

GOVERNMENT OF THE PEOPLE'S REPUBLIC OF BANGLADESH
LOCAL GOVERNMENT ENGINEERING DEPARTMENT (LGED)

**Second Rural Transport Improvement Project (RTIP-II)
and
Additional Financing**

UPDATED
**ENVIRONMENTAL MANAGEMENT FRAMEWORK
(EMF)**



April, 2018

**The updated EMF is applicable to the
RTIP-II along with its Additional Financing.**

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Abbreviations

AE	Assistant Engineer
AF	Additional Financing
BBS	Bangladesh Bureau of Statistics
BCCSAP	Bangladesh Climate Change Strategy and Action Plan
BDWS	Bangladesh Drinking Water Standard
BIWTA	Bangladesh Inland Water Transport Authority
BMD	Bangladesh Meteorological Department
BWDB	Bangladesh Water Development Board
CSC	Construction Supervision Consultant
DG	Director General
DSC	Design & Supervision Consultant
DOE	Department of Environment
DPHE	Department of Public Health Engineering
DSM	Design Supervision Management
EA	Environmental Assessment
ECA	Environmental Conservation Acts
ECC	Environmental Clearance Certificate
ECP	Environmental Code of Practices
ECR	Environment Conservation Rules
EIA	Environmental Impact Assessment
EMF	Environmental Management Framework
EMIS	Environmental Management Information System
EMP	Environmental Management Plan
EMU	Environmental Management Unit
FCD	Flood Control Drainages
FGD	Focus Group Discussions
GHG	Green House Gases
GPP	Guidelines for People's Participation
GoB	Government of Bangladesh
Govt.	Government
GRC	Grievances Redress Committee
HTW	Hand Tube Wells
ICZMP	Integrated Coastal Zone Management Plan
IDA	International Development Association
IDSS	Integrated Decision Support System
IEE	Initial Environmental Examination

IFC	International Finance Corporation
ILO	International Labor Organization
LGED	Local Government Engineering Department
MoEF	Ministry of Environment and Forest
MLGRD&C	Ministry of Local Government, Rural Development and Co-operatives
MSDS	Material Safety Data Sheets
MSL	Mean Sea Level
NCS	National Conservation Strategy
NEMAP	National Environment Management Action Plan
NEQS	National Environmental Quality Standards
NGOs	Non-Government Organizations
NOC	No Objection Certificate
NWMP	National Water Management Plan
O&M	Operation and maintenance
OP	Operational Policy
PAPs	Project Affected Persons
PD	Project Director
PIC	Project Implementation Cell
PMU	Project Management Unit
PPE	Personnel Protective Equipment
RAP	Resettlement Action Plan
RP	Resettlement Plan
RTIP	Rural Transport Improvement Project
SECs	Special Environmental Clauses
SoB	Survey of Bangladesh
SPARSO	Space Research and. Remote Sensing Organization
TMP	Traffic Management Plan
WARPO	Water Resources Planning Organization
WB	World Bank
WHO	World Health Organization
XEN	Executive Engineer

Executive Summary

Introduction

In 2017, Bangladesh experienced widespread and successive flood due to the prolonged rainfall recorded from April to October as well as due to excessive water flow from the upstream rivers in India disrupting people's normal life and damaging the properties. The flood resulted interruption in the transportation network of Bangladesh damaging about 10,544 km of LGED roads. At this situation, the IDA has agreed for Additional Financing (AF) to the ongoing RTIP-II to rehabilitate and maintain the damaged roads. The ongoing Second Rural Transport Improvement Project (RTIP-II) is now being implemented by the Local Government Engineering Department (LGED) under the Ministry of Local Government, Rural Development and Co-operatives (MLGRD&C) to improve and rehabilitate rural transport related infrastructure including inland waterway in 26 project districts. The AF has been formulated to only repair or rehabilitate around 1,540 km flood damaged road in 18 out of 26 RTIP-II project districts. There will be additional finance of US\$ 170 million of which US\$ 100 million will be from IDA and US\$ 70 million will be from GoB funding. The damaged roads will be built back better considering climate resilience and road safety.

The Environmental Management Framework (EMF) (February 2012) was prepared for the RTIP-II to identify the required environmental management measures that need to be taken by the Project authorities during the planning, design, construction and operations of the rural road improvements, rural road maintenance, rural waterways, growth center markets, in order to ensure compliance with own requirements of the Government of Bangladesh and those of the World Bank. Now the Environmental Management Framework (EMF) has been updated for the Additional Financing (RTIP-II) considering the lessons learnt from RTIP-II to comply the mentioned objectives. All the possible environmental impacts along with mitigation and management measures have been compiled in the EMF.

The original EMF was followed by the Project authorities during the planning, design, construction and operations for the different subprojects under different sub-components of the project mainly, rural road improvements, rural road maintenance, rural waterways, growth center markets, in order to ensuring environmental integration in planning, implementation, and monitoring of project supported activities. For ensuring good environmental management in the proposed program, the EMF will provide guidance on pre-investment works/studies (such as environmental screening, environmental assessment, environmental management plans, etc.), provide set of steps, process, procedure, and mechanism for ensuring adequate level of environmental consideration and integration in each investment in the project-cycle; and describes the principles, objectives and approach to be followed to avoid or minimize or mitigate impacts. The updated EMF contains the following:

- Environmental factors that needs to be considered while planning and design of different categories of activities.
- Environmental screening criteria: A screening/assessment process and actions to be taken in case there is any possibility that the IDA's environmental safeguards may be triggered under the project.
- Environmental assessment guidelines: Steps, process and procedures to be followed in different levels of environmental assessment (limited or full assessment). This includes guidance on the project level baseline information, impact identification, public consultation, alternative analysis, assessment and designing mitigation measures, and in preparing Environmental Management Plan (EMP) as well as the Monitoring Plan.
- The EMF includes project/ activity level environmental monitoring framework.
- The EMF includes the institutional arrangement for implementing EMF, environmental code of practices to be followed in project/activity level, capacity strengthening plan for environmental capacity of the involved parties in accordance with their role and functions, guidance on appropriate ways of holding consultations.

- A framework for implementation, monitoring, supervision, auditing and reporting
- The lessons learnt to mitigate environmental impacts more efficiently considering the RTIP-II experience.

The updated EMF is intended to define the process and outputs necessary to address the potential negative impacts of the physical works to be carried out under Additional Financing to RTIP-II. The EMF clearly describes how the potential environmental impacts of all sub-projects will be managed during preparation, implementation and in the post-implementation periods.

Environmental Policy, Legal and Administrative Framework

Regulatory requirements toward protection and conservation of environment have been enunciated by the GOB as well as the WB and pertinent policies and regulations among these requirements are summarized as under:

- Relevant Government Policies, Acts, Rules, Strategies and Guidelines
 - Environmental Conservation Act (ECA), 1995 and Amendments
 - Environment Conservation Rules (ECR), 1997 and Amendments
 - Environmental Policy, 1992
 - Environmental Action Plan, 1992
 - National Environmental Management Plan (NEMAP), 1995
 - Bangladesh Wildlife (Preservation) Order, 1973 (Amended in 1994)
 - National Conservation Strategy (NCS), 1992
 - Wetland Policy, 1998 (Draft)
 - National Water Policy, 1999
 - National Water Management Plan, 2001 (Approved in 2004)
 - The National Fisheries Policy, 1999
 - The Protection and Conservation of Fish Rules, 1985
 - National Agricultural Policy, 1999
 - Coastal Zone Policy, 2005
 - Coastal Development Strategy, 2006
 - The Embankment and Drainage Act, 1952
 - Bangladesh Climate Change Strategy and Action Plan
 - DOE's IEE/EIA including EMP Guidelines for Industry, 1997
 - LGED's Strategy, Guidelines and Environmental Code of Practices
- World Bank's Environmental Safeguard Policy
 - OP/BP 4.01 Environmental Assessment
 - OP/BP 4.04 Natural Habitats
 - OP/BP 4.11 Physical Cultural Resources
 - OP/BP 4.36 Forestry
 - OP/BP 4.12 Involuntary Resettlement
 - IFC Environmental, Health and Safety Guidelines

The original RTIP-II project and the RTIP-II (Additional Financing) have to ensure that all legal rules and regulations set by the DoE through the Ministry of Environment and Forest (MoEF) are adhering with. In accordance World Bank safeguard policies, the original RTIP-II project was classified as a Category A project due to the complexity of environmental issues associated with waterways improvements and also the uncertainty (lack of details at project preparation) of most of the sub-projects to be implemented in widespread areas. The policies on environment assessment (OP/BP 4.01), natural habitats (OP/BP 4.04) and physical cultural resources (OP/BP 4.11) have been triggered for the proposed operation. The AF is undertaking mainly maintenance of rural road, the proposed AF is, therefore classified as Category "B". The likely impacts are mostly construction related and these may include contamination of land and water, loss of trees, noise from operation of construction machinery, air quality deterioration, worker's health and safety, etc. Besides, in the Additional Financing part, the World Bank's policy on Forestry (OP/BP 4.36) will be triggered to

ensure that the project activities do not affect the forest conversation area and commercial forest. This will help to address deforestation and enhancement of environmental & social contribution of forest areas.

Description of Baseline Environment

Since the sub-projects of RTIP-II (Additional Financing) are not finalized, it is not possible to prepare any project specific environmental baseline for the project. Alternatively, the EMF includes the environmental baseline of each subproject type. In addition, the generic environmental baseline on the basis of national & divisional context is also described in Annex 2. The baseline environment for the subproject of each project component of RTIP-II and its flood damaged part has been described under this chapter regarding the project activities that relates to the area-specific conditions pertaining to Atmosphere and Climate, Topography, Physiography and Geology, Seismicity, Hydrology and Drainage, Air Quality, Noise Quality etc. under physical environment and Terrestrial Ecology, Aquatic Ecology, Biodiversity, National Conservation Site of Importance under Biological Environment, and Demography, Settlement Pattern, Land Use and Water Use Pattern, Water Supply and Sanitation, Fisheries, Industries and Commerce, Cultural and Archeological Resources under Socio-economic Environment.

Environmental Management Procedure

The Environmental Management Procedure establishes the criteria to identify the level of Environmental Assessment (EA) and the processes involved, their sequence to conduct the EA studies for various components/phases of the rural road improvements, rural road maintenance, rural waterways, growth center markets including their legal requirements and implications (Figure 4.1). Comprehending the level of EA will help the RTIP-II (Additional Financing) in assessing the requirement of external agency in the form of consultancy services and also the stage of such requirement, like Design Consultant at planning and design stages and Construction Supervision Consultant (CSC) at construction stage etc.

Once the need/justification of a project is finalized based on the engineering parameters (like traffic, economic and financial analysis), the process of Environmental Management Procedure starts. First step is screening of the project components to ascertain the category of Environmental Assessment required.

The general principles of RTIP-II (Additional Financing) is given below-

- The Project Director will be responsible for the environmental compliance monitoring and oversight to ensure overall project environmental compliance. The Consultants that would be hired by LGED would assist the project proponent to carry out this mandate.
- The implementing agency will follow the related government rules (laws, ordinances, acts etc.) and World Bank Operational Policies and Guidelines. This EMF would serve as the basis for ensuring this compliance.
- LGED will submit the EMF to the Department of Environment (DoE) for their review and concurrence.
- LGED will ensure the participation of local community in planning and implementation of sub-projects.
- LGED will be responsible for obtaining and ensuring clearance required from the DOE. The clearance procedure has been mentioned in Section 2.1.19 of Chapter-2. The LGED will be responsible for obtaining environmental clearance for the subprojects for which the EIA study is required. For the rest components of the project, LGED will implement themselves without DOE clearance. No project activities will be carried out in and nearby the environmental protected and critical areas as well as in disputed lands or lands restricted for development.
- All the activities proposed under the project will abide by existing Environmental Code of Practices (ECP) under RTIP-2.

Institutional Arrangement and Capacity Building

The Environmental Management Framework (EMF) implementation requires an organization support structure in the form of organizational requirements, training needs and plan, and information management system. The following section captures these institutional arrangements for EMF implementation by concerned officials of LGED, their consultant and working contractors. An organizational structure was developed at the corporate, regional and site level to aid effective implementation of the EMF document. The Design Consultant, PMU Support Consultant and Supervision Consultant that would be hired by LGED for the project execution also assist the implementation of the environmental steps in accordance with EMF.

The EMU works to implement and manage the EMF to provide co-ordination, technical support and services during the environmental screening and preparation of EA, and implementation of the environmental mitigation measures. The XEN (Environment) and the two Assistant Engineers (Environment) is selected from the existing GoB officials to undertake the assigned responsibilities effectively.

The PMU support Consultants reviews and clears all screening and environmental assessment reports. LGED conducted verification of some screening. The PMU support consultants also reviews and updates Environmental Monitoring Checklist incorporating the rural road improvements, rural road maintenance, rural waterways, growth center market improvement issues in the beginning of their contract to confirm the environmental supervision procedures and systems including inspection, monitoring and reporting mechanisms to be followed by each associated parties during the sub-project implementation.

The PMU support consultant assisted LGED in quality control, monitoring, coordinating and implementation of EMF, supervising the measures necessary to mitigate the projects effects on the society and environment as outlined in the documents. The assistance includes review of social and environmental screening/assessment, plans and budget implementation of the plans and identifying the specific agencies to be involved in the mitigation of social and environmental protection activities, particularly in cases where NGO participation needs to be arranged and coordinated.

In additional Financing, the DS consultants will be responsible for design and overall supervision including proper Environmental Assessment (EA) or EIA (If necessary) of sub-project activities. The design consultants will ensure quality control and report to PD. The DS will also assist the EMU for ensuring environmental compliance and monitoring of progress including EMP and/or ECP implementation.

The Environmental Management Unit (EMU) is responsible for monitoring entire project activities and reporting to the Project Director (PD). Regular monitoring of activities is carried out by district/upazila offices and supervision consultants at site and is being reviewed by the EMU on monthly basis. The EMU and Directors also take regular review of ongoing project activities including environment and social issues and corrective measures if required are implemented at site. This monitoring process would be continued through the entire period of RTIP-II (Additional Financing).

Stakeholder Consultations

Participatory consultation is both an essential criteria and important strategy for an integrated environmental and social analysis process, the project design and its implementation. Views of the project affected persons and NGOs have been fully taken into account during the project preparation and continue to form as a basis for further design and implementation of the sub-project throughout the implementation period of the project. The purpose of the stakeholder consultation is to identify the views of major institutional and project affected persons (PAPs) stakeholders to the roads and waterways being examined, to identify issues of relevance to the study as well as any impacts which the alignment may have on project planned by the stakeholders, and to assess any mitigation measures which may be undertaken to minimize any adverse impacts of the proposals under consideration. Subsequently, stakeholder consultation is one of the important parts of the

environmental assessment to address the environmental aspects as well as socio-economic issues from stakeholders' point of view. Project consultants were carried out a series of stakeholder consultations at different locations of the sub-project.

A public consultation was arranged for the Additional Financing of the Second Rural Transport Improvement Project (RTIP-II (Additional Financing)) at Gheor, Manikganj on January 3, 2018. Local people along with their representatives, different professionals including NGOs and women's organizations, LGED officials & consultants attended the consultation. The main objective of the meeting was to share project's planned activities and their associated potential impacts on the environment & society. In this regard, the Environmental and Social Safeguard Policy of the GoB and the Development Partner were disclosed. In the consultation program, participants' feedback was also received which reflected the necessity and demand of the proposed project.

The EMF preparation for ongoing RTIP-II included 2 initial field level consultations in addition to follow-up consultations. One of the consultations was held at Mymensingh Sadar Upazila, which was attended by about 30 community representatives including journalists, civil society organizations, contractors, truck drivers, bus drivers, members of transport workers associations, and local government institutions including one upazila chairman. The participants were overwhelmed to understand that the meeting was to consult them for designing the RTIP-II. The other consultation was held at Hatkhalir Bazar, Fulbaria Upazila of Mymensingh district and attended by around 60 persons from in and around the bazar. The Fulbaria Upazila Engineer organized the meeting and the local Upazila Chairman facilitated. An Upazila Road was nominated for the first-year construction under RTIP-II. Only about 100-m of the road required earth work and it had sufficient land for improvement. The local people including the elected representatives are yelling for long to get their road improved. They assured that if any additional strip of land is required for the improvement work, they are ready to organize by themselves. The participants in both consultations were happy to understand that social and environmental impacts addressed under the project to maximize project benefits. They did not foresee any major environmental issues from the project activities. In addition, the LGED field level staffs were consulted for effective environmental management considering the RTIP experience.

In addition, 6 meetings were held on end November 2011 on the sample project site. Total 50 participants from different locations have taken part in the consultations. The schedules, venues and the major feedbacks or queries from the participants for (i) rural road improvements; (ii) rural road maintenance; (iii) rural waterways; and iv) growth center market are summarized in EMF. The environmental management of the proposed RTIP-2 was also discussed at a national consultation meeting on the project was held on October 10, 2011 to receive their feedback.

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LESSON LEARNT FROM THE IMPLEMENTATION OF RTIP II

Most of the physical works under RTIP-II have been completed or nearly completed. As the scope of RTIP-II (Additional Financing) is limited within maintenance and rehabilitation of Roads and Bridges only, this project will make nominal impact on physical, biological, social and cultural environment in the project area. In the Additional Financing (AF), the lessons learnt from RTIP-II will be utilized to prevent the environmental impacts more efficiently.

Health and safety is the major concern in construction work, as construction works causes high probability of injuries to the labors as well as site visitors. This health and safety risk formulates the demand for the provision of Personal Protective Equipment (PPE) for workers. Though the provision ensured the availability of PPE in the work site, the workers were found reluctant in using PPE with an excuse of comfortability. So, several workshops, presentation and seminars need to be arranged.

Through those activities, the workers and contractors will be alerted that the necessity of safety equipment should be their priority.

To ease the implementation of Environmental items smoothly, the environmental item should be estimated considering the site requirement, location and other criteria rather than estimating them as fixed lump-sum item.

RTIP-II (Additional Financing) has the purpose to rehabilitate and maintain roads in a climate resilient way. To achieve this major objective, provision/scope of tree plantation in the damaged green field has been proposed to bring back the nature green again and to mitigate the Greenhouse Gases (GHG) emission from bitumen burning.

Waste disposal facilities in labor shade of road work would be ensured to be in sufficient size from the experience of waste disposal facility in GCMs built under RTIP-II.

Thus, the experiences and lessons learnt from the RTIP-II would be reflected in the EMF of the additional financing.

1. INTRODUCTION

1.1 Background

In 2017, Bangladesh experienced widespread and successive flood due to the prolonged rainfall recorded from April to October as well as due to excessive water flow from the upstream rivers in India disrupting people's normal life and damaging the properties. The flood resulted interruption in the transportation network of Bangladesh damaging about 10,544 km of LGED roads. At this situation, the IDA has agreed for Additional Financing (AF) to the ongoing RTIP-II to rehabilitate and maintain the damaged roads. The ongoing Second Rural Transport Improvement Project (RTIP-II) is now being implemented by the Local Government Engineering Department (LGED) under the Ministry of Local Government, Rural Development and Co-operatives (MLGRD&C) to improve and rehabilitate rural transport related infrastructure including inland waterway in 26 project districts. The AF has been formulated to only repair or rehabilitate around 1,540 km flood damaged road in 18 out of 26 RTIP-II project districts. There will be additional finance of US\$ 170 million of which US\$ 100 million will be from IDA and US\$ 70 million will be from GoB funding. The damaged roads will be built back better considering climate resilience and road safety.

The Environmental Management Framework (EMF) (February 2012) was prepared for the RTIP-II to identify the required environmental management measures that need to be taken by the Project authorities during the planning, design, construction and operations of the rural road improvements, rural road maintenance, rural waterways, growth center markets, in order to ensure compliance with own requirements of the Government of Bangladesh and those of the World Bank. Now the Environmental Management Framework (EMF) has been updated for the Additional Financing (RTIP-II) considering the lessons learnt from RTIP-II to comply the mentioned objectives. All the possible environmental impacts along with mitigation and management measures have been compiled in the EMF.

The Local Government Engineering Department (LGED) with the financial assistance of the World Bank (WB) has been successfully implementing rural infrastructure development projects since early nineties of the last century. After successful implementation of previous three projects, the Government of Bangladesh (GoB) looked for financial assistances from the International Development Association (IDA) of the World Bank to improve and rehabilitate the high-priority rural infrastructure in 26 districts covering mainly eastern parts of Bangladesh (excluding Chittagong Hill Tracts) under LGED. Responding the GoB's request, IDA agreed to extend its credit facilities of about US\$ 300 million for the Second Rural Transport Improvement Project (RTIP-II). The GoB contribution for this project is US\$ 117 million.

The RTIP-II bears potential risk on physical, biological, social and cultural environment in the project area. Because of weak geology, rich biodiversity, high dependency of people on natural resources and widespread poverty, the social and environmental impacts are visibly significant, particularly when construction works are undertaken in rural areas. Generally, the environmental and social risks triggered by RTIP-II activities included erosion and slope instability; loss of plants, biodiversity and agricultural land; effect to water sources due to sedimentation, water logging and drainage congestion, displacement/damage of permanent assets and loss of land. So, proper consideration of all environmental and social factors during design and implementation was of utmost concern in RTIP II of LGED in Bangladesh.

1.2 Project Description

Ongoing RTIP-II includes three components: Component A- Accessibility Improvement, Component B- Institutional Strengthening, Capacity Building and Governance Enhancement, and Component C- Rural Transport Safety.

a. Accessibility Improvement (US\$ 377 million): It comprises four sub-components:

- i. Rural Road Improvement (US\$ 170 million): The project is financing improvement of about 450 km of Upazila (sub district) Roads through upgrading earthen roads to paved road standards and improvement of about 370 km of Union Roads.
 - ii. Rural Road Maintenance (US\$ 197 million)
 - Periodic Maintenance (US\$185 million): The project is financing rehabilitation or periodic maintenance of about 4,000 km of roads.
 - Performance—Based Maintenance (US\$ 12 million): The project is supporting pilot performance—based maintenance contracts. The contract is being executed on about 446.873 km of roads.
 - iii. Rural Waterways (US\$ 4 million)
 - Dredging (US\$ 2 million): The project is also financing a pilot Inland Waterways Transport (IWT) sub-component on low impact dredging of two rural waterways using local technology and construction of river infrastructure (ghats, jetties) at about 20 locations.
 - River accessibility (US\$2 million): The sub-component finance improvement of accessibility and construction of river infrastructure (ghats, jetties).
 - iv. Growth Center Markets (US\$ 6 million)
 - The project is supporting the improvement and development of 33 markets employing women.
 - In addition to financing the market infrastructure, this project is aiming at strengthening management and operation of GCMs by providing support to the markets committees, improving the selection process of women and enhancing their capacity to operate shops in WMS.
- b. **Institutional Strengthening, Capacity Building & Governance Enhancement Component (US\$ 35 million):** It comprises two sub-components
- i. Capacity building to enhance LGED performance, governance and accountability;
 - ii. Performance monitoring and training.
- c. **Rural Transport Safety Component (US\$ 3 million):** This component consists of two sub-components focused on the safety of rural roads and rivers.
- i. Technical assistance support for integrating road safety engineering measures and awareness building to ensure improved safety along project roads;
 - ii. Technical assistance for strengthening road safety capacity of the LGED

Additional Financing: The Additional Financing to RTIP-II is likely to consists of the following components. They are similar to ongoing RTIP-II but in a limited scale, namely:

A. Accessibility Improvement: It comprises two sub-components:

- i. Rehabilitation and Maintenance: The project will finance rehabilitation or maintenance of the 175 flood affected roads of about 1540km in a sustainable and climate resilient way. There will be scope of land acquisition to provide the roads a geometric shape.
- ii. Performance-Based Maintenance: The project will support maintaining the pilot performance-based maintenance contracts under RTIP-II (Additional Financing), those not be completed within the ending of RTIP-II. 446.873km of roads are now under PBMC for 5 years period.

B. Institutional Strengthening, Capacity Building & Governance Enhancement Component: It comprises two sub-components

- i. Capacity building to enhance LGED performance, governance and accountability;
- ii. Performance monitoring and training.

C. Rural Transport Safety Component:

This component will be designed to institutionalize Road Safety Program.

1.3 Objectives of EMF

The EMF provides general policies, guidelines, codes of practice and procedures to be integrated into the implementation of the project. It defines the steps, processes, and procedures for screening, alternative analysis, assessment, monitoring and management. In addition, the EMF will analyze environmental policies and legal regime of Bangladesh and safeguard policies of the World Bank as well as institutional and capacity assessment for environmental management. The EMF is intended to be used as a practical tool during program formulation, design, implementation, and monitoring the physical intervention of the project. The original EMF was followed by the Project authorities during the planning, design, construction and operations for the different subprojects under different sub-components of the project mainly, rural road improvements, rural road maintenance, rural waterways, growth center markets, in order to ensuring environmental integration in planning, implementation, and monitoring of project supported activities. For ensuring good environmental management in the proposed AF, the EMF will provide guidance on pre-investment works/studies (such as environmental screening, environmental assessment, environmental management plans, etc.), provide set of steps, process, procedure, and mechanism for ensuring adequate level of environmental consideration and integration in each investment in the project-cycle; and describes the principles, objectives and approach to be followed to avoid or minimize or mitigate impacts. Based on the lesson learning from ongoing RTIP II, the updated EMF contains the following:

- Environmental factors that needs to be considered while planning and design of different categories of activities under the project.
- Environmental screening criteria: criteria, process, procedures, steps, time, and responsibility as well as necessary tools (format, checklist etc.) for environmental screening of the investment activities.
- Environmental assessment guidelines: Steps, process and procedures to be followed in different levels of environmental assessment (limited or full assessment). This includes guidance on the project level baseline information, impact identification, alternative analysis, assessment and designing mitigation measures, and in preparing Environmental Management Plan (EMP).
- The EMF includes project/ activity level environmental monitoring framework.
- The EMF includes the institutional arrangement for implementing EMF, environmental code of practices to be followed in project/activity level, capacity strengthening plan for environmental capacity of the involved parties in accordance with their role and functions, guidance on appropriate ways of holding consultations.
- A framework for implementation, monitoring, supervision, auditing and reporting
- The lessons learnt from RTIP-II to mitigate environmental impacts more efficiently.

1.4 Approach and Methodology

The EMF has been prepared through participatory process mainly based on open ended discussions, formal and informal interaction with stakeholders that lead to an understanding of the existing system from the perspectives of all the stakeholders. The work has been performed in close

cooperation with the project team. This included collection of secondary data, related literatures, field surveys, public/stakeholder consultations, and desk studies.

In order to prepare the EMF, relevant secondary source of information was reviewed and limited field investigation had been carried out to explain the environmental concerns related to different subprojects. The specific tools and methods used to meet the desired scope of work are highlighted below:

a) Environmental review of overall program and preparation of preliminary baseline of the project:

In order to meet the above scope, the following strategies have been adopted:

- Review of program details available at the time of assessment;
- Collection of secondary information (periodic plans of participating districts, situation analysis of pre-feasibility study and its conformity with interaction with stakeholders); and
- Sample of different subproject of baseline information at larger stage by field visit to the different districts.

b) Review of relevant plan, policies and legislations of GOB and WB:

In order to meet the above scope, the following strategies were adopted:

- Review of plan, policies, government directives and legislations related to environment in the context of Bangladesh;
- Identification of environmental provisions that is applicable to the present project;
- Review of the World Bank's environmental safeguard policies and identifies provisions/requirements that need to be met by this project; and
- Review of similar documents being used in similar type of programs.

c) Review of existing environmental management practices of RTIP-I and RTIP-II.

