive Power Plant falls under “Red” category requiring submission of Initial Environmental Examination (which may be relaxed with submission of EIA) and Environmental Impact Assessment (EIA) along with an Environmental Management Plan (EMP) to obtain Environmental Clearance Certificate. The Environmental Standards defined in the act is also applicable to the industry.	<ul style="list-style-type: none"> • Environmental Clearance Certificate (ECC) for Captive Power Plant • Environmental Clearance Certificate for Envoy Textiles Limited (Yarn Dyeing, Fabric Finishing and Washing (wet process))

4.	<i>The EIA Guidelines for Industry, 2021</i>	The EIA guidelines for industries, 2021 document outlines the steps in Environmental Impact Assessment, key components, process of integrating EIA into project lifecycle, applicable rules and regulations.	For future expansion requiring establishment of new units, ETL should follow the guidelines to conduct Environmental Impact Assessment (EIA) as per national requirements.	-
5.	<i>The Environmental Court Act 2000</i>	The 2000 Environmental Court Act supports the Environmental Conservation Act (1995) and the Environmental Conservation Rules (1997) by providing for the establishment of environmental courts for the trial of offences relating to environmental pollution. It includes protocols for the establishment of the court, and defines the court's jurisdiction, appropriate penalties, powers of search and entry, and procedures for investigation, trial and appeal. The Environmental Conservation Act, 1995 and the Environmental Court Act 2000 were amended in 2002 and the Environmental Conservation Rules, 1997 were extended to incorporate ambient air quality and exhaust fan vehicles.	Any potential litigations related to ECR violation would follow this act.	-
6.	<i>Acid Control Act. 2003</i>	The act controls acid import, manufacture, transport, stock, procurement and use control, use of acid as a corrosive combustible substance in order to prevent abuse, and to provide medical, rehabilitation and legal aid to victims of acid violence.	<ul style="list-style-type: none"> • ETL stores acidic chemicals for use in its wet processes 	<ul style="list-style-type: none"> • Acid License
7.	<i>Bangladesh Petroleum Act, 2016</i>	The Bangladesh Petroleum Corporation Act 2016 (Act No. 8 of 2016) sets out composition, duties and	ETL stores diesel to use in its backup generator and forklifts.	BERC License

		responsibilities of the Bangladesh Petroleum Corporation and regulates its functions, powers, internal organization and external relationships. The Corporation aims at performing all the activities related to crude and refined oil, other petroleum materials collected and stored, etc. The act also regulates the storage of petroleum in business premises.		
8.	<i>Fire Prevention Act 2003</i>	The act is formed to prevent and extinguish fire and undertake rescue operation.	Factories and establishment must comply with this act.	<ul style="list-style-type: none"> • Fire License
9.	<i>Bangladesh Sludge Management Guidelines 2015</i>	<p>The sludge management guidelines of 2015 classifies sludge into three categories:</p> <ol style="list-style-type: none"> 1. Category A: Municipal Sludge including comparable sludge 2. Category B: Sludge from industries including sludge from CETP 3. Category C: Sludge from industries including sludge from CETP belonging to the category of hazardous waste <p>Before sludge is disposed it needs to undergo some pre-treatments:</p> <ul style="list-style-type: none"> - Mechanical treatment - Physico/chemical treatment - Ozonation, chemical oxidation - Biological treatment - Further sludge treatment <p>The guideline gives clear recommendations on types of sludge and methods of dumping them in landfill. In particular, the guideline</p>	ETL generates Category B sludge. The sludge needs to be managed and disposed in accordance with this guideline.	

		talks about the type of land suitable for landfilling with sludge.		
10.	<i>Solid Waste Management Regulations, 2021</i>	The Regulations define the responsibilities of businesses involved in solid waste management and impose collection, recycling, and disposal obligations according to Extended Producer Responsibility (EPR) on manufacturers of non-biodegradable products such as glass, plastic, and bottles. The Regulations also include provisions for the treatment of solid waste such as composting and energy recovery. The regulation also promotes segregation requirements on businesses and households.	Envoy Textile Limited generates domestic solid waste in their factory premises as well as their dormitory. Process waste, packaging waste. ETL being a textile manufacturer has to follow waste segregation and disposal requirements. EPR is not applicable to ETL.	
11.	<i>Labor Law 2006 and Labor Rule 2015</i>	Bangladesh Labour Act was promulgated in 2006. The legislation pertains to the occupational rights and safety of factory workers and the provision of a comfortable work environment and reasonable working conditions. The amendment in 2013 has introduced a good number of important items like workers' welfare, rights and safety and industrial safety and expansion of the industry to the power transmission sector. Labor rule published in 2015, provides the guidance to implement labor law. Key directives under the regulation: <ul style="list-style-type: none"> • Approval of Employment Policy/Service Rules • Registration of manpower supply agencies • Establishment of an organogram 	ETL has 2770 workers in the premises consisting of direct workers and contracted workers. The provisions of this law is applicable.	Factory License

		<ul style="list-style-type: none"> • Providing appointment letter • Keeping registers such as service books, labor register, leave register, etc. • Provides guidance towards misconduct and punishment • Mandates two festival bonuses for fulltime workers • Provisions for provident fund • Holidays; earned leave, casual leave and sick leaves • Health and safety provisions • Wages • Requirement for factory approval • Labor court rules: The procedures and protocols to be followed for legal disputes pertaining to this law 		
12.	<i>Water Act, 2013</i>	The Bangladesh Water Act provides for the right to water when it is used for the purposes of drinking, sanitation and sewage disposal, water control, protection and conservation of water resources. The act mandates the requirement of permits/licenses for large scale water withdrawal by individuals and organizations beyond domestic use. Without prior permission issued by the Executive Committee, no individuals or organizations will be allowed to extract, distribute, use, develop, protect, and conserve water resources, nor they	ETL abstract ground water for industrial use.	

		will be allowed to build any structure that impede the natural flow of rivers and creeks. However, the maximum amount of surface water or groundwater that can be withdrawn by individuals or organizations is not mentioned in the Act.		
13.	<i>Water Rule, 2018</i>	Bangladesh Water Rule 2018 contains chapters on the national water policy, international and regional cooperation in water and rights to water. The rule empowers the water resource-planning department to determine the water requirements, maximum and minimum distance of receiving water. Based on this rule, Water Resource Planning Organization (WARPO) will give the authorization to establish water related projects and industries.	ETL abstracts ground water for industrial use.	No objection certificate from local
14.	<i>Boiler Attendant Rule, 2011 And Boiler Act, 1923.</i>	These acts and rules stipulate the control measures for boiler operation in factories and establishments.	ETL has number of boilers and boiler operators for their textile processing plant.	- Boiler License - Boiler operators licenses
15.	<i>Biomedical waste management and processing rule 2008</i>	Bangladesh Medical Waste Management and Processing Rules 2008 deals with the waste disposal of different medicals and hospitals in our country. The rule also gives coverage to medical waste in manufacturing facilities.	ETL has very small amount of medical waste. ETL is required to segregate the waste into color codes..	-

For more details of the applicability and violations of the mentioned laws are regulations, see **Chapter 6**.

4.2. Asian Development Bank's Safeguard Policy

Statement 2009

At an early stage of project preparation, the borrower/client to identify potential direct, indirect, cumulative and induced environmental impacts on and risks to physical, biological, socioeconomic, and physical cultural resources and determine their significance and scope, in consultation with stakeholders, including affected people and concerned NGOs. Once the

potentially adverse environmental impacts and risks are identified, the borrower/client will undertake an environmental assessment as early as possible in the project cycle.

Impacts and risks to be analysed in the context of the project's area of influence⁶. Depending on the significance of project impacts and risks, the assessment may comprise a full-scale environmental impact assessment (EIA) for category A projects, an initial environmental examination (IEE) or equivalent process for category B projects, or a desk review. An EIA report includes the following major elements: (i) executive summary, (ii) description of the project, (iii) description of the environment (with comprehensive baseline data), (iv) anticipated environmental impacts and mitigation measures, (v) analysis of alternatives, (vi) environmental management plan(s), (vii) consultation and information disclosure, and (viii) conclusion and recommendations. An IEE, with its narrower scope, may be conducted for projects with limited impacts that are few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures. For a project which is classified as category C if it is likely to have minimal or no adverse environmental impacts. No environmental assessment is required although environmental implications need to be reviewed.

Environmental Planning and Management

The borrower/client to prepare an environmental management plan (EMP) that addresses the potential impacts and risks identified by the environmental assessment. The EMP to include the proposed mitigation measures, environmental monitoring and reporting requirements, emergency response procedures, related institutional or organizational arrangements, capacity development and training measures, implementation schedule, cost estimates, and performance indicators.

Information Disclosure

When the project involves existing activities or facilities, relevant external experts will perform environmental audits to determine the existence of any areas where the project may cause or is causing environmental risks or impacts. If the project does not foresee any new major expansion, the audit constitutes the environmental assessment for the project. A typical environmental audit report includes the following major elements: (i) executive summary; (ii) facilities description, including both past and current activities; (iii) summary of national, local, and any other applicable environmental laws, regulations, and standards; (iv) audit and site investigation procedure; (v) findings and areas of concern; and (vi) corrective action plan that provides the appropriate corrective actions for each area of concern, including costs and schedule.

Consultation and Participation

The borrower/client to carry out meaningful consultation with affected people and other concerned stakeholders, including civil society, and facilitate their informed participation. Meaningful consultation is a process that (i) begins early in the project preparation stage and

⁶ Area of Influence encompasses (i) the primary project site(s) and related facilities that the borrower/client (including its contractors) develops or controls, such as power transmission corridors, pipelines, canals, tunnels, access roads, borrow pits and disposal areas, and construction camps; (ii) associated facilities that are not funded as part of the project (funding may be provided separately by the borrower/client or by third parties), and whose viability and existence depend exclusively on the project and whose goods or services are essential for successful operation of the project; (iii) areas and communities potentially affected by cumulative impacts from further planned development of the project, other sources of similar impacts in the geographical area, any existing project or condition, and other project-related developments that are realistically defined at the time the assessment is undertaken; and (iv) areas and communities potentially affected by impacts from unplanned but predictable developments caused by the project that may occur later or at a different location.

is carried out on an ongoing basis throughout the project cycle; (ii) provides timely disclosure of relevant and adequate information that is understandable and readily accessible to affected people; (iii) is undertaken in an atmosphere free of intimidation or coercion; (iv) is gender inclusive and responsive, and tailored to the needs of disadvantaged and vulnerable groups; and (v) enables the incorporation of all relevant views of affected people and other stakeholders into decision making, such as project design, mitigation measures, the sharing of development benefits and opportunities, and implementation issues. Consultation will be carried out in a manner commensurate with the impacts on affected communities. The consultation process and its results are to be documented and reflected in the environmental assessment report.

Grievance Redress Mechanism

The borrower/client to establish a mechanism to receive and facilitate resolution of affected peoples' concerns, complaints, and grievances about the project's environmental performance. The grievance mechanism should address affected people's concerns and complaints promptly, using an understandable and transparent process that is gender responsive, culturally appropriate, and readily accessible to all segments of the affected people at no costs and without retribution. The mechanism should not impede access to the country's judicial or administrative remedies. The affected people will be appropriately informed about the mechanism.

Monitoring and Reporting

The borrower/client to monitor and measure the progress of implementation of the EMP. For projects likely to have significant adverse environmental impacts, the borrower/client to retain qualified and experienced external experts or qualified NGOs to verify its monitoring information. The borrower/client to prepare periodic monitoring reports that describe progress with implementation of the EMP and compliance issues and corrective actions and unanticipated impacts, if any.

Biodiversity Conservation and Sustainable Natural Resource Management

The borrower/client to assess the significance of project impacts and risks on biodiversity and natural resources as an integral part of the environmental assessment process. The assessment to focus on the major threats to biodiversity, which include destruction of habitat and introduction of invasive alien species, and on the use of natural resources in an unsustainable manner. The borrower/client need to identify measures to avoid, minimize, or mitigate potentially adverse impacts and risks and, as a last resort, propose compensatory measures, such as biodiversity offsets, to achieve no net loss or a net gain of the affected biodiversity.

Pollution Prevention and Abatement

During the design, construction, and operation of the project the borrower/client to apply pollution prevention and control technologies and practices consistent with international good practice, as reflected in internationally recognized standards such as the World Bank Group's Environment, Health and Safety Guidelines.

Health and Safety

The borrower/client to provide workers with a safe and healthy working environment, taking into account risks inherent to the particular sector and specific classes of hazards in the borrower's/client's work areas, including physical, chemical, biological, and radiological

hazards. The borrower/client to apply preventive and protective measures consistent with international good practice, as reflected in internationally recognized standards such as the World Bank Group's Environment, Health and Safety Guidelines.

The borrower/client to identify and assess the risks to, and potential impacts on, the safety of affected communities during the design, construction, operation, and decommissioning of the project, and will establish preventive measures and plans to address them in a manner commensurate with the identified risks and impacts.

Physical Cultural Resources

The borrower/client is responsible for siting and designing the project to avoid significant damage to physical cultural resources. When the project is likely to have adverse impacts on physical cultural resources, the borrower/client to identify appropriate measures for avoiding or mitigating these impacts as part of the environmental planning process. These measures may range from avoidance to full site protection to selective mitigation, including salvage and documentation, in cases where a portion or all of the physical cultural resources may be lost.

4.3. Other Applicable Reference Frameworks

4.3.1. Social Protection Strategy (2001)

ADB's Social Protection Strategy refers to the set of policies and programs designed to reduce poverty and vulnerability by promoting efficient labor markets, limiting people's exposure to risks, and enhancing their capacity to protect themselves from hazards, maintain a balance in their income to avert interruption or loss.

The Social Protection Strategy requires the borrower to comply with applicable labor laws in relation to the project, and take the following measures to comply with the core labor standards for the project to be financed:

- Conduct activities with the intent of ensuring legally permissible equal opportunity, fair treatment and non-discrimination in regards to recruitment and hiring, compensation, working conditions and terms of employment for its workers (which includes prohibition of any kind of discrimination against women at the recruitment stage, etc.)
- Not confining its workers to express grievances and protecting their rights regarding working conditions and terms of employment
- Engage Contractors and other Third Party Organisations for goods and services:
 - i. Who do not employ child or forced labor
 - ii. Have an appropriate management system that will enable them to operate in a way which is ensuring legally permissible equal opportunity, fair treatment and non-discrimination for their workers, and not restricting them from expressing grievances, protecting their rights regarding working conditions and terms of employment.
 - iii. The contractors must contain provisions which align with the two points mentioned above

4.3.2. Gender and Development Policy (1998)

Asian Development Bank's Gender and Development Policy (1998) adopts gender mainstreaming as a key strategy for driving gender equity, ensuring women's participation and needs. The key elements of ADB's gender policies are:

- i. Gender Sensitivity: Observes how the project affects women and men differently and take account of their varying needs and perspectives in resettlement planning

- ii. Gender Analysis: Indicates the systematic assessment of the project impact on men and women on the economic and social relationships between them
- iii. Gender Planning: Strategies to create equal opportunities to men and women
- iv. Mainstreaming, to take gender issues into account in all of ADB's operations, in addition to efforts to encourage women's participation in the decision making process in development activities.

4.3.3. Access to Information Policy (2018)

Asian Development Bank's access to Information Policy reflects its ongoing commitment to transparency, accountability, and participation by stakeholders. The policy involves a principle of clear, timely, and appropriate disclosure, containing principles and exceptions to information sharing with external stakeholders.

4.3.4. IFC's EHS Guidelines

The IFC Environmental, Health, and Safety (EHS) Guidelines are reference documents with general or sector-specific examples of Good International Industry Practice. During the project appraisal, IFC uses the EHS as a technical source. The General Guidelines comprise of broader environmental, health, and safety issues potentially applicable to industry sectors and can be combined with relevant industry sector guidelines.

The General EHS Guidelines touch up on areas related to Environmental, Occupational Health and Safety, Community Health and Safety and, Construction and Decommissioning. Based on the approach for the management of environmental issues at the Project level, the General EHS Guidelines assists in the achieving the following:

- Identifying EHS project hazards and associated risks as early as possible in the facility development or project cycle,
- Involving EHS professionals, who have the experience, competence, and training necessary to assess and manage EHS impacts and risks,
- Understanding the likelihood and magnitude of EHS risks, based on the nature of the project activities and the potential consequences to workers, communities, or the environment if hazards are not adequately managed,
- Prioritizing risk management strategies with the objective of achieving an overall reduction of risk to human health and the environment,
- Strategies that eliminate the cause of the hazard at its source,
- When impact avoidance is not feasible, incorporating engineering and management controls to reduce or minimize the possibility and magnitude of undesired consequences,
- Preparing workers and nearby communities to respond to accidents, and
- Improving EHS performance through a combination of ongoing monitoring of facility performance and effective accountability.

4.3.5. International Labor Organization (ILO) Conventions covering core labor standards and the basic terms and condition of employment

International Labor Standards are legal instruments by ILO's constituent (government, employers, and workers) regarding basic principles and rights at work. They are either Conventions (or Protocols), which are legally binding international treaties that may be ratified by member states. Bangladesh is a signatory to the following 8 core ILO Conventions:

- Freedom of Association
- Collective Bargaining

- Forced Labour
- Child Labour
- Equality of Opportunity and Treatment
- Tripartite Consultation
- Labour Administration
- Labour Inspection

4.3.6. Interim Advice for IFC and EBRD Clients on Migrant Workers and COVID-19

This reference framework provides guidance to European Bank for Reconstruction and Development (EBRD) and clients of International Finance Corporation (IFC) to manage and respond to challenges experienced by migrant workers during Covid-19.

4.3.7. COVID-19 and Gender-Based Violence: Workplace Risks and Responses

This guidance document outlines ways in which employers can address heightened risks of gender-based violence as a result of the Covid-19 pandemic. It also provides guidelines related to improving employee and community well-being, and creating a safe and resilient workplace.

4.3.8. Interim Advice for IFC Clients on Preventing and Managing Health Risks of Covid-19 in the Workplace

The guideline provides advice from internationally recognised sources to help IFC clients instantly identify measures for preventing and managing Covid-19 outbreaks in the workplace. The document also helps to address and respond to Covid-19 infection at a community level.

4.3.9. IFC's Interim Advice for IFC Clients on Safe Stakeholder Engagement in the context of Covid-19

This document assists IFC clients to identify other alternative approaches and mechanisms for engaging stakeholders, for delivering information to the communities being affected by the projects and receiving feedback from them, while taking all feasible steps to ensure the stakeholders' health and safety.

4.3.10. Applicable Good international industry practice (GIIP) or Good Manufacturing Practice (GMP)

Good manufacturing practice (GMP) is a system for ensuring that products are consistently produced and controlled according to quality standards.

4.3.11. IFC's Good Practice Note on Cumulative Impact Assessment and Management for the Private Sector in Emerging Markets (2013)

This Guidance document is to assist private sector companies in emerging markets to identify cumulative impacts and guide them to effectively design and implement measures for managing the impacts.

4.3.12. Global Organic Textile Standard

This is a product safety standards related to the nature of cotton used in textile manufacturing process.

4.3.13. Global Recycle Standard

This is a standards of origin for the recycled cotton used in process by textile manufacturers.

4.3.14. Organic Content Standard

This is a product safety standards related to the nature of cotton used in textile manufacturing process.

4.3.15. LEED Platinum Certified factory

LEED is a certification for energy efficiency and resource efficiency measures in buildings and establishments.

5. Corporate Assessment Findings

5.1. Corporate ESMS and Policies

Envoy Textiles Limited is following ISO 14001: Environmental Management System and Business Social Compliance Initiatives (BSCI) standards for Social Management System.

Environmental Management System: ISO 14001

ISO 14001 is an internationally agreed standard that sets out the requirements for an environmental management system. It helps organizations improve **their environmental performance** through more efficient use of **resources and reduction of waste**, gaining a competitive advantage and the trust of stakeholders.

As part of Envoy Textile Limited (ETL)'s Environmental Management System, ETL has defined an environmental policy with an objective of minimizing usage of natural resource, ensuring conservation of environmental assets such as water, energy, chemical and air, complying with national regulations and guidelines, creating capacity and awareness on environmental protection, reduce pollution and waste generation and encouraging customers in embarking environmental protection activities. Moreover, through their environmental policy the company is also committed to monitor their own environmental performance.

Figure 8: Environmental Policy of ETL

Environmental Policy:

Envoy Textiles Limited is committed to making a positive impact through improvement of environmentally sustainable performance *by protecting environment, prevention of pollutions and compliance with current environmental legislations.*

- To Ensure minimum usages of natural resources.
- To Ensure conservation of all environmental assets (water/energy/chemical/air).
- To Comply with require laws, rules & customer environmental guideline.
- To Creating awareness on environmental issues on consistent training.
- Ensure Pollutions free operation and identifying environmental impact to meet EMS objectives.*
- Encourage environmental protection activities by customers.
- To Prevent pollutions and reduce of all waste *by using appropriate technologies.*
- Providing adequate resources to EMS team to support and fulfillment of EMS activities.*

The company is also committed to evaluate environmental sustainability performance annually *and ensuring continual improvement.* This statement shall be communicated to all staff, suppliers, customers *and others interested parties.*

Proposed by



Approved By



The EMS document of ETL also sets out specific targets on water consumption, energy consumption, renewable energy adoption, GHG emission reduction, wastewater treatment, reduction of hazardous chemical usage through adoption of ZDHC, reduction of waste generation, etc. ETL monitors performance of these indicators on an annual basis and records them periodically as part of their EMS renewal process.

