

Alessandro

Letter of concern regarding Samuda Food Products - project 48407

Rachel

Fri, Jan 31, 2025 at 9:39 AM

To:

Dear Alessandro and CSO colleagues,

I hope you are doing well. I'm sharing below, on behalf of Anup, the response to your email.

Dear Alessandro,

I hope you are having a good start to the year. Thank you for reaching out to us with your follow-up questions. The project has been approved by IFC's Board and as part of project supervision, IFC will work closely with Samuda Foods Products Limited (SFPL) to ensure that Environmental and Social Action Plan (ESAP) requirements for the project will be met, including the concerns that you and CSO colleagues have raised.

We appreciate your engagement and would like to address the additional issues you have mentioned in your email.

Lack of consultation and information

As part of the Environmental and Social Impact Assessment (ESIA) preparation process, consultations were conducted in March and April 2024 with various stakeholders, including the fisher community at Bamansundar, Domkhali ghat, and Saherkhali Ghat. Additionally, a sample household survey of 100 fishermen was carried out, and meetings were held with institutional stakeholders such as BEZA and other local departments in Mirsarai. The findings from these consultations were incorporated into the SFPL ESIA and E&S Management Plans (ESMPs). SFPL has a limited land footprint for the project compared to the overall MEZ-I and MEZ-II area. As part of the agreed-upon ESAP for this investment, SFPL will establish a stakeholder engagement plan and community grievance mechanism during the construction and operation stages, including regular consultation, to address the concerns of affected stakeholders and seek mitigation measures. In instances where mitigation requires a multi-stakeholder engagement approach, SFPL will bring these issues to the attention of BEZA and associated authorities for suitable mitigation.

Odor and chemical pollution

Based on the findings of the ESIA Study and the ESMPs, IFC has required SFPL to establish a Performance Standards-compliant Environmental and Social Management System (ESMS) at the proposed crushing plant, covering both the construction and operation phases. The ESMS will include Standard Operating Procedures (SOPs) to address mitigation measures defined in the ESMP and relevant sections of the World Bank Group Environmental Health and Safety (EHS) Guidelines. The mitigation measures for ambient air quality (including odor and chemical pollution) during the operation period (which will be validated as part of third party construction and operation stage EHS audit as per disclosed ESAP) are as follows: (a) installation of planned inbuilt measures such as dust collectors, scrubbers, and filters to capture particulate matter and VOC emissions; (b) adoption of best practices for handling and storage to minimize fugitive emissions; (c) regular monitoring of air quality parameters both within the plant premises and in the surrounding area; and (d) implementation of odor control measures, such as enclosing processing areas and using odor-neutralizing agents. The technical specifications of the inbuilt air quality measures/equipment are currently under discussion by SFPL and shall be reviewed once the same is shared to check whether it meets Good International Industry Practices (GIIP). In addition, SFPL will implement an E&S monitoring plan as part of the ESMS, which will regularly monitor project air emissions and odor against legal/regulatory requirements or WBG EHS Guidelines, whichever is stricter. Any deviation beyond acceptable/permitted levels will require further mitigation measures to be implemented by SFPL.

Mangroves protection

We acknowledge the concern regarding the mangroves. A 23-kilometer super dyke has been constructed by BEZA to protect against extreme weather events. When the land was handed over to SFPL in 2020, significant impacts on the land were already evident. BEZA, with the help of supervision consultants, monitors the implementation of the environmental and social safeguard aspects of the project. Additionally, as per the [World Bank report](#), BEZA has appointed environment counselors to monitor and guide environmental compliance by industries in the economic zones and has set up analytical laboratories in Chittagong EPZs to regularly assess the quality of environmental parameters.

According to the SFPL-commissioned ESIA, the project will not cause any further loss of mangroves. The ESIA studied the mangrove aspect in detail, and the Biodiversity Management Plan (BMP) included in the ESAP will protect and manage the remnant mangrove habitat along the coastline during the construction and operation of the crushing plant. Discussion as part of ESIA with the forest department Mirsharai Range confirmed that the coastal forest department had carried out mangrove plantation in this region (entire BEZA area) since 1967, primarily using species such as *Avicennia marina*, *Sonneratia apetala*, and *Excoecaria agallocha*. The forest department also indicated that they have undertaken mangrove plantation on the sea ward side of the superdyke and have plans to carry out mangrove plantation in a few areas within the Bangabandhu Sheikh Mujib Shilpa Nagar (BSMSN). There are also [other mangrove planting initiatives](#) by the Bangladesh Economic Zones Authority (BEZA) in collaboration with other organizations, in Mirsarai, Chattogram with the involvement of local communities.

We hope this addresses your concerns. Please feel free to reach out if you have any further questions.

Kind regards,

Anup

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