In order to meet the above scope, the methodologies adopted are as follows:

- Review of current environmental requirements and practices followed by RTIP-I and RTIP-II;
- Study of the effectiveness of environmental provisions applied to similar project activities in Bangladesh;
- Discussion with LGED about their existing environmental management practices existing environmental problems;
- Review and "on the ground" verification of environmental management practices and its effectiveness followed by RTIP-I including review and record of good and bad environmental practices followed; and
- Environmental Practices in other projects (WB funded, etc.).

d) Institutional and capacity assessment

The following methodologies were adopted by the consultant to meet and its objectives:

- Review of institutional mechanisms for environmental management of institutional involved in proposed program and their environmental management practices. The assessment will be made to find out the institutional capacity in terms of existence of environmental management unit, environmental staff & work load, existence of environmental management practices, resources (manpower, budget, and equipment facilities), mandate, roles and responsibility of staff in environmental management, currently ongoing environmental programs and its effectiveness;
- The system, process, procedures in complying environmental mandate, guideline, framework and its effectiveness, (tools if any, such as screening format, checklist etc.); and
- Assessment of participating institutions in terms of their capacity with regard to their existing mandates, functions, human, and financial resources available for environmental management functions as well as assessment of their capacity considering incremental workloads from the proposed program.

Based on the above, the consultant has developed the necessary institutional and capacity building activities.

e) Stakeholder analysis, consultation and disclosures

The following methodologies were adopted to meet the above scope and its objectives:

- Plan for the stakeholder consultations at the national and district level with respect to the program and its environmental management. Based on the outcomes of the stakeholders' analysis, policy review and capacity assessment, institutional mechanism for environmental management in the RTIP-2 program were developed;
- Share in LGED during the interaction about the likely environmental issues, environmental requirements of GOB and WB;
- During the preparation of EMF for additional financing, interactions were also held with District LGED offices, and private sector for their views with regards to their opinions, their roles and responsibilities in the program; and
- Assessment of stakeholder's impressions on environmental issues, causes, and in exploring ways to address it.

1.5 Overview of the EMF

The EMF is intended to define the process and outputs necessary to address the potential negative impacts of the physical works to be carried out under RTIP-II (Additional Financing) for various sub-projects associated with the rural road improvements, rural road maintenances, rural waterways, and growth center markets. In order to safeguard against any unexpected serious impacts and to improve the general environmental management practices, this EMF outlines a screening/assessment process and actions to be taken in case there is any possibility that the IDA's environmental safeguards may be triggered.

The EMF clearly describes how the potential environmental impacts of all sub-projects will be managed during preparation, implementation and, in the post-implementation periods. The EMF incorporates a framework for implementation, monitoring, supervision, auditing and reporting of the EMF requirements. The EMF report also includes Environmental Codes of Practice (ECP) and sample Environmental Management Plan (EMP) for each type project subcomponent to assist the LGED/Design Supervision Management (DSM) Consultants in preparation of the necessary environmental specifications and/or sub-project specific EMP for integration of impacts avoidance/prevention/mitigation measures with the design and contract documents of the sub-projects. The applicability of the sample EMP/ ECP to a particular type of sub-project under each project component and/or need for further EA and sub-project, specific EMP has also been established in the EMF.

The EMF also defines required mitigation measures to be carried out by this contractor to minimize potential negative impacts during and after the execution of physical works. The minimum prevention /mitigation requirements to be implemented during the implementation of the sub-projects will be included in the bidding and contract documents. The EMF provides for integration of the environmental assessment and management process with the overall project preparation and implementation process.

1.6 Environmental Code of Practices

The Environmental Code of Practices (ECP) for compliance with the World Bank's OP 4.01 is contained of this EMF. The requirements of these ECP and of the Bangladesh standard will be included in all sub project civil works contracts through a set of special environmental clauses (SECs) included in the Technical Specification of the bidding documents. These set of Special Environmental Clauses will be subject to revision for each sub project to ensure the relevant issues for each sub project are being adopted.

2. ENVIRONMENTAL POLICY, LEGAL AND ADMINISTRATIVE FRAMEWORK

2.1 Relevant Government Policies, Acts, Rules, Strategies and Guidelines

2.1.1 Environmental Conservation Act (ECA), 1995

The ECA is currently the main legislation relating to environment protection in Bangladesh. This Act is promulgated for environment conservation, environmental standards development and environment pollution control and abatement.

The main objectives of ECA are:

- Conservation and improvement of the environment; and
- Control and mitigation of pollution of the environment.

The main focuses of the Act can be summarized as:

- Declaration of ecologically critical areas and restriction on the operations and processes, which can or cannot be carried out/ initiated in the ecologically critical areas (ECA);
- Regulations in respect of vehicles emitting smoke harmful for the environment;
- Environmental clearance;
- Regulation of industries and other development activities' discharge permits;
- Promulgation of standards for quality of air, water, noise and soil for different areas for different purposes;
- Promulgation of a standard limit for discharging and emitting waste; and
- Formulation and declaration of environmental guidelines.

Before any new project can go ahead, as stipulated under the ECA, the project promoter must obtain Environmental Clearance from the Director General (DG), DoE. An appeal procedure does exist for those promoters who fail to obtain clearance. Failure to comply with any part of this Act may result in punishment to a maximum of 5 years imprisonment or a maximum fine of Tk.100, 000 or both. The DOE executes the Act under the leadership of the DG.

The Project will be undertaken in line with the aims and objectives of the Act by conserving the environment and controlling and mitigating potential impacts throughout the drilling program.

Environmental Conservation Act (Amendment 2000)

The Bangladesh *Environment Conservation Act* Amendment 2000 focuses on ascertaining responsibility for compensation in cases of damage to ecosystems, increased provision of punitive measures both for fines and imprisonment and the authority to take cognizance of offences.

Environmental Conservation Act (Amendment 2002)

The 2002 Amendment of the ECA elaborates on the following parts of the Act:

- Restrictions on polluting automobiles;
- Restrictions on the sale, production of environmentally harmful items like polythene bags;
- Assistance from law enforcement agencies for environmental actions;
- Break up of punitive measures; and
- Authority to try environmental cases.

Environmental Conservation Act (Amendment 2010)

This amendment of the act introduces new rules & restriction on:

- No individual or institution (Govt. or Semi Govt, / Non Govt. / Self Governing) can cut any Hill and Hillock. In case of national interest; it can be done after getting clearance from respective the department

- Owner of the ship breaking yard will be bound to ensure proper management of their hazardous wastes to prevent environmental pollution and Health Risk
- No remarked water body cannot be filled up/changed; in case of national interest; it can be done after getting clearance from the respective department; and
- Emitter of any activities/incident will be bound to control emission of environmental pollutants that exceeds the existing emission standards.

2.1.2 Environment Conservation Rules (ECR), 1997 and Amendments

These are a set of rules, promulgated under the *ECA*, 1995 and its amendments. The Environment Conservation Rules provide categorization of industries and projects and identify types of environmental assessment required against respective categories of industries or projects. The Rules set:

- The National Environmental Quality Standards (NEQS) for ambient air, various types of water, industrial effluent, emission, noise, vehicular exhaust etc.;
- The requirement for and procedures to obtain environmental clearance; and
- The requirement for IEE and EIA according to categories of industrial and other development interventions.

The Environment Conservation Rules, 1997 were issued by the GOB in exercise of the power conferred under the Environment Conservation Act (Section 20), 1995. Under these Rules, the following aspects, among others, are covered:

- Declaration of ecologically critical areas;
- Classification of industries and projects into 4 categories;
- Procedures for issuing the Environmental Clearance Certificate (ECC); and
- Determination of environmental standards.

Rule 3 defines the factors to be considered in declaring an 'ecologically critical area' as per Section 5 of the *ECA* (1995). It empowers the Government to declare the area as the Ecologically Critical Areas (ECA), if it is satisfied that the ecosystem of the area has reached or is threatened to reach a critical state or condition due to environmental degradation. The Government is also empowered to specify which of operations or processes may be carried out or may not be initiated in the ecologically critical area. Under this mandate, the Ministry of Environment and Forest (MOEF) has declared Sunderban, Cox's Bazar-Tekhnaf Sea Shore, Saint Martin Island, Sonadia Island, Hakaluki Haor, Tanguar Haor, Marzat Baor and Gulshan-Baridhara Lake as ecologically critical areas and prohibited certain activities in those areas.

Rule 7 of the 1997 ECR provides a classification of industrial units and projects into four categories, depending on environmental impact and location. These categories are:

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

The categorization of a project determines the procedure for issuance of an Environmental Clearance Certificate (ECC). All proposed industrial units and projects that are considered to be low polluting are categorized under "Green" and shall be granted Environmental Clearance. For proposed industrial units and projects falling in the Orange-A, Orange-B and Red Categories, firstly a site clearance certificate and thereafter an environmental clearance certificate will be required. A detailed description of those four categories of industry/project is in Schedule-1 of ECR (1997). The Rules were essentially developed for industrial developments, but under Schedule 1 of the Guidelines (Clauses 63 and 64) the following falls into the Orange B Category. The likely impacts are mostly construction related and these may include, contamination of land and water, loss of trees,

noise from operation of construction machinery, air quality deterioration, worker's health and safety, etc.

All existing industrial units and projects and proposed industrial units and projects, that are considered to be low polluting are categorized under "Green" and shall be granted Environmental Clearance. For proposed industrial units and projects falling in the Orange- A, Orange- B and Red Categories, firstly a site clearance certificate and thereafter an environmental clearance certificate will be issued. A detailed description of those four categories of industries has been given in Schedule-1 of ECR'97. Apart from general requirement, for every Red category proposed industrial unit or project, the application must be accompanied with feasibility report on Initial Environmental Examination, Environmental Impact Assessment based on approved TOR by DOE, Environmental Management Plan EMP etc.

The ECR'97 also contains the procedures for obtaining Environmental Clearance Certificates from the Department of Environment for different types of proposed units or projects. Any person or organization wishing to establish an industrial unit or project must obtain ECC from the Director General. The application for such certificate must be in the prescribed form (provided later in this chapter) together with the prescribed fees laid down in Schedule 13, through the deposit of a Treasury Chalan in favor of the Director General. Rule 8 prescribes the duration of validity of such certificate (3 years for green category and 1year for other categories) and compulsory requirement renewal of certificate at least 30 days before expiry of its validity.

- Road Construction/reconstruction/extension (feeder roads, local streets etc.) and bridge construction reconstruction/extension (less than 100m in length).

2.1.3 Environmental Policy, 1992

The concept of environmental protection through national efforts was first recognized and declared with the adoption of the Environmental Policy, 1992 and the Environmental Action Plan, 1992. The importance of policies in beefing up the environmental regime is recognized in a number of international instruments including the World Conservation Strategy in 1980 and the Brundtland Commission Report, 1987. Paragraph 14 of Chapter 8 of Agenda 21 underscored the necessity of formulation of national policies as well as laws for environmental protection and sustainable development. The major objectives of Environmental Policy are to:

- i) maintain ecological balance and overall development through protection and improvement of the environment;
- ii) protect country against natural disaster;
- iii) identify and regulate activities, which pollute and degrade the environment;
- iv) ensure environmentally sound development in all sectors; and
- v) ensure sustainable, long term and environmentally sound base of natural resources; and vi) actively remain associate with all international environmental initiatives to the maximum possible extent.

2.1.4 Environmental Action Plan, 1992

The National Environmental Action Plan,1992 recommended sector specific action plan to achieve the objectives and implement the policy recommendations of the National Environment Policy. The followings are water resources key recommended actions:

- Environmental audit on an emergency basis will be conducted for water resources development, flood control and irrigation projects. Steps to mitigate the adverse impact on the environment identified in the audit will be taken through appropriate modification of these projects.
- Environmental Impact Assessment will be incorporated in all new projects. Adverse impacts will be prevented through proper steps and adequate investments.

- Operation and maintenance will be ensured subsequent to execution of projects related to water resources development and management. Regular monitoring will be conducted to evaluate the impact of all projects.

2.1.5 National Environmental Management Plan (NEMAP), 1995

The National Environment Management Action Plan (NEMAP, 1995), based on a nationwide consultation program identified the main national environmental issues, including those related to the water sector which EA practitioners should note. The main related national concerns included flood damage, river bank erosion, environmental degradation of water bodies, increased water pollution, shortage of irrigation water and drainage congestion; various specific regional concerns were also identified.

2.1.6 Bangladesh Wildlife (Preservation) Order, 1973 (Amended in 1994)

The *Bangladesh Wildlife (Preservation) Order* makes provisions for the safety of wildlife, particularly those vulnerable to extinction. It has provisions for the establishment of 'wild life sanctuaries', banning hunting of certain species, banning 'game reserves' and provision for special permits to keep and care for certain types of animals. Schedule III to the statute includes a list of animals that are declared as protected animals, which shall not be hunted, killed or captured. The maximum penalty for any offence committed under this statute is two years imprisonment and a maximum fine of 10,000 taka.

The Government of Bangladesh under the provisions of the Act, has established three categories of protected areas being National Parks, Wildlife Sanctuaries and Game Reserves. In addition to these, the Government of Bangladesh has declared 14 protected areas and is considering declaring more. Further, the Government of Bangladesh has recently declared six areas as Ecologically Critical Areas under the *Environmental Conservation Act 1995*.

2.1.7 National Conservation Strategy (NCS), 1992

The National Conservation Strategy (NCS) was drafted in late 1991 and submitted to the Government in early 1992. It was approved in principal; however, the final approval of the document is yet to be made by the cabinet.

For sustainable development in the energy sector, the strategy document offered various recommendations, though there are none specifically relating to exploratory drilling or similar activities.

For 'Energy and Minerals' sector, the relevant strategy recommendations include:

- To use the minimum possible area of land in exploration sites;
- To take precautionary measures against Environmental Pollution from liquid effluent, condensate recovery and dehydration plants; and
- To apply technology assessment for selection of appropriate technology.

The Project aims to reduce the land required for the program where possible by implementing measures to reduce pollution risk and using appropriate technology.

2.1.8 Wetland Policy, 1998 (Draft)

The Policy is relevant to the Project because it seeks to:

- Conserve wetlands to sustain their ecological and socio-economic functions and further sustainable development;
- Establish key principles for wetland sustainability and unsustainable practices;
- Maintain existing levels of biodiversity;
- Maintain wetland functions and values; and

- Actively promote integration of wetland functions in resources management and economic development decision taking.

2.1.9 National Water Policy, 1999

The National Water Policy promulgated in 1999 with the intension of guiding both public and private actions in the future for ensuring optimal development and management of water that benefit both individuals and the society at large. The policy aims to ensure progress towards fulfilling national goals of economic developments, poverty alleviation, food security, public health and safety, decent standard of living for the people and protection of natural environment. According to the policy, *all agencies and departments entrusted with water resource management responsibilities (regulation, planning, construction, operation, and maintenance) will have to enhance environmental amenities and ensure that environmental resources are protected and restored in executing their tasks. Environmental needs and objectives will be treated equally with the resources management needs.*

The policy has several clauses related to the protection and prevention of the natural environment for ensuring sustainable development. Some of the relevant clauses are:

Clause 4.5b: Planning and feasibility studies of all projects will follow the Guidelines for Project Assessment, the Guidelines for People's Participation (GPP), the Guidelines for Environmental Impact Assessment, and all other instructions that may be issued from time to time by the Government.

Clause 4.9b: Measures will be taken to minimize disruption to the natural aquatic environment in streams and water channels.

Clause 4.9e: Water development plans will not interrupt fish movement and will make adequate provisions in control structures for allowing fish migration and breeding.

Clause 4.10a: Water development projects should cause minimal disruption to navigation and, where necessary, adequate mitigation measures should be taken.

Clause 4.12a: Give full consideration to environmental protection, restoration and enhancement measures consistent with National Environmental Management Action Plan (NEMAP) and the National Water Management Plan (NWMP).

Clause 4.12b: Adhere to a formal Environmental Impact Assessment process, as set out in the EIA guidelines and manuals for water sector projects, in each water resources development project or rehabilitation program of size and scope specified by the Government from time to time.

Clause 4.12c: Ensure adequate upland flow in water channels to preserve the coastal estuary eco-system threatened by intrusion of salinity from the sea.

Clause 4.13b: Only those water related projects will be taken up for execution that will not interfere with aquatic characteristics of those water bodies.

2.1.10 National Water Management Plan, 2001 (Approved in 2004)

The National Water Resources Council approved on March 31, 2004 a 25-year National Water Management Plan. The plan provides a framework within which all concerned with the development, management and use of water resources water services in Bangladesh can plan and implement their own activities in a coordinated and integrated manner. The planned activity programs have been presented in the eight sub-sectorial clusters: i) Institutional Development, ii) Enabling Environment, iii) Main River, iv) Towns and Rural Areas, v) Major Cities; vi) Disaster Management; vii) Agriculture and Water Management, and viii) Environment and Aquatic Resources. Each cluster comprises of a number of individual programs, with overall a total of 84 sub-sectorial programs identified and presented in the investment portfolio. It was planned to implement in three phases. It was approved at the seventh meeting of the National Water Resources Council. It calls for a coordinated approach of concerned ministries and departments to stop water-logging and to incorporate the issues of arsenic mitigation, river administration, and dredging and fisheries

resources. To mitigate the environmental risks of water sector project development, the plan suggested for a holistic view, which includes the environment itself as an important water sector stakeholder with an entire cluster of programs devoted to it. Furthermore, programs within the environment cluster are strategically timed in order that public awareness raising, the establishment and enforcement of regulatory mechanisms and long term planning are addressed as priority. Water Resources Planning Organization (WARPO) was assigned to monitor the national water management plan.

2.1.11 The National Fisheries Policy, 1999

The National Fisheries Policy, 1999 was formulated following review and intent of the *East-Bengal Protection and Conservation of Fish Act 1950*, which was updated by the *Protection and Conservation of Fish (Amendment) Ordinance 1982* and further refined by the *Protection and Conservation of Fish (Amendment) Act 1995*. These Acts and ordinance provide provisions for the protection and conservation of fish in fresh water and brackish water bodies.

The Fisheries Policy highlights the need to conserve fish breeding grounds and habitats, especially in the development of water management infrastructure. It intends to promote fisheries development and conservation in all water bodies.

The Project should consider these policies to protect the habitats, migration and connectivity of fish and fisheries resources around the Project area. Measures to reduce any potential negative impacts on local fish populations will be incorporated into all stages of the Project.

2.1.12 The Protection and Conservation of Fish Rules, 1985

The Protection and Conservation of Fish Rules 1985 are a set of rules in line with the overall objectives of the East-Bengal Protection and Fish Conservation Act. The Rules require that “no person shall destroy or make any attempt to destroy any fish by explosives, gun, bow and arrow in inland waters or within coastal waters”. Further, the Rules states “...no person shall destroy or make any attempt to destroy any fish by poisoning of water or the depletion of fisheries by pollution, by trade effluents or otherwise in inland waters”.

The Project will comply with these rules by enacting appropriate mitigation measures to reduce the potential for pollution of waterways, depletion of fisheries or disturbance of fish populations within the Project area.

2.1.13 National Agricultural Policy, 1999

The overall objective of the National Agriculture Policy is to make the nation self-sufficient in food through increasing production of all crops including cereals and ensure a dependable food security system for all. One of the specific objectives of National Agricultural Policy is to take necessary steps to ensure environmental protection as well as „environment-friendly sustainable agriculture. Through increased use of organic manure and strengthening of the integrated pest management program. The policy also suggests creating awareness so that the chemical fertilizers and pesticides used for increased crop production do not turn out to be responsible for environmental pollution. Water logging and salinity are identified as one of the serious problem in some parts of the country including the coastal areas for agricultural activities and environmental damage. The policy recommends for crop rotation and salt tolerant crop varieties.

2.1.14 Coastal Zone Policy, 2005

Coastal zone policy initiated as a harmonized policy that transcends beyond sectoral perspectives. The policy provides general guidance so that the coastal people can pursue their livelihoods under secured conditions in a sustainable manner without impairing the integrity of the natural environment. The policy framework underscores sustainable management of natural resources like inland fisheries & shrimp, marine fisheries, mangrove and other forests, land, livestock, salt, minerals, sources of renewable energy like tide, wind and solar energy. It also emphasis on conservation and enhancement of critical ecosystem- necessary measures will be taken

to conserve and develop aquatic and terrestrial including all the ecosystems of importance identified by the *Bangladesh National Conservation Strategy* (Mangrove, coral reef, tidal wetland, sea grass bed, barrier island, estuary, closed water body, etc.).

Coastal Development Strategy, 2006

Coastal Development Strategy has been approved by the Inter-Ministerial Steering Committee on Integrated Coastal Zone Management Plan (ICZMP) Project on February 13, 2006. The strategy is based on the Coastal Zone Policy and takes into account the emerging trends: increasing urbanization, changing pattern of land use, declining land and water resources, unemployment and visible climate change impacts. The strategy has 9 strategic priorities and the following 3 are relevant priorities with proposed type of interventions:

- Safety from man-made and natural hazards - i) Strengthening and rehabilitation of sea dykes; and ii) reduction of severe vulnerability in the coastal zone through multi-purpose cyclone shelters-including coping mechanism.
- Sustainable management of natural resources - i) environmentally and socially responsive shrimp farming; ii) introduction of renewable energy in coastal areas; and iii) development of marine fisheries and livelihood.
- Environmental conservation – i) Marine and coastal environmental development; and ii) strengthening of Coast Guard for improvement of coastal safety and security in coordination with other law enforcing agencies.

2.1.15 The Embankment and Drainage Act, 1952

The *East Bangle Act No. 1, 1953* was amended in 1953 which has been adapted by the People Republic of Bangladesh, by the Bangladesh Order (adaptation of Existing Laws), 1972 (President's Order No. 48 of 1972). The Act consolidates the laws relating to embankments and drainage providing provision for the construction, maintenance, management, removal and control of embankments and water courses for the better drainage of lands and for their protection from floods, erosion or other damage by water.

The specific Sections and Articles relevant to the Project are mentioned below:

- Section 4 (1) of the Act states that the embankment, water-course, and tow-path, earth, pathways, gates, berms and hedges of the embankments shall vest in the Government of the Authority (BWDB).
- Section 56 (1) states that, person will be subject to penalty (500 taka or imprisonment... if he erects, or causes or willfully permits to be erected, any new embankment, or any existing embankment, or obstructs or diverts, or causes or willfully permits to be obstructed or diverted, any water course.
- Section 15 allows for the engineer (engineer in charge of Divisional level BWDB) for constructing new embankment or enlarging, lengthening or repairing existing embankments.
- The other sections of the Act give powers and access to the Government or Authority or Engineers to commence necessary Project activities, for land acquisition (through the Deputy Commissioner), and site clearing activities including removal of trees or houses (if necessary).

2.1.16 Bangladesh Climate Change Strategy and Action Plan

The GOB also prepared the Bangladesh Climate Change Strategy and Action Plan (BCCSAP) in 2008 and revised in 2009. This is a comprehensive strategy to address climate change challenges in Bangladesh. Bangladesh Climate Change Strategy and Action Plan built on and expanded the NAPA. It is built around the following six themes:

- Food security, social protection and health to ensure that the poorest and most vulnerable in society, including women and children, are protected from climate change and that all

programs focus on the needs of this group for food security, safe housing, employment and access to basic services, including health.

- Comprehensive disaster management to further strengthen the country's already proven disaster management systems to deal with increasingly frequent and severe natural calamities.
- Infrastructure to ensure that existing assets (e.g., coastal and river embankments) are well maintained and fit for purpose and that urgently needed infrastructure (cyclone shelters and urban drainage) is put in place to deal with the likely impacts of climate change.
- Research and Knowledge management to predict that the likely scale and timing of climate change impacts on different sectors of economy and socioeconomic groups; to underpin future investment strategies; and to ensure that Bangladesh is networked into the latest global thinking on climate change.
- Mitigation and low carbon development to evolve low carbon development options and implement these as the country's economy grows over the coming decades.
- Capacity building and Institutional strengthening to enhance the capacity government ministries, civil society and private sector to meet the challenge of climate change.

There are 44 specific programs proposed in the BCCSAP under the above six themes.

2.1.17 LGED's Guidelines and Environmental Code of Practices

In response to the Environmental Conservation Act (1995) and Rules (1997), and recognizing the need of its donors to ensure sound environmental practices, LGED has developed guidelines and code of practices to ensure that its activities sustain, and where feasible enhance the environment. The LGED aims to implement all its projects in an environmentally sound and sustainable manner that meets all the requirements of the GOB and its financing partners. This approach is embodied in the LGED document:

- Environmental Assessment Guidelines for LGED Projects, Environmental Unit of LGED, October, 2008.

Two documents have been prepared under RTIP which provide a sound basis for defining the environmental management procedures and arrangements for RTIP-II (ADDITIONAL FINANCING):

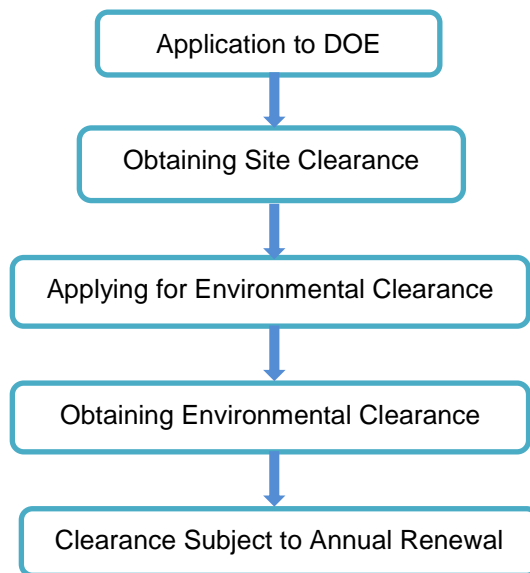
- Manual for Environmental Supervision and Monitoring and Guidelines for Environmental Screening and Categorization of Sub-project, EMU, RTIP (RDP -26), September, 2004.
- Environmental Code of Practices (ECP), EMU, RTIP (RDP -26), September, 2004.

2.2 Environmental Clearance Procedure

Legislative bases for the EIA in Bangladesh are the Environmental Conservation Act 1995 (ECA'95) and the Environmental Conservation Rules 1997 (ECR'97). The Department of Environment (DoE), under the Ministry of Environment and Forest (MoEF), is the regulatory body responsible for enforcing the ECA'95 and ECR'97. It is the responsibility of the proponent to conduct the EIA of development proposal, the responsibility to review EIA for the purpose of issuing Environmental Clearance Certificate (ECC) rests on DOE. The procedure for "Red" Category includes submission of:

- **Initial Environmental Examination (IEE)**
- **Environmental Impact Assessment (EIA)**
- **Environmental Management Plan (EMP)**

Environment clearance has to be obtained by the respective implementing agency from the Department of Environment. The main steps for environmental clearance procedure for Red Category projects can be summarized as follows:



The environmental impact assessment and subsequent environmental clearance for sub-projects having minor environmental impacts will be waived taking into consideration of significant nature of the project and the immediate local needs. However, if IEE indicates that there are significant environmental impacts from the sub-projects, the implementing agency will conduct the EIA. The concerned implementing agency will provide environmental screening report to the DOE on quarterly/half-yearly basis highlighting the possible impacts from the sub-projects and measures taken for possible impacts. The DOE will review all the screening reports of civil works and may decide to cross check some of the interventions. However, the report will have separate location specific baseline information, environmental analysis and EMP for each sub-project.