Business Social Compliance Initiatives

Envoy Textiles limited is a certified entity following BSCI standards. amfori BSCI Code of Conduct sets up the values and principles that the amfori BSCI Participants strive to implement in their supply chains. In order to participate in the program ETL is complying with the the amfori BSCI Code of Conduct. The expiration date of the certification is 14th February 2023 which was submitted on 1st March 2021. Since ETL possesses the grade 'A' title, the certification is valid for 2 years.

The certification process involves an audit which provides a comprehensive assessment of a company's social compliance, which include 13 performance areas:

Table 3 Brief Description of the BSCI's 13 Performance Areas

SL.	Performance Areas	Brief Description
1.	Social Management System and Cascade Effect:	A Social management system (SMS) is the set of policies, processes and procedures that allow a business to manage its social performance through a continuous improvement approach. Cascade effect means that a producer develops and communicates systems, procedures and competences necessary to live up to the amfori BSCI Code of Conduct within its own business culture and promotes it with its business partners.
2.	Workers Involvement and Protection:	Workers and their representatives must be involved in an honest way in communications relating to rights, protection, and ability to perform assigned tasks, be aware of their rights and responsibilities, abke to access an effective grievance mechanism, and be trained in

		occupational health and safety issues along with being able to suggest improvements.
3.	The Rights of Freedom of Association and Collective Bargaining	The producer enables workers to approach management for discussing and negotiating better working conditions. The workers must have freedom of association, which is the right to form and join organisations of their own choosing. The workers must also have the right for collective bargaining, meaning that they must have the right to negotiate between trade unions or workers' representatives and employers to define the terms and conditions of employment and confer rights, advantages, and responsibilities to the parties.
4.	No Discrimination, Violence or Harassment	No unfair or prejudicial act or practice must be acted against a worker or groups of workers based on their characteristics.
5.	Fair Remuneration	The workers must be paid following minimum wage regulations established by law or in agreements, timely payment in legal currency, reflecting the skills and experience of workers, include mandatory social benefits, and having only deductions allowed by law.
6.	Decent Working Hours:	Decent Working Hours include- not exceeding 48 hours a week and 8 hours a day, overtime according to legal limits and paid at a premium rate, right to resting break in every working day, and right to one day off in every seven days.
7.	Occupational Health and Safety	The performance of a business in OHS is assessed by its compliance with regulations, risk assessment, training of workers, and procedures and equipment to ensure OHS. The business must be able to provide documentation and explanation to ensure that all the OHS regulations are complied with. Risks to workers' health and/or lives will case the auditor to trigger an alert according to the BSCI Zero Tolerance Policy.
8.	No Child Labour	Child Labor is done by a person who is under 15 years old, dangerous (morally, physically, socially, or mentally), interferes with schooling, and is not 'light work'. Light work is acceptable if children are at least 13 years old (or at least 12 years old in countries that have set a minimum age of 14), able to attend school and have time to complete their homework (eg: two hours in any working day), supervised by a guardian or parent who ensures that tasks given to the children are harmless.
9.	Special Protection for Young Workers:	Special Protection for young workers include- not working night shifts, not working near or with dangerous substances and chemicals, must have received specific training on health and safety standards and how ot access the producer's grievance mechanism, and to ensure that their assigned working hours do not put their school attendance at risk, participation in vocational orientation, or benefit from training programs. Additionally, the producer has to take all necessary measures to provide special protection to young workers to protect them from physical, psychosocial, or moral danger at work.
10.	No Precarious Employment	No precarious employment means that the employment terms must not cause insecurity for the worker, employment contracts provide social security, temporary or seasonal contracts, apprenticeship

		schemes, and subcontracting are not used to avoid the law.
11.	No Bonded Labour, Forced Labor or Human Trafficking	Bonded labour includes any form of servitude, or any forced, bonded, trafficked, indentured, and non-voluntary labor.
12.	Protection of the Environment	Businesses must have the responsibility to follow environmental laws, minimize negative environmental impacts, and contribute towards long term development.
13.	Ethical Business Behaviour	Unethical business behavior refers to fraud, false, misinterpretation, corruption, extortion, embezzlement, and bribery.

See **Appendix A.6.** for details of the **amfori BSCI Code of Conduct** and the **amfori BSCI Guidelines for producers**. A certified entity is re-audited every year to renew the certification.

In addition to these, they subscribe to number of international standards, which are as follows:

SL.	International Certifications/Standards	Area of Focus
1.	Higg;s Facility Social Labour Module (FSLM)	Promotes safe and fair social and labor conditions for value chain workers all over the world
2.	Higg;s Facility Environmental Module (FEM)	Standardizes how facilities measure and evaluate their environmental performance every year
3.	ISO 9001:2015	Specifies requirements to plan, establish, implement, operate, monitor, review, maintain, and continually improve a documented management system
4.	LEED Platinum Certified	Provides a framework for healthy, highly efficient, and cost-saving green buildings
5.	Global Organic Textiles Standards	Credible assurance of organic origin of the product, as well as environmentally and socially accepted processing
6.	Recycled Claim Standards	Standard to track recycled raw materials throughout the supply chain
7.	Better Cotton Initiatives	Make Global cotton production more environment friendly and sustainable
8.	OEKO-TEX 100	Trusted Certification for Product Safety

Details of the standards are described in **Chapter 6.3.**

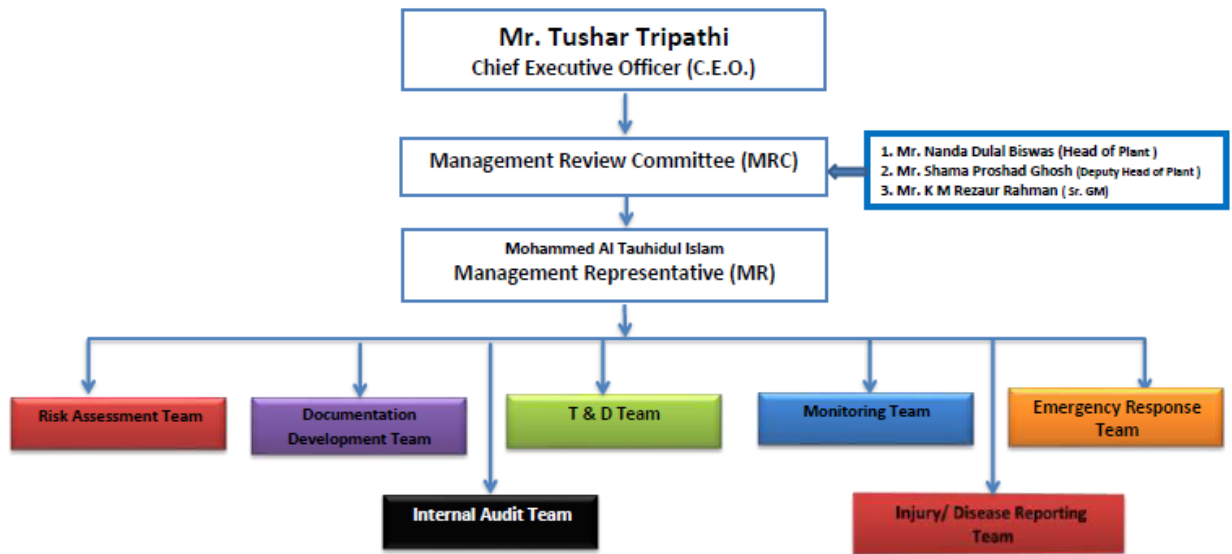
Table 4 Different Aspects of the Existing Environmental and Social Management System of ETL

Aspects of the ESMS	Available Policies, Procedures and SOPs	Identified Gap
E&S Policies	<ul style="list-style-type: none"> Environmental Policy Social Policy. OHS Policy (Details of these policies are attached in Annexure A.4)	<ul style="list-style-type: none"> Existing social policy outlines the firm's commitment to implement national law and evaluating social performance of high-risk business partners from labor compliance perspective. However, no policy outlining commitments to principles of involuntary resettlement and indigenous people safeguards
Screening & categorization	<ul style="list-style-type: none"> ISO 140001 is based on the material issues of the facilities 	<ul style="list-style-type: none"> No set procedure for screening, risk identification

Aspects of the ESMS	Available Policies, Procedures and SOPs	Identified Gap
	<p>under the scope of the certification. While it does require ETL to take into consideration planned or new development, it does not provide guidance on screening or categorization of expansions/new investments in the business.</p> <ul style="list-style-type: none"> • ETL adheres to local laws when it comes to project categorization. Local law does not take into consideration location specific risks/impacts. It only takes into consideration the project type specific risks 	<p>and project categorization in existing ESMS beyond national screening and categorization procedures as per ECA 1995 and ECR 1997.</p> <ul style="list-style-type: none"> • ETL is currently planning to expand it's existing operations through investments in spinning machineries. According to ETL management, it may expand further into ready made garments manufacturing (cut and sew) in the future.
Review and Planning Procedures	<ul style="list-style-type: none"> • Existing EMS: 14001 sets out targets and provides objective goals for reaching the targets. • ISO 14001 requires establishing a regulatory registry and complying with the existing regulations. This gives passive coverage to reviewing projects and planning mitigations as per national law. 	<ul style="list-style-type: none"> • Procedure for evaluating projects and designing risk mitigations not documented.
Organisation staffing and structure	<ul style="list-style-type: none"> • An organogram and requisite staff are present in ETL as per the requirements of ISO 14001. 	<ul style="list-style-type: none"> • No Gaps Identified
Performance Monitoring and Reporting Procedures	<ul style="list-style-type: none"> • ETL has systems and procedures to monitor performance against targets set under ISO 14001 for the following environmental aspects: • Pollution Prevention (Wastewater management, air emissions reduction and solid waste management, odour, Chemical management) • Resource Efficiency (Water, Energy, Waste Minimization) • Health and safety issues are also recorded and analysed as per their OHS policy. • Labor management aspects are recorded and monitored according to the requirements of BSCI which gives sufficient coverage to the aspects related to minimum wage, insurance coverage, working hours, overtime, freedom of association and child or bonded labor. 	<ul style="list-style-type: none"> • Prepare the Environmental management plan for textile manufacturing and captive power operations. • Environmental Monitoring frequency is not defined in the ESMS. • Envoy Textiles Limited does not have a disclosure policy on matters of environmental and social safeguard. • The reporting procedures are not defined due to absence of disclosure policy and stakeholder engagement plan

Organisation Staffing and Structure

Figure 9 Organisation Structure



The management team is led by the C.E.O, Mr. Tushar Tripathi, followed by the Management Review Committee comprising of Mr. Nanda Dulal Biswas, Mr. Shama Proshad Ghosh, and Mr. K M Rezaur Rahman. The Management Review Committee is followed by the Management Representative, Mohammed Al Tauhidul Islam. The entire team operating under the Management Representative is the main focal person responsible to implement and look over the ESMS requirements.

The fourth tier of the management team follows a horizontal structure. It includes the Risk Assessment Team, Documentation Development Team, T&D team, Monitoring Team, Internal Audit Team, Injury/Disease Reporting Team and the Emergency Response Team. All of these teams report back to the Management Representative.

Management Review Committee

The Management Review Committee conducts the following activities:

- Review policy, procedure, internal and external audit and monitoring report
- Review incident report and analysis
- Support OHSMS team to implement ISO 45001 system
- Quarries for any implementation update
- Assign roles and responsibility to concern person
- Support to MR to make plan to implement ISO 45001

For more detailed information of the Management Review Committee, see **Annexure A.5**.

Management Representative

Mr. Mohammad Tauhidul Islam is the Management Representative (MR) who reports back to the Management Review Committee. The MR has the following roles and responsibilities:

- To make liaison between Management Review Committee, Teams and employees and sharing the responsibility of teams.
- Develop management review agenda and guiding the discussions through the agenda.
- To ensure the allocation of resources to implement ISO 45001:2018 standard
- Consolidation of relevant Information with the assist of concern team
- To assist OHSMS Review Committee to conduct any Hazard & Risk, incident and accident investigations and making corrective action

- To arrange and conduct training as a requirements of ISO 45001:2018 standard
- To oversee the control of documentation and records and Implementation of the system
- To review of documents and records, forms and formats before implement at the factory
- To prepare Planning and to assist conducting of internal audits
- To monitor all the hazard, incident, accident including near miss are registered properly.
- To ensure follows up that corrective actions are implemented
- To assist OHSMS Committee on HIRA Analysis and inspect job site activities during particularly difficult or hazardous work situations;
- To assist OHSMS Committee to preparation and presentation accident, injury and ill health in the meetings;
- To ensure regular emergency response exercises and chemical spill drill including emergency evacuation drills is conducted to ensure the highest level of preparedness in any emergency. Maintains records of such drills,
- To providing recommendations for emergency response improvements;
- To supervises the regular inspection of emergency response equipment.
- To assist in developing and implementing field location emergency response procedures and evacuation plans
- To ensure that operations employees, contractors and site visitors receive health & safety inductions for theatre operations;
- Any others duties required when necessary and report to ISO 45001:2018 Management Review Committee

For more detailed information on the Management Representative, see **Annexure A.5**.

Risk Assessment Team

The Risk Assessment Team comprises of 22 individuals from the different units of the factory and their respective engineers, managers, assistant managers, support staff, safety committee members, etc. Their key roles and responsibilities are as follows:

- Conduct HIRA and share HIRA to MR as well as concerned Department Head and Workers
- Implement the findings as per HAZARD/RISK and control measures.
- Ensure legal requirements at floor/Process.
- Communicate Management Representative (MR) and other relevant team.
- Carry out any other job assigned by the Management Representative (MR)

For more detailed information on the Risk Assessment Team, see **Annexure A.5**.

Documentation Development Team

The Documentation Development Team consists of two members. One is a Senior Compliance Officer and the other is a Senior Executive Human Resource professional. Their key responsibilities are as follows:

- Develop documents as per ISO 45001:2018.
- Review amendment documents if required.
- Communicate with advisory team and Management Representative (MR) and other relevant team.
- Communicate Management Representative (MR) and other relevant team.
- Carry out any other job assigned by the Management Representative (MR)

For more detailed information on the Documentation Development Team, see **Annexure A.5**.

Internal Audit Team

The Internal Audit Team comprises of 13 individuals such as engineers, operation managers, human resource professionals etc. They have the following roles and responsibilities:

- Prepare schedule when to perform the internal audit.
- Perform audit as per plan.
- Submit report including CAP to the MR and review committee.
- Conduct follow up audit.
- Review document on operational control and record.
- Communicate Management Representative (MR) and other relevant team.
- Carry out any other job assigned by the Management Representative (MR)

For more details on the Internal Audit Team, see **Annexure A.5**.

Training & Development Team

The Training and Development Team comprises of 7 individuals from different units such as operation managers, engineers, and individuals from the compliance team and the fire department. Their roles and responsibilities are as follows:

- Prepare training plan for the workers as well as other employees
- Prepare training module on OHS and submit to MR for approval
- Conduct training as per schedule
- Ensure all employees received training on OHS
- Conduct training evaluation and analyzed for effectiveness of the OHS training
- Conduct refresher training for the RA Team and as well as for other teams.
- Communicate Management Representative (MR) and other relevant team.
- Carry out any other job assigned by the Management Representative (MR)

For more details on the Training and Development Team, see **Annexure A.5**.

Monitoring Team

The Monitoring Team comprises of 11 individuals such as engineers, operation managers, human resource professionals etc. They have the following roles and responsibilities:

- Develop checklist for monitoring.
- Prepare schedule when to perform the internal audit.
- Perform monitoring activities as schedule.
- Update progress to the review Committee.
- Communicate Management Representative (MR) and other relevant team.
- Carry out any other job assigned by the Management Representative (MR)

For more details on the Monitoring Team, see **Annexure A.5**.

Injury/Disease Reporting Team

The Injury/Disease Reporting Team comprises of 13 individuals such as engineers, operational managers and assistant managers, senior executives, and engineers from different units of the factory. Their key roles and responsibilities are as follows:

- Conduct awareness on accident & injury and disease among workers
- Collect all incident data on injury and diseases

- Record the data on the injury and diseases
- Report to MR on the injury and diseases
- Write the collected data on the display board for view.
- Communicate Management Representative (MR) and other relevant team.
- Carry out any other job assigned by the Management Representative (MR)
- Conduct meeting regularly with concern dept./section head on injury and disease.

For more details on the Injury/Disease Reporting Team, see **Annexure A.5**.

Emergency Response Team

The Emergency Response Team comprises of 18 individuals from the Administration, Fire and Safety, Medical, Security and Safety, Operations and Maintenance Department. Their roles and responsibilities are as follows:

- Identify the emergencies.
- Develop procedures.
- Train the people.
- Develop action plan to response the emergencies
- Conduct chemical spill drill including fire drill.
- Help the victim of injury to take to hospital.
- Ensure logistics/PPE
- Develop communication materials.
- Ensure team members to respond to the emergencies.
- Communicate Management Representative (MR) and other relevant team.
- Carry out any other job assigned by the Management Representative (MR)

For more details of the Emergency Response Team, See **Annexure A.5**.

The existing different teams will also be responsible in the implementation of the enhanced ESMS policy, plans and procedures.

5.2. Regulatory Compliance

Envoy Textiles Limited maintains a register of applicable environmental regulations and there is a established procedure (involving registry of regulatory compliance and keeping track of time for renewal) for keeping the regulatory compliances up to date. The following are the details of the regulatory licences by ETL.

Table 5 Details of Regulatory Licenses by ETL

Sl.	National/Local Laws and Regulations	Complied by ETL (Yes/No)	Remarks
1.	Bangladesh Labor Act, 2006 & Bangladesh Labor Rules, 2015	Yes	<p>Factory License for the Captive Power Plant: The Factory License for the Captive Power Plant is valid till 30th June 2023 and issued by the Department of Inspection for Factories and Establishments.</p> <p>Factory License for Envoy Textiles Limited: The Factory License for Envoy Textiles Limited is valid till</p>

			<p>30th June 2023 and issued by the Department of Inspection for Factories and Establishments.</p> <p>Factory License for Envoy Textiles Limited (Spinning Unit): The Factory License for Envoy Textiles Limited (Spinning Unit) is valid till 30th June 2023 and issued by the Department of Inspection for Factories and Establishments.</p> <p><i>Regarding the new spinning unit, ETL does not have to apply for an additional factory license. However, they must inform the Department of Inspection for Factories and Establishments about its new expansion plans.</i></p>
2.	Bangladesh Environment Conservation Act, 1995 & Bangladesh Environment Conservation Rules, 1997	Yes	Since the industry falls under the Red Category , an Environmental Clearance Certificate is required which expires on 1st January 2023 and issued by (<i>please indicate the name of the issuing government agency</i>)..
3.	Acid Control Act, 2002	Yes	Acid License is issued on xxxx (<i>please indicate the date of issuance</i>) for acid transportation, buying, and selling of acid since the facility uses different chemicals for production processes.
4.	The Building Construction Act, 1952, 1953, 1996	Yes	As per the Building Construction Act, a No Objection Certificate has been issued on (<i>please indicate the date of issuance/validity</i>) by the concerned authority to set up Deep Tube Well.
5.	Bangladesh Energy Regulatory Commission Act, 2003	Yes	A License was issued for the storage of upto 20,000 litres of diesel within the facility was issued by local government body. (no validity needed)
6.	The Boiler's Act, 1923	Yes	License for the use of boiler within the facility is is valid till 14 th March 2023.
7.	Bangladesh Petroleum Act, 2016	Yes	An NoC from local Upazila Parishad for the usage and transportation of approximately 20,000 litres of (second and third degree as defined in the act in terms of

			its flammability) petroleum. – No validity required.
8.	Fire Prevention Act, 2003	Yes	Fire license is valid till end of 2022.

The following tables illustrate the other licenses and clearances obtained by ETL:

Table 6 Licenses and permits obtained by ETL

Environmental aspect	Environmental sub-aspect (e.g. groundwater, hazardous materials, etc.)	Name of the regulatory agency issuing the permit or agreement	Remarks
Water use	Ground Water Approval	Local Government-NOC Union Porishad Chairman	NOC for Ground Water Extraction taken from Union Parishad in 2016 (no validity required).
	Boring of Ground Water Approval ⁷	District Commissioners Office	Law of Ground Water – Application made to Upazilla Parishad – (no validity required)
Chemical use and management	Chemical Import/Use for production	Customs & Commissionate Bond	A valid bond license is present for the facility.
Other environmental permits	Boiler Operators license	Boiler Inspection Body	All the boiler operators/attendants are full time employees of ETL. They have appropriate licenses which are displayed in the factory floor.

Envoy Textiles Limited is a member of Bangladesh Textile Manufacturer’s Association, a trade association for textile industries in Bangladesh. All the conditions and requirements in each permit/clearance/approval have been met and addressed by ETL and no record of violations/fines/penalties have been identified during the conduct of the audit.

5.3. Land Acquisition and Ethnic Minorities

Land Acquisition

Envoy Textiles Limited does not have a “Land acquisition and Resettlement Safeguards” policy or procedure. The existing 36 acres of land for the facility was acquired through direct purchase from multiple owners. There were 11 previous land owners from whom ETL directly purchased the land. Based on the stakeholder consultations and discussion with ETL, there are no land or payment claims for this land. This land was previously used for farming before ETL established its textile industry. Typically land acquisition using government’s eminent domain power is done for government projects. However, Acquisition and Requisition of Immovable Property Act of 2017 allows private sector companies to acquire land through this act on projects of national significance. Moreover,

⁷The national regulation does not require volumetric approval for water abstraction.

according to ADB SPS and IFC's performance standards, in case of government managed land acquisition for private sector projects there are some private sector's responsibilities. (example PPP projects where government acquires land for private parties). Though both the scenarios are not currently material for ETL, the principles of "Involuntary Resettlement" as per SR2 should be adopted to safeguard future conduct of ETL.