2.3 World Bank’s Environmental Safeguard Policy

OP/BP 4.01 Environmental Assessment

The Bank requires Environmental Assessment (EA) of projects proposed for Bank support to ensure that they are environmentally sound and sustainable, and thus to improve decision making. The EA is a process whose breadth, depth, and type of analysis depend on the nature, scale, and potential environmental impact of the proposed project. The EA evaluates a project's potential environmental risks and impacts in its area of influence; examines project alternatives; identifies ways of improving project selection, siting, planning, design, and implementation by preventing, minimizing, mitigating, or compensating for adverse environmental impacts and enhancing positive impacts; and includes the process of mitigating and managing adverse environmental impacts throughout project implementation. The EA takes into account the natural environment (air, water and land); human health and safety, social aspects (involuntary resettlement; indigenous peoples and physical cultural resources) and transboundary and global environmental aspects. The borrower is responsible for carrying out the EA and the Bank advises the borrower on the Bank’s EA requirements.

The Bank classifies the proposed project into three major categories, depending on the type, location, sensitivity, and scale of the project and the nature and magnitude of its potential environmental impacts.

- **Category A:** The proposed project is likely to have significant adverse environmental impacts that are sensitive, diverse, or unprecedented. These impacts may affect an area broader than the sites or facilities subject to physical works.
- **Category B:** The proposed project’s potential adverse environmental impacts on human population or environmentally important areas-including wetlands, forests, grasslands, or other natural habitats- are less adverse than those of Category A projects. These impacts are site specific; few if any of them are irreversible; and in most cases mitigatory measures can be designed more readily than Category A projects.

- **Category C:** The proposed project is likely to have minimal or no adverse environmental impacts.

OP/BP 4.04 Natural Habitats

The conservation of natural habitats, like other measures that protect and enhance the environment, is essential for long-term sustainable development. The Bank therefore supports the protection, maintenance, and rehabilitation of natural habitats and their functions in its economic and sector work, project financing, and policy dialogue. The Bank supports, and expects borrowers to apply, a precautionary approach to natural resource management to ensure opportunities for environmentally sustainable development. The Bank promotes and supports natural habitat conservation and improved land use by financing projects designed to integrate into national and regional development the conservation of natural habitats and the maintenance of ecological functions. Furthermore, the Bank promotes the rehabilitation of degraded natural habitats. The Bank does not support projects that involve the significant conversion or degradation of critical natural habitats.

OP/BP 4.11 Physical Cultural Resources

Physical cultural resources are defined as movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. Their cultural interest may be at the local, provincial or national level, or within the international community. Physical cultural resources are important as sources of valuable scientific and historical information, as assets for economic and social development, and as integral parts of a people's cultural identity and practices. The Bank assists countries to avoid or mitigate adverse impacts on physical cultural resources from development projects that it finances. The impacts on physical cultural resources resulting from project activities, including mitigating measures, may not contravene either the borrower's national legislation, or its obligations under relevant international environmental treaties and agreements. The borrower addresses impacts on physical cultural resources in projects proposed for Bank financing, as an integral part of the environmental assessment (EA) process. The following projects are classified during the environmental screening process as Category A or B, and are subject to the provisions of this policy: (a) any project involving significant excavations, demolition, movement of earth, flooding, or other environmental changes; and (b) any project located in, or in the vicinity of, a physical cultural resources site recognized by the borrower. Projects specifically designed to support the management or conservation of physical cultural resources are individually reviewed, and are normally classified as Category A or B. When the project is likely to have adverse impacts on physical cultural resources, the borrower identifies appropriate measures for avoiding or mitigating these impacts as part of the EA process. These measures may range from 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.

OP/BP 4.36 Forestry

The Policy envisages the protection of forests through consideration of forest-related impact of all investment operations, ensuring restrictions for operations affecting critical forest conservation areas, and improving commercial forest practice through the use of modern certification systems.

In the process of forest conservation interventions, especially the local people, the private sector and other pertinent stakeholders should be consulted.

In general, the Policy aims at reducing deforestation and enhancing the environmental and social contribution of forested areas. Experience with the Bank reveals that the Bank does not support commercial logging in primary tropical moist forest.

OP/BP 4.12 Involuntary Resettlement

This Policy is based on assisting the displaced persons in their efforts to improve or at least restore their standards of living.

The impetus of this Policy is that development undertakings should not cause the impoverishment of the people who are within the area of influence of the undertakings. In cases where resettlement of people is inevitable, or in cases where loss of assets and impacts on the livelihood of the PAPs is experienced, a proper action plan should be undertaken to at least restore, as stated above, their standard of life prior to the undertakings.

Concerning public consultation, resettlers as well as the host communities should be consulted for the successful implementation of the resettlement process. The views of the consulted resettles and the host communities should be incorporated into the Resettlement Action Plan (RAP) including the list of their choices.

2.4 IFC Environmental, Health and Safety Guidelines

The Environmental, Health and Safety (EHS) Guidelines of the International Finance Corporation (IFC), 2008 is the safeguard guidelines for environment, health and safety for the development of the industrial and other projects. They contain performance levels and measures that are considered to be achievable in new facilities at reasonable costs using existing technologies.

2.5 Implication of GOB Policies

Except ECA'95 and ECR'97, all other policies, strategies and legal instruments do not explicitly require any environmental assessment. However, most of the policies, strategies and legal instruments emphasized the need for environmental consideration along with the project planning and implementation. Again, there was no straight forward environmental categorization for the RTIP-II as per ECA'95 and ECR'97. However, depending on the extent of the subprojects, the road improvement and waterways subcomponent will fall under the Red or Orange-B category as per ECR'97. The Growth Center Markets and road maintenance should be marked as Orange-A category. All the proposed pilot rural waterways with ancillary facilities and improvement of road networks required IEE or EIA including EMP (depend upon the impacts). But for the GC markets, needed IEE or limited Impact Assessment including EMP and for the maintenance of roads need EMP. Considering the number of subprojects spread over large area and developing a mechanism for environmental due diligence at LGED level, the subprojects only requiring Environmental Impact Assessment i.e., water ways and road improvement with culverts more than 100 m was sent for DOE clearance. Other subprojects having limited environmental impacts reviewed and cleared at LGED.

Due to the devastating effect of flood occurred last year, many improved roads under RTIP project of different districts of Bangladesh, need reconstruction and maintenance because of the flood damage. Generally, activity of reconstruction and maintenance of road is referred to category "B" as per Environmental Conservation Rules (ECR'97). As a result, considering the maintenance activity of RTIP-AF project, it is categorized in "B" as per ECR'97.

For flood damaged road maintenance works, LGED will ensure that the Environmental management will be integral part of the components of project planning, designing, implementation and operation and maintenance (O&M). LGED will screen and monitor the environmental issues in both construction, and operation & maintenance phases and it will ensure the implementing the project keeping all environmental parameters in control

2.6 Implication of Safeguard Policies of WB

RTIP-II was considered as a Category A project, due to the complexity of environmental issues associated with waterways improvements. The policies on environment assessment (OP/BP 4.01), natural habitats (OP/BP 4.04) and physical cultural resources (OP/BP 4.11) had been triggered for the ongoing operation. Each subproject required environmental screening/assessment before processing.

The AF is undertaking mainly maintenance of rural road, the proposed AF is, therefore classified as Category "B". The likely impacts are mostly construction related and these may include contamination of land and water, loss of trees, noise from operation of construction machinery, air quality deterioration, worker's health and safety, etc. Besides, in the Additional Financing part, the

World Bank's policy on Forestry (OP/BP 4.36) will be triggered to ensure that the project activities do not affect the forest conservation area and commercial forest. This will help to address deforestation and enhancement of environmental & social contribution of forest areas.

3. DESCRIPTION OF BASELINE ENVIRONMENT

3.1 General

The RTIP-II is being implemented in 26 districts out of 64 districts of Bangladesh. These districts are under four divisions of the eastern part of Bangladesh (except hill tracts districts). It will include 224 upazila (sub districts) covering 61,000 sq.km (41% of Bangladesh's land area) and 60 million (48.60% of total population). The name of the districts along with the division names are provided in Table 3.1. Figure 3.1 shows the project districts.

Table 3.1: Name of 26 Districts under Project

Sl. No	Divisions	Districts
1	Rajshahi	Pabna and Sirajganj
2	Sylhet	Sylhet, Hobiganj, Sunamganj and Moulavibazar,
3	Dhaka	Dhaka, Tangail, Manikganj, Gazipur, Munshiganj, Narayanganj, Narsingdhi, Mymensingh, Jamalpur, Sherpur, Kishoreganj, and Netrokona.
4	Chittagong	Comilla, B.Barua, Chandpur, Noakhali, Laxmipur, Feni, Chittagong and Cox's bazar

The RTIP-II (Additional Financing) will be implemented in 18 out of 26 project districts of Bangladesh. These districts are under three divisions of the eastern part of Bangladesh (except hill tracts districts). The name of the districts along with the division names are provided in Table 3.2. Figure 3.2 shows the project districts.

Table 3.2: Name of 18 Districts under RTIP-II (Additional Financing)

Sl. No	Divisions	Districts
1	Rajshahi	Pabna and Sirajganj
2	Sylhet	Sylhet, Hobiganj, Sunamganj and Moulavibazar,
3	Dhaka	Dhaka, Tangail, Manikganj, Gazipur, Munshiganj, Narayanganj, Narsingdhi, Mymensingh, Jamalpur, Sherpur, Kishoreganj, and Netrokona.

3.2 Environmental Baseline for Sub-projects

During RTIP-II, Environmental Impact Assessments were conducted for the sub-projects to collect environmental baseline of the projects areas. Environmental Baseline for sub components of the project incorporates description of the subproject, physical environment, Biological environment and Socio-Economic environment. Physical environment covers Atmosphere and Climate, Topography, Physiography and Geology, Seismicity, Hydrology and Drainage, Air Quality and Noise Quality. Biological Environment describes Terrestrial Ecology, Aquatic Ecology and National Conservation site of Importance. Generally Physical; Biological and Social environmental factors are mainly main observation tools for every single subproject. Environmental screening, Description of the location the subproject area; culture; social activity; structures; religious community consultation etc. are major steps for environmental baseline survey

The environmental baseline analysis was carried on some proposed subprojects areas as a guideline for carrying out of the subprojects to be selected during implementation stage. The overall baseline survey of the project area to be covered under additional financing is shown in the Annex.

4. ENVIRONMENTAL MANAGEMENT PROCEDURE

4.1 Introduction

The Environmental Management Procedure establishes the criteria to identify the level of Environmental Assessment (EA) and the processes involved, their sequence to conduct the EA studies for various components/phases of the rural road improvements, rural road maintenance, rural waterways, growth center markets including their legal requirements and implications (Figure 4.1). Comprehending the level of EA will help the project in assessing the requirement of external agency in the form of consultancy services and also the stage of such requirement, like Design Consultant at planning and design stages and Construction Supervision Consultant (CSC) at construction stage etc.

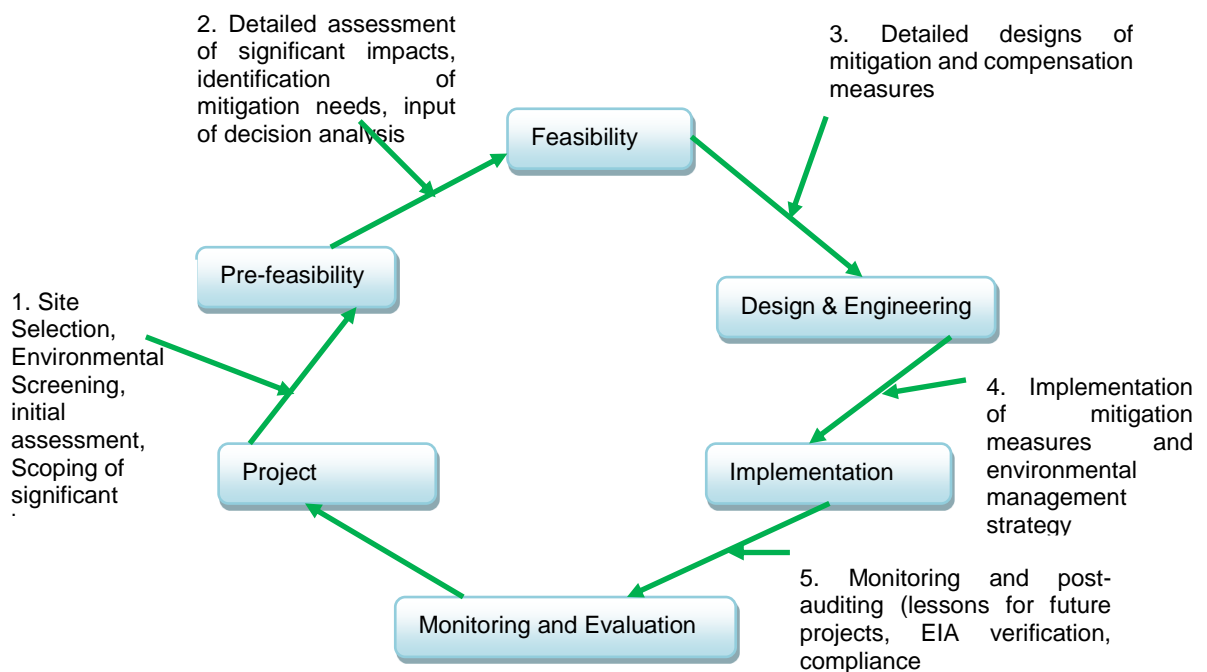


Figure 4.1: Environmental Management Procedure in Project Life Cycle

Environmental Management procedure starts at the beginning of the project concept stage. First step is screening of the project components to ascertain the category of Environmental Assessment required.

The category of EA can be assessed by the project or if desired can be offered to some agency or independent environmental expert. It is worth to mention here that any external agency or consultant or expert can help RTIP-II in analyzing and reporting of environmental features and parameters, filing the application for clearance and approval, but ultimately the responsibility lies with RTIP-II. The project has to ensure that all legal rules and regulations set by the DOE through the Ministry of Environment and Forest (MoEF) are adhering with.

4.2 General Principles for Environmental Management

- The Project Director will be responsible for the environmental compliance monitoring and oversight to ensure overall project environmental compliance. The Consultants that would be hired by LGED would assist the project proponent to carry out this mandate.
- The implementing agency will follow the related government rules (laws, ordinances, acts etc.) and World Bank Operational Policies and Guidelines. This EMF would serve as the basis for ensuring this compliance.

- LGED will submit the EMF to the Department of Environment (DoE) for their review and concurrence.
- LGED will ensure the participation of local community in planning and implementation of sub-projects.
- LGED will be responsible for obtaining and ensuring clearance required from the DOE. The clearance procedure has been mentioned in Section 2.1.19 of Chapter-2. The LGED will be responsible for obtaining environmental clearance for the project components for which the EIA study is required. For the rest components, LGED will implement themselves without DOE clearance. No project activities will be carried out in and nearby the environmental protected and critical areas as well as in disputed lands or lands restricted for development.
- LGED will ensure to mitigate all risks associated with labor influx, although the size of labor influx will be moderate with around 50-100 workers, most of whom can be recruited locally. Though the number of outsider workers is considered at the “low” side compared to the community population, there might be still potential social risks related to gender-based violence and sexual exploitation and abuse. The project therefore will adopt a series of measures to prevent, mitigate, and respond promptly and adequately to any case of gender-based violence.
- All the activities proposed under the project will abide by the existing Environmental Code of Practices (ECP) prepared under the project. Principles and guidelines for contractor’s Codes of Conduct and management of worker’s health and safety will be incorporated in the bidding documents and will be regularly monitored by the supervision consultant during the execution of works. Contractors will be required to train all workforce at regular basis on the Workers Code of Conduct to ensure clear definition of obligations of contractors’ staff and workers with regard to implementing the project’s environmental, social, health and safety (ESHS) and occupational health and safety (OHS) requirements; help prevent, report and address gender-based violence (GBV) within the work site and in its immediate surrounding communities; and inform workers about national laws that make gender-based violence a punishable offence which is prosecuted.

4.3 Environmental Assessment Procedure

4.4.1 Regulatory Clearance Requirements and current:

- Environmental Clearance from the Department of Environment, Ministry of Environment and Forests, Government of Bangladesh? If so, under what category
- Does Project require any type of Forest clearance? If so provide the details including current status and relevant documents
- Status of No Objection Certificate (NOC) from the Department of Environment with supporting documents
- What is the project arrangement (like contract provisions, concession arrangements, etc.) for required construction stage environmental permits/clearance (e.g. quarries, borrow pits, tube wells for construction water, construction camps etc.). Provide the current status
- Which of the World Bank Safeguard Policies are applicable for the project and how does the project comply with these arrangements (refer www.worldbank.org/safeguard)

4.4.2 Screening

Screening is the process by which the appropriate level and type of EIA is determined for a given project on the basis of its likely environmental impacts. The methodology for screening includes desk study, reconnaissance survey and literature available.

Desk Study: To collect the secondary information and chalking out the methodology for carrying out the EA study and fixing of responsibilities of the EA team members for preparing a complete, addressing all issues, Environmental Management Plan.

- Gathering and reviewing existing environmental data (secondary data) relevant to the proposed development, in the form of top sheets, physical maps, thematic maps showing details of soil type, geology, seismic activity, hydrology etc.
- Collect all the earlier carried out environmental and engineering studies in project influence area.

Reconnaissance survey: to collect the first hand information about the project area and develop a perspective of the entire team and revise the methodology and work program.

- Verifying the data collected during desk study, assessing the likely impacts, identifying the major/main issues and preparing the methodology for detailed investigation.

Screening Statement: compiles the primary & secondary data thus collected, and checking with the legal framework of Bangladesh Government thus suggesting the requirement/category of the Environmental Assessment Required. There are usually three possible outcomes (categories) of a screening process:

- Where significant concerns exist or where there is a lot that is unknown about project impacts, a full EIA study is necessary.
- If environmental impacts of a project are known and can be easily mitigated, a limited environmental study and mitigation plan may be all that is necessary.
- If screening identifies no concerns, further environmental analysis is unnecessary, and the project may proceed without the EIA study.

Subproject wise sample Screening checklists are shown in annex-6 and the work done screening checklist for four sample subprojects under different subcomponents are shown in annex-7.

Determining Degree of Impact

Once all project environmental aspects will be identified, the level of impact that may result from the following parameters

- type – biophysical, social, health or economic
- nature – direct or indirect, cumulative, etc.
- extent– local, regional, transboundary or global
- timing – immediate/long term
- duration – temporary/permanent
- uncertainty – low likelihood/high probability
- reversibility – reversible/irreversible
- significance* – unimportant/important

An environmental impact is an estimate or judgment of the significance and value of environmental effects on physical, biological, social or economic environment. Low, medium and high representing impact or level of importance associated with a factor. The impact level depends on duration, reversibility, magnitude, benefit, significance etc.

4.4.3 Initial Environmental Examination (IEE)

In addition, the sub-projects will require initial environmental assessment (IEE) based on the requirement of DOE. Based on the extent of environmental impact obtained from the environmental screening, the decision for further environment impact assessment will be taken. In general, rural road improvements with minor environmental impact under RTIP-2 will require only IEE. Environmental screening is part of the IEE. IEE is considered as the first level of assessment applied project identification and pre-feasibility stage. The IEE addresses the issues at project (sub-project) identification and pre-feasibility planning stage. The main objective at this stage is to help define the project (sub-project) in terms of locations, components and designs. The main activities of are to:

- assess regional resources and the effects of past interventions;
- examine the likely project-environment interactions;
- establish an effective people's participation program;
- identify the key environmental issues and the range and potential severity of impacts;

- compare the environmental consequences of project alternatives; and
- prepare an initial EMP.

4.4.4 Description of the Environment

To achieve the following objectives general description and background of physical resources, ecological resources, environmental quality baseline, social and cultural profile, and economic activities will need to be explained in the EIA preparation phase of the subprojects under the project.

- To establish the environmental baseline in the subproject area, and to identify any significant environmental issue;
- To assess these impacts and provide for measures to address the adverse impacts by the provision of the requisite avoidance, mitigation and compensation measures;
- To integrate the environmental issues in the project planning and design;
- To develop appropriate management plans for implementing, monitoring and reporting of the environmental mitigation and enhancement measures suggested.

In order to identify any potential impact on and potential change to the natural and socioeconomic environments, the existing baseline environmental data are to be collected. Baseline will include but not limited to following:

- **Primary data/monitoring to define characteristics of the existing environmental condition including soil, water, air, noise, land use, cultural properties and flora and fauna.**
 - Monitoring to be carried at critical locations;
 - Identification of residential, commercial, industrial and forest areas for monitoring;
 - Air and noise monitoring at significant location, major settlements, mosque, school and hospitals etc.;
 - Water monitoring at river/canal/pond and ground water sources near major settlements;
 - Soil monitoring at major settlements, near surface water bodies;
 - Tree inventory to be carried out, in consultation with the Forest Department; and
 - Inventory of cultural, religious and archeological sites will be done along with measurements, details and photographs, consultation will be done for gathering public opinion.
- **Secondary data to define meteorological, geology, seismicity, quarries, borrow areas, disposal sites etc.**
 - Details of quarry and borrow areas to be used will be collected (photographs, measurements and public opinion) and a comprehensive plan for extracting material will be prepared.
 - Meteorological data from Bangladesh Meteorological Department (BMD), topographic sheets and maps from Survey of Bangladesh (SOB), geological and soil data from Bangladesh Soil Resources Institute, Seismic data from Space Research and Remote Sensing Organization (SPARSO).
 - Social data including ownership pattern, identification of tribal, vulnerable social groups, land estimates etc.

4.4.5 Scoping

The next step in the EA will be to define the project activities and the natural, regulatory (i.e. legal) and environment of the area in which development will occur. This will be achieved through scoping. Scoping will identifies which of the activities has a potential to interact with the environment. Scoping will be conducted early in the EA process so that a focus on the priority issues (i.e. those that have the greatest potential to affect the natural and/or environment) can be established for the rest of the EA process.

Key elements/inputs to the scoping exercise will be as follows:

- Gathering and reviewing existing environmental data like atmosphere, climate, topography, congestion area, alternative requirement, land use pattern, hydrology and drainage pattern, major River and waterways, religious, cultural and archaeological sites and sensitive areas.
- Identifying project stakeholders; including PAPs, Government and non-government agencies (utilities) Forest Department, Agricultural Department, Department of Environment (DoE) etc.
- Assemble and review relevant legislative requirements, environmental standards and guidelines (national and international) associated with the proposed development as well as the World Bank's operational policies and standards.
- Gathering existing information sources and local knowledge;
- Informing stakeholders of the project and its objectives and get input on the EA;
- Identifying the key environmental concerns (community and scientific) related to a project and the relative importance of issues;
- Defining/preparing the EA work program, including a plan for public and stakeholder involvement;
- Carrying out monitoring of natural environment including air, water, soil, noise etc.
- Defining the range of project alternatives to be considered.
- Obtaining agreement/consensus on the methods and techniques to be used in EA studies and document preparation;
- Determining/freezing the spatial and temporal boundaries for the EA studies.

Focus of scoping will be on the collection and analysis of pertinent data and the assessment of significant environmental attributes. The end result will be a work program which is well focused and cost-effective. The following issues will be addressed through scoping, but will not be limited to.

- To improve the quality of EA information by focusing scientific efforts and EA analysis on truly significant issues;
- To ensure environmental concerns identified and incorporated early in the project planning process, at the same time as cost and design factors are considered;
- To ensure research efforts are not wasted on insignificant issues, rather focused on core issues.
- Reducing the likelihood of overlooking important issues;
- Thinning the chance of prolonged delays and conflicts later in the EA process by engaging stakeholders in a constructive participatory process early in the EA process.

4.4.6 Stakeholder Consultation at all Stages of Project

Identification of stakeholder's primary as well as secondary.

- Primary stakeholders include people having direct impact.
- Secondary stakeholders include village representatives, women's group, voluntary organizations, field level officers and staff, other government officials.

Structured Consultation

- Consultation at Village Level
- Consultation at Upazila and District Level
- Consultation at Divisional level

Consultation at Village Level

- Along with preliminary inventory and survey information dissemination will be done along the project area by one by one canvassing about the project. Date and venue for detailed consultation will be fixed.
- Pictorial method (Pamphlet) will be adopted to explain proposed improvements and possible environmental impact in the concerned villages.
- Public consensus would try to be arrived for and mitigation proposed.
- Public suggestion and graveness will be addressed at appropriate level.

Consultation at Upazila and District Level

- Consultation with officers of Agricultural Department, Forest Department, Soil Department, Fisheries Department, Department of Public Health Engineering (DPHE), etc.
- Consultation with the elected representatives and other stakeholders.

Consultation at Divisional level

- Consultation with senior department officers, like DOE office, District Commissioner Offices, Settlement offices etc. and mechanism of regulatory clearance, utility shifting, land acquisition etc.

4.4.7 Impact Identification:

Impact Identification depends on different types of subproject activities like rural road improvement, rural road maintenance, development of rural waterways and growth center market. Impact varies with different subproject activities.

4.4.8 Environmental Management Plan

EMP will be done for the subprojects, in the following order of priority, to:

- Eliminate or avoid adverse impacts, where reasonably achievable.
- Reduce adverse impacts to the lowest reasonably achievable level.
- Regulate adverse impacts to an acceptable level, or to an acceptable time period.
- Create other beneficial impacts to partially or fully substitute for, or counter-balance, adverse effects.

Project specific environmental construction guidelines should be developed. These guidelines should specify precautions and mitigation measures for construction activities, and to be included with the EMP. Good Environmental Construction guidelines has been compiled in Annex 8: Environmental Code of Practice (ECP).

EMP has 2 parts: i) Environmental Mitigation Plan; ii) Environmental Monitoring Plan.

A. Environmental Mitigation Plan

Mitigation measures will be considered starting with Environmental Assessment process. Impacts identified severe in consequence category and or likelihood category will be further analyzed to identify additional mitigation measures that are potentially available to eliminate or reduce the predicted level of impact. Potential mitigation measures will include:

- habitat compensation program
- species specific management program
- engineering design solutions
- alternative approaches and methods to achieving an activity’s objective
- stakeholders participation in finalizing mitigation measures
- construction practice, including labor welfare measures.
- operational control procedures
- management systems

Based on the past experience, a template for impacts mitigation plan has been presented below for reference. This table will be prepared for three phases of the subprojects, i.e. Pre-Construction Activities, Construction Phase Activities and Post-construction Operation & Maintenance Phase Activities.

Sub-project Activity	Potential Environmental Impact(s)	Mitigation Measures	Location	Estimated Mitigation	Responsibility	
					Implementation	Supervision

A template for monitoring plan has been presented below

A) MITIGATION MONITORING							
Environmental Indicator	Parameters / Units	Location	Means of Monitoring	Frequency / Duration Standards	Responsibilities		Estimated Cost
					Implementation	Supervision	

Environmental Management Measures

Generic Environmental Activities and Management Measures for original RTIP-II and Additional Financing are addressed and shown in the table below.