Ethnic Minorities⁸

Envoy Textiles Limited does not have any policy with regards to impact on indigenous/ethnic communities. Through the course of the assessment, we have not found sufficient evidence of any impact on ethnic communities or indigenous population. There is a limited presence or no presence of indigenous people/ethnic minorities near the project site. According to the Bangladesh Bureau of Statistics, in 2011 there were only 1000 ethnic minority households in Bhaluka Upazila and 54 households in Bhaluka Paurashava (BBS 2011). The main ethnic groups include Garo, Barmon and Hajong. These groups of people live further north (approximately 100km far) near the India-Bangladesh border. It is recommended to inbuilt a policy regarding impact on indigenous people in accordance with ADB SPS 2009.

5.4. Stakeholder Engagement

To ensure proper and effective stakeholder engagement, the activities and interactions can be classified into eight different components. The following table illustrates the present situation of ETL with respect to the eight components.

SL.	Component of Effective Stakeholder Management	Description of the component	"As is" Scenario in ETL
1.	Stakeholder Identification and Analysis	Invest time in identifying and prioritizing stakeholders and assessing their interests and concerns.	ETL has identified and listed the relevant external and internal stakeholders along with their contact points' information, impact and influence levels, importance, responsibilities, and strategies for proper engagement. However, ETL being a public listed company has not included its shareholders in the stakeholder list.
2.	Information Disclosure	Communicate information to stakeholders early in the decision-making process, in ways that are meaningful and accessible, and continue this communication throughout the project life.	ETL does not have an Information Disclosure policy as required by ADB and other lender guidelines. The existing information disclosure policy deals with confidentiality of company information.
3.	Stakeholder Consultation	Plan out each consultation process, consult inclusively, document the process, and communicate follow up	ETL does not have a defined policy or procedure to report to their stakeholders. Even though the facility regularly communicates with their shareholders and regulators, there is no defined mechanism or proper documentation.
4.	Negotiation and Partnerships	For controversial and complex issues enter good faith negotiations that	Limited number of engagements/face-to-face interactions relating to negotiations

⁸ The 'Indigenous People' of Bangladesh are referred to as the 'Ethnic Minorities.'

		satisfy the interest of all parties. Add value to impact mitigation or project benefits by forming strategic partnerships.	and partnerships have been encountered between ETL and its stakeholders. However, this is not a requirement from the buyers or local regulators.
5.	Grievance Management	Establish accessible and responsive means for stakeholders to raise concerns and grievances about the project throughout its life.	ETL has a defined Grievance Policy and Procedure for its stakeholders. Approximately 30 Grievance/Suggestion boxes are installed in most of the areas within the facilities such as washrooms, dining halls, main gate, etc. Some grievances are also communicated through messages and phone calls to the employees' respective team leaders. However, the policies and procedures of Grievance Management are not well communicated with the nearby community. When consulted with them, the community made no ETL-specific complaints.
6.	Stakeholder Involvement in Project Monitoring	Involve directly affected stakeholders in monitoring project impacts, mitigation, and benefits, and involve external monitors where they can enhance transparency and credibility.	ETL has no such procedure to involve directly affected stakeholders in the project monitoring.
7.	Reporting to Stakeholders	Report back to stakeholders on environmental, social and economic performance, both those consulted and those with more general interests in the project and parent company.	ETL has no such procedure to report back to stakeholders on environmental, social, and economic performance.
8.	Management Functions	Build and maintain sufficient capacity within the company to manage process of stakeholder engagements, track commitments, and report on progress.	ETL has no such procedures in place to manage process of stakeholder engagements, track commitments and report back to the stakeholders for progress.

The identified stakeholder may be updated to include other material stakeholders such as their shareholders, service providers, raw material suppliers, etc.

Gaps identified:

ETL does not have a stakeholder engagement plan, which needs to be prepared in accordance with ADB requirements including an updated stakeholder analysis.

5.5. Gender and Development

ETL has Anti-Harassment policies and procedures to highlight the gender equity issues within the company. Regular trainings are conducted to make sure that the policies are well communicated with the employees. To ensure safety of the existing women population among the workforce, a **Sexual Harassment Committee** has been formed to come up with a mechanism for the prevention and redressal of sexual harassment cases and other acts of gender-based violence within the ETL facility. The committee comprises of six internal staff and two external staff who are members of Bangladesh Centre for Worker's Solidarity. Awareness trainings on **Anti-Harassment Committee** (Sexual Harassment Committee) **and Policy** are also held and led by the sustainability team of ETL. Grievance boxes are also installed in multiple areas of the facility to drop written complaints. In case any workers want to file a complaint verbally, they must reach out to their respective division chief.

It was observed that the facility has approximately 13 women workers among the labour force of 2770 people. However, later it was justified that since ETL is a 24-hour facility, workers work on three shifts and due to the unusual working hours and activities related to heavy machineries, women workers. **Though ETL mentioned that regulatory issues are also hindering employment of women in night shift, local regulations permit night shifts of women given they consent to working in night shifts.** These consents are to be taken annually and the consent letter format is provided in Labor Rule 2015, Form 35. Therefore, employment of women in night shifts imposes additional regulatory record management.

5.6. Labour and Grievance Management

Labour Management

ETL maintains Business Social Compliance Initiative (BSCI) standards to manage labor related issues in their facilities. They have received an overall rating of A in amfori Social Audit, which is valid till 14th February 2023.

Figure 10: BSCI rating of Envoy Textiles Limited

Overall rating



Section rating

PA1: Social Management System	B
PA 2: Workers Involvement and Protection	A
PA 3: The Rights of Freedom of Association and Collective Bargaining	A
PA 4: No Discrimination	A
PA 5: Fair Remuneration	A
PA 6: Decent Working Hours	A
PA 7: Occupational Health and Safety	B
PA 8: No Child Labour	A
PA 9: Special Protection for Young Workers	A

Table 7 List of Available Social Policies and Procedures

SL	Name of the policy/procedure document	Brief content of the document
1	Recruitment Policy	<ul style="list-style-type: none"> The selection process is well defined. Child labor is prohibited as per the recruitment policy. Requirement of maintaining a personal file established.
2	Prohibition of Child Labour Policy	<ul style="list-style-type: none"> Policy defines child labor as individuals less than 14 years of old as per Labor Law 2006. The policy prohibits use of child labor. The policy defines the procedure for collecting and recording age proofs. The requirements regarding employment of adolescent workers are also stipulated in the policy in accordance with the local regulations. The procedure for remediation of child labor – in the event of identification of such a case is also defined. The policy outlines the individuals responsible for the implementation of this document. The policy also outlines the capacity building requirements.
3	Wage, Overtime & Other Benefit Policy & Procedure Work Hour Policy	<ul style="list-style-type: none"> The policy adopts the minimum wage of Bangladesh Government. Regular working hour is defined as 8 hours a day and 48 hours a week. One day weekly holiday (weekend), and 1 hour break during a work day. Overtime is limited to maximum 2 hours a day, weekly limited to 60 hours and annual average weekly work hours would not be more than 53 hours. Overtime pay

		<p>is at twice the basic wage. This is in conformity with national regulations.</p> <ul style="list-style-type: none"> • The procedure for determining overtime schedule is outlined in the policy. • Recording and payment of overtime is also defined in the policy.
4	Prohibition of Forced Labor Policy & Procedure	<ul style="list-style-type: none"> • ETL prohibits the use of forced labor and bonded labor. • ETL to refrain from forcefully hiring employees. • ETL not to keep copies of original certificates, national identity card or other documents. • Employees cannot be kept against their will. • ETL to refrain from keeping business relations with organizations involved in use of forced or bonded labor. • Employees are free to leave the organization after serving two months of notice period.
5	Anti-Harassment and Anti-Abuse Policy	<ul style="list-style-type: none"> • The policy defines forms of harassment and abuse and aims to prohibit such actions in the facility. • The policy contains a brief description of the grievance management procedure. • The policy also defines a disciplinary procedure against perpetrators of abuse or harassment. • Awareness and training requirements are also established in the document regarding this policy.
6	Health & Safety Policy	<ul style="list-style-type: none"> • The policy defines the occupational health and safety management steps to be taken by ETL. • Personal Protective Equipment Requirements • Machine safety aspects • Fire safety aspects • Electrical safety aspects. • Chemical safety • First Aid facilities • First aid training requirements
7	Freedom of Association	<ul style="list-style-type: none"> • ETL employees are free to unionize upon meeting the criteria set by local law. • The Policy is communicated to the workers through different trainings such as orientation trainings, etc.

Grievance Management Procedure in ETL

ETL has one grievance management procedure for the internal and external stakeholders. The grievance management system at ETL has the following features:

- **Guiding Principle:** The GRM adopts Bangladesh Labor Law 2006 as the guiding principle.
- **Definition of Grievance:** The policy defines grievances as “Any improvement proposal or complaints on any injustices in workplace, dissatisfaction of officers/employees or humanitarian appeal to higher authority”

- **Scope of the Grievance Policy:** All employees and external communities will be covered under this policy through submitting complaints verbally, electronically, phone call or in writing. Criminal nature complaints are kept separate from this GRM- the management will assign a grievance handling committee to gather the initial information and the investigation report will be sent to the top management for review. If an employee is suspected as guilty and found to violate criminal law, the management will call legal authority to take further actions as per Bangladesh Labor Law (2006), Clause 23/4.
- **Procedure for Resolution of Grievances:** Complaints received by the individuals working within the factory premises or residing in nearby communities are registered either verbally, electronically, phone call or in writing. These complaints can also be filed anonymously. Next, a responsible person, who are usually the sustainability/compliance officer and a welfare officer (See **Annexure A.7** for more details) provides a tracking number to the grievance and chief executive officer/director/chairman is appraised of the complaint and the tentative time to resolve the issue is communicated. Then the root cause of the problem is analysed. After the main cause of problem is identified, meeting with concerned complainants and potential perpetrator is held. The resolution of the issue will be provided as per the grievance category. Different category of grievances will be handled by different responsible persons. For example, harassment or abuse related grievances would be handled by the Anti-Harassment committee. Step 6: If anyone is unsatisfied with the resolution, they can further escalate the matter to the chairman of ETL. **Fig. 11** shows a step by step procedure for the resolution of Grievances.

Figure 11 Procedure for Resolution of Grievances



- **Grievance Categories:** The types of Grievances are classified into the following categories by ETL:
 1. Structural: Any Grievance related to security and professional activities within ETL
 2. Personal: Any Grievance related to personal or physical harassment within the workplace
 3. Contractual Rights: Grievances related to violation of contract with employees, differences in payment/salary, overtime, professional trainings for promotions, etc.
 4. Human Rights: Grievances related to gender discrimination or any other kind of discrimination to workers within the workplace
 5. Others: Any Grievance which does not fall under the above categories
- **Awareness and training regarding use of GRM:** Awareness campaigns and trainings are proposed to make the Grievance members, Workers, Supervisors and senior officials aware about the existence of GRM and Grievance register and resolution process.

Gaps Identified

- **Labour Compliance:** Procedure for ensuring E&S compliance in supply chain workers/contracted workers is absent. Requirement for due diligence of suppliers and service providers is not established.
- **Retrenchment Policy:** ETL does not have a retrenchment policy which delineates options analysis and careful consideration in case of planned layoffs.
- **Grievance Management Policy:** The grievance policy needs to incorporate the following –
 - Enhance definition of grievances to include impact of ETL operations on the community and the environment.
 - Create awareness about ETL's existing GRM among community stakeholders.

5.7. Corporate Social Responsibility

ETL performs a few CSR activities which primarily focuses on medical facilities and children. The list of activities conducted by them are listed as follows:

Paediatric Intensive Care Unit (ICU) cum High Dependency Unit (HDU):

ETL has financed a Pediatric Intensive Care Unit (ICU) along with a High Dependency Unit (HDU) at Dhaka Medical College Hospital, under National Institute of Burn & Plastic Surgery, generally known as 'Burn Unit of Dhaka Medical'. This facility was the first ICU/HDU for pediatric burn patients both in Government and Private Hospitals. Additionally, ETL also takes responsibility for the annual maintenance cost of the unit including full cleaning of the premises, laundry of the bed sheet/pillows, electrical, mechanical and civil constructions. The 16-bed facility has air-conditioners with a central oxygen system.

Priority Appointment of Physically Challenged People:

ETL prioritizes the employment of physically challenged people. So far, 9 people were appointed, and the facility takes care of their needs with extra care and regular follow-ups

Art Competition for Neighbourhood Children:

ETL hosts annual Art Competition for the children around the factory premises. The winners are awarded, and the winning art is preserved in the facility's wall every year.

Tree Planation Campaign to Schooling with BADC and DoE:

ETL has distributed 5000 fruit & wood seedlings among the students of 10 schools near our factory in Bhaluka, Mymensingh. This is part of a continued campaign which had started back in 2014 with the goal of ensuring a greener tomorrow.

5.8. Environmental and Social Performance

Monitoring

Environmental and Social Management Plan - Implementation Monitoring

ETL is having Environmental Clearance Certificate (ECC) covering all wet processes and the captive power plants. The environmental clearance procedures as per local regulations stipulates the submission of Environmental Impact Assessment (EIA) reports and associated Environmental Management Plan for Red Category Industries like ETL. However, the factory has informed that the EIA report is not available in their records. Hence, the EMP monitoring implementation performance has not been reviewed as part of this assessment.

Environmental and Social Performance Monitoring

Both ISO 14001 and BSCI certification requires the monitoring of E&S performance by ETL. ISO 14001 outlines specific targets for pollution prevention and resource efficiency which is monitored by ETL on a regular basis. The ISO 14001 is renewed after three years basis the soundness of the management system in setting targets & monitoring performance. BSCI certification requires the labor related indicators to be monitored. Based on BSCI standards, annually the social performance of the facility is monitored, and performance rating is provided.

Monitoring Indicators and Plan

Table 8 Monitoring Indicators and Plan

Performance Area	Monitoring Parameters	Monitoring Frequency
Air Emission	Stack Emission: NOx, Sox, CO, SPM GHG emission – KG of COe/KG of finished product Ambient Air Quality	As per Policy: Undefined in the EMS Practice: Stack emission is tested annually through a third party. Energy Consumption Records are well maintained in-house. Ambient Air Quality is monitored by DoE annually.
Wastewater	Wastewater Pollution: COD, BOD, TSS, TDS	Monitored regularly in internal labs. External Monitoring: <ul style="list-style-type: none"> - Department of Environment (DoE) quarterly monitors performance - Third party detailed assessment is conducted twice a year. <p>The color of the wastewater effluent is visually inspected and monitored by ETL.</p>
Noise Pollution	Indoor Noise Ambient Noise	Indoor noise levels are assessed every month (inhouse).

		Ambient noise level is assessed by DoE every year.
Chemicals	Grams/Kg of finished product	Chemical consumption data is well maintained in-house.
Waste	Hazardous waste (gm)/Kg of finished product Non-hazardous waste (gm)/Kg of finished product	Waste Records are maintained in log-books.
Water Consumption	Ground water - Liters/KG of finished product Process water use – Liters/KG of finished product Recycling of water - % of water recycled. Rainwater harvesting – Liter/KG of output.	Water extraction and water use is monitored regularly through automatic systems.
Energy Consumption	Megajoule reduction - Natural Gas – M ³ /KG of output - Energy from Grid – kwh/kg of output - Diesel – Liter/KG of output Total Electricity use reduction – KwH/KG	Energy Consumption information is well maintained in log-books.

From a social and occupational health and safety compliance point of view, grievances register is maintained regularly, incident and accident register are maintained, payroll data is maintained, working hours are recorded through fingerprint based login systems used by the workers, etc. ETL also records the common accidents such as accidental cutting while the machine is operating, injury while carrying heavy objects, etc. ETL also has operating procedures and conducts OHS risk assessments to determine which units or processes require different kind of PPE. PPE signages are attached within the facility to create awareness among workers.

Details of accident or related incident reports are attached in **Annexure A.4**. E&S performance from monitoring are referred in **Section 6.4**.

Gaps and recommendation

- In absence of the ESMP document or internal document outlining the monitoring frequencies adequately, an Environmental and Social Performance Monitoring Plan should be developed.

5.9. Assessment Summary

The summary of the corporate assessment findings are as follows:

SL.	Component	Summary of Area of Concern
1.	Corporate ESMS and Policies	No screening and categorization procedures as per ADB.
2.	Regulatory Compliance	No Area of Concern since Company's operations is fully compliant with all applicable regulatory requirements.
3.	Land Acquisition and Ethnic Minorities	Lack of involuntary resettlement and indigenous people safeguard in social policy.
4.	Stakeholder Engagement	Lack of Stakeholder Management Plan
5.	Gender and Development	No Area of Concern

6.	Labour and Grievance Management	E&S policies/procedure for contracted workers and supply chain workers No Retrenchment Policy
7.	Corporate Social Responsibility	No Area of Concern
8.	Environmental and Social Performance Monitoring	An Environment and Social Performance Monitoring Plan including management plan to be developed.

6. Compliance Assessment Findings for the existing manufacturing project and associated facilities:

6.1. Details of the site visit

The assessment was kicked off with an introductory presentation by ETL, presenting their history, current operations, future plan of action for expansion, CSR activities, awards and certifications obtained and other relevant details of the facility. The introductory presentation was followed by another meeting with the E&S experts from Asian Development Bank and Envoy Textiles Limited where the PwC team presented the agenda and the action points of the three-day site visit which was held on **16th, 18th, and 19th June 2022**.

Among the three-day visit to the ETL facility, the first day involved getting familiarised with the different units and processes of the facility through a tour with the officials of the designated units. The officials provided a high-level description on each units and the overall factory premises including worker dormitories, etc. PwC reviewed ETL's existing Environmental and Social Management System (ESMS) and its Environmental and Social (E&S) Performance as a facility. As part of reviewing the ESMS, various documents (as listed in **Appendix A.3**) were reviewed to identify and assess the existing policies and procedures to address gaps and sections which require changes or further improvement. Additionally, the PwC team also reviewed the industry's current E&S performance following an assessment checklist that was developed prior to the visit. The team observed and conducted interviews with the employees working on designated units to perform on-site assessments in order to comprehend the overall environmental and social state or activities of the industry. All the gaps identified from the assessment are addressed for improvements in the Corrective Action Plan (CAP).

6.2. E&S Safeguard Documents and Legal Compliance

The E&S team couldn't get access to the E&S safeguard documents (ESIA or EMP) because the original Environmental Clearance Certificate was issued in the year 2008. The records of that year are not available with ETL, therefore we are unable to comment on the performance with respect to the ESIA and EMP.

During this assessment, the Company was found to be complying with applicable legal requirements according to the review of permits, licenses and approvals and environmental monitoring activities have been carried out as per government requirements. For more details, please refer to section 5.2.

6.3. Standards and Certifications

ETL is complying with the following standards:

- ISO 14001: Environmental Management Systems: ETL’s Jamirda, Bhaluka, Mymensingh – 2240, Bangladesh is ISO 14001 certified, and it is valid till 10 February 2024.
- Business Social Compliance Initiative (BSCI): ETL is certified for social compliance as per BSCI standards. Through an external audit assessment, ETL was given an overall rating of A for their level of social compliance. This certification/score is valid till 14 February 2023.
- ETL has self-reported for Higg;s Facility Social Labour Module (FSLM) with a verified score of 76.62. which was last updated 02 October 2021.
- ETL has self-reported for Higg;s Facility Environmental Module (FEM)⁹ with a verified score of 93.2% which was last updated in 2021, and verified in the online portal on April 2022.
- ETL is following ISO 9001:2015 (Quality Management System).
- Envoy Textiles Limited is LEED Platinum Certified since 2016.
- As part of their customer requirements, they are also following different product safety and material sustainability standards such as Global Organic Textiles Standards, Organic Content Standards, Global Recycled Standards, Recycled Claim Standards, Cotton made in Africa and Better Cotton Initiatives and OEKO-TEX 100.

Moreover, ETL is participating in IFC’s Partnership for Cleaner Textiles (PaCT) through which lot of the resource efficiency measures and hazardous chemical reducing measures prescribed in IFC’s Textile Sector’s EHS guideline in the factory.

6.4. Pollution Prevention and Resource Efficiency

ETL has taken number of steps to prevent pollution and enhance resource efficiency in their business operations.

Figure 12 Measures taken for Pollution Prevention

Thematic Area	Specific Area	Interventions
Air Pollution	Indoor Air Quality	<ul style="list-style-type: none"> • Installation of dust suppression equipment, dust filter, and dust bags in spinning units • Installation of HVAC system, Dust Filter & dust bags to regulate air quality in at risk units.
	Stack Emission	<ul style="list-style-type: none"> • Monitoring of Stack Emission conducted by a third party testing company. The emission testing results are compiled with the government

⁹ The Higg Facility Environmental Module (Higg FEM) informs manufacturers, brands, and retailers about the Environmental Performance of their individual facilities, empowering them to scale sustainability improvements. The Higg FEM assesses the following- Environmental Management Systems, Energy Use and Greenhouse Gas Emissions, Water Use, Wastewater, Emissions to Air (if applicable), Waste Management, and Chemical Management.

		<p>standards. (For more details on the recent Stack Emission Test Report, 2021- see Annexure A.4)</p> <ul style="list-style-type: none"> • Regularly tuning burner to reduce emission intensity
GHG Emission	Energy Consumption	<ul style="list-style-type: none"> • Taken long term targets to reduce GHG emissions and is planning to introduce renewable energy sources. • Installation of heat recovery measures to increase energy efficiency. • Total energy consumption in 2021 is 98,127,965 KwH.
Wastewater	Wastewater Treatment	<ul style="list-style-type: none"> • The factory has an ETP of capacity 4320 m3/day. • About 300 m3/day is recycled and reused for fire hydrant and toilet flush purpose. • The residual treated wastewater is finally discharged to the municipal wastewater/sewage system. • Artificial lake is not linked to the ETP. (For more details, see Section 2.2.6)
Hazardous Chemicals	Chemical Management	<ul style="list-style-type: none"> • ETL is complying with Zero Discharge of Hazardous Chemicals (ZDHC) requirements¹⁰. The ZDHC test reports from January 2022 and July 2022 are attached in Annexure A.4.
Solid Waste Management	Solid Waste	<ul style="list-style-type: none"> • 54.7% waste is process waste. 10% of the process waste is being recycled. For example: Spinning unit's waste is reused in the production to produce yarn in some capacity. • As part of their EMS, waste reduction targets are present. Details on the waste reduction targets will be found in Annexure A.4
	Hazardous Waste	<ul style="list-style-type: none"> • Hazardous waste constitutes about 18% of total waste among them about 10% is waste treatment sludge. • To manage sludge waste, ETL has an agreement with Geocycle, who is licensed to manage sludge in Bangladesh. This is in compliance with sludge management guidelines of Bangladesh.

¹⁰ ZDHC wastewater guidelines are put in place to set a single globally unified expectation for sampling, testing and reporting of industrial wastewater and sludge resulting from wet-processing across industries such as textile and leather.

		<p>The capacity of the ETP is 4320 cubic meter per day. On average, the ETP treats 2880 m³/day and discharges around 2000 m³/day and 300m³ is reused for fire hydrant and toilet flush.</p> <p>ETP sludge is not permitted to be stored in open scape. It is kept in the sludge drying bed for dewatering and then the dried sludge is stored in bags and transferred to shaded storage areas and left there for 5-6 months for further drying. The fully dried sludge is supplied to the local brick field for final disposal. Records are maintained of the details of the final disposal of sludge.</p>
Noise level monitoring	Ambient noise	<ul style="list-style-type: none"> • Indoor noise levels are assessed every month (inhouse). • Ambient noise level is assessed by DoE every year.
	Noise during machine operations	
Water quality for domestic and industrial use	Water quality testing for potable drinking water	<ul style="list-style-type: none"> • Drinking Water Quality is tested as per WHO standards
	Water quality for industrial waste	<ul style="list-style-type: none"> • Water extraction and water use is monitored regularly through automatic systems.
Color and odor quality	Wastewater/Effluent	<ul style="list-style-type: none"> • Color and odor are monitored based on observation

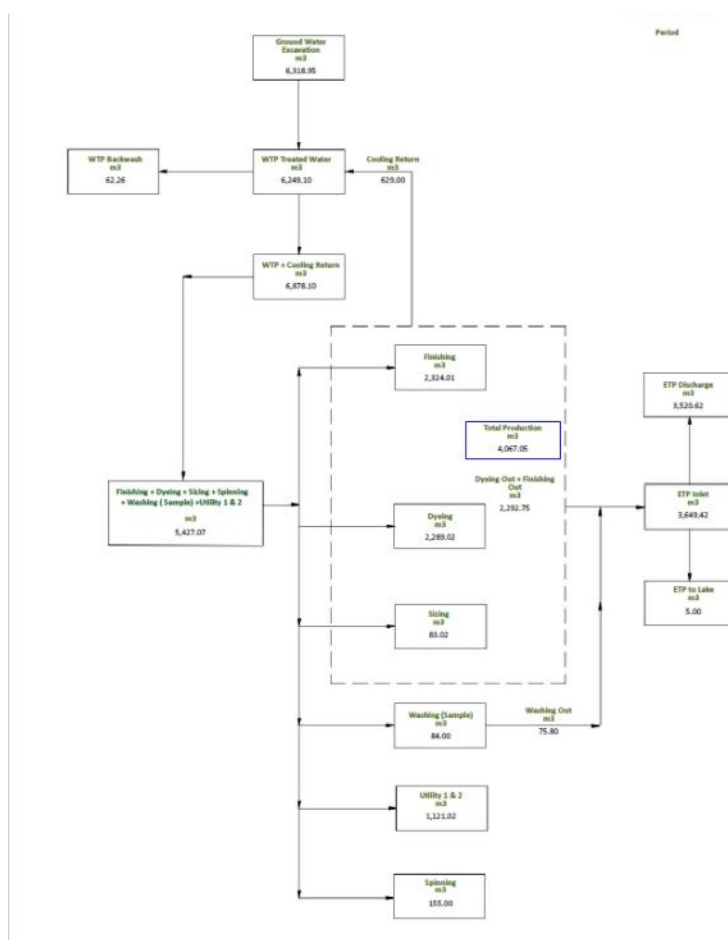
Energy Efficiency and Clean Energy

The factory has taken number of energy efficiency measures to reduce emission/energy use. These are further elaborated in **Chapter 8**. There are also plans to add 2.5 MW of solar power to the energy mix through the installation of rooftop solar by the year 2026.

Wastewater Generation and Reuse

Envoy Textile Limited has an ETP of capacity 4320m³/day. The ETP on average treats 2880 m³/day and discharges around 2000 m³/day and 300m³ is reused for fire hydrant and toilet flush.

Figure 13: ETL Water-balance for 16th June 2022



On 16th July 2022, the volume of ground water of 6218m³ was extracted from boreholes (*how many boreholes are in operation*). Out of 6218 m³, 3649 m³ water was treated in the ??? (*pls indicate the water treatment technology e.g. reverse osmosis- being used by ETL*), **from which 3520 m³ was discharged** after treatment in (*please indicate the final receiving body of water for the residual discharge*).

Performance of pollution level parameters

Ambient Air quality

The quality of outdoor air in our surrounding environment. It is typically measured near ground level, away from direct sources of pollution.

Table 9 Ambient air quality

Location	Sampling date	SPM µg/M ³	Standard (ECR'97)	WHO Guideline Value in µg/m ³
North Side & 15m From Production	06-09-2021	173	200	--

Source: DOE, 2021

According to the Table 1, the weather was sunny, wind direction was from south to north. As per ECR'97 of DOE (Amendment of 2005), standard limit of Ambient Air quality is 200. According to the

Bangladesh ECR' 97, the ambient air quality is within the standard. The sample was analyzed by Dhaka lab of the department of environment.

Indoor Air quality

Indoor air quality (IAQ) is a term, which refers to the air quality within and around buildings and structures, especially to the health and comfort of building occupants. IAQ complies with two important standards such as labor law of Bangladesh and the laws of and the guidelines of International Labor Organization (ILO). Department of Environment (DoE) of Bangladesh has also set up the threshold values of various air quality indicating parameters.

According to the third-party test reports conducted by Bluwin in December 2021, the indoor air quality of the factory is good. Factory has installed HVAC system, Dust Filter & Bag Filter that ensures the proper air circulating in the floor. There are few sections where values are above the standard limit but in these section, preventative measures such as wearing of proper PPE is practiced. The concentration of PM 2.5 ($\mu\text{g}/\text{m}^3$) is exceeded the ECR' 97 standards at few sections like denim 1, denim 2, and this exceedance can be attributed to the nature of the process. Company has implemented necessary corrective measures such as mandating and wearing appropriate PPE to avoid any harm from the workers.

Sound/noise level monitoring result

Table 10 Data of Sound/Noise Level Monitoring Results

Location	Sampling date	Noise level (dBa)	Standard (ECR'97)	WHO (dBa) Day time (Industrial area)
West Side and Outside The Boundary (Sampling Station No.1)	06-09-2021	72.0	60.0	70
South Side and Outside The Boundary (Sampling Station No.2)	06-09-2021	57.0	60.0	70
East Side and Outside The Boundary(Sampling Station No.2)	06-09-2021	59.0	60.0	70
North Side and Outside The Boundary(Sampling Station No.4)	06-09-2021	NO SPACE	60.0	70

Source: DOE, 2021

The term Noise pollution/sound pollution is any unwanted or disturbing sound that affects the health and well-being of humans and other organisms. Sound is measured in decibels. As per Sound Pollution Control Rules'2006 Standard Limit of Sound in daytime for Mixed Area is 60.0 (dBa). Noted that the Plant is in good running condition and is regularly well maintained. However, Table 10, showed that the obtained noise level in the two sampling locations (Sampling Station Nos. 2 and 3) met the ECR 97 standard while Sampling Station No. 1 is above the ECR' 97 standards and WHO guidelines. This exceedance can be attributed since the west side boundary is adjoining the main highway and noise levels may be resultant from traffic that cannot be controlled by the Company. The sample was analysed by Dhaka lab of the department of environment.

Wastewater Monitoring Results:

Table 11 Wastewater Quality Monitoring Results

Location	Sampling date	Lab code	pH	DO (mg/L)	BOD (mg/L)	COD (mg/L)	TDS (mg/L)	EC (µS/cm)
Inlet of ETP (Raw water)	06-09-2021	J-04	12.37	0.0	580	1450	2230	-
Outlet of ETP (Treated water)	06-09-2021	J-03	8.03	6.3	31	95	1860	1200
ECR'97			6-9	4.5-8.0	50	200	2100	1200

Source: DOE, 2021

Water pollution is the contamination of water sources by substances of human or industrial activities which make the water unusable for drinking, cooking, cleaning, swimming, and other activities. Pollutants include physical, biological, chemicals, trash, bacteria, and parasites. All forms of pollution eventually make their way to water. According to the table 11, the treated wastewater quality parameters (pH, DO, BOD, COD, TDS and ES) remain below the ECR' 97 standards. The sample was analysed by Dhaka laboratory of the Department of Environment.

According to the ZDHC standard, ETL has conducted a thorough testing of their waste water through SGS. The results are as follows:

Table 12 Results of the test conducted by SGS according to ZDHC Standards

	Raw Wastewater	Discharged Wastewater	Sludge
Conventional Parameters / Anions / Metals:	Fulfill Aspirational Limit	Fulfill Progressive Limit	Detected
MRSL Parameters	Not Detected	Not Detected	Not Detected

According to the test conducted, no Manufacturing Restricted Substance List Parameters were detected in raw wastewater, discharged wastewater and sludge. However, some restricted anions and metals were detected in the sludge. Overall, ETL maintains good control over uses of environmentally friendly chemicals which is advocated by ZDHC. Hence, the ETP of ETL is getting raw effluent with lower pollution load.

Stack air emission

The stack Emissions Monitoring is routinely undertaken (See **Table 11**) for many different reasons, most commonly to demonstrate compliance against limits outlined for permitted processes. There are captive power plants, boilers and few machines which have stack for air emission. All these units were tested under operational conditions.

According to the third-party stack emission test conducted by Bluwin in December 2021, the utility section, some of the CO values are high due to incomplete combustion (as gas pressure remains low). In contrast, all particulars for process machinery were found to be within a controlled level.

Overall, the pollution levels in the factory are largely within permissible limits with only a few scopes for improvement. Details of the stack air emission are attached in **Annexure A.4**.

6.5. Involuntary Resettlement

Envoy Textiles Limited's project and subprojects part of the scope of this assessment, has not triggered requirements under ADB's SPS 2009 on involuntary resettlement as they have directly procured the land from individual owners of the land.

The factory is in a 36-acre land parcel. According to ETL management, the entire land parcel has been procured from individual owners. Details of the Land Procurement history are attached in **Annexure A.9**. Stakeholder consultations revealed no grievances pertaining to land acquisition from nearby community stakeholders. Further assessment of land purchase details from ADB's Legal due diligence team required on the matter. It must be noted that no additional land will be acquired for ETL's expansion.

6.6. Labour Management

ETL follows BSCI standards to manage labor related issue in their facilities. The issues such as minimum wage, working hours and benefits as applicable as per law, grievance management, child labor, bonded labor, freedom or association, etc. are addressed by complying with labor law and other social standards such as BSCI and SLCP. Some of the aspects of labor compliance are detailed below:

Number of workers: There are about 2770 workers in the facility among whom 130 are contracted workers through third party (cleaning staff). There are only 13 female workers in these facilities.

Minimum Wage: The factory is paying a minimum wage of 7500 BDT for lowest grade workers which is higher than the national minimum wage for Textile Industries which is 3600 BDT (based in Upazilas eg: Bhaluka- where the project site is located). Overtime payment is made at double the basic wage, as per labor law. During the visit, on a sample basis payroll data was reviewed to confirm the above statements. For details of minimum wage in the cotton industry, see **Annexure A.4**.

Working Conditions: The employees working in different units are provided with adequate protective gears to prevent themselves from any injury or long term medical condition. They are also allowed to take breaks in between work. Moreover, safe drinking water supply is also available all over the factory.

Working Hours and benefits mandated by law: The factory maintains an 8-hour regular workday, with regular working hours per week being 48 hours with a provision for one day of weekly leave a week. Overtime hours does not exceed 60 hours a week as per the requirement of the labor law. The above facts were confirmed through review of login data of workers sampled during the visit. The worker is entitled to leaves as per the local labor law. **However, inconsistency was found in case of contracted workers, their cleaning service provider was not providing sick leaves as per legal mandate to their workers.** Law mandates 14 days of sick leave to regular workers. This was absent in the contract between their third-party cleaning service provider and its workers.

Child Labor and Forced Labor: ETL does not allow child or forced labor. Evidence of child labor or forced labor was not found during the site visit through discussion with the workers, observation, or documentary review. The E&S team reviewed the age proof documents, recruitment policy, observed appropriate signages child labor or forced labor and training documents providing adequate evidence of general awareness among workers, supervisors, and employees of ETL about their child labor and forced labor policy. **However, in case of the primary supply workers (long term suppliers and service provided who work outside the premises), there are no policies to ensure child labor and forced labor compliance. No E&S clauses in their contracts.** But they are aware about such requirements in ETL.

Freedom of Association and workers organizations: ETL does not have unionized workers but workers have the freedom to unionize as per the local regulations. ETL has a workers participation

committee (WPC) with representations from management and workers who represent the workers in raising workers issue to the management. WPC members are elected every two years through voting by workers. During the assessment, WPC members were interviewed who informed that regular meetings are held by WPC members and worker related issues are raised in the meeting and these issues are considered by the management. The documents pertaining to these meeting, their resolution and minutes were also reviewed during the visit.

Grievance Management System: The existing GRM is worker friendly. There are complaint boxes in every floor and in the washrooms where workers can anonymously raise issues to the management. These boxes are opened every month and resolution is provided in a timely manner. During the assessment, grievance registers and resolution documents were reviewed by the E&S team.

No events of **retrenchment** have occurred in the facility.

Recommendations

- Contractually ensuring contracted workers and primary supply workers comply to labor requirements.
- Conducting due diligence by ETL on their contractors and primary suppliers.

6.7. E&S Capacity of ETL

ETL E&S responsible staff are trained on areas such as environmental management systems, OHS, Labor compliance, fire safety, pollution prevention and resource efficiency, etc. areas. They are trained on different standard such as ISO 14001, Higg, BSCI, etc. However, they have no exposure to international lender's E&S requirements such as ADB SPS or IFC PS.

Recommendations

- Capacity building of E&S staff on lender's E&S requirements.

6.8. Stakeholder Engagement, Grievance Management and Disclosure

ETL has identified a list of stakeholders relevant to their business. These stakeholders can be categorized in mainly the following groups workers and employees, contractors, government, etc. ETL has conducted a stakeholder analysis and identification which is furnished below:

Table 13: ETL's stakeholder Identification and Analysis

SL NO	Stakeholder Name	Stakeholder criteria (Internal/External)	IMPACT	INFLUENCE	What is important to the Stakeholder	How could the stakeholder block the project	Strategy for engaging the stakeholder
			Impact How much does the project impact them (Low, Medium, High)	How much influence do they have over the project (Low, Medium, High)			
1	Kalkarkana Odidoptor	External	High	Medium	Legal authority of the government to recruit employees as well as ensure BLA	To ensure legal requirements, if not conformance then license extension may risk.	Update all legal requirements, visiting industry inspector by DIFE
2	Labour Ministry (Sromo Odidoptor)	External	High	Medium	Legal authority of the government to recruit employees as well as ensure BLA	To ensure legal requirements, if not conformance then license extension may risk.	Update all legal requirements, visiting industry inspector by LM

3	DOE (Department of Environment)	External	Medium	Low	DOE has legal authority to ensure environmental laws that relevant with workers OHS.	If not comply with applicable laws, the organization have authority shut down the factory.	Update all legal requirements, visiting industry inspector By DOE
4	Department of Public health Engineering	External	Medium	Medium	DPHE has legal authority to ensure relevant laws that relevant with workers OHS.	If not comply with applicable laws, the organization have authority shut down the factory.	Update all legal requirements, visiting industry inspector by DOE
5	DC Office	External	Low	Low	Legal authority of the government & all applicable laws.	To ensure legal requirements, if not conformance then license extension may risk.	Update all legal requirements, visiting industry inspector by DC
6	Upozila Parisad	External	Medium	Medium	Legal authority of the government to ensure applicable laws	To ensure legal requirements, if not conformance then organization may risk.	Update all legal requirements, visiting industry inspector by UNO

7	Local Fire Station (FS&CD)	External	High	High	Legal authority of the government to ensure BLA & BLR	To ensure legal requirements, if not conformance then license extension & organization may risk.	Update all legal requirements, visiting industry inspector by FSCD
8	Union Parisad	External	Medium	Low	UP has legal authority to ensure applicable local laws that relevant with organization.	To ensure legal requirements, if not conformance then organization may risk.	Update all legal requirements, visiting inspector by UP
9	Energy Regulatory Commission	External	High	Low	All energy related has to be given by this authority	CPP not continue	Always connecting & share savings pattern of Energy
10	Police Station/ Industrial Police	External	High	High	PS/IP has legal authority to ensure local laws & security that relevant with workers OHS.	If not comply with applicable laws, the organization have authority shut down the factory.	Ensure all legal requirements, visiting industry inspector by PS/IP

11	kobir Enterprise	External	Medium	High	Ensure all kinds of cleaning support and provide daily labour for loading & unloading	If no ensure supportive man power, organization may risk on time delivery of product and unrest of worker	Ensure regular meeting & all kinds of cleaning & daily labour requirements of organization.
12	Sheba Enterprise	External	Medium	High	Ensure all kinds of security safety to protect external problems.	If no ensure checking at boundary area & transport protection, organization may risk .	Ensure all kinds of security safety of organization.
13	Padma Digital Hospital & Diagnostic Center	External	Medium	High	To ensure all kinds of Hospitality support that relevant with test .	Any emergency disaster moment may risk to support from them & unrest of workers.	Doing regular meeting with them & internal worker diagnostic test sent to them
14	Participation Committee/workers association	Internal	High	Medium	To develop employer & employees relationship, reduce waste, produce quality of production & ensure workers health and safety.	Bad reputation & unrest by workers.	Doing regular meeting with them & ensure workers OHS.

15	Customs Bond Commisionerate	External	Medium	High	Ensure all kinds of logistic support that relevent with business & economy.	Bad reputation & shut down business.	Update all legal requirements, visiting industry inspector by CBC
16	Factory Employees	Internal	High	High	To produce quality of product, involve with production & earn foreign currency.	If no, ensure quality of product & no earn foreign currency organization may risk & shut down.	Ensure quality of product & no earn foreign currency organization
17	Local Community	External	Medium	Medium	Local community help us to support all kinds of social, economic issues.	Create bad reputation	Always connecting & gives support us
18	NGO's	External	Medium	Medium	Ensure all kinds of logistic support that relevent with Social.	Create bad reputation	Always connecting & gives support us

From the above table it is unclear what is the medium of the engagement. However, it was observed that for regulators/government offices – ETL engages with them to renew permits/licenses and keep the compliances in check, workers are engaged through trainings and campaigns and local communities are not engaged much.

Disclosure Policy

ETL only disclose information to regulators, their customers and customer mandated stakeholders. As a public limited company, they also publish financial reports and annual reports for the public. However, there are no policies and procedures of disclosing E&S performance/E&S safeguard documentations to the stakeholders. Additionally, there is no regulatory requirement by the government to publicly disclose the E&S performance to the nearby or affected community.

6.9. EHS policy implementation, monitoring, and Emergency Response Plan

ETL is implementing their Occupational Health and Safety (OHS) policy and complying with the legal requirements pertaining to Environment, Health and Safety. ETL has conducted process, machines and other risk assessments. Examination of training records showed that they are having inhouse trainings pertaining to fire safety and firefighting, chemical handling, waste handling, chemical handling, occupational health and safety training, PPE trainings, first aid, etc. OHS related training are designed and conducted as per local labor laws and international best practices. Different training modules are designed and recommended for different groups of workers as per their needs. All the mentioned trainings are conducted at least once per month (See **Annexure A.4** for detailed information on training schedule of the year 2022. The workers interviewed confirmed that they had attended trainings on these aspects, and they were provided regularly. The factory also ensures the policies pertaining to EHS are communicated with new joiners in the organization through orientation trainings. Relevant Personal Protective Equipment (PPE) was provided to the employees free of cost. PPE procurement records and disbursement records were reviewed to confirm the distribution of PPEs to the employees.