Sl. No.	Environmental Parameter	Specification
Effective Implementation of Environmental Management Measures		
1. Soil/Aggregate		
1.1	Disposal of Debris and Other Wastes	<p>No-objection from land owner / Revenue Authorities as may be applicable.</p> <p>Disposal Areas</p> <ul style="list-style-type: none"> - No residential areas are located downwind side of these locations; - Dumping sites are located at least 1000 m away from sensitive locations such as all notified forestlands, all water bodies, and productive lands - Available waste lands are given preference. - Specifications for Waste Disposal - In case of bituminous wastes, debris are to be disposed in a minimum 60cm thick clay lined pits so as to eliminate any chances of leaching and top layer shall be covered with soil/good earth so as to enable natural re-vegetation of the disposed area/site. Care should be taken not to dispose these wastes near farmland and water bodies. - In case of filling of low-lying areas with wastes, it needs to be ensured that the level matches with the surrounding areas. In this case care should be taken that these low lying areas are not used for rainwater storage - In case oil and grease are trapped for reuse in a minimum 60cm thick lined pit, care shall be taken to ensure that the pit should be located at the lowest end of the site and away from the residential areas. - All arrangements for transportation during construction including provision, maintenance, dismantling and clearing debris, where necessary will be planned and implemented as approved and directed by the Engineer.
1.2	Borrowing of Earth (in case of opening of new borrow areas)	<p>Borrow Area Selection</p> <p>Borrowing within the ROW is prohibited. However, earth available from excavation for road side drains as per design, may be used as embankment material (if necessary and applicable), subject to</p>

Sl. No.	Environmental Parameter	Specification
		<p>approval of the Engineer, with respect to acceptability of material. Borrowing to be avoided on the following areas:</p> <ul style="list-style-type: none"> - Lands close to toe line and within 0.5 km from toe line. - Irrigated agricultural lands (In case of necessity for borrowing from such lands, the topsoil shall be preserved in stockpiles. - Grazing land. - Lands within 1km of settlements. - Environmentally sensitive areas such as reserve forests, protected forests, sanctuary, wetlands. Also, a distance of 500 m should be maintained from such areas. - Unstable side-hills. - Water-bodies (only if permitted by the local authority, and with specific pre-approved redevelopment plans by the concerned authority and engineer-in-charge) - Streams and seepage areas. - Areas supporting rare plant/ animal species; <p>Documentation of Borrow Pit</p> <p>The contractor must ensure that following data base must be documented for each identified borrow areas before commencing the borrowing activity that provide the basis of the redevelopment plan.</p> <ul style="list-style-type: none"> - Chainage along with offset distance; - Area (sqm); - Photograph and plan of the borrow area from all sides; - Type of access/width/kutch/pucca etc. from the roadway; - Soil type, Slope/drainage characteristics; - Water table of the area or identify from the nearest well, etc; - Existing land use, for example barren / agricultural / grazing land; - Location/name/population of the nearest settlement from borrow area; - Quantity excavated (likely and actual) and its use; - Copy of agreement with owner/government; and - Community facility in the vicinity of borrow pit. - Rehabilitation certificate from the land owner along with at least four photograph of the rehabilitated site from different angles.
1.3	Contamination of Soil by Fuel and Lubricants	Location of fuel storage and refilling areas at least 500m from all cross drainage structures and important water bodies and storing of fuel and lubricants on a sand flooring of at least 6” thick, done on brick edge flooring lined with polyethylene sheet
1.4	Quarry Operations and Management (if new quarries are opened)	<p>To minimize the adverse impact during excavation of material following measures are need to be undertaken:</p> <ul style="list-style-type: none"> - Adequate drainage system shall be provided to the excavated area - At the stockpiling locations, the Contractor shall construct sediment barriers to prevent the erosion of excavated material due to runoff. - Construction of offices, laboratory, workshop and rest places shall be done in the up-wind of the plant to minimize the adverse impact due to dust and noise.

Sl. No.	Environmental Parameter	Specification
		<ul style="list-style-type: none"> - The access road to the plant shall be constructed taking into consideration location of units and also slope of the ground to regulate the vehicle movement within the plant. <p>The followings precautions shall be undertaken during quarry operations.</p> <ul style="list-style-type: none"> - Overburden shall be removed. - During excavation slopes shall be flatter than 20 degrees to prevent their sliding. - In case of blasting, the procedure and safety measures shall be taken as per DOE guidelines. - The Contractor shall ensure that all workers related safety measures shall be taken. - The Contractor shall ensure maintenance of crushers regularly as per manufacturer's recommendation. - During transportation of the material, measures shall be taken to minimize the generation of dust and to prevent accidents.
2. Water		
2.1	Labor Camp, Sanitation and Waste Disposal in Construction Camps	Construction labor camps shall be located at least 500m away from the nearest habitation complying all relevant legal requirements.
3. Air Pollution		
3.1	Generation of Dust	<ul style="list-style-type: none"> - All vehicles delivering materials should be provided with tail guard and shall be covered to avoid spillage of materials. - No fugitive dust emission at settlement sites arising from maintenance activities shall be allowed. All such operation leading to dust pollution in settlement areas shall be performed with necessary dust suppression by adequate water sprinkling to keep the dust below visible limit. Such measures shall be taken to ensure no dust pollution arises from construction stock piles
3.2	Concrete Mix Plants and Batching Plants	<ul style="list-style-type: none"> - Concrete mix plants to be used at least 1000m from the nearest habitation in the cross wind direction. - In case if new Concrete mix plants/Batching plants are set up, the conditions of DOE shall be strictly adhered
3.3	Odor from Construction Labor Camps.	<ul style="list-style-type: none"> - Construction worker's camp shall be located at least 500 m away from the nearest habitation. - The waste disposal and sewerage system for the camp shall be properly designed, built and operated so that no odor is generated.
3.4	Pollution from Crusher	All crushers used in construction shall confirm to relevant dust emissions control stipulated as per DOE norms
4. Noise Pollution		

Sl. No.	Environmental Parameter	Specification
4.1	Noise from Vehicles, Plants and Equipment	<ul style="list-style-type: none"> - Any activities related to road maintenance operations and/or associated facilities near settlements shall not be carried out during night time (10:00 PM to 6.00 AM). - Workers in vicinity of strong noise, and workers working with or in crushing, compaction, batching or concrete mixing operations shall wear earplugs.
5. Flora and Fauna		
5.1	Loss or Damage of Vegetation	<ul style="list-style-type: none"> - All works shall be carried out in a fashion that ensures minimum damage or disruption to the flora. Prior tree felling permission under Forest Act will be obtained before felling any tree. Trees or shrubs will only be felled or removed that impinge directly on the permanent works or necessary temporary works with prior approval from the Engineer. - The Engineer shall approve such felling; only when the proponent secures receives a "clearance" for such felling from the DOF, as applicable.
5.2	Loss, Damage or Disruption to Fauna	<ul style="list-style-type: none"> - All works shall be carried out in a fashion to ensure minimum damage to the fauna. - Construction workers shall be instructed to protect natural resources and fauna, including wild animals and aquatic life, Hunting and unauthorized fishing are prohibited.
6. Disruption to Users		
6.1	Loss of Access	<ul style="list-style-type: none"> - At all times, the Contractor shall provide safe and convenient passage for vehicles, pedestrians and livestock to and from side roads and property accesses connecting the project corridor. Work that affects the use of side roads and existing accesses shall not be undertaken without providing adequate provisions to the prior satisfaction of the Engineer. - The works shall not interfere unnecessarily or improperly with the convenience of public or the access to, use and occupation of public or private roads, and any other access footpaths to or of properties whether public or private.
6.2	Traffic Jams and Congestion in Road Crossing Areas	<ul style="list-style-type: none"> - Detailed Traffic Management Plans (TMP) shall be prepared and submitted to the Engineer for approval 5 days prior to commencement of maintenance works on any cross-section with road. The traffic control plans shall contain details of temporary diversions, details of arrangements for construction under traffic and details of traffic arrangements after cession of work each day. - Temporary diversion for road traffic (including scheme of temporary and acquisition) will be constructed with the approval of the Engineer. - Special consideration shall be given in the preparation of the traffic control plan to the safety of pedestrians and workers at night - The contractor shall ensure that the running surface is always maintained within diversion guidelines, particularly during the monsoon so that the traffic flow is smooth at all times. - The temporary traffic detours in settlement areas shall be kept free of dust by frequent application of water.

Sl. No.	Environmental Parameter	Specification
6.3	Traffic Control and Safety	<ul style="list-style-type: none"> - The Contractor shall take all necessary measures for the safety of traffic during construction and provide, erect and maintain such barricades, including signs, markings, flags, lights and flagmen as may be required by the Engineer for the information and protection of traffic approaching or passing through the cross section. - All signs, barricades, pavement markings shall be as per road specification.
7. WORKERS' ACCIDENT RISKS		
7.1	Risk from Operations	The Contractor is required to comply with all the precautions as required for the safety of the workmen as per the International Labor Organization (ILO) convention. The contractor shall supply all necessary safety appliances such as safety goggles, helmets, masks, books, etc., to the workers and staff. The contractor has to comply with all regulation regarding safe scaffolding, ladders, working platforms, gangway, stairwells, excavations, trenches and safe means of entry and egress.
7.2	Risk from Electrical Equipment	Adequate precautions will be taken to prevent danger from electrical equipment. No materials on any of the sites will be so stacked or placed as to cause danger or inconvenience to any person or the public. All necessary fencing and lights will be provided to protect the public. All machines to be used in the construction will conform to the relevant Bangladesh Standards (BS) codes, will be free from patent defect, will be kept in good working order, will be regularly inspected and properly maintained as per BS provisions and to the satisfaction of the Engineer.
7.3	Risk at Hazardous Activity	All workers employed on mixing material, cement, lime mortars, concrete etc., will be provided with protective footwear and protective goggles. Workers, who are engaged in welding works, would be provided with welder's protective eye-shields. Stone-breakers will be provided with protective goggles and clothing and will be seated at sufficiently safe intervals.
7.4	Malarial Risk	The Contractor shall, at his own expense, conform to all anti-malarial instructions given to him by the Engineer and the EMU, including filling up any borrow pits which may have been dug by him.
8. WORKERS' RESIDENCE AND HEALTH CONCERNS		
8.1	First Aid	<ul style="list-style-type: none"> - Medical facilities shall be provided to the labor at the construction camp. Visits of doctor shall be arranged twice a month wherein routine checkups would be conducted for women and children. A separate room for medical checkups and keeping of first aid facilities should be built. Workplaces remote and far away from regular hospitals will have indoor health units with one bed for every 250 workers. Suitable transport will be provided to facilitate take injured or ill person(s) to the nearest approachable hospital.

Sl. No.	Environmental Parameter	Specification
		<ul style="list-style-type: none"> - First Aid Box will be provided at every construction campsite and under the charge of a responsible person who shall always be readily available during working hours.
8.2	Payment of Wages	<ul style="list-style-type: none"> - The payment of wages should be as per the Minimum Wages Act, Department of Labor, and Government of Bangladesh for both male and female workers. - Display of the minimum wages board at camps and major construction sites should be done in local languages at the construction and labor camp sites. - Wages should be paid to the laborers only in the presence of RTIP-II (Additional Financing) staff; - Contractor is required to maintain register for payment of labor wages with entry of every labor working for him. Also, he has to produce it for verification if and when asked by the Engineer, EMU and/or the concerned RTIP-II (Additional Financing) staff/Engineer's representative.
8.3	Rehabilitation of Labor and Construction Camp	<p>At the completion of construction, all construction camp facilities shall be dismantled and removed from the site. The site shall be restored to a condition in no way inferior to the condition prior to commencement of the works.</p> <p>Various activities to be carried out for site rehabilitation include:</p> <ul style="list-style-type: none"> - Oil and fuel contaminated soil shall be removed and transported and buried in waste disposal areas. - Soak pits, septic tanks shall be covered and effectively sealed off. - Debris (rejected material) should be disposed of suitably. - Underground water tank in a barren/non-agricultural land can be covered. However, in an agricultural land, the tank shall be removed. - If the construction camp site is on an agricultural land, preserve top soil and good earth can be spread back for a minimum 30cm for faster rejuvenation of the land. - Proper documentation of rehabilitation site is necessary. <p>This shall include the following:</p> <ul style="list-style-type: none"> - Photograph of rehabilitated site; - Land owner consent letter for satisfaction in measures taken for rehabilitation of site; and - Undertaking from contractor; <p>In cases, where the construction camps site is located on a private land holding, the contractor would still have to restore the campsite as per this guideline. The rehabilitation is mandatory and should be include in the agreement with the landowner by the contractor. Also, he would have to obtain a certificate for satisfaction from the landowner.</p>
9. DAMAGE AND LOSS OF CULTURAL PROPERTIES		
9.1	Conservation of	<ul style="list-style-type: none"> - All necessary and adequate care shall be taken to minimize impact on cultural properties which includes cultural sites and remains, places of worship including temples, mosques, churches and shrines, etc., graveyards, monuments and any

Sl. No.	Environmental Parameter	Specification
	Religious Structures and Shrines	<p>other important structures as identified during design and all properties / sites / remains notified. No work shall spill over to these properties, premises and precincts. The design options for cultural property relocation and enhancement need to be prepared.</p> <ul style="list-style-type: none"> - All conservation and protection measures will be taken up as per design. Access to such properties from the road shall be maintained clear and clean.
9.2	Chance found Archaeological Property	<ul style="list-style-type: none"> - During earth excavation, if any property is unearthed and seems to be culturally significant or likely to have archaeological significance, the same shall be intimated to the Engineer. Work shall be suspended until further orders from the PD. The Archaeological Department shall be intimated of the chance find and the Engineer shall carry out a joint inspection with the department. Actions as appropriate shall be intimated to the Contractor along with the probable date for resuming the work. - All fossils, coins, articles of value of antiquity and structures and other remains or things of geological or archaeological interest discovered on the site shall be the property of the Government, and shall be dealt with as per provisions of the relevant legislation.
10. ENVIRONMENTAL ENHANCEMENT		
10.1	RTIP-II (Additional Financing) Landscape	Protect all the trees, re-vegetation of RTIP-II (Additional Financing) project road embankments and other slopes, edge treatment of water bodies shall be taken up as per either detailed design or typical design guidelines given as part of the bid documents.

For each of the environmental components, the monitoring plan specifies the parameters to be monitored; location of the monitoring sites and duration of monitoring. The monitoring plan also specifies the applicable standards, implementation and supervising responsibilities.

- A generic Environmental Monitoring Plan for Rural Road Maintenance activity is shown in the table below.

Rural Road Maintenance

Environmental component	Location	Means of Monitoring	Frequency	Responsibility	
				Implementation	Supervision
Construction Stage					
Dust Management	Dust Generating place Close to School/Madrasha, Hospital, etc.	Observation	As & when required	Contractor	LGED
Worker facilities	Proper sanitation facilities should be provided at construction camp	Observation	As & when required	Contractor	LGED
Health and Safety	Construction Site and Camp sites	Inspection	As & when required	Contractor	LGED
Air Quality	Close to School/ Madrasha, Hospital & Villages	Test (Measurement of dust and vehicular emissions such as SPM, etc.)	once	Contractor	D&SC & LGED
Flora and fauna	in vicinity of construction camp	Inspection (Monitoring of flora, fauna and other resources.)	Monthly	Contractor	D&SC & LGED
Traffic movements	Construction areas	Inspection (Monitoring of traffic control devices)	Daily	Contractor	D&SC/LGED
Waste management (including construction wastes)	Construction Yard/Labor Camp	Inspection (Monitoring of collection, transportation and disposal of solid waste. Inspection of waste disposal sites and construction camps)	Daily	Contractor	D&SC/LGED

Environmental component	Location	Means of Monitoring	Frequency	Responsibility	
				Implementation	Supervision
Documentation	Along the road	Reporting	Daily	Contractor	D&SC/LGED
Operation Stage					
Traffic Safety	Along the road	Inspection (Monitoring of traffic control devices)	Once	LGED	LGED
Tree plantation	Road side slope	Inspection (Two tree seedlings to be planted for each tree felled)	Monthly	FD/NGOs	LGED

In addition to the critical locations selected during design stage, the environmental monitoring will also be done at the construction camp site and any other plant site during construction stage. List of critical locations for carrying out monitoring should be presented in the IEE/EIA report

B. Rapid Monitoring Indicators

Moreover, a rapid environmental monitoring will be carried out according the following checklist in terms of visual judgment during field visit as an indirect control to implement Environmental Mitigation plan.

Parameters	Visual judgment		
	Poor	Moderate	Satisfactory
Traffic Safety			
Workers Safety			
Emergency Response			
Camp Site Management			
Plant Site Management			
Borrow Area Management			
Top Soil Prevention			
Waste Management			
Reporting and Documentation			

4.4.9 Technical and public review

Public disclosure on EIA and EMP to the government officials, NGOs, affected people, local government's representatives etc.

4.4.10 Reporting and Implementation

- To describe the results of the EIA for decision-makers and other interested. A decision as to whether the project should proceed and, if so, under what conditions; and, if the project is approved.
- To check on the implementation of the terms and conditions of approval during the construction and operation phases; to take any actions necessary to ameliorate problems; and, as required.

4.4.11 Monitoring and Post Auditing

Construction Monitoring, including field inspections and surveys, should be carried out by an environmental expert (to be employed by RTIP-II (Additional Financing) on regular basis) to ensure that environmental protection requirements are being met. It is important to plan and budget for environmental construction monitoring as part of the project. If construction is to be contracted out, RTIP-II (Additional Financing) to reconfirm that specific environmental requirements during construction (as already specified) are built into construction bidding documents and contracts to ensure, they are met (e.g. requirements for local hiring, penalty for not adhering to the EMP clause requirements etc.).

Post Construction Monitoring is used to identify environmental changes resulting from the implementation of the project. In the context of EIA, post construction monitoring programs are carried out to achieve the following results:

- to ensure that the facility is meeting all environmental regulatory requirements, and that commitments made in the EIA document and/or the conditions of approval are being met;
- to test impact hypotheses, and to verify the predictions and assessment of environmental impacts, thus contributing to better assessments in the future;
- to evaluate the performance effectiveness of mitigation;
- to compare actual and predicted changes to the environment, so that immediate actions can be taken to mitigate unanticipated impacts;
- to strengthen confidence by both government and the public in the EIA process, the decisions made the road design etc.

The monitoring programs to be carried out during the construction and operation of the undertaking are normally described in the EIA document.

4.4 EIA Report

Report At a minimum, an EIA report should have the following contents:

1. Executive Summary
2. Introduction
3. Description of the Project: Project Type, Need Assessment, Location etc.
4. Description of the Environment : Baseline data
5. Anticipated Environmental Impacts and Mitigation Measures
6. Alternatives
7. Environmental Monitoring
8. Additional Studies
9. Environmental Management Plan
10. Institutional Arrangement
11. Summary and Conclusions
12. Annexes

4.5 Bid Document

To prepare bid document DS/LGED will ensure that all the relevant clauses regarding proper implementation of EMP as well as obligations to Contractor are properly ventilated in the document; if necessary a BOQ item should be kept against EMP implementation.

- Prepare cost estimates, to be incorporate in Bid Documents.
- Environmental Management Plan along with the good environmental construction guidelines to be incorporated in the bid document's work requirements.
- Preparation of work requirement (addendum/corrigendum to road specifications) and
- Corrigendum / Addendum to road specification as special provisions to be incorporated in bid document. Penalty clauses for not complying with EMP requirements to be incorporated. Indicative penalty clauses proposed in the RTIP-II (Additional Financing) are presented below.
 - The contractor has to follow all traffic safety measures as defined in the technical specification. Damage shall be levied at the rate Tk. 3000/- per day per location for non – conformity of traffic safety measures as per the decision of the engineer.
 - The contractor has to follow all environmental mitigation measures as defined in the technical specification read along with the Environmental Management Plan for the specific RTIP-II (Additional Financing) activities. Damage shall be levied at the rate

Tk. 3000/- per day per location for nonconformity of Environmental Management Plan measures as per the decision of the Engineer.

- The contractor has to ensure that prior to every monsoon season, during the construction period; all the temporary and permanent cross drainage structures are free from debris as defined in the Technical Specifications read along with the Environmental Management Plan. Damage shall be levied at the rate of Tk.3000/- per day per location for non-conformity as per the decision of the Engineer.
- The contractor has to ensure that sufficient numbers and good quality Personnel Protective Equipment (PPE), should be provide to staff and labor all time as defined in the labor codes read along with the Environmental Management Plan (EMP). Damage shall be levied at the rate of Tk. 1000/- per day for non-conformity as per the decision of the Engineer.

4.6 Environmental Management Information System (EMIS)

RTIP-II has developed a web based monitoring tool named Environmental Management Information System (EMIS) for storing, managing and analyzing of environment related data of the project sustainable environmental management including necessary decision support. The major software development related task is completed and it has already been used for report generation on pilot basis for some selected schemes of RTIP II. In the forthcoming Additional Financing project, the use of EMIS for report generation will be scaled up.

5. INSTITUTIONAL ARRANGEMENT AND CAPACITY BUILDING

5.1 Introduction

The implementation of Environmental Management Framework (EMF) requires an organization support structure in the form of organizational requirements, training needs and plan, and information management system. The following section captures these institutional arrangements for EMF implementation by concerned officials of LGED, their consultant and working contractors. An organizational structure is developed at the PMU, regional and site level to aid effective implementation of the EMF document. The organizational of the LGED flowchart are shown in Figure 5.1.

5.2 EMU - Functions and Staffing Responsibilities

An EMU was established in accordance with the recommendation of original project, to provide co-ordination, technical support and services during the environmental screening and preparation of EA, and implementation of the environmental mitigation measures. Functions and the staffing responsibilities of EMU are listed in Table below. In order to effectively manage the EA process and EMP implementation, the EMU was established and made operational as soon as possible. The XEN (Environment) and the two Assistant Engineers (Environment) were selected from the existing GoB cadre and provided extensive training and exposure during the project implementation period to be able to undertake the assigned responsibilities effectively. This process of structuring EMU will be continued through the RTIP-II (Additional Financing).

Functions and Responsibilities of the EMU

Designation	Function / Responsibilities
EMU	<ul style="list-style-type: none"> - Assist the PD in conducting environmental screening and categorization of the sub-projects; - Assist the PD in the preparation of Environmental Assessment; - Assist the PD in implementation of the EMF during the project implementation period; - Ensure integration of the EA and resulting EMP into the sub-project design and implementation plans (contract documents); - Ensure compliance of the mitigation measures by the Contractors; - Ensure incorporation of appropriate environmental specifications (on the basis of screening and ECP) into the respective bidding & contract documents; - Assist the LGED Engineers at site by providing appropriate environmental advice, and developing appropriate environmental mitigation measures for the sub-projects; - Documenting the experience in the implementation of the environmental process; - Assist MS/DS consultant's and LGED community organizer to carryout participatory consultation during planning, design and implementation of the sub-projects; - In collaboration with the Environmental Specialist or the MS and DS Consultants, prepare and conduct training programs for the LGED Engineers and Contractors by incorporating standard construction practices and sound environmental management of the sub-projects; and - prepare periodic progress reports on the implementation of the EMF for transmission to the World Bank throughout the project implementation period. -

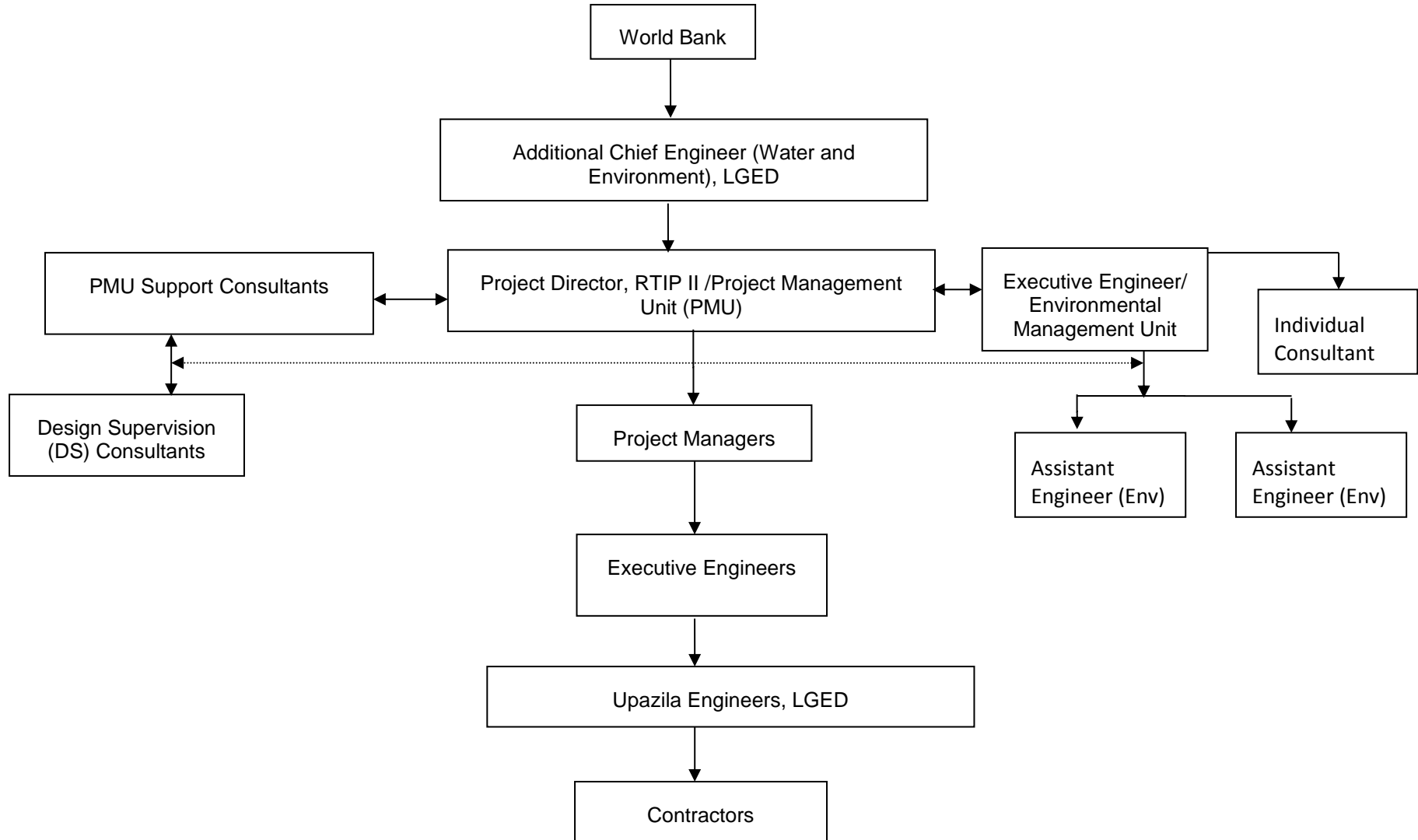


Figure 5.1: LGED Organizational Arrangement for Implementation of RTIP-II (Additional Financing)

The PMU Support Consultants are expected to have in-house capacity to prepare EA, to advise on and to supervise the implementation of the EMF and the EMPs including making the decisions regarding environmental categorization of the sub-project, to assess the applicability of relevant ECP to the sub-projects, preparation of site specific environmental designs and modifications to the mitigation and enhancement measures, as necessary, during the sub-projects' implementation. For this purpose, the PMU Support Consultants will deploy a full time Environmental Engineer. The prime duty of the Environmental Engineer would be to:

- review the screening and categorization of the sub-projects;
- prepare the EA, as required by the EMF;
- assist the XEN & AE to supervise the implementation of the EMP by the contractors; and
- ensure that day to day construction activities are carried out in an environmentally sound and sustainable manner.