List of chemicals used in process were reviewed. MSDS was available for the chemicals used in the process. The factory has documented emergency preparedness procedures for handling accidents and emergencies. The emergency response team was aware of the procedure. The factory has adequate ventilation and lighting. Sufficient toilets (male-509, female-02) were present in the facility in proportion to the number of male and female workers. Drinking water facilities are present in all the floors. The factory has a medical team with doctors and nurses. First level medical services are provided to the workers upon injury or illness by the medical team. Serious cases are taken to the nearby hospital. All the exit doors and evacuation aisles were found obstacle-free and installed with an illuminated exit sign and emergency light with secondary power backup. The facility provides a dormitory to the workers with sufficient space, hygiene, suitable living environment. The factory conducts regular test of pressure vessels, lift tests, boiler tests, etc. twice a year (See **Annexure A.4.** for details of the Standard Operating Procedure). The factory provides group insurances accidental insurance to all the workers and the insurance provides adequate coverage. Health emergencies are not covered by the insurance (not legally mandated), however, records suggest the company offers support to workers suffering from health issues.

Sufficient firefighting equipment was installed and available in the factory. During the factory visit, a fire drill was conducted by the E&S review team and the workers were able to gather into the assembly point. The firefighting equipment were also tested during the drill and workers demonstrated their knowhow in operating the equipment.

However, during the factory visit it was observed that in the wet processing units, workers were not wearing safety boots as required in the safety instructions. The cleaning staff in the spinning unit were not wearing earmuffs, which could cause hearing loss in those workers.

Appropriate signage regarding the movement of forklifts and vehicles were missing in the facility. Moreover, it was observed that during the movement of forklifts backup sirens were not functional and safety lights were also not used sometimes.

Recommendations

- The PPE training curriculum to be updated to include more information on the detrimental effects of not wearing PPE.
- Training the supervisors/floor in-charge on PPE requirements and including PPE compliance in their KPI.
- ETL should develop a traffic management plan which would give coverage to internal traffic movement and implement it.

6.10. Biodiversity Conservation and Management

According to the United Nations Environment Program (UNEP) Biological diversity or biodiversity is the variety of life on Earth and the natural patterns it forms. The biodiversity we see today is the result of 4.5 billion years of evolution and, increasingly, of human influence as well. It forms the web of life, of which we are an integral part and upon which we so fully depend. The protection, restoration, and management of biodiversity in obtaining sustainable development of resources are called Biodiversity conservation and management. Therefore, biodiversity conservation plays an important role in the quality of life of all living organisms.

Under the Environmental Conservation Act (ECA' 1995), ecologically sensitive and precious areas are designated as Ecologically Critical Area (ECA) by Department of Environment in Bangladesh in cases where an ecosystem or biodiversity area is threatened to reach to a critical state. There is no ecologically critical area located in Mymensingh. However, forest land covers the north-west border of the region. On the other hand, protected areas such as national parks and protected forests are designated by Department of Forest under the Wildlife Order and Forest Act. There is no protected area within 10km radius of the project area. The nearest protected area, Madhupur National Park, in Tangail is located about 49.9km away from the project location on the North-western border of Mymensingh. The 49.90 km. In addition, during the field visit, and talked to the local elderly people, it has assumed that the Project site does not fall under any forest area, and ecologically critical area. Hence, there is no potential and or adverse impact on forest areas, and local biodiversity due to the project activities or facilities.

In addition to the above details, no species of importance were found to be available in the artificial reservoir lake within the factory premises (based on observations and discussions with ETL). Fish cultivation is often practiced in the lake by ETL. For more details, see **Section 2.2.6**.

6.11. Indigenous People and Cultural Heritage

There is no archeological and cultural heritage site within the project area or boundaries. However, there are two archeological and cultural heritage sites outside of the project location which are almost long distance. Muktagachha Jomidar Bari, which is located 52km away from project site, another one is Mymensingh museum which is in Mymensingh and is away from 199km from project site. Therefore, it was found that all the cultural heritages have historical importance. During the field visit and talked to local elderly people and key persons, there is not any archeological and cultural heritage site around the project sites which may not have any potential impact due to project activities. On the other hand, there is not any indigenous group or community around the project site, but some Indigenous communities such as Garo, Koch, Dalu, Barman and hajong belong to this district, which is away from 49.9km from the project site. Therefore, based on the analysis and data, there no Indigenous People and Cultural Heritage sites around the project site.

7. Environmental and Social Conditions

Envoy Textile World's 1st LEED certified company by US Green Building Council on xxxxx. Envoy Textiles Limited (ETL) is a 100% export-oriented denim fabric manufacturer. Factory of Envoy textile limited located at Word 5, Bhaluka Paurashava, Bhaluka, Mymensingh which is about 48km far from Mymensingh Divisional City. Study area is also 25km (approximately) from Bhawal National Park, a natural Shal forest in Bangladesh. Factory area is sub-urban in nature and surrounded by various industries. This section provides a brief overview of the Social and Environmental baseline of the region focusing the factory area of Envoy Textile Limited.

Table 14 Map showing Bhaluka Upazila



7.1.1. Climatic Condition

The three most prominent seasons of Bhaluka, Mymensingh are as follows:

- Summer/Pre-monsoon: March to June
- Monsoon: July to November
- Winter: December to February

Summer lasts for about four months in the region starting from the 16th of March to the 28th of June with an average temperature of 31°C. June is the hottest month in Bhaluka, Mymensingh with an average high of 32°C and average low of 26°C. Winter in Bhaluka starts from the 12th of December and continues till the 3rd of February. The average winter temperature of this region is 25°C. January is the coldest month with an average high of 24°C and average low of 12°C. The maximum average recorded temperature in 2011 as per Bangladesh Bureau of Statistics stood at 22.2°C and the minimum average temperature in the same year was 10.8°C. Monsoon usually overlaps with Summer and rainfall starts from mid-April and continues till November. July is the wettest month in the region with an average

of 24 wet days with an average rainfall of 11.0 inches. The average annual rainfall recorded in 2011 was 2153 millimetre. The region remains extremely humid for about 8 months starting from March till November. The recorded relative humidity in 2011 was 79.3%.

7.1.2. Natural Hazards

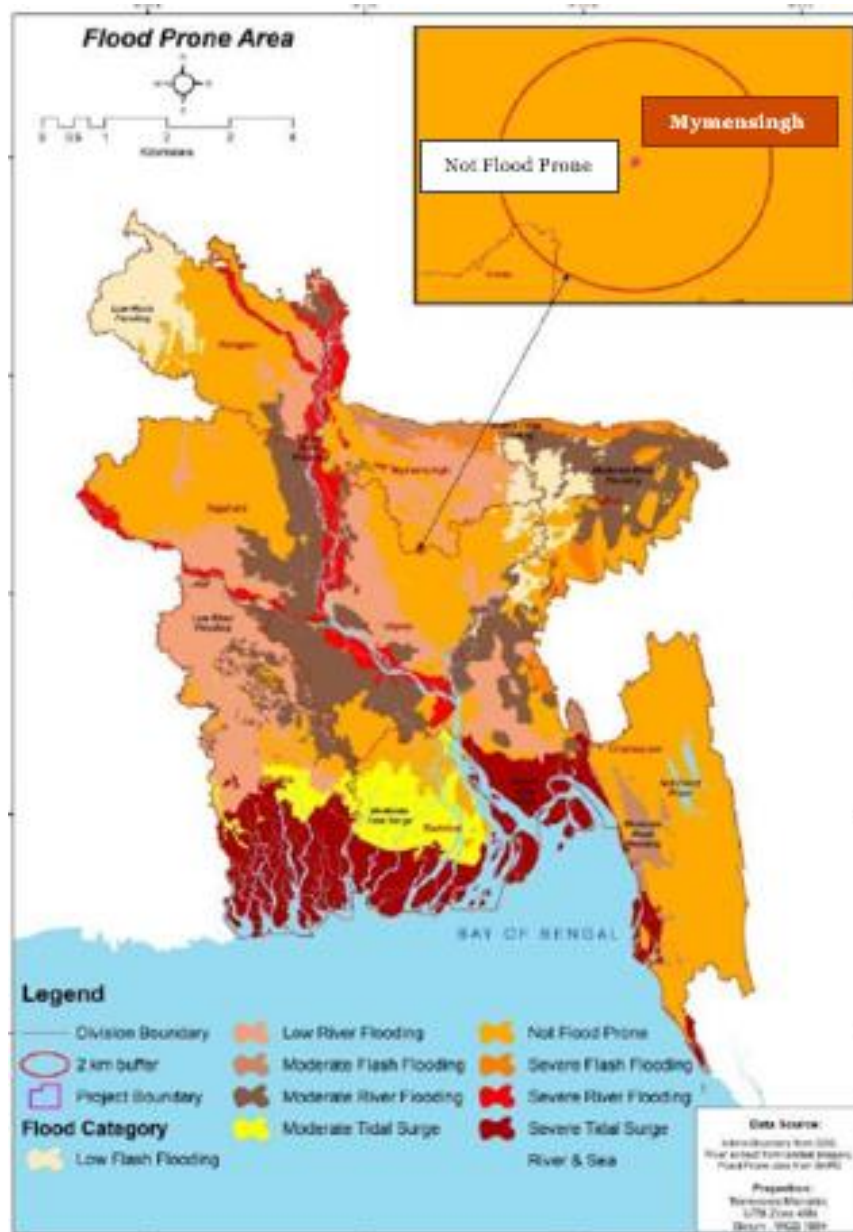
The geographical location of Bangladesh makes it one of the most disaster prone countries in the world. In the past years, the country has been a victim of several devastating cyclones and floods. Bangladesh Meteorological Department (BMD) collects the daily information of natural disasters.

Since the project site (Bhaluka, Mymensingh) is far from the coast bordering the Bay of Bengal, the region is not too prone to cyclones. The last tornado to hit the nearest location of the **project site was back in April 1972.**

Bangladesh is also a tectonically active area which makes it prone to natural disasters such as earthquakes. According to a seismic study, 43% of the country is rated high risk including the Mymensingh area, making the project location vulnerable to earthquakes. However, no records of **significant tectonic activities near the project site.**

Flash floods within the country usually occurs in the northwest, southwest and the Chattogram region. **The Mymensingh area is not known as a flood prone area.**

Figure 14 Flood Zone of the Project Area

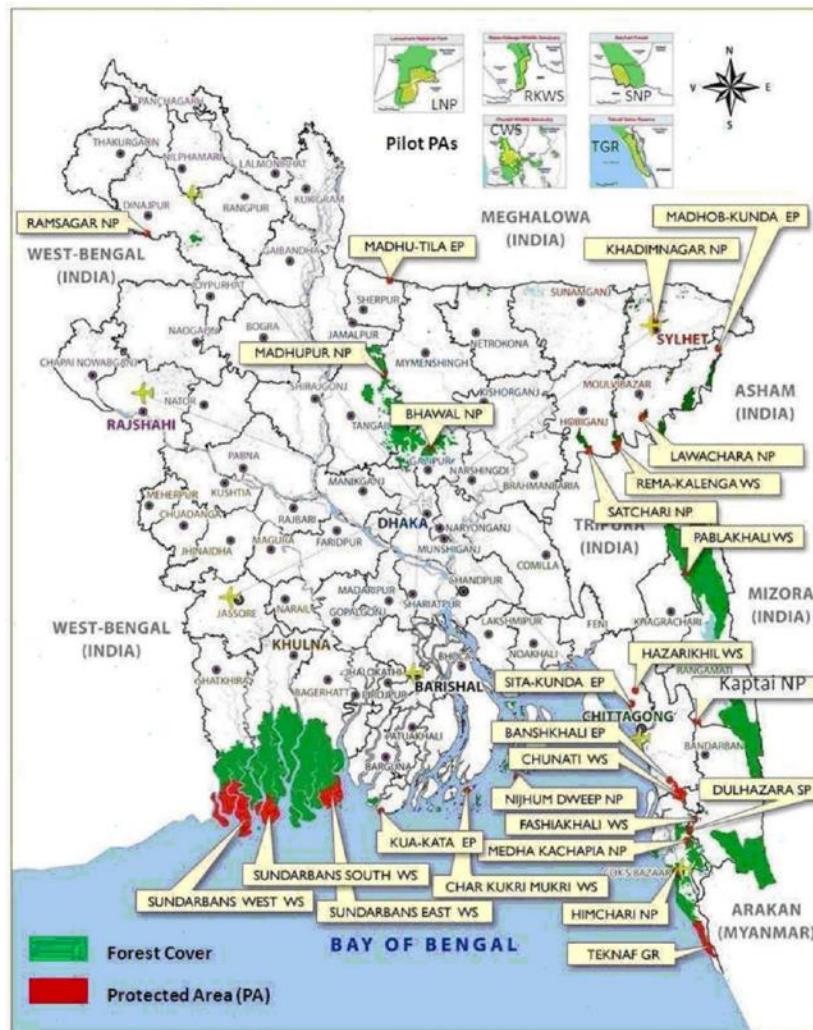


7.1.3. Biological Environment

Ecologically Critical Area:

Under the Environmental Conservation Act, ecologically sensitive and precious areas are designated as Ecologically Critical Area (ECA) by Department of Environment in Bangladesh in cases where an ecosystem or biodiversity area is considered to be threatened to reach to a critical state. There is no ecologically critical area located in Mymensingh. However, forest land covers the north-west border of the region.

Figure 15 Map showing Protected Areas of Bangladesh



Protected Area:

On the other hand, protected areas such as national parks and protected forests are designated by Department of Forest under the Wildlife Order and Forest Act. There is no protected area within 10km radius of the project area. The nearest protected area, Madhupur National Park, is located in Tangail on the North-western border of Mymensingh.

7.1.4. Socio-Economic Condition

Demographic Information

The following table illustrates the demographic information of the Bhaluka Paurashava, Bhaluka Upazila and Mymensingh District:

Sl. No.	Socio-economic aspects	Mymensingh District	Bhaluka Upazila	Bhaluka Paurashava
2	Population	Male: 2539124 Female: 2571148 Total: 5110272	Male: 217134 Female: 213186 Total: 430320	Male: 20239 Female: 18535 Total: 38774
3	Population Density	1163 sq. km	969 sq. km	-

4	Average Size of Household	4.44	4.0	3.9
5	Literacy rate	Male: 44.9% Female: 42.2% Total: 43.5%	Male: 52.0 Female: 46.2 Total: 49.1	Male: 76.5 Female: 70.8 Total: 73.8
6	Ethnic Population (Garo, Barmon, Hajong)	Male: 17288 Female: 18619 Total: 35907	Male: 2019 Female: 1964 Total: 3983	Male: 83 Female: 59 Total: 142
Source: Bangladesh Bureau of Statistics (BBS, 2011)				

The total rural population of Mymensingh District in 2011 was 5110272. The male and female population during this time was 2539124 and 2571148 respectively. The male to female ratio was 99 and average household size was 4.44. The male and female literacy stood at 44.9% and 42.2% respectively. There are a significant number of ethnic people in Mymensingh District. Bhaluka Paurashava have also few ethnic populations stated in above but in project area have no ethnic population which have been confirmed by both BBS data and public consultation with local people.

Economic Condition

Agriculture, industry, and fisheries are the three main economic sectors of the region. The average daily wage of male agricultural workers in 2011 was Tk. 279 and that of female agricultural workers was Tk. 222. The average daily wage of male labors working in non-agricultural sectors in 2011 was Tk. 272 and that of female labors was Tk. 215.

The number of commissioned and operational deep tube-wells in 2011 was 2324 and 4723 units respectively. In 2011, the number of fishermen in the region stood at 25,883 and 1,39,067 metric tons of fish was produced.

The region has 21 textile mills and 18 of these are located in Bhaluka. There are 28 garments factory of which 26 are in Bhaluka. All 3 of the steel and engineering industries of Mymensingh are based in Bhaluka. The region also has 1219 rice mills, 1 jute mill, and 492 handlooms. Due to the proximity of Bhaluka from Dhaka, textile and Ready-Made Garments industries have flourished in the region.

The number of male and female factory workers in the textile mills is 10,935 and 11,688 respectively. The total spindle capacity of these textile mills is 5,11,828 and loom capacity is 126.

7.1.5. E&S Risks of ETL's Operations

The following table illustrates the Environmental and Social risks of ETL's Operations. It includes the nature of impacts- both short and long term, along with some additional remarks.

Table 15 Details of the Environmental and Social Impacts of the Operation of ETL

S. No.	Activities	Impacts	Negative Impact		Positive Impact		Remarks
			Short Term	Long Term	Short Term	Long Term	
i	Operation of ETL	Impact on the ambient Air Quality		✓			Air Emission will increase due to the industrial

S. No.	Activities	Impacts	Negative Impact		Positive Impact		Remarks
							activities of the region.
		Noise Pollution		✓			Noise Pollution will increase due to the industrial activities of the region.
		Potential for surface water pollution due to industrial waste discharge	✓	✓			ETP discharges may affect the cultivation practices of nearby communities.
		Economic Development			✓	✓	The expansion plan of ETL will generate employment within the region it is located in which will eventually enhance the standard of living of the residents.
		Accessibility				✓	Bhaluka, being an industrial region has already improved its infrastructure which enhanced the city's accessibility to the capital and other regions within the country

S. No.	Activities	Impacts	Negative Impact		Positive Impact		Remarks
		Groundwater exploitation		✓			Large amount of water usage may negatively impact the groundwater level of the region in the long term
		Potential for land contamination due to industrial activities		✓			Improper disposal of Chemicals used in dyeing processes may contaminate nearby land.
		Improved drainage			✓	✓	
		Electrification of the area				✓	
		Improved health and sanitation facilities				✓	
		Increased Run-off		✓			
		Generation of Employment				✓	The expansion plan of ETL will generate employment within the region it is located in which will eventually enhance the standard of living of the residents.

8. Corrective Action Plan

Based on the outcome of ESMS assessment and review of the factory's E&S performance a corrective action plan is developed below outlining the key recommendations to align ETL's E&S practices with ADB's SPS and DEG's ESMS requirements (IFC performance standards).

No.	A Action/Measure	Priority* (High, Medium, Low)	Responsibility	Requirement being Complied with (National Legislation, ADB SPS, GIIP*)	Timeframe	Performance Indicator /Monitoring Requirement	Status/Remarks
1	Corporate Environmental and Social Management System (ESMS) Assessment						
1.1	ESMS related						
1.1.1	Third-Party Workers and Supply Chain Workers Procedures	Medium	Key Responsibility: ETL Supporting Role: PwC	ADB SPS 2009 ILO Core Labor Standards	Prior to first disbursement	<ul style="list-style-type: none"> Adoption of third-party workers and supply chain workers' management procedure Development of supplier/service provider 	<p>Gap</p> <p>ETL does not have a defined procedure to ensure compliance in their third party and supply chain workers.</p> <p>Recommendation</p> <p>A policy third-party workers and supply chain workers' labor</p>

No.	Action/Measure	Priority* (High, Medium, Low)	Responsibility	Requirement being Complied with (National Legislation, ADB SPS, GIIP*)	Timeframe	Performance Indicator /Monitoring Requirement	Status/Remarks
						Evaluation and Audit checklists.	compliances should be ensured. IFC performance standards 2 may be referred for the development of the procedure.
1.1.2	Traffic Management Procedures/Plan (internal)	Medium	Key Responsibility: ETL Supporting Role: PwC	GIIP	Prior to first disbursement	<ul style="list-style-type: none"> Adoption of a traffic management procedure/plan 	<p>Gap</p> <p>ETL does not have a defined traffic management procedure/policy. There are internal roads, and passageways within facilities, which are used by forklifts and other vehicles.</p> <p>Recommendation</p> <p>A traffic management plan is to be developed which would include internal traffic rules, signage requirements,</p>

No.	Action/Measure	Priority* (High, Medium, Low)	Responsibility	Requirement being Complied with (National Legislation, ADB SPS, GIIP*)	Timeframe	Performance Indicator /Monitoring Requirement	Status/Remarks
							labor rules for driving, capacity building requirements, etc. A traffic management plan may be developed keeping in consideration of IFC Performance standards and ADB's requirements.
1.1.3	Retrenchment Policy	Medium	Key Responsibility: ETL Supporting Role: PwC	ADB guidelines	3 months after first disbursement	<ul style="list-style-type: none"> Adoption of a Retrenchment Policy. 	<p>Gap</p> <p>There were no incidences of Retrenchment in the factory.</p> <p>Recommendation</p> <p>ETL to develop a retrenchment policy outline the process of evaluating alternatives in event of retrenchment and avoiding such instances.</p>

No.	A Action/Measure	Priority* (High, Medium, Low)	Responsibility	Requirement being Complied with (National Legislation, ADB SPS, GIIP*)	Timeframe	Performance Indicator /Monitoring Requirement	Status/Remarks
1.2	ADB SPS safeguard requirements 1-3						
1.2.1.	Social Policy Incorporating Involuntary Resettlement and Indigenous People Issues.	High	Key Responsibility: ETL Supporting Role: PwC	ADB SPS 2009	Prior to first disbursement	<ul style="list-style-type: none"> Revised social policy 	<p>Gap</p> <p>ETL's social policy does not take into consideration resettlement principles and indigenous/ethnic peoples safeguard.</p> <p>Recommendation</p> <p>ETL should incorporate Indigenous People and Involuntary Resettlement Policy within their Social Policy</p>
1.2.2	Environmental and Social Monitoring Plan	High	Key Responsibility: ETL Supporting Role: PwC	ADB SPS 2009	Prior to first disbursement	<ul style="list-style-type: none"> Revised Environmental and Social management plan to include the appropriate 	<p>Gap</p> <p>ETL's EMP was prepared for local environmental clearance but is currently unavailable. Their EMS/ESMS does not define the monitoring</p>

No.	Action/Measure	Priority* (High, Medium, Low)	Responsibility	Requirement being Complied with (National Legislation, ADB SPS, GIIP*)	Timeframe	Performance Indicator /Monitoring Requirement	Status/Remarks
						monitoring frequency.	<p>frequencies – through monitoring parameters are defined.</p> <p>Recommendation</p> <p>ETL to prepare an environmental and social management and monitoring performance plan.</p>
1.2.3.	Screening and project categorization	Low	Key Responsibility: ETL Supporting Role: PwC	ADB SPS 2009	Prior to first disbursement	<ul style="list-style-type: none"> Adopting ADB's project screening and categorization. 	<p>Gap</p> <p>ETL's existing ESMS does not have any defined risk categorization/screening procedure for any development of future projects/sub-projects. ETL follows local regulations for screening and categorization. DoE's screening only takes into consideration</p>

No.	Action/Measure	Priority* (High, Medium, Low)	Responsibility	Requirement being Complied with (National Legislation, ADB SPS, GIIP*)	Timeframe	Performance Indicator /Monitoring Requirement	Status/Remarks
							<p>the operational risks. It does not take into consideration the location-specific risks to communities and the environment due to the project.</p> <p>Recommendation</p> <p>ETL should adopt ADB's screening and project categorization principles for any future or proposed expansion/improvement project within the existing footprint or to new location and for any new construction of manufacturing plant outside the existing project site. The safeguard measures as suggested by ADB SPS</p>

No.	Action/Measure	Priority* (High, Medium, Low)	Responsibility	Requirement being Complied with (National Legislation, ADB SPS, GIIP*)	Timeframe	Performance Indicator /Monitoring Requirement	Status/Remarks
							2009 for new and expansion of existing projects to be adopted.
1.3	Stakeholder groups and current stakeholder engagement activities						
1.3.3.	Stakeholder Engagement Plan	Medium	Key Responsibility: ETL Supporting Role: PwC	ADB SPS 2009	Prior to first disbursement	<ul style="list-style-type: none"> A new stakeholder engagement plan along with stakeholder analysis, stakeholder engagement methods, and frequencies, grievance procedure, revised grievance management system, disclosure policy, etc. 	<p>Gap</p> <p>ETL does not have a stakeholder engagement plan. However, they have conducted a stakeholder analysis.</p> <p>Recommendation</p> <p>ETL to prepare a stakeholder engagement plan in accordance to ADB SPS.</p>

No.	Action/Measure	Priority* (High, Medium, Low)	Responsibility	Requirement being Complied with (National Legislation, ADB SPS, GIIP*)	Timeframe	Performance Indicator /Monitoring Requirement	Status/Remarks
	Disclosure Policy	Medium	Key Responsibility: ETL Supporting Role: PwC	ADB SPS 2009	Prior to first disbursement	<ul style="list-style-type: none"> New Disclosure Policy 	<p>Gap</p> <p>ETL does not have a policy regarding the disclosure of E&S safeguard documents. Local regulations do not mandate disclosure.</p> <p>Recommendation</p> <p>ETL is to adopt a disclosure policy in accordance with ADB's SPS 2009.</p>
	Grievance Redress Policy and Procedures	Medium	Key Responsibility: ETL Supporting Role: PwC	ADB SPS 2009	Prior to first disbursement	<ul style="list-style-type: none"> Revised GRM – 1 for internal stakeholders and 1 for external stakeholders 	<p>Gap</p> <p>GRM of ETL has a narrow definition of Grievances which does not include the impact on the community due to ETL's operation. The existing policy does not define how it will be</p>

No.	Action/Measure	Priority* (High, Medium, Low)	Responsibility	Requirement being Complied with (National Legislation, ADB SPS, GIIP*)	Timeframe	Performance Indicator /Monitoring Requirement	Status/Remarks
							publicized to external stakeholders. Recommendation ETL to revise their existing GRM in accordance to ADB's requirements.
2	Environment land Social Compliance Audit Findings						
2.1	ESMS Related						
	EHS and Social capacity training plan	High	Key Responsibility: ETL	ADB SPS 2009	3 months after the first disbursement	<ul style="list-style-type: none"> Identify the corporate and/or plant operational staff that need to attend related EHS training program % of E&S responsible person's trained Number of training days 	Gap E&S responsible persons of ETL have not implemented projects where lender's E&S compliances were followed (such as ADB SPS or IFC PS). They do not have any training or exposure to these standards.

No.	Action/Measure	Priority* (High, Medium, Low)	Responsibility	Requirement being Complied with (National Legislation, ADB SPS, GIIP*)	Timeframe	Performance Indicator /Monitoring Requirement	Status/Remarks
							<p>Recommendation</p> <p>ETL to submit an EHS and Social training plan and train their staff accordingly and submit training completion reports in the first and succeeding annual E&S monitoring reports to ADB.</p>
2.2	ADB SPS Safeguard requirements 1-3						
2.2.1	Environmental and Social Monitoring Proforma	Medium	ETL	ADB SPS 2009	Prior to first disbursement	<ul style="list-style-type: none"> Annual monitoring reports according to the new Environmental and Social Monitoring Plan. 	<p>Gap</p> <p>The E&S monitoring parameters and status of performance of ETL as per monitoring data made available was satisfactory. The frequencies of monitoring was not defined in ESMS.</p>

No.	Action/Measure	Priority* (High, Medium, Low)	Responsibility	Requirement being Complied with (National Legislation, ADB SPS, GIIP*)	Timeframe	Performance Indicator /Monitoring Requirement	Status/Remarks
							<p>Recommendation</p> <p>It is recommended that after the development of the monitoring plan, the proforma of the report should be developed and later to submit an annual E&S monitoring report submitted to ADB.</p>
2.2.2	<p>Grievance Redress Mechanism Procedures (internal and external grievances)</p>	Medium	ETL	ADB SPS 2009	<ul style="list-style-type: none"> • Prior to first disbursement and information dissemination activities will be done annually • System in place within 2 months after the first disbursement 	<ul style="list-style-type: none"> • Number of community members created awareness of the existence of GRM and procedure for registering grievances. • Regular monitoring and grievance database management 	<p>Gap</p> <p>ETL does not have a strong community engagement and the existence of GRM is not well advertised to the community.</p> <p>Recommendation</p> <p>ETL to engage with community stakeholders and inform them about</p>

No.	A Action/Measure	Priority* (High, Medium, Low)	Responsibility	Requirement being Complied with (National Legislation, ADB SPS, GIIP*)	Timeframe	Performance Indicator /Monitoring Requirement	Status/Remarks
					and will continue as part of the responsible persons tasks		the Grievance Redress Mechanism.
2.2.3	Stakeholder Engagement Plan implementation	Medium	ETL	ADB SPS 2009	3 months after the first disbursement	<ul style="list-style-type: none"> Stakeholder Analysis Annual SEP (w/ target stakeholders, information to be disclosed/shared, target timeline, person responsible) Records of meetings/ FGDs/events with different stakeholders. 	<p>Gap</p> <p>ETL does not have a defined stakeholder engagement plan. Engagement with local communities, NGOs, etc. may be strengthened.</p> <p>Recommendation</p> <p>Implement stakeholder engagement plan and report progress of in the annual E&S monitoring report to be submitted to ADB.</p>
2.3	International, national and local environmental, health, safety (EHS) requirements and standards, gender and development, social protection and internationally recognized core labor standards						

No.	Action/Measure	Priority* (High, Medium, Low)	Responsibility	Requirement being Complied with (National Legislation, ADB SPS, GIIP*)	Timeframe	Performance Indicator /Monitoring Requirement	Status/Remarks
2.3.1	EHSS Training Plan.	Medium	ETL	National Regulations and GIIP	On a semi-annual or annual basis or if there are new joiners in the company should undergo this PPE Compliance Training	<ul style="list-style-type: none"> • Number of Supervisors trained • Submission of revised OHS curriculum • Number of ETL workers trained • Number of Contractual Workers Trained 	<p>Gap</p> <p>ETL is providing adequate PPE to the workers. During the assessment, it was found that workers in wet processing units were not wearing appropriate PPE (safety boots) and contracted workers were not wearing ear muffs in spinning units.</p> <p>Recommendation</p> <ul style="list-style-type: none"> • Build Capacity and spread awareness among the supervisors • Include PPE compliance as a KPI for the supervisors

No.	Action/Measure	Priority* (High, Medium, Low)	Responsibility	Requirement being Complied with (National Legislation, ADB SPS, GIIP*)	Timeframe	Performance Indicator /Monitoring Requirement	Status/Remarks
							<ul style="list-style-type: none"> • Improve the curriculum of OHS Training to focus on health hazards that may arise due to violation of not wearing proper safety gear (can mention real-life case studies) • Capacity building training to be provided to general workers including contractual workers who work within the industries • Submit quarterly

No.	A Action/Measure	Priority* (High, Medium, Low)	Responsibility	Requirement being Complied with (National Legislation, ADB SPS, GIIP*)	Timeframe	Performance Indicator /Monitoring Requirement	Status/Remarks
							progress report to ADB.
2.3.2	Traffic Management Plan Implementation	Medium	ETL	GIIP	3 months after the first disbursement	<ul style="list-style-type: none"> Implementation of appropriate signages within the site. Inspection reports of the vehicles/emission reports Capacity building of drivers on the traffic management plan 	<p>Gap</p> <p>No internal traffic rules defined, lack signages indicating movement of vehicles, speed limits, etc.</p> <p>Recommendation</p> <p>Post adopting a traffic management plan, submitting quarterly monitoring reports to ADB.</p>
Compliance with applicable labor laws							
2.3.4	Contracted Worker – Labor Compliance	Medium	Primary Responsibility: ETL	Local Law (from Vendor’s Perspective) ADB SPS 2009	Prior to disbursement	<ul style="list-style-type: none"> Having records of contractual or third-party labor hired Records of E&S Trainings 	<ul style="list-style-type: none"> ETL have to conduct to review their cleaning service provider’s labor compliance.

No.	Action/Measure	Priority* (High, Medium, Low)	Responsibility	Requirement being Complied with (National Legislation, ADB SPS, GIIP*)	Timeframe	Performance Indicator /Monitoring Requirement	Status/Remarks
			Secondary Responsibility: ETL's vendors			<p>provided to the contractual workers before onboarding them</p> <ul style="list-style-type: none"> Filled-out contractor / service provider's monitoring form 	<p>(K.M. enterprise)</p> <ul style="list-style-type: none"> ETL to add conditions on child labor, bonded labor prohibition, and other labor-related national laws and/or requirements in the terms and conditions to their logistics service provider's contract. ETL must conduct due diligence of all vendors as per the procedure set up in the

No.	Action/Measure	Priority* (High, Medium, Low)	Responsibility	Requirement being Complied with (National Legislation, ADB SPS, GIIP*)	Timeframe	Performance Indicator /Monitoring Requirement	Status/Remarks
							third-party worker and supply chain worker management procedure.

9. Development Impact

Energy Efficiency

Majority of the operations of the facility are powered by natural gas (58%), and CNG (29%). Other energy sources include diesel and electricity from the grid. Thermal energy in the form of steam is generated from the boiler to be used in process for generating hot water and used in steam dryers and iron machines. To reduce the overall electrical and thermal energy usage within the facility, ETL has conducted the following technical changes:

Table 16 Actions taken to promote energy efficiency within ETL

SL.	Energy Consumption Type	Area	Actions taken to promote cleaner production
1.	Electrical	Lighting System	Replace 36W tube lights by energy efficient LED lamps
		Compressed Air	Regular monitoring of compressed air network and arrest leakages on regular basis.
2.	Thermal	Boiler	Install online oxygen tuning system which will maintain optimum oxygen level of 2-3% in boiler.
		Blow down control in Boiler	Install auto blow down control system which will sense TDS level in boiler and accordingly blow down control valve will operate.
		Improvement in condensate recovery	Improve condensate recovery from 80% to about 95%. This will lead to saving in natural gas, water consumption will reduce and also the treatment cost of ground water will also reduce.

Furthermore, ETL is proposed to install VFD or smaller size impeller to remove throttling of the cooling water pumps to decrease electrical energy usage. Even though there is an existing rainwater harvesting system to cater to domestic usage, a sizeable one should be established to contribute to industrial use. The installation of a rainwater harvesting system to meet a portion of the industrial demand is feasible due to the large rooftop area of the facility. ETL is also planning to setup 2.5MW rooftop solar plant in their facility.

ETL prioritizes reducing energy, water, chemical usage, waste, air pollution and discharge of wastewater as a part of their sustainability goals. The company is committed to evaluate environmental sustainability performance annually and ensuring continual improvement. As a part of their sustainability target, they are committed to achieve the following targets by 2026:

Table 17 Sustainability Targets of ETL by the year 2026

Energy	Water	Chemical	Air Emission	Waste	Wastewater
Overall Megajoule reduction by 19.66% Electricity reduction by 18.41% Add 2.5MW to energy demand through renewable sources	Ground water reduction by 34.91% Process water reduction by 25.07% Reuse 1 M litre of water Recycle water by 34% Rainwater Harvesting- +0.5% Increase	Reduce Process Chemical use by 10% Procure 100% Green chemical (by 2023)	GHG (mostly carbon dioxide) reduction by 25.92% Reduce stack pollutants average by 10% Introduce usage of CFC free Refrigerant gas	Reduce Hazardous waste by 15% Reduce non-hazardous waste by 25% Divert landfilling of waste disposal by 30% 100% monitoring of all third-party contractor	Reduce waste-water pollutants by 10%

Socio-Economic Benefits

According to the Household Income and Expenditure Survey (HIES, 2016), the poverty rate of the Mymensingh District is approximately 32.77%. ETL, being a textile giant in the Bhaluka region have generated employment by massive amounts. Additionally, given that ETL will expand its operations in the future, it is likely to have a positive impact on the current poverty level. With the proceeds of the ABD loan, ETL will expanding their operations by installing another spinning unit which is estimated to generate employment for 220 workers, giving rise to more employment opportunities for the people living in the neighboring areas. Likely all of the workers in this new section would be male due to lack of interest level in working in such industries from women.

Recommendations and Opportunities for enhanced Economic, Environmental, and Social Development

The CSR activities of ETL are focused on health, employing disadvantaged people and education. The CSR activities of ETL can be focused on areas where ETL's operations has an impact. For example, ETL is dependent on ground water for use in its production. It is commendable that ETL is making efforts in monitoring water usage, reducing, recycling water, and harvesting rainwater. However, as was revealed through consultation with Department of Public Health and Engineering (DPHE) and discussions with nearby community, availability of clean water is becoming an issue in the region due to excessive water abstraction by the myriad of industries which have been established in the region. ETL can also focus on providing clean water to nearby communities.

10. Conclusion

Based on the documents reviewed and observations during the factory visit, the overall environmental and social performance is found to be satisfactory. Envoy Textiles limited has a E&S responsible team capable of handling environmental and social issues in projects. ETL is complying with number of environmental and social standards as per local and buyer's requirements. The E&S responsible team is not familiar with lender requirements for E&S safeguard. The gaps identified in this document reflects that. The policies and procedures suggested in the corrective action plan should be developed before disbursal of funds.

Annexure

9.1. A.1. Stakeholder Consultations

Table 18 Internal Stakeholders/List of Persons Interviewed

SL	Name	Designation	Envoy staff or Third Party	ID
1.	Kona Bisshash	General Worker	Envoy Staff	160149
2.	Saiful Islam -	Medical Assistant	Envoy Staff	-
3.	Rajib Sharkar, MBBS	Medical Officer	Envoy Staff	-
4.	Md. Hafizur Rahman	Forklift Operator	Envoy Staff	
5.	Md. Daulad Ali	Workers Participation Committee Member	Envoy Staff	
6.	Faisal Ahmed	Social Compliance Officer	Envoy Staff	-
7.	Rashida Khatun	Cleaner	Third-Part Staff (Temporary)	
8.	Mohammad Nur Alam	Security Guard	Third-Party Staff	
9.	Taslina Akter	Junior Security	Third-Party Staff (Permanent)	210085
10.	Anowara	Cleaner	Third-Party Staff (Temporary)	

External Stakeholders

Institutional Stakeholders

Table 19 Institutional Stakeholders

SL.	Name of the Stakeholder	Designation	Institution	Contact Number
1.	Raufur Rahman		Department of Public Health Engineering (DPHE)	
2.	Al Mamun	Senior Station Officer	Bangladesh Fire Service and Civil Defence, Bhaluka	01718818512
3.	Kamrul Hasan	Manager	Padma Digital Hospital and Diagnostic Centre	01710659124
4	Md. Humayun Kabir	Proprietor,	Tabasshir Enterprise, Logistics Service Provider of ETL	

Table 20 Community/Local Stakeholders

SL.	Name of the Stakeholder	Location	Contact Number
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1.	Mohammad Zafar	Lobonkotha, Bhaluka (Village situated near the canal which releases ETLP discharge)	-
2.	Shirajul Haque	Gadimya, Bhaluka	-
3.	Nurul Haque	Hobirbari, Bhaluka	-

Discussion Points

SL.	Stakeholder	Discussion Points
1.	Department of Public Health Engineering (DPHE)	<ul style="list-style-type: none"> According to DPHE, in 2021, the water table of the region has gone down 8ft which is highest amount recorded in recent times. Usually, the water table goes down approximately 1 or 2 ft. Due to the area being an industrial zone, water is used in high amounts. Therefore, there is little time for water recovery. Majority of the factories in the region do not recycle water by treating it with ETP In some cases, factories are drilling untreated water into the ground which is contaminating the ground water affecting the drinking water source of nearby households
2.	Bangladesh Fire Service and Civil Defence, Bhaluka	<ul style="list-style-type: none"> Since Envoy Textile Limited has a spinning mill, according to the fire department, drills conducted in the industry are limited since spinning processes must go on without breaks
3.	Padma Digital Hospital and Diagnostic Centre	<ul style="list-style-type: none"> A local hospital named the Padma Hospital has an agreement with Envoy Textile Limited. They expressed that the workers belonging to the Envoy facilities can seek medical attention free of cost. They usually come to seek help for industrial injuries while operating machines, to treat fungus on skin, skin burns, or overall medical check-ups. However, it is observed by the hospital authorities that most of the workers coming in for medical help have ENT related problems such as tonsils, nasal problem, hearing problem. These issues are the most common among the workers since they work with cotton and are exposed to loud noises for a significant amount of time.
4.	Local Population	<ul style="list-style-type: none"> The local population has no Grievances against the operations of ETL. However, since it is an industrial area, there are some overall complaints about the operations of other industries in the area. For example: there is a battery factory nearby which discharges hazardous effluent in the sewage system generating bad odor. Moreover, due to the effluent discharge by other neighboring industries, agriculture in the nearby areas are getting impacted.