PMU Support Consultant reviews and clears all screening and environmental assessment reports. LGED will conduct verification of some screening.

The PMU Support consultants also reviews and updates Environmental Monitoring Checklist incorporating the rural road and bridge improvements, rural road and bridge maintenance and rehabilitation issues in the beginning of their contract to confirm the environmental supervision procedures and systems including inspection, monitoring and reporting mechanisms to be followed by each associated parties during the sub-project implementation. The manual will be continuously updated / modified throughout the remaining implementation period of RTIP-II and continuing through RTIP-II (Additional Financing) so as to document the best operating / construction practices for future use by LGED as part of the agreed strategy or mainstreaming the environmental management process into all LGED works. The Environmental Specialist of the PMU Support Consultants would primarily be responsible for providing technical assistance to the EMU, XEN, and Upazila Engineers.

The PMU Support consultant assists LGED in quality control, monitoring, coordinating and implementation of EMF, supervising the measures necessary to mitigate the projects effects on the society and environment as outlined in the documents. The assistance will include review of social and environmental screening/assessment, plans and budget and, where necessary, structuring and phasing implementation of the plans and identifying the specific agencies to be involved in the mitigation of social and environmental protection activities, particularly in cases where NGO participation needs to be arranged and coordinated.

5.3 Design and Supervision (DS) Consultants for RTIP-II and AF

The DS consultants of RTIP-II are based in the regional office and responsible for design and overall supervision of sub-project activities. The design consultants ensures quality control and report to PD through the PMU Support Consultant. The DSCs assist the EMU for ensuring environmental compliance and monitoring of progress including EMP and/or ECP implementation.

RTIP-II (Additional Financing) will ensure that proper environmental screening will be done by the design consultant. Design consultant will ensure Environmental Assessment or Environmental Impact Assessment (EIA) of the all rural road sub-projects. LGED will conduct verification of some screening and assessment. LGED will ensure that proper environmental screening will be done by the design consultant.

There are two fulltime Junior Environment Specialist in Design and Supervision Consultancy. During implementation of AF, these specialists will prepare subproject specific environment screening/assessment report with EMP, supervise the implementation of EMP and support capacity building of the field level staff of LGED and contractor. A Senior Environment Specialist under the PMU Support Consultancy will review the quality of the environmental screening/assessment with EMP.

5.4 Contractor

The Contractor will be responsible for implementation of all environmental related activities under the project. In addition, the contractor shall be responsible for familiarizing themselves with “Chance Finds Procedures” in the EA/EIA’s Report incase culturally valuable materials are uncovered during excavation or any project activities.

Chance-Find Procedures for Physical Cultural Property

The Contractor will be responsible for familiarizing themselves with the following “Chance Finds Procedures” in case culturally valuable materials are uncovered during excavation or any project activities, including:

- Stop work immediately following the discovery of any materials with possible archeological, historical, paleontological, or other cultural value, announce findings to project manager and notify relevant authorities;
- Protect artifacts as well as possible using plastic covers, and implement measures to stabilize the area, if necessary, to properly protect artifacts;
- Prevent and penalize any unauthorized access to the artifacts; and
- Restart construction works only upon the authorization of the relevant authorities.

5.5 Monitoring

The success of the project authorities may be attributed to vigorous and continuous monitoring of all its activities including environment and social issues. The Environmental Management Unit (EMU) is **responsible** for monitoring entire project activities and reporting to the Project Director (PD). Regular monitoring of activities is carried out by district/upazila offices and supervision consultants at site and is being reviewed by the EMU on monthly basis. The EMU and Directors also take regular review of ongoing project activities including environment and social issues and corrective measures if required are implemented at site. For environmental and social components of a project, environmental and social monitoring plan is developed, based on baseline data and impacts predicted during the environmental and social assessment process. The concerned forest department staffs, as part of their duties monitor impacts on ecological resources through which the transport line traverses. The project authority appoints concerned officials for timely implementation various activities such as compensatory afforestation, ROW maintenance, prevention of fire hazards, natural regeneration of vegetation etc. The environmental and social monitoring plan for each project will be integrated with construction, operation and maintenance and shall be monitored by the EMU on a monthly basis in association with the LGED monitoring group. The higher management is apprised through a monthly report.

5.6 Capacity Building

Since the effectiveness of the Environmental Assessment & implementation depends considerably on the understanding and preparedness of their Engineers and in particular their Environmental Team (Consisting of LGED Environmental specialist, and Consultant environmental specialist, EMU). It is important that the project authority makes effort to sensitize the Engineers and Environmental Team on management of environmental issues, provides guidance, and encourages them to build requisite capacities. Capacity building can be achieved by two prong strategy.

- Training programme for existing staff
- Technical Assistance: knowledge sharing with consultants, having requisite expertise.

5.7 Institutional Development

The component B i.e., Institutional Strengthening, Capacity Building and Governance Enhancement Component will support implementation of the LGED action plan for strategic enhancements in the areas of capacity, effectiveness, governance and accountability, including via operationalization of a comprehensive IT-ICT supported Integrated Decision Support System (IDSS). The project will provide

funding for essential technical assistance, consulting services, advanced staff training and ‘exposure’ activities (in Bangladesh and elsewhere), necessary software (IP) and advanced equipment procurement. The main areas to be covered under this support will be:

- Maintenance Policy & Operations
- Quality Assurance & Management (including ISO Certification program)
- Financial Management & Planning
- Environmental & Social (Impact) Management
- Performance Management including Monitoring & Evaluation
- IT-ICT-MIS Facilities & Capacity (including IDSS implementation), and
- Strategic Coordination & Development.

5.8 Training Programme

All the issues discussed in previous chapters, will at some stage require a certain element of training in the process of developing capacity within the organization. A number of the identified issues will be new to the existing environmental team and their staff members. It is therefore vital that a major programme of training is developed and implemented by the project authority. Before commencing any training, there are a number of activities which needs to be completed. The first step is to ensure that all procedures in the Environmental Management Procedure have been properly worked out. As part of this process, there is a need to closely evaluate the existing organizations both at central and local level in relation to their suitability and current capacity to take on the new responsibilities. This exercise needs to clearly identify the performance requirements of the various officials involved. Duties and responsibilities need to be clearly defined for the institutions as a whole and individually for each category of staff. It is only on this basis that the new staff performance requirements can be established, and the training required for existing and new staff can be determined. When developing a training programme of this nature, it is important to acknowledge that this is not a one-time event. It is rather the start of a long term training service which not only strengthens capacity, but also contributes to sustain this capacity within the organization.

A key concept in training programs for any organization is to provide training through a combination of formal classroom training and practical on-the job sessions. Technical assistance should be made available to provide training, guidance and advisory support in all aspects of works implementation in order that the key players (environmental as well as technical team) become fully conversant with, and capable of carrying out their respective duties. Training for the various categories of staff needs to be carried out with varying durations and through different approaches, such as on-site and classroom training, workshops, seminars and practical on-the-job training.

Training is always an effective up-front quality assurance measure. Experience shows that there is a great demand for training in technical subjects for the government staff in charge of work supervision. Effective training programs involve both the introduction of new technology as well as in-depth studies of the particular skills required in each position in the works organization. As the training content for these reasons relate to practical hands-on skills, the training often consists of dissemination of best practices and work methods which have been proved most effective in projects with similar tasks and working conditions (i.e. neighboring districts, projects, etc.).

6. STAKEHOLDER CONSULTATIONS

6.1 Introduction

Participatory consultation is both an essential criteria and important strategy for an integrated environmental and social assessment process, the project design and its implementation. The purpose of the stakeholder consultation during the project preparation of the sub-project and throughout the implementation period of the RTIP-II and RTIP-II (Additional Financing) is to

Identify the views of major institutional persons, project affected persons (PAPs) as well as all stakeholders involve with the subprojects.

- to address the environmental aspects as well as socio-economic issues from stakeholders' point of view.
- Assess any mitigation measures which may be undertaken to minimize any adverse impacts of the proposals under consideration. Subsequently,

Project consultants were carried out a series of stakeholder consultations at different locations of the sub-project.

The schedule of consultations will be well announced by mike, notices, 3 days prior to the consultations. Ensure the presence of project affected people, LGED officials, BIWTA officials (for waterway's subprojects), local officials, public representatives, NGOs, local entrepreneurs, etc. in the public consultation meetings.

A public consultation was arranged for the Additional Financing of the Second Rural Transport Improvement Project (RTIP-II (Additional Financing)) at Gheor, Manikganj on January 3, 2018 Local people along with their representatives, different professionals including NGOs and women's organizations, LGED officials & consultants attended the consultation. The main objective of the meeting was to share project's planned activities and their associated potential impacts on the environment & society. In this regard, the Environmental and Social Safeguard Policy of the GoB and the Development Partner were disclosed. In the consultation program, participants feedback was also received which reflected the necessity and demand of the proposed project.



Photograph: Public Consultation of ESMF at Gheor, Manikganj on January 3, 2018 for RTIP-II (Additional Financing)

6.2 Consultation and Information Disclosure

Public Consultation

A critical element in planning a participation and consultation program is associated with the selection of participation techniques to meet desired objectives. Considering the importance of effective participation and consultation in a wide spread project area along with the time and resource constraints in the present project, the following participation techniques were followed:

- Information dissemination and information sharing techniques will be used to inform the stakeholders regarding the action being taken in a program area through personal communication to make them aware about the project as well as to incorporate users input at different stages of the project.
- Information gathering techniques to gather quantitative and qualitative information about the individual schemes through questionnaires survey.
- Focused Group Discussions (FGDs) will be conducted covering different components of the project aims to increase local awareness about the forthcoming project as well as to incorporate their views, needs, priorities considering different positive and negative impact of the project.
- Key Informant surveys will be carried out among the knowledgeable and elderly people of the project area to incorporate their views and suggestions from their long experiences and knowledge.
- Hot Spot Consultation will be conducted in problematic locations of the schemes with participation of knowledgeable and affected people, local elite, public representatives, officials and NGO people to mitigate adverse impact considering their views suggestions from their practical experiences as per local needs and demands.
- Participatory workshops will be organized with the participation of different types of representative stakeholders.

- Public disclosure of the Draft EA Reports (including a non-technical summary) will be disclosed at the project districts, Project Headquarters and the World Bank.

Modes of Future Consultations

A range of formal and informal consultative methods will be carried out for all subprojects including, but not limited to: focus group discussions, public meetings, community discussions, and in depth and key informant interviews; in addition to the censuses and socio-economic surveys. Consultations will be held with special emphasis on vulnerable groups. Encouraging public participation in consultations informs the public and serves as a venue for the public to express their opinion on priorities which the Project should address.

The key stakeholders to be consulted during sub-project preparation and program implementation includes:

- all project affected persons (PAPs), including vulnerable households;
- project beneficiaries;
- host populations in resettlement sites (if any);
- political party representatives, community leaders, and representatives of community-based organizations;
- local NGOs;
- Officials of municipalities and relevant government agency representatives.

Consultations with PAPs during project preparation will ensure that views of PAPs on compensation and resettlement assistance measures are fully incorporated while consultations conducted during resettlement plan (RP) implementation will identify necessary assistance required by APs during rehabilitation. Continuing involvement of those affected by sub-projects is necessary in the resettlement process. The municipality with support and guidance from the PMU consultants will ensure that PAPs and other stakeholders are informed and consulted about the sub-project, its impact, their entitlements and options, and allowed to participate actively in the development of the sub-project. This will be done particularly in the case of vulnerable PAPs, who will be encouraged to choose options that entail the lowest risk. This exercise will be conducted throughout the sub-project-during preparation, implementation, and monitoring of sub-project results and impacts.

Under the harmonized safeguard policy, two public consultations will be required for the Project as part of the environmental assessment procedure. LGED guided the EMU in preparing the program of public meetings, presentations about the Project and drafting the comments sheet in English and Bengali. Information on the public consultation meetings will be published in national and regional newspapers 10 days prior to the consultations. Announcements on the commencement of the Environmental Assessment in the newspaper, the availability of the Background Information Document, the venue and the schedule of consultations and public opinion feedback processes will be published in the national newspapers.

Information Disclosure and Dissemination

The Environmental Assessment, documenting the mitigation measures and consultation process, will be made available for public review in both English and Bengali. The summary EA will be published on the LGED and WB websites, and the full environmental report will be available upon request from the WB and will be accessible in LGED website. The relevant information prior to these consultations in a timely manner and in a form that is meaningful for, and accessible to, the groups being consulted, has been disseminated. The framework for the information disclosure that has been adopted for the project is shown in Table below. The Table also includes the framework for further information dissemination during the future design and implementation of the sub-projects.

Grievances Redress Mechanism

It is expected that through a participatory process, acceptance of the sub-projects and grievances can be minimized. However, it is necessary to establish an effective grievance redress mechanism to address complaints/grievances related to social issues that may arise. Any grievances and objections retarding the social aspects of the project is referred to the project Grievances Redress Committee (GRC). The project GRCs have formed at central and district levels under the original RTIP II.

The affected persons can register their grievances at the complaint cell established at central level and district level. All cases are registered, categorized and prioritized by the district level authority and by the Environmental Specialist at central level. The GRCs meet periodically to discuss the merit of each case and fix a date for hearing and notify the PAP to submit necessary documents in proof of her/his claim/case; resolve grievances within 4 weeks of receipt of complaint.

7. LESSON LEARNT FROM THE IMPLEMENTATION OF RTIP II

7.1 Introduction:

Second Rural Transport Improvement Project (RTIP II) is being implemented by Local Government Engineering Department (LGED) with financial assistance from the World Bank in 26 districts of Bangladesh aiming at improving rural accessibility and strengthening institutional capacity of LGED. This project is going to be concluded on April 2018. RTIP-II included four components: Accessibility Improvement, Institutional Strengthening, Capacity Building & Governance Enhancement Component, Rural Transport Safety and Contingency Emergency Response. Accessibility Improvement comprises of Road Improvement, Road Maintenance and Rehabilitation, Growth Centre Market Development, Pilot River Dredging and Jetty Development. The Project was classified as Category A project as river dredging work was included in the sub-components which makes significant environmental impacts and also the uncertainty (lack of details at project preparation) of the most of the sub-projects to be implemented in widespread areas. Environmental Management Framework for RTIP- II was prepared and formed to mitigate and management of environmental impacts emerges during the project work.

In 2017, Bangladesh experienced prolonged rainfall and flood which damaged numerous LGED roads and bridges in rural area. On these backdrops, the World Bank has come forward with additional financing under RTIP-II (Additional Financing) for damaged roads and bridges repair and maintenance. As the scope of RTIP-II (Additional Financing) is limited within maintenance and rehabilitation of Roads and Bridges only, this project will make nominal impact on physical, biological, social and cultural environment in the project area. For flood damaged road maintenance works, the upcoming RTIP-II (Additional Financing) is categorized as category “B” as per ECR’97.

7.2 Lessons Learnt

7.2.1 Reluctance in Using Personal Protective Equipment (PPE):

Construction works poses health and safety risks to the construction workers and site visitors leading to severe injuries and deaths. Considering these health and safety risks, EMF of RTIP-II provided provision of Personal Protective Equipment (PPE) for workers such as safety boots, helmets, masks, gloves, protective clothing, goggles, full-face eye shields and ear protection. This provision ensured the availability of PPE in work site. But during the site visit, some workers were observed to be reluctant using PPE with an excuse of comfortability. So, proper counseling of contractors and workers through workshops, presentations, seminars should be implemented to make them realized about the importance and necessity for personal protective equipment for safety.

7.2.2 Estimate of Environmental Items

In RTIP-II, the rate of different environmental items such as camp facilities or tube-well were estimated as fixed lump-sum amount, which caused problem in implementation of those items due to higher price in several places. In RTIP-II (Additional Financing), most of the environmental items’ rate will be estimated considering the site requirement, location and other criteria.

7.2.3 Damage of Green Land

In few cases of RTIP-II works, burning of bitumen damages the nearby green grass including small plants. In additional financing, provision/scope of tree plantation has been proposed to bring back the nature green again and also to mitigate the Greenhouse Gases (GHG) emission from bitumen burning.

7.2.4 Insufficient Dustbin

The Growth Centers developed under RTIP-II had provision of dustbin for waste disposal. In some of the GCMs, dustbin size was found insufficient for the generated waste. With this lesson learnt, the waste disposal facility in labor shed of road work has been proposed to be of sufficient size.

Thus, the experiences and lessons learnt from the RTIP-II has been reflected in the EMF of the additional financing.

ANNEX 1: General Baseline Description for RTIP-II (Additional Financing)

1.1 Physical Environment

1.1.1 Atmosphere and Climate

National Context: Bangladesh has a tropical monsoon climate with the three main seasons: monsoon or wet season (from June to October), cold season (November to February) & hot season (March to May). The mean annual temperature in Bangladesh is about 26°C. The temperature varies from 10° C to 39° C. Bangladesh is monsoonal and characterized by highly seasonal rainfall. The mean annual rainfall is around 2540mm but concentrated in the five months of the monsoon (June to October). During monsoon season, rainfall varies from 1300 to 4300mm. Humidity remains as high as 80 % or more in Bangladesh. The wind speed may rise up to 150 km/hour. Cyclones develop in the Bay of Bengal and cause damage to coastal areas of Bangladesh. The most severe cyclone (wind speed 224km/hr.) that ever hit Bangladesh occurred on 12 November 1970 killing 300,000 people.

Divisional Context: Rajshahi Division has a tropical wet and dry climate. The climate of Rajshahi Division is generally marked with monsoons, high temperature, considerable humidity and moderate rainfall. The hot season commences early in March and continues till the middle of July. The maximum mean temperature observed is about 32 to 36 °C during the months of April, May, June and July and the minimum temperature recorded in January is about 7 to 16 °C. The highest rainfall is observed during the months of monsoon. The annual rainfall in Rajshahi Division is about 1,832 millimeters. The maximum mean temperature observed in Sylhet Division is about 30 to 33.2 °C during the months of April, May, June and July and the minimum temperature recorded in January is about 7 to 13.2 °C. The highest rainfall is observed during the months of monsoon. The annual rainfall in Sylhet Division is about 3334 millimeters. The maximum mean temperature observed in Dhaka Division is about 32 to 35.2 °C during the months of April, May, June and July and the minimum temperature recorded in January is about 9 to 15.2 °C. The highest rainfall is observed during the months of monsoon. The annual rainfall in Dhaka Division is about 3000 millimeters. The maximum mean temperature observed in Chittagong Division is about 35.1 °C during the months of April, May, June and July and the minimum temperature recorded in January is about 10 to 17.2 °C. The highest rainfall is observed during the months of monsoon. The annual rainfall in Chittagong Division is between 2,500 to 3,500mm.

1.1.2 Topography

National Context: Bangladesh is a mostly low-lying delta formed at confluence of 3 major rivers namely Jamuna, Ganges & Meghna. Overall topography of Bangladesh is relatively flat alluvial plains (about 90% area) except Chittagong & Sylhet Zones. The topography of Chittagong & Sylhet Zones is hilly, undulated & flat. The land gradient of Bangladesh is approximately 1m /20km from north to south. The maximum elevation above the mean sea level is about 1230m at Keocradang Hill in Rangamati District under Chittagong Hill Tracks.

Divisional Context: The topography of the Rajshahi Division is mainly flat. The lands in Rajshahi are generally classified as very low (about 10m water depth during high flood) to medium high (about 0.90m water depth during minimum flood). The ground elevation of the region ranges from 25mPWD to 40mPWD. The major rivers run in Rajshahi are: Padma, Brahmaputra, Atrai, Punarbhaha and Karatoya. The topography of the Sylhet and Dhaka Divisions is low-lying floodplains covering Sunamganj, Habiganj, Netrokona, Manikganj, Munshiganj districts. The maximum flooding is in the haor areas of Kishoreganj, Netrokona, Sunamganj, Hobiganj and Brahmanbaria districts, large parts of which are deeply flooded during the monsoon season. Dhaka Division covers Dhaka itself, Narayanganj, Gazipur and Narshingdi districts are generally more deeply flooded than those in the other parts of the Division. In greater Dhaka, the Madhupur terrace extends north-west from the north of the city,

resulting in higher, dry land areas covering the north-west of Dhaka district, much of Gazipur and parts of Narayanganj district. The north-east of Narshingdi district is also relatively high. The highest elevation in Bangladesh occurs in the Chittagong Division at around 1,000 meters above Mean Sea Level (MSL). There are upland areas in many of the districts that border on to India and Myanmar – run-off from these hills makes the downstream areas prone to flash-flooding.

1.1.3 Physiography and Geology

National Context: The term 'physiography' refers to the form of the earth's surface. The physiography of Bangladesh may be classified into three distinct regions: (a) floodplains, (b) terraces, and (c) hills, each having distinguishing characteristic and has been divided into 24 sub-regions and 54 units. Bangladesh has been tentatively divided into 30 Agro-ecological Zones. The Project area encompasses 17 agro-ecological zones of Ganges floodplains, Brahmaputra and Jamuna Floodplain, Barind Tract, Surma-Kushiyara Floodplain, Piedmont Plain, Meghna River Floodplain, Northern and Eastern Hills, Chittagong Coastal Plain, etc.

Geologically, Bangladesh is a part of the Bengal Basin, one of the largest geosynclinals in the world. The Basin is bordered on the north by the steep Tertiary Himalayas; on the northeast and east by the late Tertiary Ceylong Plateau, the Tripura hills of lesser elevation, and the Naga-Lusai folded belt; and in the west by the moderately high, ancient Chotanagpur plateau. The geophysical evidence indicates that the southern fringe of the basin is open towards the Bay of Bengal for a considerable distance, though it is not distinct. The formation and growth of the Bengal Basin is directly related to the origin and morphology of the Indo-Gangetic trough, which itself is overlaid and filled by sediments thousands of meters thick. The flat topography of the Basin, and the occurrence of recurring floods that cause rivers to change course have complicated the river morphology pattern.

Divisional Context: A large portion of the project area lies within the major physiographic unit of the Ganges-Brahmaputra and Meghna floodplains covers Rajshahi Division. Chandpur, Laxshmipur, Noakhali, Feni, Chittagong and Cox's Bazar all have coastal areas. There are upland areas in many of the districts that border on to India – run-off from these hills makes the downstream areas prone to flash-flooding. Scattered throughout the RTIP-II (Additional Financing) project area there are higher land areas which form part of the Pleistocene terraces. In greater Dhaka the Madhupur terrace extends north-west from the north of the city, resulting in higher, dry land areas covering the north-west of Dhaka district, much of Gazipur and parts of Narayanganj district. The north-east of Narshingdi district is also relatively high. The Sylhet Division covers Northern and Eastern Hills floodplains of low hills, and piedmont plains, high hill range.

1.1.4 Seismicity

National Context: Bangladesh is situated in one of the most tectonically active regions in the world. Here is where three major plates meet (the Indian Plate, the Tibet Sub-Plate, and the Burmese Sub-Plate). However due to the location of relevant plates, fault lines and hinge zones, Bangladesh itself is divided into three seismic zones, based on the ranges of the seismic coefficient (*note: the seismic coefficient is a measure of how strong an earthquake has the potential to be based on a combination of the mass of the plate and the seismic forces acting on it, as well as how frequently these quakes are likely to occur*). Zone 3 is in the most seismically active area with a seismic coefficient on 0.25, and Zone 1 is the least active with a significantly lower seismic coefficient of 0.075. The project area are located all the three seismic zones based on the ranges of the seismic coefficient.

Divisional Context: Rajshahi and Sylhet Divisions are located in zone I which is defined as being seismically severe area and most vulnerable to earthquake disaster. Dhaka Division and Noakhali and the western part of Chittagong Division are located zone II is the moderately severe and moderate vulnerable to earthquake disaster. The other part of Chittagong region is located in zone III which is defined as being seismically relatively quiet and has the lowest probability of an earthquake occurring.

1.1.5 Hydrology and Drainage

National Context: In Bangladesh, rainfall and transnational river flows are the main sources of surface water (SW). The sources of SW in the Project area are mainly: rivers, canals, ponds and beels. Bangladesh has an average annual surface flow of approximately 1,323,526, 014 m³ (1,073 million acre feet (MAF), of which about 1,073,129 m³ (870 MAF (93%)) are received from India as inflow and the remaining 250,397 m³ (203 MAF (7%)) as rainfall. This is enough water to cover the entire country to a depth of 9.14m. About 162,820 m³ (132 MAF (65% of rainfall and 12% of total)) is evaporated (114.30 cm), and the remainder flows into the Bay of Bengal. The rivers passing through the Project areas carry a considerable amount of flow during the rainy season. The surface hydrology of the coastal plains of Bangladesh presents a complicated interaction of fresh water flows with the tides and tidal flows from the Bay of Bengal (FAO, 1985).

Except for higher ridges including the Madhupur Tract, the water table is generally high because of soil porosity and permeability, and low topography. In the floodplains it varies from within one meter of the surface in the wet season to seven meters or more during the dry season. In the older terraces the water level is more than 15 meters below the surface during the dry season. However, increasing extraction of water for irrigation and domestic use, and the reduced flow of the Ganges, in recent years have contributed to general lowering of the water table. However, in 1993 Department of Public Health and Engineering (DPHE) first detected arsenic in hand tube wells (HTW's) and arsenic contamination has become one of the most pressing environmental issues in Bangladesh. The levels of arsenic in groundwater in Bangladesh are considered to be some of the highest in the world. At present, occurrence of Arsenic in drinking water has been identified in 272 Upazilas under 61 Districts of the country. The World Health Organization's (WHO) has defined the tolerance limit of arsenic for drinking water as 0.01mg/L while the Bangladesh standard for arsenic in drinking water is 0.05mg/L.

Divisional Context: The project comprises vast floodplains traversed by three river basins of the Himalayan drainage system: the Ganges, the Brahmaputra and Meghna. Rajshahi Division is located in Ganges-Padma and Brahmaputra-Jumuna-Tista River systems. The headwaters of both the Ganges-Padma and Brahmaputra-Jumuna-Teesta River systems are in the main Himalayan ranges. Dhaka region is located in the Meghna river system and most of the water drains through this river system. The Meghna and the Padma Rivers join a few kilometers downstream of Munshiganj, Dhaka Division. Water for the Meghna River, originating in the Shillong Plateau, drains one of the heaviest rainfall areas of the world. Sylhet Division is located in Surma-Kushiyara river system and maximum water is drained through this system. Chittagong Division is located in Karnaphuli river system and maximum water drains through this channel. Lots of channels and streams are found in the Chittagong Division which have immense productive value as surface water source. The levels of arsenic in groundwater in Bangladesh are the highest in the coastal areas and hilly regions. Rajshahi Division is also considered relatively high in arsenic contamination. Dhaka Division is considered relatively low in arsenic contamination. The ground water table of Sylhet Division is generally high because of soil porosity and permeability, and low topography.