9.2. A.2. Photographs of Sites Visited

A.2.1. Sites visited within ETL

Opening Meeting to kickstart the Three-Day Visit to ETL

Figure 16 Opening Meeting with Asian Development Bank, Envoy Textiles Limited & PwC



Snapshots of the ETL Facility

Figure 17 (Left) Technical expert of ETL showing the unique code by which the cotton is stored in the Cotton Warehouse of ETL (Right) Technical Experts explaining the significance of the unique code and how it helps them track the material throughout its life-cycle



Figure 18 Spinning Unit at ETL



Figure 19 Blow Room of the Facility



Figure 20 Effluent Treatment Plant (ETP)



Figure 21 Collecting and Managing Dust in the Weaving Facility



Figure 22 Fire Drill During Factory Visit- Workers assembling downstairs



Figure 23 Fire Drill During Factory Visit - Workers practice to extinguish fire



A.2.2. Sites visited outside ETL

Figure 24 Stakeholder Consultation with nearby Community



Figure 25 (Left) Consultation with DPHE (Right) Consultation with a nearby hospital which has an agreement with ETL



Figure 26 Consultation with the local Fire Department



Figure 27 Location of the canal through which the ETP water flows



9.3. A.3. Issues/concerns identified in the site visits

Figure 28 Cleaner not wearing ear plugs in a loud unit within the facility



9.4. A.4. Relevant Documents

Table 21 List of Documents Reviewed

SL.	Documents Reviewed
1	Envoy Textiles Limited- OHS Policy-2021
2	Envoy Textiles Limited- Social Policy and Strategy-2022
3	Envoy Textiles Limited- EMS Strategy- 2022
4	ETL EMS Policy and Strategy-2022
5	Envoy- ISO 14001 Scope Certificate
6	Envoy- ISO 9001 Scope Certificate
7	Amfori BSCI- Envoy Textiles Limited
8	CPI2 Certificate- Envoy Textiles Limited
9	LEED Platinum Letter- Envoy Textiles Limited
10	Higg v FSLM certificate- Envoy Textiles Limited
11	BCI Details- Envoy Textiles Limited
12	Envoy Textiles Limited- CmiA- 11.2022
13	GOTS- Scope Certificate- 2022-01-30
14	OCS- Scope Certificate- 2022-01-30
15	OEKO Tex- Certificate- 07.2021
16	Scope Certificate- GRS- 01.2022
17	Scope Certificate- RCS- 01.2022
18	Grievance Record
19	Grievance Policy and Procedure
20	Grievance Report
21	Scope of Grievance Policy
22	Accident Investigation Report
23	Environmental Management- Roles and Responsibilities
24	EMS Training
25	OHS Training
26	Third Party Training Policy and Procedure
27	K.M Enterprise Agreement
28	K.M Enterprise Factory License
29	Recruitment Policy
30	Captive Power Plant Clearance Certificate 22-23
31	Environmental Clearance Certificate 22-23
32	Air Test Result- April and July 2021
33	Indoor Air Quality Test Report- December 2021
34	Sound Test Result- April and July 2021
35	Sound Test Result- Jan, April, Jul, Oct 2021, Jan 2021
36	Stack Emission Test Report- Dec 2021
37	Water Test Result- Jan, April, July 2021
38	Water Test Result- Oct 2019, Jan, April & Jul 2020
39	Water Test Result- Oct 2020
40	Chemical Management Strategy
41	Waste Management Strategy
42	Safety Committee Approval 06.02.2022
43	Fire Drill 2022
44	Anti- Corruption Policy
45	Anti-Harassment Policy & Procedure
46	Child Labor Policy

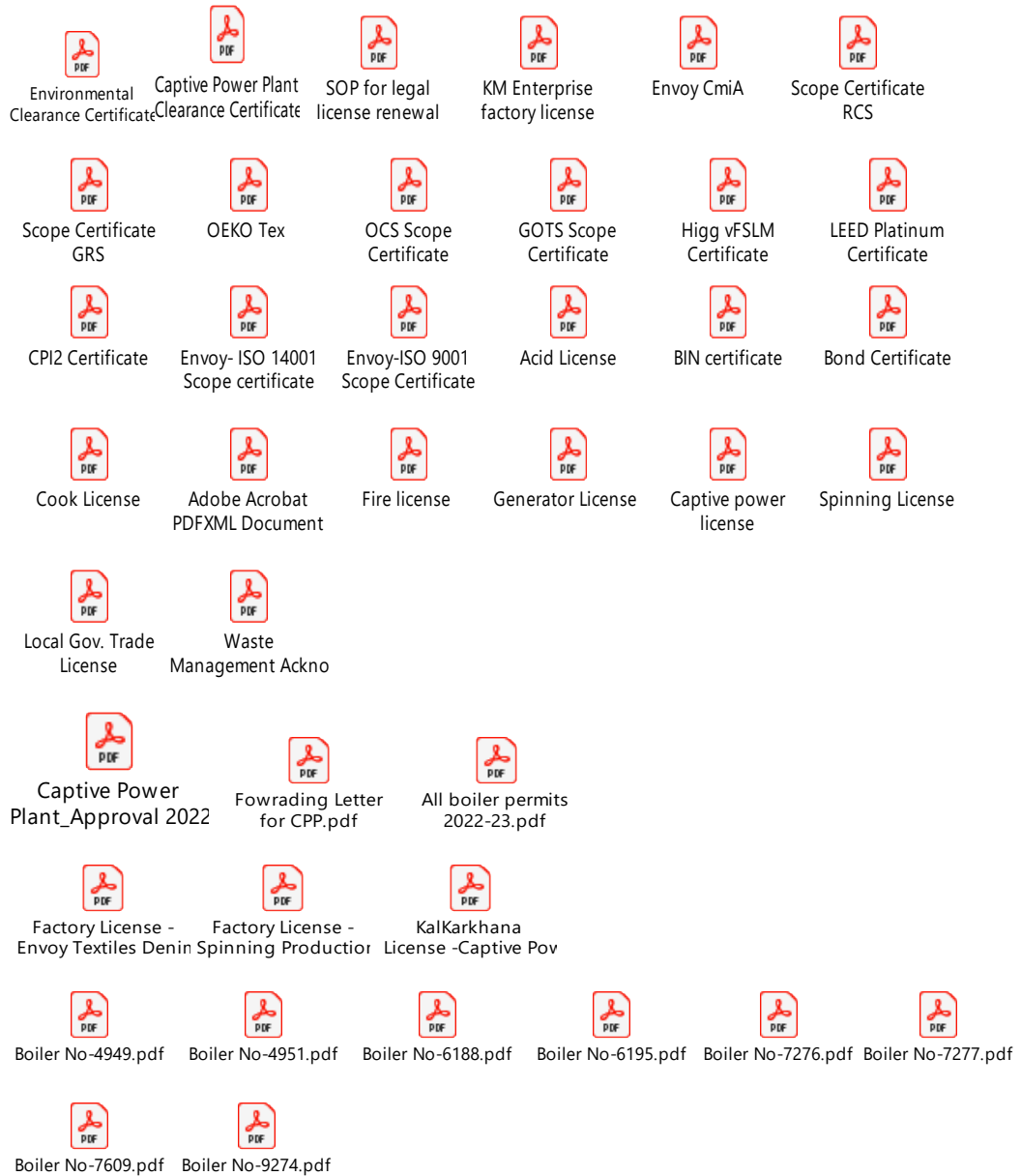
47	Child Labour remediation
48	Force labour policy
49	Freedom of Association
50	Health and Safety
51	Wage Compensation and Benefit policy
52	Working Hours
53	Quality & Environment Management System Manual_9001_14001_2015
54	AHS- BSWC representatives
55	AHS- BSWC representative's profile (1)
56	AHS- BSWC representative's profile (2)
57	Health Initiatives against covid-19
58	Certificate of Acknowledge of Waste Acceptance
59	Fire Department Permit
60	Awareness Training on Claimed Material Traceability
61	Disclosure Policy
62	Maintenance Schedule for Processing Machines
63	PPE distribution records
64	Training summary 2022

Table 22 List of Permits for Envoy Textiles Limited

Environmental aspect	Environmental sub-aspect (e.g. groundwater, hazardous materials, etc.)	Name of the regulatory agency issuing the permit or agreement	Name of the Permit	Expiry date (If any)	Plan to renew the permit to ensure compliance	Responsible person
Water use	Ground Water Approval	Local Government- NOC Union Porishad Chairman	NOC of Ground Water Extraction	NA	NA	AGM- Administrations, Mr.Sarwar Hossain
	Boring of Ground Water Approval	Zela Porishod Karzulay	Law of Gound Water	Applied for permission	06/01/2020	AGM- Administrations, Mr.Sarwar Hossain
Water discharge	Environment Clearance certificate	Department of Environment	Environment Clearance certificate	26/01/2022	01/01/2023	AGM- Administrations, Mr.Sarwar Hossain
	Water Discharge	Department of Environment	Waste Water Discharge	NA	NA	AGM- Administrations, Mr.Sarwar Hossain

Wastewater treatment	Environment Clearance certificate	Department of Environment	Environment Clearance certificate for water treatment and discharge	01/11/2021	01/01/2022	AGM-Administrations, Mr.Sarwar Hossain
Chemical use and management	Diesel Stroage & Use	Zela Porishod Karzaloy	Diesel Stroage & Use	Applied for permission	17/02/2022	AGM-Administrations, Mr.Sarwar Hossain
	Chemical Import/Use for production	Customs & Commissionate Bond	Bond License	02/04/2021	01/04/2022	AGM-Bond Department, Mr.Mizanur Rahman
	Acid Use	Zela Porishod Karzaloy	Acid License	15/09/2021	30/06/2022	AGM-Administrations, Mr.Sarwar Hossain
Air emissions	Captive Power Use	Bangladesh Energy Regularity Commission	Captive Power Plant Approval	11/07/2021	30/06/2022	Deputy Manager-Administration, Khandoker Mehzamin
	Captive Power Use	Department of Environment	Environment Clearance certificate for Captive	17/02/2022	11/02/2023	AGM-Administrations, Mr.Sarwar Hossain
	Captive Power Use	Department of Inspection for Factories and Establishments	License for Captive	07/09/2020	30/6/2021	Deputy Manager-Administration, Khandoker Mehzamin
Solid waste discharge	NA					
Other environmental permits	Boiler Approval	Boiler Inspection Body	License for Boiler	Yearly Updates	30/05/2021	Deputy Manager-Administrations

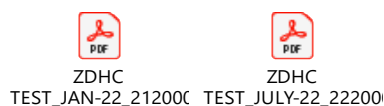
Copies of Licenses and Permits:



Stack Emission Monitoring Report



ZDHC Reports



Training Schedule (2022)



Updated Yearly
Training Plan-2022.>

Standard Operating Procedure for the Facility's significant environmental impacts to Identify, Monitor & Verify



REGULATORY
MONITORING SOP_2

Environmental, Social, and OHS Policies



ENVOY TEXTILES
LIMITED_OHS POLIC



ENVOY TEXTILES
LIMITED_SOCIAL POI



ETL EMS PLOLCY
AND STRATEGY_202

ESMS Strategies and Monitoring



ENVOY TEXTILES
LTD_EMS STRATEGIE

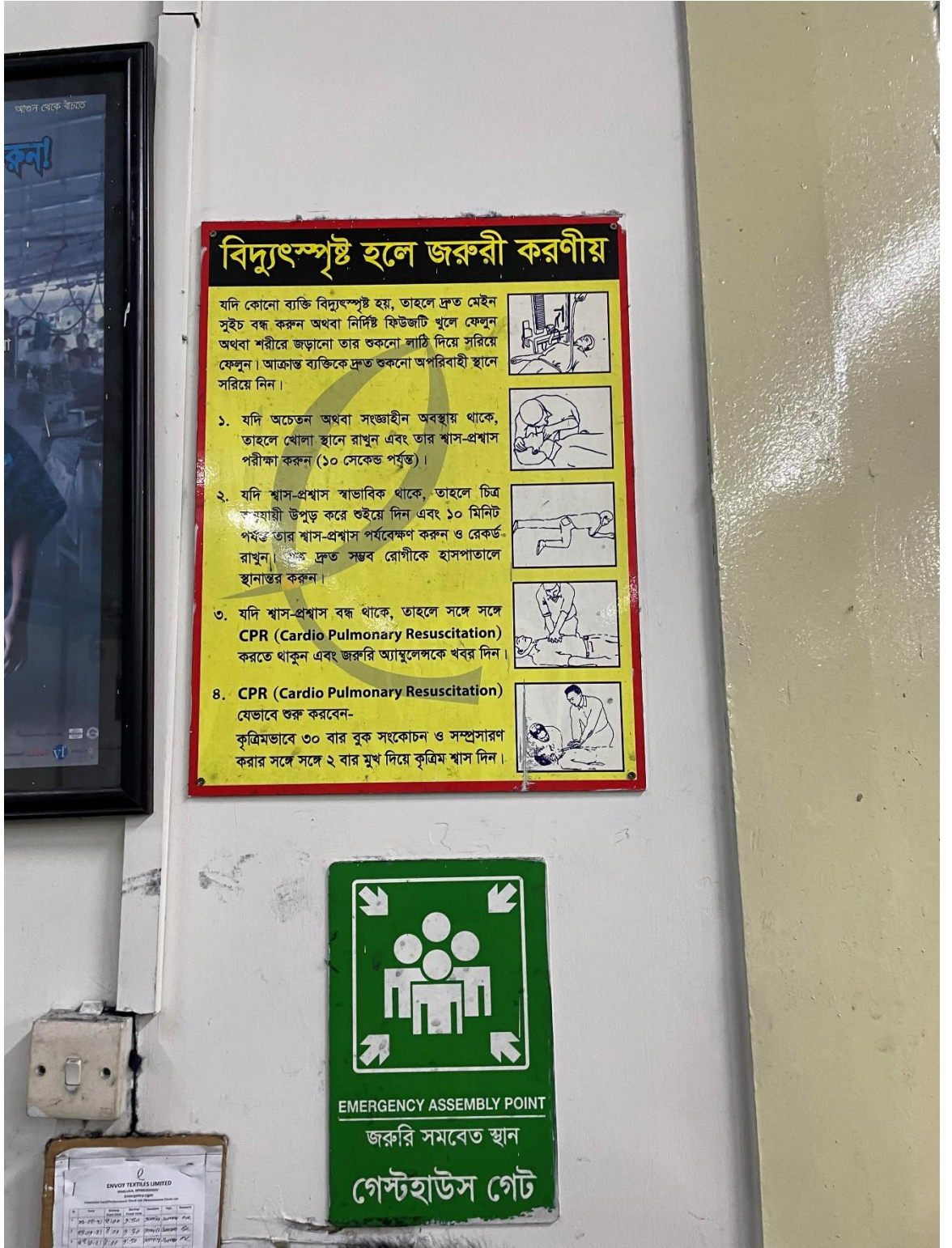
Minimum Wage Gazette for Cotton Industries



21. Minimum
Wages Gazette for C

Occupational Health & Safety Awareness and Monitoring







ব্যক্তিগত সুরক্ষাকারী উপকরণ :

ব্যবহার: কাজের সময় রাসায়নিক বা হাতু "হ্যান্ড, ধূসোবালি, গ্যাস বা বাষ্প সোপের মধ্যে প্রবেশ করে সোপের ক্ষতি সাধন হতে পারে, এমন কি সোপ সারা জীবনের জন্য নষ্ট হয়ে যেতে পারে। তাই সোপ সুরক্ষার জন্য এবং রাসায়নিক পদার্থ বা হাতু "হ্যান্ড, ধূসোবালি, গ্যাস বা বাষ্প হতে বাচার জন্য গগলস্ বা নিরূপজতা চশমা সঠিকভাবে ব্যবহার করা প্রয়োজন।



ব্যক্তিগত সুরক্ষাকারী উপকরণ :

হ্যান্ড গ্লোবস: হ্যান্ড গ্লোবস বা হাত সুরক্ষাকারী যন্ত্র ব্যবহার না করলে বিভিন্ন ধরনের ক্ষতিকারক রাসায়নিক পদার্থ আমাদের হাতে লেগে অনেক ধরনের বিপদ হতে পারে। হাতে ঘাঁচুলকানি, ফুসকুচি সহ নানান ধরনের রোগব্যাধি হতে পারে। হ্যান্ড গ্লোবস ছেড়া আরে কিনা তা খেয়াল রাখতে হবে। তাই উত্তরকণ বিপদ থেকে মুক্তি পাওয়ার জন্য আমাদেরকে অবশ্যই হাত সুরক্ষাকারী যন্ত্র ব্যবহার করতে হবে।



ব্যক্তিগত সুরক্ষাকারী উপকরণ :

সেপটি বুট: পায়ের সুরক্ষার জন্য প্রতিরক্ষামূলক পাদুকা পরিধান করা উচিত যা পা ও পায়ের বিভিন্ন আঘাতের মুখোমুখি হতে কর্মচারীদের সুরক্ষা করবে। তাছাড়া যারা কেমিক্যালের কাজের সাথে জড়িত তারা যদি সেপটি বুট না পড়ে তাহলে কেমিক্যাল পায়ে পড়ে ঘাঁ সহ বিভিন্ন ধরনের মারাত্মক রোগ হতে পারে। তাই নিজেকে সুরক্ষার জন্য সেপটি বুট ব্যবহার করা একান্ত প্রয়োজন।



Case Study



Mr. Zhang has been working in a service dust environment for a shoe factory for 5 years. The factory provided him with 12 masks every year, but he sold them and never wore any. Now it is proven that he has pneumoconiosis (occupational disease).

1. Do you think the factory is responsible for his occupational disease?
2. How can we encourage our employee wear PPE willingly?



ওকুপেশনাল হেলথ এন্ড সেইফটি কি ?

- ❖ ওকুপেশনাল হেলথ এন্ড সেইফটি হল কর্মস্থল বা কাজের স্থানে স্বাস্থ্যসংশ্লিষ্ট বিষয়ে প্রাতিষ্ঠানিক/অপ্রাতিষ্ঠানিক বিভিন্ন ধরনের অনাকাঙ্ক্ষিত এবং অপ্রত্যাশিত দৈব দুর্ঘটনা বা পরিস্থিতি থেকে নিজেকে রক্ষা করা বা নিরাপত্তা প্রদান করে একটি সুন্দর কর্মপরিবেশ তৈরী করা।
- ❖ Safety অর্থ হচ্ছে নিরাপত্তা অর্থাৎ দুর্ঘটনার শিকার থেকে নিজেকে যত্নপাতি ও কারবানাকে রক্ষা করার জন্য যে সব সাবধানতা বা নিয়ম মেনে চলা হয় তাকে Safety বা নিরাপত্তা বলে।

Six Dimensions of Health

Wellbeing is a sustainable state of feeling good and functioning well as a whole human being.

Six Dimensions of Health & Wellbeing



Six Dimensions of Health

<p>Physical Is concerned with the state of the body including its development, functions, and maintenance.</p>	<p>Intellectual Is being able to enhance knowledge and skills, make decisions, and be creative, and have comprehension and common sense.</p>
<p>Social Ability to develop relationships with others and maintain such relationships.</p>	<p>Emotional Which is sometimes referred to as psychological health is about acceptance, being able to cope and express them appropriately and recognize others' feelings.</p>
<p>Environmental Environmental wellbeing can comprise of both internal and external. There are some aspects to individual environmental health they have no control over but there are some in which they do for instance their lifestyle.</p>	<p>Spiritual It about beliefs and faith. "Spiritual wellbeing" combines a person's ethics, values and morals.</p>

সেইফটি উপকরণ :

EQUIPOS DE PROTECCIÓN PERSONAL



রিস্ক এনালাইসিস ?

- ❖ **ঝুঁকি (রিপস্কি) কি ?**
 - একটি ভৌত পরিস্থিতি বা অবস্থা যার ফলে মানুষ সম্পদ এবং পরিবেশের ক্ষতি সাধন করার সম্ভাবনা রয়েছে।
 - একটি ভৌত পরিস্থিতি যা দুর্ঘটনা ঘটানোর জন্য সক্ষম।
 - ঝুঁকি যখন সক্রিয় হয়ে উঠে ইহা জরুরী পরিস্থিতি সৃষ্টি করতে পারে।
- ❖ **Hazard কি ?**
Hazard এর বাংলা অর্থ হচ্ছে সম্ভাব্য বিপদ। কর্মস্থানে যেসব বস্তু উপস্থিত করণে কর্মী দুর্ঘটনার শিকার হতে পারে সেসব বস্তু বা পরিস্থিতি বা অবস্থা হচ্ছে Hazard হাজার্ড।

রিস্ক এনালাইসিস ?

- ❖ **দুর্ঘটনা কি ?**
 - দুর্ঘটনা হল অনিয়ন্ত্রিত, অনাকাঙ্ক্ষিত এবং অপ্রত্যাশিত কোন ঘটনা যা কর্মপরিস্থিতি থেকে উদ্ভব হয়। ইহা ব্যক্তি অপব্যক্ত কর্ম অভিজ্ঞতা অথবা ত্রুটিপূর্ণ যত্নপাতির কারণে উদ্ভব হয়। ব্যক্তি বা বস্তুর ক্রিয়া প্রতিক্রিয়ার কারণে কর্মচারী/ব্যক্তি/ব্যক্তিবর্গ আঘাতপ্রাপ্ত হতে পারে বা হবার সম্ভাবনা দেখা দিতে পারে।
 - দুর্ঘটনা, যদিও অপ্রত্যাশিত, কোন আকস্মিক বা দৈব ঘটনা নয় যা ভাগ্যক্রমে ঘটে।

ব্যক্তিগত সুরক্ষাকারী উপকরণ :

- পারসোনাল প্রটেক্টিভ ইকুইপমেন্ট কি ?
- ওকুপেশনাল হেলথ এন্ড স্ফেইফটি একটি বড় ধরনের ইস্যু হল ব্যক্তিগত সুরক্ষাকারী উপকরণ, কর্মক্ষেত্রে পারসোনাল প্রটেক্টিভ ইকুইপমেন্ট হল ব্যক্তিগত সুরক্ষাকারী সারঞ্জাম, যা আমাদেরকে বিভিন্ন ধরনের রোগব্যাধি হতে রক্ষা করে। যা কর্মক্ষেত্রে সাধারণত (PPE) হিসাবে অবহিত করা হয়। ব্যক্তিগত সুরক্ষাকারী সারঞ্জাম-যেমন: মুখের মাস্ক, নিরাপত্তা বুট, হাতের গ্লাবস, চশমা, শ্রবণ সুরক্ষা ইত্যাদি ব্যবহারের ফলে আমাদেরকে স্বাস্থ্যসম্মত কর্ম পরিবেশ নিশ্চিত করে থাকে এবং যাহার ফলে আমরা বিভিন্ন ধরনের রোগব্যাধি হতে রক্ষা পেয়ে থাকি।

PPE MANAGEMENT

- Providing appropriate & sufficient PPE to worker
- Regular Monitoring and Maintenance Of PPE
- Arranging training programs for the employees
- Other provisions as instructed by Law & Rules

Reference:

- ✓ Bangladesh Labour Rules 2015, Chapter-6, Rules- 67
- ✓ National Occupational Health & Safety Policy-2013, Article-4.d.7



ব্যক্তিগত সুরক্ষাকারী উপকরণ :

মাস্ক :- মুখের মাস্ক। আমাদের কাজের স্থান পূর্ণাবরণি এবং মহিড়ের ড্রপেট তরঙ্গিত। আমরা যখন কাজ করি তখন অসংখ্য ধূলাবালি আমাদের নাক ও মুখ দিয়ে প্রবেশ করতে পারে, যা আমরা অনেক সময় গোপন দেখতে পারি আবার অনেক সময় কা গোপন দেখতে পারি না। মাস্ক কাগজ, সিলিকন, ফুসফুসে প্যাঙ্গালাসহ আরও বিভিন্ন ধরনের মাস্ক তৈরি ও বিভিন্ন রোগে আপনাকে ধীরে ধীরে আক্রান্ত করতে পারে। আপনি আগে আগে রোগাক্রান্ত হতে পারেন। মাস্ক তাই নিজেকে সুরক্ষার জন্য কর্মক্ষেত্রে মুখের মাস্ক ব্যবহার করা অত্যাবশ্যকীয় হয়েছিল।