1.1.6 Air Quality

National Context: There is no official record of secondary air quality data due to non-availability of a regular air quality monitoring program for ambient conditions or emissions. Air quality monitoring in Bangladesh is mainly done in Dhaka city and Chittagong city where ambient concentrations of airborne pollutants have been found to be generally higher than the WHO guidelines and the United States EPA National Ambient Air Quality Standards. The main sources of air pollutant emissions in Bangladesh are brick kilns and domestic biomass burning (such as wood, dung, and straw) is responsible for most air emissions. Other contributors to air pollution include vehicular and rail traffic, re-suspended road dust to make bricks, and small industries.

Divisional Context: Air Pollution problem is acute in Dhaka (capital city) and Chittagong (commercial capital city) cities However; the air quality is generally good in the other two divisions like Rajshahi and Sylhet. Moreover, air pollution due to vehicular emissions is also low in those areas.

1.1.7 Noise Quality

National Context: Noise is another potentially serious threat to the quality of the environment. Noise levels vary at the given locations according to (i) the number, composition, and speed of vehicles; (ii) horn usage by locomotives; and (iii) other sources of ambient noise, including road-traffic noise, industrial noise, general community noise, and noise from birds and insects.

Divisional Context: The background noise level at the project area is low except Dhaka and Chittagong Divisions, due to an absence of heavy industries, large urban development or other significant noise sources.

1.2 Biological Environment

1.2.1 Terrestrial Ecology

National Context: The countries of South and Southeast Asia are considered by the IUCN as regions of high species diversity. A large number of native plants, including 3,000-4,000 species of woody flora, have been recorded from Bangladesh. The country lies at the meeting point (ecotonal region) of several floristic provinces, including the Manipur-Khasia, Bengal and North Burman provinces within the Indo-Malayan realm.

The entire floodplain of Bangladesh was once well forested, but most of the native forests have disappeared in recent decades due to mounting pressure from human populations. The floodplain land has long been subject to cultivation, the most dominant land use within the study area. Thus only scattered patches of native trees, savanna, wetlands and associated fauna habitat remain in isolated locations within the terrestrial environment. In many parts of the country, such as eastern Sylhet and northern Barisal, the abundance of plantations and groves of trees around villages creates an aspect of discontinuous forest. In many of these village groves, density and diversity of plant species are extremely good. However the Ganges floodplain, which constitutes the major part of the study area, possesses very low endemism and there is a low probability of the occurrence of any rare or vulnerable plant species in the Project areas.

Divisional Context: The terrestrial floral habitats in the project area include various types of trees and natural vegetation in common, fairly common and frequent distributions in and around homesteads, along roads and in open spaces as well as in non-cultivated highlands that support a wide range of wildlife species. The tree species in Dhaka, Rajshahi, Sylhet Divisions are almost same and include: jackfruit (*Artocarpusheterophylla*), bamboo (*Bambusabalcoona*), fanpalm (*Borassusflabellifer*), coconut (*Cocosnucifera*), eucalyptus (*Eucalyptus sp.*), banyan tree (*F. religiosa*), mango (*Mangiferaindica*), banana (*Musa sapientum*), guava (*Psidiumguajava*), mahogany (*Swieteniamahogoni*), tamarind (*Tamarindusindica*), shajna (*Moringaoleifera*), etc. Natural vegetations occurring in the subproject site areas include: dholpata (*Commelinabenghalensis*), junjhuni (*Crotalaria saltiana*), grasses (*Axonopuscompressus*, *Cynodondactylon*, *Dicanthiumannulatum*, *Digitariasanguinalis*, *Eleusineindica*, *Oplismenusburminii*, *Veteveriazizanioides*, etc.), kantamehdi (*Durantareppens*), matkila, datmajon (*Glycosmispentaphylla*), dulkalmi (*Ipomoea crassicaulis*), dhanchi (*sesbaniacanabina*), pakur (*Ficuscomosa*). Tree species in Chittagong are generally: Jhaw, coconut, babla, shilkoroi, shishu, mehogoni, shishu, epil-epil etc.

The terrestrial common faunal species in most of the divisions are: mongoose (*Herpestesauropunctatus*), field mouse (*Musboodga*), rodent (*Musmusculus*), squirrel (*Callosciurus sp.*), wild cat (*Felischaus*), jackal (*Vulpesbengalensis*), frog (*Ranacyanophyctis*), toad (*Bufo melanostictus*), lizard (*Hemidactylusflaviviridis*), monitor (*Varanusbengalensis*), etc. Bird species include crow,

woodpecker, kite, sparrow, weaver bird, parakeet, robin, bulbul, pigeon, dove, hawk, cuckoo, black cormorant, owl, etc.

1.2.2 Aquatic Ecology

National Context: Rivers, canals, perennial water bodies and fishponds are the permanent wetland. Seasonal wetlands are mainly floodplains which inundates in the monsoon. Most of the Project areas support seasonal wetlands. Wetlands govern necessary nutrients and other elements for whole ecosystems as it is an important type.

Divisional Context: Aquatic flora in the wetland ecosystem within the project divisions include aquatic vegetation species, like ghechu (*Aponogeton appendiculatus*), wild paddy (*Hygroriza aristata*), water lily (*Nymphaeanouchali*), panchuli (*Nymphoides indica* and *Nymphoides cristata*), kuchkola (*Otletia alismoides*), water hyacinth (*Eichhornia crassipes*), floating grass (*Echinocloa colonum*), water chestnut (*Trapa bispinosa*), spiral algae (*Spirogyra* sp.), reeds/sedges, etc., within and along the banks of ponds, lakes, rivers, channels and floodplain lands. The fish species include: prawn (*Macrobrachium malcolmsoni*, *M. dyanus*, *M. birmanicus*, *M. lamenii*, *Leander styliferus*, etc.), perch (*Anabas testudineus*), catfish (*Mystus vittatus*, *Mystus tengara*, *Clarius batrachus*, *Wallago attu*, *Heteropneustes fossilis*, *Ompok bimaculatus*, etc.), major carp (*Labeo rohita*, *Catla catla*, etc.), minor carp (*Puntius sophore*, *Puntius ticto*, *Amblypharyngodon mola*, *Pseudeutropicus atherinoides*, etc.), shads (*Gudusia chapra*, *Corica soboma*), snakehead (*Channa punctatus*, *Channa striatus*, *Channa manulius*), eel (*Mastacembelus armatus*, *Xenentodon cancila*), etc.

The faunal species present in the terrestrial ecosystems are the common kingfisher (*Alcedo althia*), openbill stork (*Anastomus oscillans*), great egret (*Egretta alba*), small egret (*Egretta gazetta*), intermediate egret (*Egretta intermedia*), fish eagle (*Ichthyophaga ichthyaetus*), snipe (*Gallinago henura*), kite (*Haliastur indus*), water snake (*Enhydra inhydris*), monocellate cobra (*Naja naja*), common toad (*Bufo melanostictus*), and others.

1.2.3 Biodiversity

National Context: Traditionally biodiversity in Bangladesh has been identified and described in three levels (e.g. Genetic, species and ecosystem). Bangladesh was once rich in wildlife species and is an important transition zone between Indo-China, the Himalayas and the rest of the Indian subcontinent. The tropical moist forests were botanically amongst the richest in the Indian subcontinent, and they also supported the greatest diversity of mammals and a high diversity of birds. In recent times, although the endemism is low and the species richness is relatively large for the small area of Bangladesh, the population size of most of the species has declined drastically. Eighteen species of wildlife are now extinct from Bangladesh. Among them are several internationally threatened species such as the three species of Asian rhinoceros, and also the banteng, nilgai, swamp deer, pink headed duck, bengal florican and mugger crocodile.

Divisional Context: Fish and aquatic resources, and other biodiversity of this country are summarized in the following Table below. Red list of IUCN data indicates there are 54 species of inland fishes, 8 amphibians, 58 reptiles, 41 resident birds, and 40 mammals, which are threatened throughout the country. Among the marine and migratory species of animals, 4 fishes, 5 reptiles, 6 birds, and 3 mammals are threatened. Most of the forests of project districts are located in the Chittagong, Sylhet, Dhaka, Mymensingh, Noakhali, Lakshimpur, Feni and Tangail districts.

Table: Flora Resources

Category	Total number of Species
Flora	
Angiosperms	5000

Category	Total number of Species
Gymnosperms	5
Algae/seaweed	168

Source: Khan, 1991; Ahmed and Ali, 1996; Alam 1967; IUCN, 2000, Adopted from: State of Environment, Bangladesh

Table: Fauna Resources

Category	Total number of Species
Fauna	
Sponges	3
Corals	66
(Marine + freshwater) Molluscs	(336+26) 362
Insects	2493
Mites	19
Shrimp/prawns	56
(Marine + freshwater) Crabs	(11+4) 15
Lobsters	3
Echinoderms	4
(Marine + freshwater) Fish	(442+266) 708
Amphibians	22
(Marine + inland) Reptiles	(17+109) 126
Birds	628
(Marine + inland) Mammals	(3+110) 113

Source: Khan, 1991; Ahmed and Ali, 1996; Alam 1967; IUCN, 2000, Adopted from: State of Environment, Bangladesh

1.2.4 National Conservation Site of Importance

National Context: Several Environmentally Protected Areas (EPAs) are located in Bangladesh. All of them are ecologically very important. Some endangered wildlife species such as wild elephants, monkeys, snakes are living in these habitats. The national conservation sites of importance in Bangladesh are: (a) Himchari National Park, Cox' Bazar District, (b) Teknaf game reserve, Cox's Bazar, (c) St. Martins island, Cox's Bazar, (d) Bostami pond, Chittagong, (e) Chunati reserve forest, Chittagong, (f) Bogakine lake, Chittagong , (g) Rangamti lake, Chittagong District, (h) Cox's Bazar Sea Beach, Cox' Bazar, (i) Sundarban, Khulna District, (j) Kuakata, Patuakhali District, (k) Tangua Haor, Sunamganj District, (l) Hakaluki Beel, M. Bazar District, (m) Ramsagar , Dinajpur (n) Bhawal National Park, Gazipur District & (o) Modhupur Forest, Tangail District.

Divisional Context: In the project divisions, there are 7 National Parks, 4 Wildlife Sanctuaries and 1 Game Reserve, declared as environmentally protected areas according to the provisions of the Bangladesh Wildlife Preservation Act 1973 and Bangladesh Wildlife Preservation Act [Amendment] 1974 for biodiversity conservation and improvement. A location map for protected areas and 26 districts under the project is shown in this chapter.

But none of these is affected by any of the sub-projects under the RTIP-II (Additional Financing) as these are located far away (> 2km) from the sub-project sites.

Table: List of National Parks & Wildlife Sanctuary & Game Reserve*

Sl. No.	Name	Location	Year created	Area (ha)
NATIONAL PARK				
1	Himchari National Park	Northeastern part of Cox's Bazar District	1980	1729
2	Madhupur National Park	Northeastern part of Tangail District with some part in Mymensingh District	1982	8436
3	Bhawal National Park	Gazipur district near Dhaka	1982	5022
4	Lawachara National Park	Sylhet Forest Division, Moulavibazar District)	1996	1250
5	Kaptai National Park	Rangamati Hill District	1999	5465
6	Ramsagar National Park	Eastern part of Dinajpur District	2001	15
7	Nijhum Dweep National Park	Consisting of 11 different chars in the South eastern part of Noakhali District	2001	16352
WILDLIFE SANCTUARY				
1	Hazarikhel Wildlife Sanctuary	North eastern part of Chittagong District	1973 (Not formally notified)	2903
2	Rema Kalenga Wildlife Sanctuary	Sylhet Forest Division(Eastern Part of Habiganj District)	1981/1996 (area expanded in 1996)	1796
3	Pablakhali Wildlife Sanctuary	Khagrachari Hill District	1983	42087
4	Chunati Wildlife Sanctuary	South western part of Chittagong District	1986	7764
GAME RESERVE				
1	Teknaf Game Reserve	South eastern part of Cox's Bazar District	1983	11615
Total				244174

Table : List of Ecologically Critical Areas to be preserved *

Sl. No.	Name	Location	Area (ha)	Year	Present condition/remarks
1	Cox's Bazar to Teknaf sea beach	Teknaf, Ukhia, Ramu and Cox's Bazar Upazilas of Cox's Bazar District	10645	1999	Will be managed under GEF supported project to be implemented by DOE. The project has been approved and will enter into execution phase soon
2	St Martin's Island	Teknaf Upazila, Cox's Bazar District	590	1999	Will be managed under GEF supported project to be implemented by DOE. The project has been approved and will enter into execution phase soon
3	Sonadia Island	Moheshkhali Upazila, Cox's Bazar District	4916	1999	Will be managed under GEF supported project to be implemented by DOE. The project has been approved and will enter into execution phase soon
4	Hakaluki Haor	Barolekha and Kulaura upazilas Moulvibazar District, and Fenchuganj, Golabganj upazilas Sylhet District	18383	1999	Will be managed under GEF supported project to be implemented by DOE. The project has been approved and will enter into execution phase soon. Certain activities are underway by IUCN/CNRS under SEMP support.
5	Tanguar Haor	Taherpur and Dharmapasha upazilas, Sunamganj District	9727	1999	Declared as a Ramsar site Environment Management Plan prepared MOEF is seeking fund from NORAD for implementation of the Environment Management Plan prepared under NCS Implementation Project 1
6	Gulshan Baridhara lake	Dhaka City Corporation	Not specified	2002	A rather strange ECA in the very urban setting, which has aesthetic and recreational value

*Note that the above mentioned environmental protected and critical areas are not affected by the project activities as these areas are located far away (>2km) from the RTIP-II (Additional Financing) sites.

1.3 Socio-economic Environment

1.3.1 Demography

National Context: Bangladesh is the most densely populated country in the world. Based on the 2001 census, the total population of Bangladesh is 123 millions of which 64 million (about 52%) male and 59 million (about 48%) female. The national average population density of Bangladesh is 981 persons/sq,km in 2011 which was 881 in 2001. According to BBS, 2003, the rate of population growth

is 1.54%. About 77 % populations live in rural areas & rest 23% in urban areas. The average household size in Bangladesh is 5.5. According to 2001 population census, muslim communities comprise about 90% of the total population 8.2% Hindus are the largest religious minority in Bangladesh. Rest (1.1%) is Buddhist, Christians & others. The Muslim and Hindus are distributed throughout the country. The Buddhists are mainly concentrated in the Eastern Hill areas. The country's settlement pattern is predominantly rural & about 80% population lives in rural areas. Indigenous or tribal minority communities are reported to comprise slightly over 1% of the country's population and are geographically concentrated mainly in Chittagong Hill Tracts Areas. The major ethnic of Bangladesh are Bengali. The minor ethnic group includes Santhal, Chakma, Garo, Bihari, Oraon, Munda and Rohingya.

Divisional Context: The highest population density of the project divisions was observed in Dhaka (1252 persons /sq.km) & lowest was in Chittagong Division (67 persons/sq.km). Indigenous or tribal minority communities are reported to comprise slightly over 1% of the country's population and are geographically concentrated mainly in Chittagong and Sylhet Division. The major ethnic of Sylhet regions are monipur. But none of the project sites are located inn the minority communities.

1.3.2 Settlement Pattern

- **National Context:** The population of Bangladesh is overwhelmingly rural; forming about 84 per cent of the whole (Ericksen *et.al.* 1997). Rural land is densely settled, especially in the more fertile areas where alluvial soils support such crops as rice, jute, fruit and vegetables. However, in only seven of the 64 districts making up Bangladesh does the population density fall below 500/km². Because of flooding in the rainy season, settlements in low basins, floodplains, and the delta are sited on natural or artificially raised land (ridges or mounds). Thus, linear settlements are the norm. About half of rural settlement in Bangladesh is of this type. The remainder— in areas of Medium Highland and Highland land types- the settlement pattern is either semi-nucleated or scattered. In low-lying basins, homestead mounds may be 3-5m high (Sultana, 1993). Also worth noting is the rather surprising prevalence of dispersed settlement in estuarine *char* areas, with homesteads built on plinths raised only above normal seasonal flood levels, not above experienced storm surge levels. The latter does not seem to reflect a misplaced sense of security behind coastal embankments, since the practice pre-dates modern embankments. There seems little prospect that this basic rural settlement pattern will alter over the next 40 years. Three things that may change are:
 - The continued spread of population onto flood- and cyclone-prone *char* land;
 - The spread of settlements onto relatively lower land in flood-protected areas (as in the Dhaka-Narayanganj-Demra project area) where they would be exposed to risk of catastrophic flooding if embankments are breached;
 - The expanding urban population will spread onto floodplain agricultural land.

Divisional Context: The mostly densities population areas in Dhaka district, where it averages 3,000 people per km², and the nearby districts of Narayanganj and Narsingdi, where it is over 1500/km² (BBS, 1992). These three districts also have large urban populations. In a band extending south-east from Dhaka to Chittagong, the population averages over 1,000/km². The concentration in these areas probably reflects more stable agricultural production and less proneness to flood and drought than in many other areas of the country. The other two divisions like Rajshahi and Sylhet are experienced low population densities rather than Dhaka. It is certain that, over the next 40 to 60 years, the density of rural settlement in Bangladesh will markedly increase. This will increase the absolute number of people at risk from climatic variations and extremes. It is clear that densities in rural and urban areas will increase, exposing settlements to the full range of climatic extremes. If these extremes are exacerbated by climate change and sea level rise, then the exposure of infrastructure associated with settlements will be greatly enhanced, especially on floodplains and along the coast in the project areas.

1.3.4 Land Use and Water Use Pattern

National Context: The land area of Bangladesh is 147,470 sq. km. Land is an important non-produced asset of Bangladesh. Proper use of land can bring prosperity in production & growth. The productivity of land in Bangladesh is very high & present agricultural production can be increased to a large extent with intensive cultivation. In terms of use of land in Bangladesh 52% of total land are agricultural land, 24% water bodies & urban land, 17% forests land, 3% fallow land, & rest 4% are wasteland (BBS,2004).

Divisional Context: Agriculture land is dominating the land use in all four regions. Clustered houses are found elsewhere with numerous small, medium & large homestead trees. Roadside settlement is frequently visible. Roadside trees are also observed. Roadside borrow-pits & ponds are found at most of the road sides in the Rajshahi and Sylhet regions. But in Dhaka and Chittagong Divisions such type of scenario is very rare in case. Big scour hole (treats as fish ponds) are found at downstream of most of the bridges on the roads. These borrow-pits & ponds are mainly used for fish culture. Rivers & canals are across almost all the roads in Sylhet and Chittagong Divisions. Factories & industries are also located at both sides of some roads and river side's factories are common in the Dhaka Division.

1.3.5 Water Supply and Sanitation

National Context: About 96% of population in Bangladesh had access to potable water within 150m of their dwellings via DTWs, HTWs, taps or ring wells (Water Aid Bangladesh Country strategy Plan 2006-2011). The effective coverage of safe water dropped to approx. 80% due to arsenic (As) contamination. About 60% of the households in rural areas of Bangladesh used hygienic latrines such as water sealed latrines & homemade pit latrines as of 2004. Using of hygienic latrines in urban areas is double that of rural areas.

Divisional Context: Bangladesh has made commendable strides in improving access to safe water. About 96% of the people drink tube well water. Arsenic in groundwater is estimated to have affected 19% of the shallow wells increasing the ratio of persons per tube well from 15 to 188; in pockets of hard to reach areas, the ratio is even higher. Hand tube wells, of which there are an estimated 7.5 million, are the primary means of water supply in rural Bangladesh of the project area. However, the majority of these do not have a proper platform and drainage, jeopardizing the current claimed level of access to safe water further. More than 50% of the urban populations of the project areas of Bangladesh have access to an improved water supply. Less than one third, i.e. about 31%, of the 300-plus municipal towns has piped water that primarily serves the urban core. The people in urban slums, fringes and in medium and small towns rely on hand tube wells. Surface water is the traditional source of water in Bangladesh but high pathogen, agro-chemical and industrial loads render most surface water sources of the project areas unsuitable for consumption without treatment. Surface water from perennial water bodies have been used for developing small-scale piped water systems as demonstrated by the DCH. Arsenic in groundwater poses a great challenge to the water supply in the regions of the country. Since the detection of arsenic in 1993, various organizations have been screening tube wells for arsenic contamination in excess of the Bangladesh Drinking Water Standard (BDWS) of 0.05mg/L. The most contaminated areas lie in the in the districts of Chandpur, Comilla, Noakhali, Munshiganj. Excessive levels have also been found in the part of the North West of Rajshahi Division, Sylhet and Dhaka Divisions. The least contaminated or uncontaminated areas lie in the Rajshai, Dhaka and Chittagong Divisions. (Water Aid Bangladesh Country strategy Plan). 2006-2011).

The access to sanitary latrines is 44% in rural areas, 69% in municipalities and 73% in city corporations of the project areas (Progress Report March 2005, Government of Bangladesh). Half of rural primary schools do not have sanitary latrines in the project regions. GOB's effort to achieve 100% sanitation coverage by 2010 has pushed sanitation high up in the list of government priorities. They undermine the strong empirical evidence suggesting that social mobilization, not funding, is critical to sustainable

access to sanitation in the project areas. The sanitation facilities in schools and public places and their proper use and maintenance are again a big challenge to achieving the sanitation target.

1.3.6 Fisheries

National Context: The challenges for sustaining multiple uses of aquatic resources are evident globally. Until recently, traditional management of fisheries resources has commanded a low level of compliance with management measures (Alam and Thomson, 2001; Nielsen et al., 2004) and resulted in over exploitation leading to resource degradation. Such management has often ignored the socio-economic aspects of small-scale fisheries (World Bank, 1991), generating increasing calls for a tangible change in the process. The most significant issues arising from attempts to change existing fisheries management will be the need for resource protection and equity in the allocation of access to the resource, both between and within the various user groups. However, many developing countries face major constraints in capacity and the ability to identify and achieve implementation of long-term sustainable policies (Rahman, 1992; Williams, 1996).

In addition to varieties of aquatic organisms, a total of 260 indigenous freshwater bony fish species suitable for human consumption, belonging to 145 genera and 55 families (Rahman, 1992), constitutes a very rich aquatic bio-diversity. Within these, Hilsha (*Tenuulosa ilisha*) is perhaps the most important single species and highly demanded in the local market. The annual catch of Hilsha is over 0.20 million metric ton (Mmt) and accounts for 20% of the country's total fisheries production (FAO, 1995a). Besides the large number of fresh water fish species, there are 24 species of shrimps belonging to five families having a very high commercial value and playing an important role in the economy. Fish from inland water accounts for an average of 83% of the total fish protein and most of the inland water fish species are only used for domestic consumption. More than 70% of the population of the country lives in flood plain and coastal areas where the fish and aquatic resources are perceived as exploitable natural capital assets but needing no husbandry. The unrestricted access which fishing communities have to the rivers and floodplains which are the ideal natural breeding grounds for many commercial and non-commercial fish species, has significantly contributed to over-fishing and severe resource degradation. However, the denial of access to certain public fishing grounds which have been leased to private leaseholders has also contributed to making life more difficult for fishing communities. Fish habitat destruction by the construction of roads and embankments, together with drainage, flood control and natural siltation, along with weak implementation of outdated policy measures by the government, have been commonly cited as causes for the deterioration of the country's fishery resources. Increased use of pesticides and fertilizers for producing high yielding varieties of food crops and rising industrial pollution are also contributing to the deterioration of the aquatic environment (Ali, 1997). The situation has further been complicated by upstream damming in the major river systems that significantly reduces the water level and raises much of the river beds, thus dangerously modifying many of the aquatic habitats of the country. The conflicting demand for agricultural production, particularly rice, encourages attempts to dry out the floodplains, reducing open water areas and destroying their fisheries resources. Furthermore, population growth, rapid urbanization and industrialization are also imposing rapidly growing pressures on aquatic resources.

Divisional Context: The project areas located in the delta of three mighty rivers (the Ganges, the Meghna and the Brahmaputra), has vast inland water resources in the forms of ponds, *beels*, *haors*, *baors*, canals, rivers, floodplains and reservoirs. Among these resources ponds, *baors*, Flood Control Drainages (FCD) and burrow pits are used for freshwater aquaculture (MOFL, 1995). However, the freshwater culture fisheries include the following water bodies. The total area of freshwater ponds is about 0.15 million ha representing 3.53 percent of total inland water resources (DoF, 1995). The total area under this component is estimated to be 0.7 million ha, of which about 7,000 ha area is now under being developed for different integrated aquaculture projects. Data regarding the area of water bodies under burrow pits could not obtained (MOFL, 1995). The freshwater area is getting reduced and the overall ecology of fish habitats and the routes of migration have altered due to various water resources development activities in the project areas. So, it is very difficult to fulfill the minimum protein requirement of the

teeming millions from the freshwater sub-sector alone. But the highest priority has always been accorded to the freshwater fisheries, as reflected in the number of fisheries development projects implemented since liberation, in spite of that the marine and brackish water fisheries sectors have the lion's share of foreign exchange earnings and contributes to the development budget in that proportion. If similar level of management and development attention was paid to the marine and brackish water sectors, it would be possible to give substantially increased production in the coastal areas.

1.3.7 Industries and Commerce

National Context: The industrial sector in Bangladesh is relatively small, but growth in output has been at nearly 6 percent per year during the past decade. Some 3 million people were employed in this sector in 1986 out of a total labor force of 31 million (Bangladesh Bureau of Statistics, 1991a). Industries are largely based on agricultural commodities, such as jute, cotton, sugarcane, tea, and hides. However, Bangladesh also has some heavy industries, such as steel, pharmaceuticals, chemicals, machine tools, and diesel plants. According to the Bangladesh Bureau of Statistics (1991a,)), the industrial sector accounted for 8.74 per cent of the GDP in 1989-90, of which 58 per cent was due to large-scale industries and 42 per cent to small scale industries. However, there is a large number of rural (generally cottage type) industries dispersed throughout the country, most of which are not included in the statistics of the Bangladesh Bureau of Statistics, but significantly contribute to national income and employment, and have the potential to contribute much more to both. Much of the industry is located on floodplains, although in the metropolitan areas it is often on elevated land or land that is protected by embankments. Nevertheless, whether concentrated or dispersed, much of the nation's industry is susceptible to severe flooding and/or cyclones.

Divisional Context: Different industrial units including garment factories, jute mills, dying industries, fertilizer factories, sugar mills and brick manufacturing units (fields) are in operation in the project area. Most of these industries are concentrated in the city areas Dhaka, Chittagong, Sylhet and other district towns. Industry along the coast is predominantly concentrated within the Patenga area of Chittagong areas. This area supports a variety of industrial plant which includes the following:

- Fertilizer Manufacturing Plant (TSP)
- Chittagong Steel Mills
- General Electrical Manufacturing
- Chittagong Cement Clinker Factory
- Eastern Cable
- Eastern Refinery

Another concentration in this industrial area is the Bangladesh Export Processing Zone which was established in 1983. There are many farmers engaged in salt production particularly in the districts of Chittagong and Cox'sbazar. Tannaries are mostly concentrated in the Hazaribag areas of Dhaka City and some in the Chittagong area. As the industrial units are mostly without proper effluent treatment facilities are the major source of pollution including untreated sewerage disposal.

1.3.8 Cultural and Archeological Resources

National Context: Bangladesh is exceptionally rich in historical, archaeological & cultural wealth, especially of the medieval period during muslim & pre-muslim rules. Buddhist Monastery at Rajshahi District, Mausoleum of Hazrat Shah Jalal, one of the greatest muslim saints in the sub-continent, at Sylhet District, Ahshan Monzil at Dhaka, the stronghold of Isha Khan (one of the famous Twelve Bhuyians of Bengal during Maghal Rule) at Kishoreganj District, ancient Shib Temple at Dinajpur District named as Kantajeer Temple, two famous Majar (Islamic holy or memorial places) at Chittagong named "Baro Awliar Majar" and "Bijit Bostami'r Majar", Mohasthanagarh at Bogra District, the seat of administration of the old rulers with its ruins & archaeological finds, Independence War Monument at Dhaka etc. All these resources signify abundance of historical/ archaeological and cultural resources of

concerned areas in Bangladesh. Other cultural resources such as mosques, graveyards, temples are frequently found in all over Bangladesh.

Divisional Context: The following important cultural and archeological sites which have immense natural and environmental value are located in the project divisions. But these cultural and archeological sites are not at all affected by any of the sub-projects under the RTIP-II (Additional Financing) as these are located far away (> 2km) from the sub-project areas.

- The stone sarcophagus of Sultan Ghiyasuddin Azam Shah (1409 A.D.) Sonargaon, Narayanganj;
- Atia Jami Mosque, Tangail;
- Shah Muhammad Mosque at Egarasindur, Mymensingh;
- Hajiganj Fort at Narayanganj;
- Sonakanda Fort on the eastern bank of Sitalakhya river, Narayanganj;
- Lalbagh Fort, Dhaka City;
- Three domed two-storeyed Mosque, built by Khan Muhammad Mirdha, Dhaka;
- Bara Katra, Dhaka;
- Highly ornate 'Jor Bangla' temple at Dakshin Raghobpur, Pabna Town;
- Bara Ahnik temple at Puthia;
- 'Pancharatna' Govinda temple at Puthia;
- 'Pancharatna' Siva temple at Puthia;
- The Siva and Kali temples at Sonarang (Tongibadi) near Dhaka;
- A Buddhist pagoda with tapering spire at Cox's Bazar;
- Picturesque Buddhist Khyangs at Ramu near Cox's Bazar;
- Megalithic memorial monuments at Jaintiapur, associated with the Khasi tribe, Jaintiapur, Sylhet; and
- Ahsan Manzil or the palace of the Nawabs' of Dhaka, Dhaka City.

ANNEX 2: Sample Screening Checklist for RTIP-II and Additional Financing

Rural Road Improvements

Name of Sub-project:

Location of Sub-project: 1). Upazila: 2). District:

Major Components of the Improvement works:

Screening Questions	Yes	N o	Scale of Impact*			Remarks
			Hig h	Medi um	Lo w	
Potential Environmental Impacts during planning and design phase/ Sub-project siting.						
Is the sub-project area adjacent to or within any of the following environmentally sensitive areas?						
Protected Area (Forest)						
Wetland (Beel, Haor)						
National Park						
Wildlife sanctuary						
Buffer zone of protected areas						
Special area for protecting biodiversity						
Potential Environmental Impacts from construction of improved road.						
Will the sub-project cause.....						
loss of agricultural land ?						
negative effects on rare (vulnerable), threatened or endangered species of flora or their habitat ?						
negative effects on designated wetlands ?						
negative effects on wildlife habitat, populations, corridors or movement ?						
negative effects on locally important or valued ecosystems or vegetation?						
destruction of trees and vegetation						

Screening Questions	Yes	No	Scale of Impact*			Remarks
			High	Medium	Low	
Impact on fish migration and navigation ?						
Obstruction of natural connection between river and wetlands inside project area ?						
water logging in polder areas ?						
insufficient drainage ?						
negative effects on surface water quality?						
negative effects on groundwater quality, quantity or movement?						
loss of existing buildings, property, economic livelihood ?						
increased soil erosion and/or sedimentation ?						
negative impact on soil stability and compactness ?						
impacts on sustainability of associated construction waste disposal ?						
traffic disturbances due to construction material transport and wastes ?						
increased noise due to transportation of equipment and construction materials ?						
increased noise due to day-to-day construction activities ?						
increased wind-blown dust from material (e.g. fine aggregate) storage areas ?						
health risks to labors involve in activities ?						
Potential Impacts of the improved road. Will the improved road cause						
negative effects on neighborhood or community characters ?						
negative effects on local business, institutions or public facilities ?						
potential social conflict between occupational groups- farmers vs. fisheries ?						

Screening Questions	Yes	No	Scale of Impact*			Remarks
			High	Medium	Low	
degradation or disturbance of historical or culturally important sites (mosque, graveyards, monuments etc.) ?						
blockage of navigation system ?						
impediments to movements of people and animals ?						
conflicts in water supply rights and related social conflicts ?						
Air quality ?						

*Please consider scale of 1 -2 for Low, 2 -3 for Medium and 5 for High impact.

** Protected areas are lands and waters where development and use is restricted by legal or other means for the conservation of nature

Note: Please add any other screening questions relevant to the sub-project. Also provide additional comments and/or positive impacts in 'remarks' column.

Assessment:

.....

Categorization:

Category	Action Required	Assessment
Low Impact		
Medium Impact		
High Impact		

Surveyed by:
 Date:

Designation:

Signature:

Rural Road Maintenance

Name of Sub-project:

Location of Sub-project: 1). Upazila: 2). District:

Major Components of the Improvement works:

Screening Questions	Yes	No	Scale of Impact*		
			High	Medium	Low
Potential Environmental Impacts during planning and design phase/ Sub-project siting.					
Is the sub-project area adjacent to or within any of the following environmentally sensitive areas?					
Protected Area (Forest)					
Wetland (Beel, Haor)					
National Park					
Wildlife sanctuary					
Buffer zone of protected areas					
Special area for protecting biodiversity					
Potential Environmental Impacts from construction of maintenance road.					
Will the sub-project cause.....					
loss of agricultural land ?					
negative effects on rare (vulnerable), threatened or endangered species of flora or their habitat ?					
negative effects on designated wetlands ?					
negative effects on wildlife habitat, populations, corridors or movement ?					
negative effects on locally important or valued ecosystems or vegetations ?					
destruction of trees and vegetation					
impact on fish migration and navigation ?					

Screening Questions	Yes	No	Scale of Impact*		
			High	Medium	Low
obstruction of natural connection between river and wetlands inside project area ?					
water logging in polder areas ?					
insufficient drainage ?					
negative effects on surface water quality?					
negative effects on groundwater quality, quantity or movement?					
loss of existing buildings, property, economic livelihood ?					
increased soil erosion and/or sedimentation ?					
negative impact on soil stability and compactness ?					
impacts on sustainability of associated construction waste disposal ?					
traffic disturbances due to construction material transport and wastes ?					
increased noise due to transportation of equipment and construction materials ?					
increased noise due to day-to-day construction activities ?					
increased wind-blown dust from material (e.g. fine aggregate) storage areas ?					
health risks to labors involve in activities ?					
Potential Impacts of the maintenance road. Will the improved road cause					
negative effects on neighborhood or community characters ?					
negative effects on local business, institutions or public facilities ?					
potential social conflict between occupational groups-farmers vs. fisheries ?					
degradation or disturbance of historical or culturally important sites (mosque, graveyards, monuments etc.) ?					
blockage of navigation system ?					

Screening Questions	Yes	No	Scale of Impact*		
			High	Medium	Low
impediments to movements of people and animals ?					
conflicts in water supply rights and related social conflicts ?					
air quality ?					

*Please consider scale of 1 -2 for Low, 2 -3 for Medium and 5 for High impact.

** Protected areas are lands and waters where development and use is restricted by legal or other means for the conservation of nature

Note: Please add any other screening questions relevant to the sub-project. Also provide additional comments and/or positive impacts in 'remarks' column.

Assessment:

.....

Categorization:

Category Action Required

Low Impact		
Medium Impact		
High Impact		

Surveyed by:
 Date:

Designation:

Signature:

ANNEX 3: ENVIRONMENTAL CODE OF PRACTICES (ECP)

Guideline-1: Stackyard Facilities

Guideline-2: Site Preparation

Guideline-3: Waste Management

Guideline-4: Hazardous Materials Management

Guideline-5: Water Resources Management

Guideline-6: Drainage Management

Guideline-7: Soil Quality Management

Guideline-8: Top Soil Management

Guideline-9: Borrow Areas Development & Operation

Guideline-10: Air Quality Management

Guideline-11: Noise and Vibration Management

Guideline-12: Tree Cutting and Afforestation

Guideline-13: Protection of Fisheries

Guideline-14: Road Transport and Road Traffic Management

Guideline-15: Water Transport Management

Guideline-16: Erosion and Sedimentation Control

Guideline-17: Construction Camp Management

Guideline-18: Cultural and Religious Issues

Guideline-19: Occupational Health and Safety

Guideline-1: Stackyard Facilities

All facilities covered in this Guideline should be provided for Stackyard. The provision of facilities listed in this Guideline is subject to the availability of power and services.

Entry and exit

- The means of entering and leaving a workplace must be safe, both in normal working conditions and in an emergency.
- Aisles and walkways should be at least 600mm wide, and kept free of building material or obstructions at all times.
- Open sides of any entrance and exit where a worker could fall from one level to another must be protected with edge protection.
- You should consider separate entrances and exits where mobile plant is entering and exiting, to reduce the risk of anyone being hit by the moving plant.
- Emergency routes must be easily identified, kept free of obstructions, and have emergency lighting, directional signs and exit points marked. Emergency lighting systems must have a back-up system with sufficient capacity in event of a power failure.
- Temporary emergency exits should be clearly marked.

Meal rooms

- Adequate numbers of suitable tables and seating should be provided for eating meals.

- Seating should be either chairs or benches .
- The floor area provided should be at a rate of at least 1m² of floor space for each person using the room at any one time. This space includes space occupied by any tables and seating, but excludes fixtures and appliances.
- Meal rooms should be free of construction related dust and odours, and should have appropriate ventilation and temperature control systems such as:
 - reverse-cycle air conditioning
 - cooling fans or heaters, and
 - flow through ventilation.
- An adequate supply of boiling water for hot drinks should be provided.
- Food warming facilities of adequate size should be provided in each meal room.
- A sink unit of adequate size, with a supply of clean water, should be provided in each meal room.
- A suitable space or shelves for storage of workers' provisions should be provided, including for utensils and food.
- Garbage bins, with removable liners and secure lids should be provided. Bins should be emptied daily or more frequently if required.

Toilets

- Toilets should be located as close as practicable to the workplace and/or facilities.
- The number of toilets provided should be at a ratio of at least one for each ten (10) people or a fraction of 10 people.
- Separate toilets should be provided in workplaces where there are both male and female workers. However, one unisex toilet may be provided in workplaces with both male and female workers where:
 - the total number of people who normally work at the workplace is 10 or fewer
 - there are two or fewer workers of one gender.
- Toilets should be soundly constructed single units, or separated by partitions of strong construction at least 1.5 metres (m) in height, with internal measurements of at least 1400mm long x 850mm wide and 2200mm high. Each toilet should be weatherproof and provided with adequate natural/artificial lighting and ventilation.
- Toilets and urinals should be installed so as to provide adequate privacy. Each toilet should be located:
 - in a position that gives privacy, and
 - in a cubicle, or room, that is fitted with a door that gives privacy and is lockable from inside the cubicle or room.
- Toilets should be clearly marked where separate toilets are provided for males and females.
- Each toilet made available to a female worker must:
 - have facilities to dispose of sanitary items for females and serviced regularly, and
 - be separated from urinals so that no urinal can be seen by her.
- Toilet facilities should be installed to prevent any odours reaching dining facilities. Each toilet should be constantly supplied with fresh air from openings to the outside air or from mechanical ventilation.
- Toilets should be connected to the sewer where available.

- If connection to a sewer is not available, self-contained freshwater flushing or open closet portable toilets should be provided. If the total number of people who normally work at the workplace is 10 or more then an ablution block fitted to a septic tank or temporary holding tank should be provided.
- Toilets that are not connected to a sewer should be serviced at least once a week for a toilet used by five or more people.
- Each toilet should be well drained and have a floor constructed of, or covered with, durable waterproof material.
- Portable toilets should be installed to prevent them toppling over.
- The internal measurements for portable toilets should be at least 1.05m² in area and 1.9m high.
- Covered walkways should be provided to ensure toilets remain accessible during inclement weather.

Washing facilities

- Undercover facilities within or adjacent to each toilet or urinal should be provided. These should be in addition to any provided within portable toilets.
- Clean water and cleansing agents (and disinfecting where appropriate) should be provided for the purposes of washing.
- Basins or wash trough points should be provided with water, and hot water where practicable, at the rate of at least one for each 10 people or fraction of 10 people.
- Water taps over a trough should be at least 500mm apart.
- Adequate number of mirrors should be provided at convenient points.
- Garbage bins, with removable liners and secure lids should be provided. Bins should be emptied daily or more frequently if required.

Showers

- Shower facilities should be provided when required by the nature of the construction work being carried out.
- When required, a minimum of one shower for each workplace should be provided and at the rate of at least one for each 25 people or fraction of 25 people. A higher ratio should be provided for work such as demolition, tunnelling or work of a dirty nature.
- Separate shower facilities should be provided with adequate privacy for the exclusive use of male or females, where both males and females are employed.
- Each shower cubicle should have a shower curtain or door, soap holder, and hot and cold water.
- Shower facilities should have non-slip flooring throughout.
- Bench seating at least 400mm wide and 460mm in length for each shower adjacent to each group of showers should be provided.
- At least one hook or peg for hanging clothes should be provided.

Drinking water

- An adequate supply of cool, clean drinking water should be available on the working site.
 - A supply should be located within 30m of where the worker is working on a single level building, or
 - A supply should be located on the ground level and then every second level of a high rise building being built.
- Drinking water points should be provided near all hot and strenuous work stations. Additional points if needed should be provided.

- Where a connection to water supply is not possible, supply may be provided by other means suitable for dispensing drinking water, such as a flask, water bag, or cooled drink dispenser. If the water is made available in a container, the worker must be able to drink the water without having to drink directly from the same container as someone else.

Facilities for the safe keeping of tools and personal belongings

- A space should be provided for workers to bring hand tools inside amenity sheds during breaks/change times.
- Hooks or pegs (not nails) should be provided to enable hand tools to be kept off the floor. These should be in addition to hooks provided for clothes.
- Lockable chests, or other means, should be provided for the safe keeping of workers' personal belongings and tools kits.

GUIDELINE-2: SITE PREPARATION

1. General

The preparation of site for construction involves: (i) clearing of land required for construction; and (ii) management of activities such as traffic during construction. These activities have been detailed out for civil works of RTIP-II (Additional Financing)activities separately.

2. RTIP-II (Additional Financing)activities

a. Site Preparation Activities

After obtaining the consent of the community on the alignment, the Project Implementation Cell (PIC) of the District Office shall be responsible to stake out the alignment by establishing working benchmarks on ground. It shall be the responsibility of the PIC to take over the possession of the proposed RoW and hand over the land width required clear of all encumbrances to the Contractor. Activities pertaining to the clearance of land and relocation of utilities need to be initiated by the PIC well in advance to avoid any delays in handing over of site to the Contractor. Assistance of the Revenue Department shall be sought in accomplishing the task. To summarize, the PIC's responsibilities before handing over the site to the contractor include:

- Clearance of encroachments within proposed ROW;
- Initiation of process for legal transfer of land title;
- Alignment modification or relocation of common property resources in consultation with the local community;
- Alignment modification or relocation of utilities in consultation with the various government departments; and
- Obtain clearances required from government agencies for
 - Cutting of trees; and
 - Land Diversion of forestlands, etc.

b. Site Preparation Activities by the Contractor

Site preparation shall involve formation of the road base wherein it is ready for construction of protective/drainage works, carriageway, shoulders, parapets and other road furniture. The PIC shall transfer the land for civil works to the Contractor after peg marking of the alignment.

The Contractor shall verify the benchmarks soon after taking possession of the site. The Contractor, prior to initiation of site preparation activities, shall highlight any deviations/discrepancies in these benchmarks to the PIC in writing. The contractor shall submit the schedules and methods of operations

for various items during the construction operations to the PIC for approval. The Contractor shall commence operations at site only after the approval of the schedules by the PIC.

The activities to be undertaken by the contractor during the clearing and grubbing of the site are as follows:

The clearance of site shall involve the removal of all materials such as trees, bushes, shrubs, stumps, roots, grass, weeds, part of topsoil and rubbish. Towards this end, the Contractor shall adopt the following measures: (i) Limiting the surface area of erodible earth material exposed by clearing and grubbing; (ii) Conservation of top soil and stock piling as per the measures suggested as part of Guideline 7, "Top Soil Salvage Storage and Replacement"; and (iii) Carry out necessary backfilling of pits resulting from uprooting of trees and stumps with excavated or approved materials to the required compaction conforming to the surrounding area. To minimize the adverse impact on vegetation, only ground cover/shrubs that impinge directly on the permanent works shall be removed. Cutting of trees and vegetation outside the working area shall be avoided under all circumstances. In case the alignment passes through forest areas, The Forest Ranger shall be consulted for identification of presence of any rare/endangered species within the proposed road way. Protection of such species if found shall be as per the directions of the Forest Department.

The locations for disposal of grubbing waste shall be finalized prior to the start of the works on any particular section of the road. The selection of the site shall be approved by the PIC. The criteria for disposal of wastes shall be in accordance with the measures given in Guideline on, "Waste Management and Debris Disposal" (Guideline 2).

In locations where erosion or sedimentation is likely to be a problem, clearing and grubbing operations should be so scheduled and performed that grading operations and permanent erosion and sedimentation control features can follow immediately, if the project conditions permit. Dismantling of structures and culverts shall be carried out in a manner as not to damage the remaining required portion of structures and other surrounding properties. The disposal of wastes shall be in accordance with the provisions given in Guideline 2, "Waste Management". The following precautions shall be adopted:

- The waste generated shall not be disposed off in watercourses, to avoid hindrance to the flow,
- All necessary measures shall be taken while working close to cross drainage channels to prevent earthwork, stonework as well as the method of operation from impeding cross drainage at rivers, water canals and existing irrigation and drainage systems.

The designated sites duly approved by Implementing Agency shall be cleared of its existing cover for setting up of the construction sites, camps and related infrastructure facilities, borrow areas and other locations identified for temporary use during construction. The contractor shall comply with all safety requirements in consideration as specified in the Guideline on, "Labour & Worker's Health and Safety". Before initiation of site preparation activities along these lands to be used temporarily during construction, it shall be the responsibility of the Contractor to submit and obtain approval of the site redevelopment plan from the implementing agency. The letter/contract agreement between the owner(s) of the land parcel for temporary usage shall include site redevelopment to its original status. The guidelines for the same are furnished in the Guideline on, "Construction Plants & Equipment Management"; guideline, "Construction and Labour Camps"; and "Borrow areas".

c. Traffic management during construction

Traffic management during construction is an activity specific to the contractors. Contractors must ensure a reasonably smooth flow of traffic during construction. The following are the general principles to be followed for traffic management during construction:

- Partial pavement construction over long lengths will not be permitted. The contractor should concentrate his activities over sections such that he can complete continuous fronts of up to a maximum of 1 km before starting the adjacent front. The contractor may open more than one continuous 1 km front provided that he has the separate resources to do so. The resources

working on a 1 km front may not be shifted to another front until no longer required on that front.

- The construction activities should be staggered over sub-sections to the extent that the use of plant and equipment is optimized to maximum efficiency and to avoid idling. For road widening operations, excavation adjacent to the existing road shall not be permitted on both titles simultaneously. Earthworks must be completed to the level of the existing road before excavation work on the opposite side will be permitted.
- The construction operations taking place on a particular front must be managed efficiently such that delays between successive pavement layers are minimized.
- Before the start of the monsoon season (June) the contractor shall ensure that the pavement over any front is complete, full width, at least up to Dense Bituminous Macadam, DBM level, but preferably with Asphaltic Concrete, AC wearing course. The contractor should not start any sections of pavement that he cannot complete by the start of the monsoon season.
- In the absence of permanent facilities, temporary drainage and erosion control measures, as required by the Specifications, are to be implemented prior to the onset of the monsoon.

In cases where separate traffic diversions are not essential or cost effective the construction methodology should be in accordance with the guidelines following:

On a 1km section, the pavement construction (except new alignments) should be limited to 500m subsections with a minimum of 1 to 1.5 km between successive sub-sections to ease traffic management and safety issues. The earthworks in the widening portions are not limited in, this respect. Excavation on both sides of the existing, road over the same sub-section simultaneously shall not be permitted for reasons of safety to the traffic, particularly at night.

Sub-sections longer than 500m may be authorized by the Engineer if two-way traffic flow can be comfortably managed and the Contractor can demonstrate his ability to maintain dust control, proper road edge delineation, proper signage and traffic control. Where single file traffic is permitted ('only applicable to final wearing course operations), the sub-sections shall be reduced to a maximum length whereby safe traffic regulation can be physically managed. Single file traffic may not be permitted at certain locations or times of the day when traffic volumes are such that excessive congestion shall occur.

GUIDELINE-3: WASTE MANAGEMENT

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
General Waste	Soil and water pollution from the improper management of wastes and excess materials from the construction sites.	<p>The Contractor shall</p> <ul style="list-style-type: none"> ▪ Develop waste management plan for various specific waste streams (e.g., reusable waste, flammable waste, construction debris, food waste etc.) prior to commencing of construction and submit to RTIP-II (Additional Financing), LGED for approval. ▪ Organize disposal of all wastes generated during construction in an environmentally acceptable manner. This will include consideration of the nature and location of disposal site, so as to cause less environmental impact. ▪ Minimize the production of waste materials by 3R (Reduce, Recycle and Reuse) approach. ▪ Segregate and reuse or recycle all the wastes, wherever practical.

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		<ul style="list-style-type: none"> ▪ Prohibit burning of solid waste ▪ Collect and transport non-hazardous wastes to all the approved disposal sites. Vehicles transporting solid waste shall be covered with tarps or nets to prevent spilling waste along the route ▪ Provide refuse containers at each worksite. ▪ Request suppliers to minimize packaging where practicable. ▪ Maintain all construction sites in a cleaner, tidy and safe condition and provide and maintain appropriate facilities as temporary storage of all wastes before transportation and final disposal.
Hazardous Waste	Health hazards and environmental impacts due to improper waste management practices	<p>The Contractor shall</p> <ul style="list-style-type: none"> ▪ Collect chemical wastes in 200 liter drums (or similar sealed container), appropriately labeled for safe transport to an approved chemical waste depot. ▪ Store, transport and handle all chemicals avoiding potential environmental pollution. ▪ Store all hazardous wastes appropriately in banded areas away from water courses. ▪ Make available Material Safety Data Sheets (MSDS) for hazardous materials on-site during construction. ▪ Collect hydrocarbon wastes, including lube oils, for safe transport off-site for reuse,

GUIDELINE-4: HAZARDOUS MATERIALS MANAGEMENT

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Fuels and Hazardous goods.	Materials used in construction have a potential to be a source of contamination. Improper storage and handling of fuels, lubricants, chemicals and hazardous goods/materials on-site, and potential spills from these goods may harm the	<ul style="list-style-type: none"> ▪ Prepare spill control procedures and submit the plan for RTIP-II (Additional Financing), LGED approval. ▪ Train the relevant construction personnel in handling of fuels and spill control procedures. ▪ Store dangerous goods in bounded areas on a top of a sealed plastic sheet away from watercourses. ▪ Refueling shall occur only within bounded areas. ▪ Make available MSDS for chemicals and dangerous goods on-site. ▪ Transport waste of dangerous goods, which cannot be recycled, to a designated disposal site approved by the DoE.

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
	environment or health of construction workers.	<ul style="list-style-type: none"> ▪ Provide absorbent and containment material (e.g., absorbent matting) where hazardous material are used and stored and personnel trained in the correct use. ▪ Provide protective clothing, safety boots, helmets, masks, gloves, goggles, to the construction personnel, appropriate to materials in use. ▪ Make sure all containers, drums, and tanks that are used for storage are in good condition and are labeled with expiry date. Any container, drum, or tank that is dented, cracked, or rusted might eventually leak. Check for leakage regularly to identify potential problems before they occur. ▪ Put containers and drums in temporary storages in clearly marked areas, where they will not be run over by vehicles or heavy machinery. The area shall preferably slope or drain to a safe collection area in the event of a spill. ▪ Take all precautionary measures when handling and storing fuels and lubricants, avoiding environmental pollution. ▪ Avoid the use of material with greater potential for contamination by substituting them with more environmentally friendly materials.