TYPES OF PERSONAL PROTECTIVE EQUIPMENTS

HEAD-PROTECTION
EYE PROTECTION
EAR PROTECTION
RESPIRATORY PROTECTION
FACE PROTECTION
HAND PROTECTION
LEG PROTECTION
BODY PROTECTION

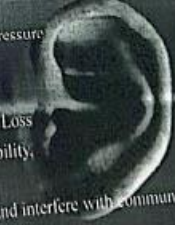
ব্যক্তিগত সুরক্ষাকারী উপকরণ :

ইয়ারপ্লাগ: কানের সুরক্ষার জন্য কর্মক্ষেত্রে ইয়ারপ্লাগ ব্যবহার করা জরুরী। অতিরিক্ত শব্দ আমাদের কাজের পরিবেশ নষ্ট করে এবং কাজে নিচিহ্নিটে ও অনাগ্রহতা সৃষ্টি করে। মাথা ব্যাথা, বদ্বির/কানে কন ওনা সহ আরও বিভিন্ন ধরনের মারাত্মক রোগ আপনাকে ধীরে ধীরে আক্রান্ত করতে পারে। তাই শব্দযুক্ত জায়গায় কানের প্লাগ ব্যবহার করা প্রয়োজন। পভেথনায় জনা যায় উচ্চ শব্দ আপনার শুনানির ক্ষতি সাধন করে, বদ্বির হওয়ার সম্ভাবনা থাকে। আপনার শুনানি শক্তি আছে আছে হারিয়ে যাবে এবং কর্মক্ষেত্রে কাজের অনাগ্রহতা বাড়বে।



HEALTH EFFECTS OF NOISE POLLUTION

- ◆ Hearing Loss (including occupational hearing loss)
- ◆ Stress
- ◆ High Blood pressure
- ◆ Sleep Loss
- ◆ Distraction
- ◆ Productivity Loss
- ◆ Cause Irritability,
- ◆ headache
- ◆ Annoying and interfere with communications



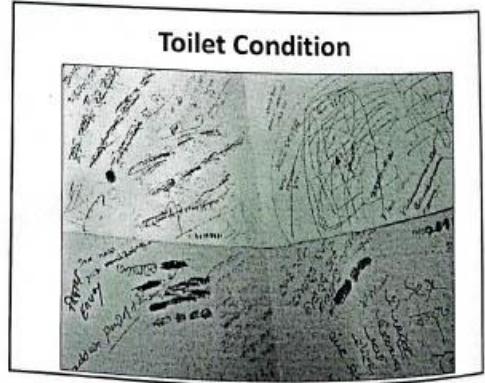
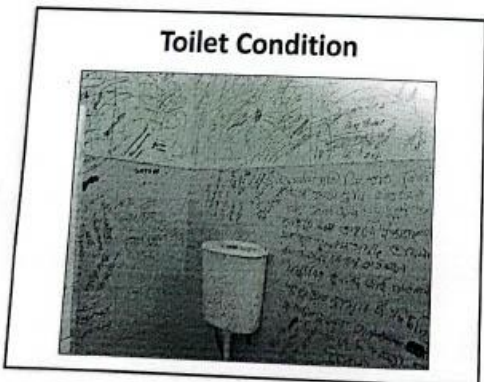


ব্যক্তি

- পারিসেবন
- ওয়েস্টমেন
- ব্যক্তিগত
- ইকুইপ
- নির্ভর
- সামান্য
- সুস্থ
- স্বা

- টয়লেট ও হাইজেনিক ব্যবহারের নিয়মাবলী:**
- ০.১.১. ব্যবহারের পর জল বন্ধ রাখা।
 - ০.১.২. টয়লেট সবসময় শুকনো রাখতে চেষ্টা করা।
 - ০.১.৩. ময়লা (টিউ পেন্সিল, কলম, মালখানা) নিক্ষেপ করা যাবে না।
 - ০.১.৪. টয়লেট করার পরে হাত ধোঁতে পানি ব্যবহার করা।
 - ০.১.৫. হাইজেনিক ব্যবহারের সময় কয়েকটি স্ট্রোলের মধ্যে বসে থাকা।
 - ০.১.৬. কমান্ড ব্যবহারের পর কমান্ড কন্ট্রোল স্ট্রোলের দিকে মুখে উপরে টাইপে রাখা।
 - ০.১.৭. ব্যবহারের পর পরিষ্কারে সজ্জা করা।
 - ০.১.৮. টয়লেটের ভিতরে সারসন ব্যবহারে যত্নসহ হওয়া।
 - ০.১.৯. কোনরূপ সমস্যা হলে কর্মচারী ইন্সপেক্টর জানানো।

০১	ব্যক্তির হাতের মধ্যে জল রাখা পরিষ্কার করে নেওয়া হবে না।	
০২	ব্যক্তির হাতের মধ্যে পুস্ট।	
০৩	ব্যক্তির হাতের মধ্যে জল রাখা পরিষ্কার করে নেওয়া হবে না।	
০৪	ব্যক্তির হাতের মধ্যে জল রাখা পরিষ্কার করে নেওয়া হবে না।	
০৫	ব্যক্তির হাতের মধ্যে জল রাখা পরিষ্কার করে নেওয়া হবে না।	
০৬	ব্যক্তির হাতের মধ্যে জল রাখা পরিষ্কার করে নেওয়া হবে না।	



Accident and Incident Reports

Envoy Textiles Limited

ISO 45001:2018 SECTION WISE WEEKLY INCIDENT REPORT

ISO 45001:2018 Clause# 5.4, 8.1.2, 9.1 & 10.2	Document Title: Weekly Incident Report	Document Type: Form
Document Number: ISM 02.03	Section Name: Spinning Simplex	Date: 30/07/2024

SL No	INJURY OR I.L HEALTH TYPE	Weekly Basis			Total Incident
		Near Miss	Accident	Injury	
1	Falling from height (চিঁচু সনে থেকে পড়ে যাওয়া)				
2	Fall of objects (উপরে থেকে পড়তে যাওয়া)				
3	Hit by objects (কোনো বস্তু ধরে আঘাত পাওয়া)				
4	Collapse of Trench or Scaffolding (মই বা মাল্টা হতে পড়ে যাওয়া)				
5	Glass/glass broken (কাঁচ ভাঙা)				
6	Needle stick (সেপিনের সূঁচ ফোটা)				
7	Commuting accident (with employer's transport) (কর্মক্ষেত্রে যাতায়াতে দুর্ঘটনা (নিয়োগকারীর পরিবহনে))				
8	Commuting accident (other transports) (কর্মক্ষেত্রে যাতায়াতে দুর্ঘটনা (অন্যান্য পরিবহনে))				
9	Slipping in wet (গাটিতে পা পিছলে পড়া)				
10	Heat of Machineris (উত্তম মেশিনারী)				
11	ঘরান শ্রমপতির ব্যবহার (ছুরি, কাঁচি ইত্যাদি)				
12	Accident related to Chemical Management (like exposure or contact with Toxic acid, hazardous material radiation, skin burns, respiratory diseases etc. (রাসায়নিক পদার্থ ব্যবস্থাপনার দুর্ঘটনা যেমন, ক্ষতিকর এলিড এর সংস্পর্শে আসা, রেডিয়েশন, চামড়া পুড়ে যাওয়া, শ্বাসজনিত রোগ ইত্যাদি))				
13	Burns Injury (গোড়া)				
14	Electrocution (তড়িৎসহিত বা বিদ্যুৎ পৃষ্ঠ)				
15	Chemical Eye Injury (চোখে আঘাত, দৃষ্টি হ্রাস বা অন্ধত্ব)				
16	Broken bones (হাড়কাশা)				
17	Knee and ankle injury (হাঁটু এবং গোড়ালিতে আঘাত বা পায়ে আঘাত)				
18	Neck, shoulder & back injury (ঘাড়, কাঁধ বা পিঠে আঘাত)				
19	Spinal cord injury (সেরসডের হাড় আঘাত)				
20	Illnesses caused by toxic chemical exposure (বিষাক্ত দ্রব্য রাসায়নিক পদার্থের সংস্পর্শে থাকার জন্য সৃষ্ট অসুস্থতা)				
21	*Head injury and/or brain injury (মাথায় আঘাত এবং মস্তিষ্ক আঘাত)				
22	Finger Injury (আঙ্গুলে আঘাত)				
23	Leg Injury (পায়ে আঘাত)				
24	Death (মৃত্যু)				
25	Others (অন্যান্য)				

Implementation Partner:



Kingdom of the Netherlands



german cooperation
giz

ENVOY TEXTILES LIMITED
ACCIDENTAL INJURY ANALYSIS RECORD

S N	Date & Time	ID	Patient Name	Section	Sex	Illness details	Medical Leave	Treatment details	Patient Sign
	15 - April - 2022 11.00 pm	220105	Anowar Hasen Jabid	Finishing	m	Accidental pain injury of Rt. Foot. (on entry time)	02 days	ETL medical center.	

Investigation Committee	Injury investigation Details	Injury Reason
Md. Mehed Hasan Medical Asst. Md. Jabid - Driver	৬ম তলত পৰিষ্কাৰ কৰাৰ সময়ত কোম্পানীৰ মেইন গেটৰ খাৰা-চোকাৰ ফাঁকৰে পৰিষ্কাৰ কৰা হৈছিল।	পৰিষ্কাৰ কৰাৰ সময়ত মেইন গেটৰ ফাঁকৰে পৰিষ্কাৰ কৰা হৈছিল।

Inform higher management: Administration Division Head
Employee Department Head

Recommendation: পৰিষ্কাৰ কৰাৰ সময়ত
মেইন গেটৰ ফাঁকৰে
পৰিষ্কাৰ কৰা হৈছিল।

Medical Asst	Medical Officer	Division Head Administration
Md. Mehed Hasan Registration No-DPMC 0141 Medical Assistant Envoy Textiles Limited.	DR. Rajib Sarker Medical Officer Envoy Textiles Limited.	

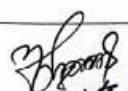

ENVOY TEXTILES LIMITED
ACCIDENTAL INJURY ANALYSIS RECORD

S N	Date & Time	ID	Patient Name	Section	Sex	Illness details	Medical Leave	Treatment details	Patient Sign
	17. April -2022 (5.05 PM)	140479	Pankage Shaha	Utility	M	Accidental cut. injury of 02 days Head, (on duty time)		ETC medical center.	

Investigation Committee	Injury investigation Details	Injury Reason
Md. Alamgir Hosen Medical Asst.	স্বাভাবিক কার্যকর কাজের সময়	স্বাভাবিক কারণে
Md. Masum - operator	কাজে ফিটনেস অবস্থায় কাজ করতে যাচ্ছিলেন।	কাজের সময়

Inform higher management: Administration Division Head
Employee Department Head

commendation: স্বাভাবিক কারণে কাজ করা পর্যাপ্ত
(যদিও তা)

Medical Asst	Medical Officer	Division Head Administration
 Md. Mehedi Hasan Registration No-DPMC 0141 Medical Assistant Envoy Textiles Limited.	 Dr. Rajib Sarker Medical Officer Envoy Textiles Limited. 18.4.22	

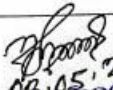

ENVOY TEXTILES LIMITED
ACCIDENTAL INJURY ANALYSIS RECORD

S N	Date & Time	ID	Patient Name	Section	Sex	Illness details	Medical Leave	Treatment details	Patient Sign
	03. May -2022 (10.30 AM)	150047	Shusanto	Electrical	M	Accidental pain injury of Lt. leg. on (Duty time)	02 days	ETC Medical center.	

Investigation Committee	Injury investigation Details	Injury Reason
Md. Saiful Islam. SR. Medical Asst.	ফিফটি ফিফট-ফিফট তত্ত্ব ফিফট ফিফট ফিফট ফিফট ফিফট ফিফট তত্ত্ব ফিফট ফিফট ফিফট ফিফট ফিফট	ফিফট ফিফট ফিফট ফিফট ফিফট ফিফট

Inform higher management: Administration Division Head
Employee Department Head

Recommendation: ফিফট ফিফট ফিফট
ফিফট ফিফট ফিফট

Medical Asst	Medical Officer	Division Head Administration
 03.05.2022 Md. Mehedi Hasan Registration No-DPMC 0141 Medical Assistant Envoy Textiles Limited.	 DR. Rajib Sarker Medical Officer Envoy Textiles Limited. 6.5.22	

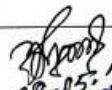

ENVOY TEXTILES LIMITED
ACCIDENTAL INJURY ANALYSIS RECORD

S N	Date & Time	ID	Patient Name	Section	Sex	Illness details	Medical Leave	Treatment details	Patient Sign
	08. May -2022 (9.25 PM)	210806	Shabirul Rahman	Dyeing	m	Accidental cutting injury of Lt. Arm. (on Duty Home)	02 days	ETL Medical Center.	

Investigation Committee	Injury investigation Details	Injury Reason
Md. Alamgir Hosen Medical Center	১৯/০৫/২০২২ ১৯/০৫/২০২২ ১৯/০৫/২০২২ (১৯/০৫/২০২২)	১৯/০৫/২০২২ ১৯/০৫/২০২২ ১৯/০৫/২০২২

Inform higher management: Administration Division Head
 Employee Department Head

Recommendation: ১৯/০৫/২০২২
 (১৯/০৫/২০২২)

Medical Asst	Medical Officer	Division Head Administration
 19.5.2022 Md. Ashrafi Hasan Registration No-DPMC 0141 Medical Assistant Envoy Textiles Limited	 19.5.22 Dr. Rajib Sarker Medical Officer Envoy Textiles Limited	

ENVOY TEXTILES LIMITED
ACCIDENTAL INJURY ANALYSIS RECORD

S N	Date & Time	ID	Patient Name	Section	Sex	Illness details	Medical Leave	Treatment details	Patient Sign
	08. May -2022 (9.25 PM)	210806	Shahinur Rahman	Dyeing	M	Accidental cutting injury of Lt. Arm. (on Duty Home)	02 days	ETC Medical Center.	

Investigation Committee	Injury investigation Details	Injury Reason
Md. Alamgir Hasan Medical Center	১৯/০৫/২০২২ ১৯/০৫/২০২২ ১৯/০৫/২০২২ ১৯/০৫/২০২২	১৯/০৫/২০২২ ১৯/০৫/২০২২ ১৯/০৫/২০২২

Inform higher management: Administration Division Head
 Employee Department Head

Recommendation: ১৯/০৫/২০২২
 ১৯/০৫/২০২২

Medical Asst	Medical Officer	Division Head Administration
Md. Mehedi Hasan Registration No-DPMC 0141 Medical Assistant Envoy Textiles Limited	DR. Rajib Sarker Medical Officer Envoy Textiles Limited 19.5.22	

ENVOY TEXTILES LIMITED
ACCIDENTAL INJURY ANALYSIS RECORD

S N	Date & Time	ID	Patient Name	Section	Sex	Illness details	Medical Leave	Treatment details	Patient Sign
	12. May - 2022 (01.10Am)	200331 200331	Mukher	Dyeing	M	Accidental pain injury of Rt. foot. (on duty time)	02 days	ETL medical Center.	

Investigation Committee	Injury investigation Details	Injury Reason
Md. Saiful Islam SR. Medical Asst. Md. Shohel.	যুক্তি কোম্ব ন্যাকটন? ন্যাক কোম্ব যুক্তি ন্যাক ন্যাক কোম্ব ন্যাক ন্যাক ন্যাক	ন্যাক কোম্ব ন্যাক ন্যাক কোম্ব ন্যাক ন্যাক কোম্ব ন্যাক

Inform higher management: Administration Division Head
 Employee Department Head

Recommendation: *(Handwritten Bengali text)*

Medical Asst	Medical Officer	Division Head Administration
<i>(Signature)</i> Md. Divyendran Hasan Registration No-DPMC 0141 Medical Assistant Envoy Textiles Limited	<i>(Signature)</i> Dr. Rajib Sarker Medical Officer Envoy Textiles Limited 9.05.22	

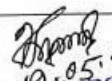

ENVOY TEXTILES LIMITED
ACCIDENTAL INJURY ANALYSIS RECORD

S N	Date & Time	ID	Patient Name	Section	Sex	Illness details	Medical Leave	Treatment details	Patient Sign
	19 May -2022 (09.35 AM)	180075	Ruhul Amin	Dyeing	M	Accidental cutting injury of Rt. Great toe, on (Duty time)		ETC Medical Center.	

Investigation Committee	Injury investigation Details	Injury Reason
Md. Meheddi Hasan (Medical Asst) Md. Hamidur Rahman - operator.	কোনো নিরাপত্তা সরঞ্জাম ব্যবহার করা হয়নি। ফালসিভাবে মেশিন চালাতে গিয়েছিল।	ফালসিভাবে মেশিন চালাতে গিয়েছিল।

Inform higher management: Administration Division Head
 Employee Department Head

Recommendation: কাজে নিরাপত্তা সরঞ্জাম
 ব্যবহার করা।

Medical Asst	Medical Officer	Division Head Administration
 19.05.2022 Md. Meheddi Hasan Registration No-DPMC 0141 Medical Assistant Envoy Textiles Limited	 Dr. Rajib Sarker Medical Officer Envoy Textiles Limited 19.5.22	

9.5. A.5. Details of the E&S Organogram



4a.

D02.04-01Organogr



4. OHSM 02.04
Procedure_Roles an

9.6. A.6. amfori BSCI Code of Conduct



amfori BSCI Code of
Conduct - English -



PART IV amfori BSCI
Guidelines for produ

9.7. A.7. Job Descriptions of Responsible Persons for Grievances



JD of Faisal
Ahmed.pdf



JD of Welfare
Officer.pdf

9.8. A.8. Layouts of the Units

Overall Factory Layout



1. OVERALL
FACTORY LAYOUT.jp



Envoy Textiles
Limited Building Des



SOP For Ware
Houses.pdf

Denim Unit



2. DENIM UNIT-01
MACHINE LAYOUT.p



3. DENIM UNIT-02
MACHINE LAYOUT.p



4. DENIM UNIT-03
WEAVING MACHINE

Spinning Unit



5. SPINNING UNIT
MACHINE LAYOUT.p



Existing Spining
First Floor.pdf

Knit Winding



6. KNIT WINDING
UNIT MACHINE LAYC

Expansion Layout



1st Floor
(18-04-2022) (2007).f



New Machine
Layout_Spinning 1st

9.9. A.9. History of Land Procurement

Khatian No ¹¹	Sl no.	Deed no	Date	Seller	Total Land (Decimal)
801/645	1	2560	05.04.03	Mr. A Kashem	64.00
779	25	2561	05.04.03	Mr. Mojrat Ali	43.00
	26	4192	13.06.02	Mr. Mojrat Ali	54.00
	27	7226	25.10.01	Mr. M.A Samad	206.00
682	11	1707	03.05.06	Mr. A Hashem & Others	30.25
	12	1632	25.04.06	Mr Aladin Al Azad	49.00
681	9	1201	16.03.06 19.03.06	Mr. A Karim Prodhani	56.00
	10	1268	22.03.06	Mr. A Hamid & Others	102.00
748	7	3096	12.07.07	Mr. Aladin Al Azad	14.00
	8	3097	12.07.07	Ar. Abul Hossain	21.00
712	5	3860	07.09.06	Mr. A Hamid	9.00

¹¹ Khatian number is the registration information of the complete records of a land or property. It is an assigned name of the land records issued by the state government to the landowners

	6	3863	07.09.06	Mr. Montaz Uddin	27.00
925,617,624	13	3141	12.04.02	Mr M Anower	1,259.00
925,617,624	13	3141	12.04.02	Mr. M Anower	
881	14	7514	06.10.04	Ms. Khodeza Khatun	36.00
	15	7513	06.10.04	Ms. Shakhina Katun	81.00
	16	7700	13.10.04	Mr. Giasuddin & Others	66.00
	17	8997	13.12.04	Mr. Mofiz Uddin	89.00
	18	8299	10.11.04	Ms. Shakhina Katun	54.00
	19	1611	16.04.07	Mr. A Latif & Others	66.00
886	2	7699	13.10.04	Mr. Razab Ali	81.00
	3	759	20.01.04	Mr. Rusmat Ali	278.00
	4	8093	24.11.03	Ar. Abu Hossain	104.00
998	20	9824	30.12.04	Mr. Hekmat Ali	3.50
	21	3482	19.05.02	Mr. Rahmat Ali	49.00
	22	4608	29.06.03	Mr. Rahmat Ali	97.00
	23	7001	01.10.03	Mr. Hekmat Ali	33.33
	24	3479	19.05.02	Mr. Omar Ali & Others	34.00
1377	28	5311	31.05.11	Mrs Shukkuri Khatun	49.70
	29		31.05.11	Mrs. Kamla Khatun	36.20
	30		31.05.11	Md. Shaheb	13.50
	31	242	12.01.11	Mr. Serai Uddin & Mr. Shabab	23.65
	32	12095	12.12.10	Mr. Shamsul Haq & Mrs. Monar	54.00
	33	5312	31.05.11	Md. Abdur Rashid	88.36
	34		31.05.11	Md. Nurul Islam	88.36
1480		700	26.01.12	Abdul Aziz	57.50
1606		8984	17.10.12	Abul Hossain	28.00
			17.10.12	Abdul Samad	2.93
550		2991	24.07.06	Mr. Shahidullah	44.00
33		7807	30.10.03	Ms. Golapjan & Others	34.00

		3478	19.05.02	Mr. M Rashid	78.00
				TOTAL	3,604.28

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