GUIDELINE-5: WATER RESOURCES MANAGEMENT

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Discharge from construction sites	During construction both surface and groundwater quality may be deteriorated due to construction activities in the river, sewerages from construction sites and work camps. The construction works will modify groundcover and topography changing the surface water drainage patterns of the area including infiltration and storage of storm water. These changes in hydrological regime lead to	<p>The Contractor shall</p> <ul style="list-style-type: none"> ▪ Install temporary drainage works (channels and bunds) in areas required for sediment and erosion control and around storage areas for construction materials ▪ Install temporary sediment basins, where appropriate, to capture sediment-laden run-off from site ▪ Divert runoff from undisturbed areas around the construction site ▪ Stockpile materials away from drainage lines ▪ Wash out ready-mix concrete agitators and concrete handling equipment at washing facilities off site or into approved bounded areas on site. Ensure that tires of construction vehicles are cleaned in the washing bay (constructed at the

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
	increased rate of runoff increase in sediment and contaminant loading, increased flooding, groundwater contamination, and effect habitat of fish and other aquatic biology.	entrance of the construction site) to remove the mud from the wheels. This should be done in every exit of each construction vehicle to ensure the local roads are kept clean.
Soil Erosion and siltation	Soil erosion and dust from the material stockpiles will increase the sediment and contaminant loading of surface water bodies.	<p>The Contractor shall</p> <ul style="list-style-type: none"> ▪ Stabilize the cleared areas not used for construction activities with vegetation or appropriate surface water treatments as soon as practicable following earthwork to minimize erosion ▪ Ensure that roads used by construction vehicles are swept regularly to remove sediment. ▪ Water the material stockpiles, access roads and bare soils on an as required basis to minimize dust. Increase the watering frequency during periods of high risk (e.g. high winds)
Construction activities in water bodies	Construction works in the water bodies will increase sediment and contaminant loading, and effect habitat of fish and other aquatic biology.	<p>The Contractor Shall</p> <ul style="list-style-type: none"> ▪ Monitor the water quality in the runoff from the site or areas affected by dredge plumes, and improve work practices as necessary ▪ Protect water bodies from sediment loads by silt screen or bubble curtains or other barriers ▪ Minimize the generation of sediment, oil and grease, excess nutrients, organic matter, litter, debris and any form of waste (particularly petroleum and chemical wastes).. ▪ Use environment friendly and nontoxic slurry during construction of piles to discharge into the river. ▪ Reduce infiltration of contaminated drainage through storm water management design ▪ Do not discharge cement and water curing used for cement concrete directly into water courses and drainage inlets.
Drinking water	Groundwater at shallow depths is contaminated with arsenic and hence not suitable for drinking purposes.	<p>The Contractor Shall</p> <ul style="list-style-type: none"> ▪ Pumping of groundwater should be from deep aquifers of more than 300 m to supply arsenic free water. Safe and sustainable discharges are to be ascertained prior to selection of pumps. ▪ Tube wells will be installed with due regard for the surface environment, protection of groundwater

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
	Depletion and pollution of groundwater resources.	<p>from surface contaminants, and protection of aquifer cross contamination</p> <ul style="list-style-type: none"> ▪ Protect groundwater supplies of adjacent lands

GUIDELINE-6: DRAINAGE MANAGEMENT

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Excavation and earth works, and construction yards	Lack of proper drainage for rainwater/liquid waste or wastewater owing to the construction activities harms environment in terms of water and soil contamination, and mosquito growth.	<p>The Contractor shall</p> <ul style="list-style-type: none"> ▪ Prepare a program for prevent/avoid standing waters, which CSC will verify in advance and confirm during implementation ▪ Provide alternative drainage for rainwater if the construction works/earth-fillings cut the established drainage line ▪ Establish local drainage line with appropriate silt collector and silt screen for rainwater or wastewater connecting to the existing established drainage lines already there ▪ Rehabilitate road drainage structures immediately if damaged by contractors' road transports. ▪ Construct wide drains instead of deep drains to avoid sand deposition in the drains that require frequent cleaning. ▪ Provide appropriate silt collector and silt screen at the inlet and manholes and periodically clean the drainage system to avoid drainage congestion ▪ Protect natural slopes of drainage channels to ensure adequate storm water drains. ▪ Regularly inspect and maintain all drainage channels to assess and alleviate any drainage congestion problem. ▪ Reduce infiltration of contaminated drainage through storm water management design
Ponding of water	Health hazards due to mosquito breeding	<ul style="list-style-type: none"> ▪ Do not allow ponding of water especially near the waste storage areas and construction camps ▪ Discard all the storage containers that are capable of storing of water, after use or store them in inverted position

GUIDELINE-7: SOIL QUALITY MANAGEMENT

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Filling of Sites with dredge materials	Soil contamination will occur from drainage of dredged materials	<p>The Contractor shall</p> <ul style="list-style-type: none"> ▪ Ensure that dredged sand used for land filling should be free of pollutants. Prior to filling, sand quality should be tested to confirm whether soil is pollution free. Sediments should be properly compacted. Top layer should be the 0.5 m thick clay on the surface and boundary slopes along with grass. Side Slope of Filled Land of 1:2 should be constructed by suitable soils with proper compaction as per design. Slope surface should be covered by top soils/ cladding materials (0.5m thick) and grass turfing with suitable grass. ▪ Leaching from the sediments should be contained to seep into the subsoil or should be discharged into settling lagoons before final disposal. ▪ No sediment laden water in the adjacent lands near the construction sites, and/or wastewater of suspended materials excessive of 200mg/l from dredge material storage/use area in the adjacent agricultural lands.
Storage of hazardous and toxic chemicals	Spillage of hazardous and toxic chemicals will contaminate the soils	<p>The Contractor shall</p> <ul style="list-style-type: none"> ▪ Strictly manage the wastes management plans proposed in ECP1 and storage of materials in ECP2 ▪ Construct appropriate spill contaminant facilities for all fuel storage areas ▪ Establish and maintain a hazardous materials register detailing the location and quantities of hazardous substances including the storage, use of disposals ▪ Train personnel and implement safe work practices for minimizing the risk of spillage ▪ Identify the cause of contamination, if it is reported, and contain the area of contamination. The impact may be contained by isolating the source or implementing controls around the affected site ▪ Remediate the contaminated land using the most appropriate available method to achieve required commercial/industrial guideline validation results
Construction material stock piles	Erosion from construction material stockpiles may contaminate the soils	<p>The Contractor shall</p> <ul style="list-style-type: none"> ▪ Protect the toe of all stockpiles, where erosion is likely to occur, with silt fences, straw bales or bunds

GUIDELINE-8: TOP SOIL MANAGEMENT

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Land clearing and earth works	Earthworks will impact the fertile top soils that are enriched with nutrients required for plant growth or agricultural development.	<p>The Contractor shall</p> <ul style="list-style-type: none"> ▪ Strip the top soil to a depth of 15 cm and store in stock piles of height not exceeding 2m. ▪ Remove unwanted materials from top soil like grass, roots of trees and similar others. ▪ The stockpiles will be done in slopes of 2:1 to reduce surface runoff and enhance percolation through the mass of stored soil. ▪ Locate topsoil stockpiles in areas outside drainage lines and protect from erosion. ▪ Construct diversion channels and silt fences around the topsoil stockpiles to prevent erosion and loss of topsoil. ▪ Spread the topsoil to maintain the physico-chemical and biological activity of the soil. The stored top soil will be utilized for covering all disturbed area and along the proposed plantation sites ▪ Prior to the re-spreading of topsoil, the ground surface will be ripped to assist the bonding of the soil layers, water penetration and re-vegetation

GUIDELINE-9: BORROW AREAS DEVELOPMENT AND OPERATION

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Development and operation of borrow areas	Generally dredge materials will be used as borrow material for filling of construction sites to the 100 year flood level. In case, the borrow pits developed by the Contractor, there will be impacts on local topography, landscaping and natural drainage.	<p>The Contractor shall</p> <ul style="list-style-type: none"> ▪ Identify borrow pits in consultation with the local LGED staff and RTIP-II (Additional Financing) staff. ▪ Obtain the borrow material from: <ul style="list-style-type: none"> - barren land or land without tree cover outside the road reserve; - excavating land and creating new water tanks/ponds; - land acquired temporarily outside the road reserve; - excavation of proposed culverts; ▪ Do not dig the borrow pits within 5m of the toe of the final section of the road embankment.

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		<ul style="list-style-type: none"> ▪ Dig the borrow pits continuously. Ridges of not less than 8 m widths shall be left at intervals not exceeding 300 m and small drains should be cut through the ridges to facilitate drainage ▪ Slope the bed level of the borrow pits, as far as possible, down progressively towards the nearest cross drain, if any, and do not lower it than the bed of the cross-drain, to ensure efficient drainage. . ▪ Do not locate the borrow pits within 500 m of any identified archaeological, religious or cultural sites if any. ▪ Follow the below for restoration of borrow areas are: <ul style="list-style-type: none"> - Return stockpiled topsoil to the borrow pit if is used for agriculture; - Stabilize the banks of the borrow pit with the top soil if it is used for fish ponds by compaction; - Return stockpiled topsoil to the borrow pit and all worked areas to be stabilized through re-vegetation using local plants. ▪ Control at each site by ensuring that base of the borrow pit drains into a sediment trap prior to discharging from the site.

GUIDELINE-10: AIR QUALITY MANAGEMENT

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Construction vehicular traffic	Air quality can be adversely affected by vehicle exhaust emissions and combustion of fuels.	<p>The Contractor should</p> <ul style="list-style-type: none"> ▪ Fit vehicles with appropriate exhaust systems and emission control devices. Maintain these devices in good working condition. ▪ Operate the vehicles in a fuel efficient manner ▪ Cover haul vehicles carrying dusty materials moving outside the construction site ▪ Impose speed limits on all vehicle movement at the worksite to reduce dust emissions ▪ Control the movement of construction traffic ▪ Service all vehicles regularly to minimize emissions
Construction machinery	Air quality can be adversely affected by emissions from	<p>The Contractor shall</p> <ul style="list-style-type: none"> ▪ Fit machinery with appropriate exhaust systems and emission control devices. Maintain these devices in good

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
	machinery and combustion of fuels.	<p>working condition in accordance with the specifications defined by their manufacturers to maximize combustion efficiency and minimize the contaminant emissions. Proof or maintenance register shall be required by the equipment suppliers and contractors/subcontractors</p> <ul style="list-style-type: none"> ▪ Focus special attention on containing the emissions from generators ▪ Machinery causing excess pollution (e.g. visible smoke) will be banned from construction sites ▪ Service all equipment regularly to minimize emissions ▪ Provide filtering systems, duct collectors or humidification or other techniques (as applicable) to the concrete batching and mixing plant to control the particle emissions in all its stages, including unloading, collection, aggregate handling, cement dumping, circulation of trucks and machinery inside the installations
Construction activities	Dust generation from construction sites, material stockpiles and access roads is a nuisance in the environment and can be a health hazard.	<ul style="list-style-type: none"> ▪ Water the material stockpiles, access roads and bare soils on an as required basis to minimize the potential for environmental nuisance due to dust. Increase the watering frequency during periods of high risk (e.g. high winds). Stored materials such as gravel and sand shall be covered and confined to avoid their being wind-drifted ▪ Minimize the extent and period of exposure of the bare surfaces ▪ Reschedule earthwork activities or vegetation clearing activities, where practical, if necessary to avoid during periods of high wind and if visible dust is blowing off-site ▪ Restore disturbed areas as soon as practicable by vegetation/grass-turfing ▪ Store the cement in silos and minimize the emissions from silos by equipping them with filters. ▪ Establish adequate locations for storage, mixing and loading of construction materials, in a way that dust dispersion is prevented because of such operations

GUIDELINE-11: NOISE AND VIBRATION MANAGEMENT

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Construction vehicular traffic	Noise quality will be deteriorated	The Contractor shall

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
	due to vehicular traffic	<ul style="list-style-type: none"> ▪ Maintain all vehicles in order to keep it in good working order in accordance with manufactures maintenance procedures ▪ Make sure all drivers will comply with the traffic codes concerning maximum speed limit, driving hours, etc. ▪ Organize the loading and unloading of trucks, and handling operations for the purpose of minimizing construction noise on the work site
Construction machinery	Noise and vibration may have an impact on people, property, fauna, livestock and the natural environment.	<p>The Contractor shall</p> <ul style="list-style-type: none"> ▪ Appropriately site all noise generating activities to avoid noise pollution to local residents ▪ Use the quietest available plant and equipment ▪ Modify equipment to reduce noise (for example, noise control kits, lining of truck trays or pipelines) ▪ Maintain all equipment in order to keep it in good working order in accordance with manufactures maintenance procedures. Equipment suppliers and contractors shall present proof of maintenance register of their equipment. ▪ Install acoustic enclosures around generators to reduce noise levels. ▪ Fit high efficiency mufflers to appropriate construction equipment ▪ Avoid the unnecessary use of alarms, horns and sirens
Construction activities	Noise and vibration may have an impact on people, property, fauna, livestock and the natural environment.	<p>The Contractor shall</p> <ul style="list-style-type: none"> ▪ Notify adjacent landholders prior any typical noise events outside of daylight hours ▪ Educate the operators of construction equipment on potential noise problems and the techniques to minimize noise emissions ▪ Employ best available work practices on-site to minimize occupational noise levels ▪ Install temporary noise control barriers where appropriate ▪ Plan activities on site and deliveries to and from site to minimize impact ▪ Monitor and analyze noise and vibration results and adjust construction practices as required. ▪ Avoid undertaking the noisiest activities, where possible, when working at night near the residential areas

GUIDELINE-12: TREE CUTTING AND AFFORESTATION

This Guideline discusses the issue of tree cutting and afforestation. Loss of trees creates adverse environmental impacts. In order to mitigate these impacts, suitable measures have been suggested as part of this Guideline. These measures have been given for each of the stages of the road construction activities.

1. Project Planning and Design Stage

During alignment finalization, due consideration shall be given to minimize the loss of existing tree cover, encroachment of forest areas / protected areas etc. as specified in guideline on, "Project Preparation". Tree felling, if unavoidable, shall be done only after compensatory plantation of at least three saplings for every tree cut is done.

The plantation/afforestation would be carried out by the forest department. It should be ensured that plantation is carried out only in areas where water can be made available during dry seasons and the plant can be protected during the initial stages of their growth. The species shall be identified giving due importance to local flora. It is recommended to plant mixed species in case of both avenue or cluster plantation.

The plantation strategy shall suggest the planting of fruit bearing trees and other suitable trees. Development of cluster plantations will be encouraged in the community lands, at locations desired by the community. The choice of species will be based on the preferences of the community. The PIC shall oversee the plantation to check the following:

- Whether trees are obstructing line of sight at junctions;
- Whether trees are at the inside of the junctions; and
- Whether trees are within 5 meters of the proposed centerline.

2. Post-construction Stage

The maintenance of the saplings (including activities such as weeding, watering, planting of replacement saplings, etc. application of manure etc.) shall be the responsibility of the forest department. The PIC shall ensure the following:

- Shoulder of roads to be kept clear of weeds/undesirable undergrowth; and
- Branches of trees do not obstruct clear view of the informative and caution signs.

GUIDELINE-13: PROTECTION OF FISHERIES

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Construction activities in River	The main potential impacts to fisheries are hydrocarbon spills and leaks from riverine transport and disposal of wastes into the river	The Contractor shall <ul style="list-style-type: none"> ▪ Ensure the riverine transports, vessels and ships are well maintained and do not have oil leakage to contaminate river water. ▪ Contain oil immediately on river in case of accidental spillage from vessels and ships and in this regard, make an emergency oil spill containment plan to be supported with enough equipment's, materials and human resources

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		<ul style="list-style-type: none"> Do not dump wastes, be it hazardous or non-hazardous into the nearby water bodies or in the river
Construction activities on the land	Filling of ponds for site Preparation will impact the fishes.	<p>The Contractor shall</p> <ul style="list-style-type: none"> Inspect any area of a water body containing fish that is temporarily isolated for the presence of fish, and all fish shall be captured and released unharmed in adjacent fish habitat Install and maintain fish screens etc. on any water intake with drawing water from any water body that contain fish

GUIDELINE-14: ROAD TRANSPORT AND ROAD TRAFFIC MANAGEMENT

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Construction vehicular traffic	Increased traffic use of road by construction vehicles will affect the movement of normal road traffics and the safety of the road users.	<p>The Contractor shall</p> <ul style="list-style-type: none"> Prepare and submit a traffic management plan to the RTIP-II (Additional Financing), LGED for his approval at least 30 days before commencing work on any project component involved in traffic diversion and management. Include in the traffic management plan to ensure uninterrupted traffic movement during construction: detailed drawings of traffic arrangements showing all detours, temporary road, temporary bridges temporary diversions, necessary barricades, warning signs / lights, road signs etc. Provide signs at strategic locations of the roads complying with the schedules of signs contained in the Bangladesh Traffic Regulations. Install and maintain a display board at each important road intersection on the roads to be used during construction, which shall clearly show the following information in Bangla: <ul style="list-style-type: none"> Location: chainage and village name Duration of construction period Period of proposed detour / alternative route Suggested detour route map Name and contact address/telephone number of the concerned personnel Name and contact address / telephone number of the Contractor

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		- Inconvenience is sincerely regretted.
	Accidents and spillage of fuels and chemicals	<ul style="list-style-type: none"> ▪ Restrict truck deliveries, where practicable, to day time working hours. ▪ Restrict the transport of oversize loads. ▪ Operate road traffics/transport vehicles, if possible, to non-peak periods to minimize traffic disruptions. ▪ Enforce on-site speed limit

GUIDELINE-15: WATER TRANSPORT MANAGEMENT

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Construction activities in River	The presence of construction and other construction activities in the River can cause hindrance and risks to the river traffic.	<p>The Contractor shall</p> <ul style="list-style-type: none"> ▪ Not obstruct other normal riverine transport while doing riverine transport and works ▪ Keep regular and close contacts with Bangladesh Inland Water Transport Authority (BIWTA) regarding their needs during construction of the project ▪ Plan the river transport and transportation of large loads in coordination with BIWTA to avoid traffic congestions. ▪ Provide signage for river traffic conforming to the BIWTA requirements
	Accidents	<p>The Contractor shall</p> <ul style="list-style-type: none"> ▪ Prepare an emergency plan for dealing with accidents causing accidental sinking of the vessels and ships ▪ Ensure sufficient equipment and staffs available to execute the emergency plans ▪ Provide appropriate lighting to barges and construction vessels.

GUIDELINE-16: EROSION AND SEDIMENTATION CONTROL

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Clearing of construction sites	Cleared areas and slopes are susceptible for erosion of top soils that affects the growth	<ul style="list-style-type: none"> ▪ Reinststate and protect cleared areas as soon as possible. ▪ Mulch to protect batter slopes before planting

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
	of vegetation which causes ecological imbalance.	<ul style="list-style-type: none"> ▪ Cover unused area of disturbed or exposed surfaces immediately with mulch/grass turfings/tree plantations
Construction activities and material stockpiles	The impact of soil erosion are (i) Increased run off and sedimentation causing a greater flood hazard to the downstream, (ii) destruction of aquatic environment in nearby lakes, streams, and reservoirs caused by erosion and/or deposition of sediment damaging the spawning grounds of fish, and (iii) destruction of vegetation by burying or gullyng.	<p>The Contractor shall</p> <ul style="list-style-type: none"> ▪ Locate stockpiles away from drainage lines ▪ Protect the toe of all stockpiles, where erosion is likely to occur, with silt fences, straw bales or bunds ▪ Remove debris from drainage paths and sediment control structures ▪ Cover the loose sediments and water them if required ▪ Divert natural runoff around construction areas prior to any site disturbance ▪ Install protective measures on site prior to construction, for example, sediment traps ▪ Control drainage through a site in protected channels or slope drains ▪ Install 'cut off drains' on large cut/fill batter slopes to control water runoff speed and hence erosion ▪ Observe the performance of drainage structures and erosion controls during rain and modify as required

GUIDELINE-17: CONSTRUCTION CAMP MANAGEMENT

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Siting and Location of construction camps	Campsites for construction workers are the important locations that have significant impacts such as health and safety hazards on local resources and infrastructure of nearby communities.	<p>The Contractor shall</p> <ul style="list-style-type: none"> ▪ Locate the construction camps at areas which are acceptable from environmental, cultural or social point of view. ▪ Consider the location of construction camps away from communities in order to avoid social conflict in using the natural resources such as water or to avoid the possible adverse impacts of the construction camps on the surrounding communities. ▪ Local authorities responsible for health, religious and security shall be duly informed on the set up of camp facilities so as to maintain effective surveillance over public health, social and security matters
Construction Camp Facilities	Lack of proper infrastructure facilities such as housing, water	<p>Contractor shall provide the following facilities in the campsites</p> <ul style="list-style-type: none"> ▪ Adequate housing for all workers

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
	supply and sanitation facilities will increase pressure on the local services and generate substandard living standards and health hazards.	<ul style="list-style-type: none"> ▪ Safe and reliable water supply. Water supply from deep tube wells of 300 m depth that meets the national standards ▪ Hygienic sanitary facilities and sewerage system. The toilets and domestic waste water will be collected through a common sewerage. Provide separate latrines and bathing places for males and females with total isolation by wall or by location. The minimum number of toilet facilities required is one toilet for every ten persons. ▪ Provide in-house community/common entertainment facilities. Dependence of local entertainment outlets by the construction camps to be discouraged/prohibited to the extent possible.
Disposal of waste	Management of wastes is crucial to minimize impacts on the environment	<p>The Contractor should</p> <ul style="list-style-type: none"> ▪ Ensure proper collection and disposal of solid wastes within the construction camps ▪ Insist waste separation by source; organic wastes in one pot and inorganic wastes in another pot at household level. ▪ Store inorganic wastes in a safe place within the household and clear organic wastes on daily basis to waste collector. Establish waste collection, transportation and disposal systems with the manpower and equipments/vehicles needed. ▪ Locate the garbage pit/waste disposal site min 500 m away from the residence so that peoples are not disturbed with the odor likely to be produced from anaerobic decomposition of wastes at the waste dumping places. Encompass the waste dumping place by fencing and tree plantation to prevent children to enter and play with. ▪ Do not establish site specific landfill sites. All solid waste will be collected and removed from the work camps and disposed in approval waste disposal sites.
Health and Hygiene	There will be a potential for diseases to be transmitted including malaria, exacerbated by inadequate health and safety practices.	<p>The Contractor shall</p> <ul style="list-style-type: none"> ▪ Provide adequate health care facilities within construction sites. ▪ Provide first aid facility round the clock. Maintain stock of medicines in the facility and appoint fulltime designated first aider or nurse. ▪ Provide ambulance facility for the laborers during emergency to be transported to nearest hospitals. ▪ Initial health screening of the laborers coming from outside areas

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
		<ul style="list-style-type: none"> ▪ Provide adequate drainage facilities throughout the camps to ensure that disease vectors such as stagnant water bodies and puddles do not form. Regular mosquito repellent sprays during monsoon. ▪ Carryout short training sessions on best hygiene practices to be mandatorily participated by all workers. Place display boards at strategic locations within the camps containing messages on best hygienic practices

GUIDELINE-18: CULTURAL AND RELIGIOUS ISSUES

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Construction activities near religious and cultural sites	Disturbance from construction works to the cultural and religious sites, and contractors lack of knowledge on cultural issues cause social disturbances.	<p>The Contractor shall</p> <ul style="list-style-type: none"> ▪ Communicate to the public through community consultation and newspaper announcements regarding the scope and schedule of construction, as well as certain construction activities causing disruptions or access restriction. ▪ Do not block access to cultural and religious sites, wherever possible ▪ Restrict all construction activities within the foot prints of the construction sites. ▪ Stop construction works that produce noise (particularly during prayer time) should there be any mosque/religious/educational institutions close to the construction sites and users make objections. ▪ Take special care and use appropriate equipment when working next to a cultural/religious institution. ▪ Show appropriate behavior with all construction workers especially women and elderly people ▪ Resolve cultural issues in consultation with local leaders and supervision consultants ▪ Establish a mechanism that allows local people to raise grievances arising from the construction process.

GUIDELINE-19: OCCUPATIONAL HEALTH AND SAFETY

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
Best practices	Construction works may pose health and safety risks to the construction workers and site visitors leading to severe injuries and deaths. The population in the proximity of the construction site and the construction workers will be exposed to a number of (i) biophysical health risk factors, (e.g. noise, dust, chemicals, construction material, solid waste, waste water, vector transmitted diseases etc.), (and (ii) road accidents from construction traffic.	<p>The Contractor shall</p> <ul style="list-style-type: none"> ▪ Implement suitable safety standards for all workers and site visitors which should not be less than those laid down on the international standards (e.g. International Labor Office guideline on ‘Safety and Health in Construction; World Bank Group’s ‘Environmental Health and Safety Guidelines’) and contractor’s own national standards or statutory regulations, in addition to complying with the national standards of the Government of Bangladesh (e.g. ‘The Bangladesh Labor Code, 2006’) ▪ Provide the workers with a safe and healthy work environment, taking into account inherent risks in its particular construction activity and specific classes of hazards in the work areas, ▪ Provide personal protective equipment (PPE) for workers, such as safety boots, helmets, masks, gloves, protective clothing, goggles, full-face eye shields, and ear protection. Maintain the PPE properly by cleaning dirty ones and replacing them with the damaged ones. ▪ Safety procedures include provision of information, training and protective clothing to workers involved in hazardous operations and proper performance of their job ▪ Appoint an environment, health and safety manager to look after the health and safety of the workers
Accidents	Lack of first aid facilities and health care facilities in the immediate vicinity will aggravate the health conditions of the victims	<ul style="list-style-type: none"> ▪ Provide health care facilities and first aid facilities are readily available. Appropriately equipped first-aid stations should be easily accessible throughout the place of work ▪ Document and report occupational accidents, diseases, and incidents. ▪ Prevent accidents, injury, and disease arising from, associated with, or occurring in the course of work by minimizing, so far as reasonably practicable, the causes of hazards. In a manner consistent with good international industry practice. ▪ Identify potential hazards to workers, particularly those that may be life-threatening and provide necessary preventive and protective measures. ▪ Provide awareness to the construction drivers to strictly follow the driving rules ▪ Provide adequate lighting in the construction area and along the roads
Water and	Lack of Water sanitation facilities at construction sites	<ul style="list-style-type: none"> ▪ The contractor should provide portable toilets at the construction sites, if about 25 people are working the whole day for a month. Location of portable facilities

Project Activity/ Impact Source	Environmental Impacts	Mitigation Measures/ Management Guidelines
sanitation facilities at the construction sites	cause inconvenience to the construction workers and affect their personal hygiene.	<p>should be at least 6m away from storm drain system and surface waters. These portable toilets should be cleaned once a day and all the sewerage should be pumped from the collection tank once a day and should be brought to the common septic tank for further treatment.</p> <ul style="list-style-type: none"> ▪ Contractor should provide bottled drinking water facilities to the construction workers at all the construction sites.

ANNEX 4: Stakeholder Consultation

The original EMF preparation includes 2 initial field level consultations in addition to follow-up consultations. One of the consultations was held at Mymensingh Sadar Upazila, which was attended by about 30 community representatives including journalists, civil society organizations, contractors, truck drivers, bus drivers, members of transport workers associations, and local government institutions including one upazila chairman. The participants were overwhelmed to understand that the meeting was to consult them for designing the RTIP-2. The other consultation was held at Hatkhalir Bazar, Fulbaria Upazila of Mymensingh district and attended by around 60 persons from in and around the bazaar. The Fulbaria Upazila Engineer organized the meeting and the local Upazila Chairman facilitated. An Upazila Road has been nominated for the first year construction under RTIP-2. Only about 100-m of the road will need earth work and it has sufficient land for improvement. The local people including the elected representatives are yelling for long to get their road improved. They assured that if any additional strip of land is required for the improvement work, they are ready to organize by themselves. The participants in both consultations were happy to understand that social and environmental impacts will be addressed under the project to maximize project benefits. They did not foresee any major environmental issues from the project activities. In addition, the LGED field level staffs were consulted for effective environmental management considering the RTIP experience.

In addition, 6 meetings were held on end November 2011 on the sample project site. Total 50 participants from different locations have taken part in the consultations. The schedules, venues and the major feedbacks or queries from the participants for (i) rural road improvements; (ii) rural road maintenance; (iii) rural waterways; and iv) growth center market are summarized in Annexes.

The environmental management of the proposed RTIP-2 was also discussed at a national consultation meeting on the project was held on October 10, 2011 to present the EMF and SMF and to receive their feedback.



Consultation Meeting Held on October 10, 2011

Further LGED, the executing agency (EA) conducted a day-long workshop on Disclosure of draft Environmental Management Framework and social Management Framework at LGED Auditorium on 7

February 2012 attention to all levels stakeholder including civil society, government's official, representative from local government, NGO's, Educationalist, LGED staff etc. The main objective of the Workshop was to (i) inform the project stakeholders at all levels (local to national levels) regarding environmental and social measures are proposed to mitigate the adverse impacts of the subprojects. The suggestions and outcomes from this workshop are incorporated in this EMF. Close to 100 participants attended the national Workshop and actively contributed their valuable views. A paper cutting regarding the news of the workshop is attached in Annex 9B.



Workshop on February 7, 2012

Additional Financing :A public consultation was arranged for the Additional Financing of the Second Rural Transport Improvement Project (RTIP-II (Additional Financing)) at Gheor, Manikganj on January 3, 2018. Local people along with their representatives, different professionals including NGOs and women's organizations, LGED officials & consultants attended the consultation. The main objective of the meeting was to share project's planned activities and their associated potential impacts on the environment & society. In this regard, the Environmental and Social Safeguard Policy of the GoB and the Development Partner were disclosed. In the consultation program, participants feedback was also received which reflected the necessity and demand of the proposed project.