



3rd Operation Phase E&S
Monitoring Report - 584
MW Gas Fired Combined
Cycle Power Project in
Sonargaon, Narayanganj,
Bangladesh – Jul-Sept
2024
Final Report

PREPARED FOR



SFL SFL Unique Nebras Meghnaghat
Power Limited

DATE

4 November 2024

REFERENCE

0575406



DOCUMENT DETAILS

The details entered below are automatically shown on the cover and the main page footer. PLEASE
NOTE: This table must NOT be removed from this document.

DOCUMENT TITLE	3rd Operation Phase E&S Monitoring Report - 584 MW Gas Fired Combined Cycle Power Project in Sonargaon, Narayanganj, Bangladesh – Jul-Sept 2024
DOCUMENT SUBTITLE	Final Report
PROJECT NUMBER	0575406
Date	4 November 2024
Version	01
Author	ERM India Private Limited
Client name	SFL Unique Nebras Meghnaghat Power Limited

DOCUMENT HISTORY

				ERM APPROVAL TO ISSUE		
VERSION	REVISION	AUTHOR	REVIEWED BY	NAME	DATE	COMMENTS
01	00	Dhritiman R Dawipayan D Debojyoti K	Subhradeb P Tufail K	Subhradeb P.	04.11.2024	For issue to client

SIGNATURE PAGE

3rd Operation Phase E&S Monitoring Report - 584 MW Gas Fired Combined Cycle Power Project in Sonargaon, Narayanganj, Bangladesh – Jul-Sept 2024

Final Report

0575406

[Double click to insert signature]

Subhradeb Pramanik

Partner

ERM India Private Limited
3rd Floor, Building 10B,
DLF Cyber City,
Gurgaon – 122002 | India
T: +91 124 417 0300
F: +91 123 417 0301

© Copyright 2026 by The ERM International Group Limited and/or its affiliates ('ERM'). All Rights Reserved.
No part of this work may be reproduced or transmitted in any form or by any means, without prior written permission of ERM.



CONTENTS

EXECUTIVE SUMMARY	1
CURRENT PROJECT STATUS	1
ENVIRONMENT LINKED OBSERVATIONS	2
HEALTH & SAFETY LINKED KEY OBSERVATION	3
SOCIAL LINKED OBSERVATION	3
1. INTRODUCTION	5
1.1 BACKGROUND	5
1.2 OBJECTIVES	5
1.3 WORK SCOPE – PERIODIC E&S MONITORING	5
1.4 APPLICABLE REFERENCE FRAMEWORK	6
1.5 ERM TEAM	6
1.6 APPROACH – E&S MONITORING	8
1.7 LIMITATIONS & ASSUMPTIONS	9
1.8 USE OF THE REPORT	10
1.9 LAY OUT OF THE REPORT	10
2. PROJECT APPRECIATION & CURRENT PROJECT STATUS	11
2.1 THE PROJECT	11
2.1.1 Project owner/company	12
2.1.2 Project location	12
2.1.3 plant layout	13
2.1.4 key project components	16
2.1.5 key project facilities	16
2.1.6 Project Associated Facilities	19
2.1.7 current project status	20
2.1.8 Status of E&S Indicators	21
2.1.9 project manpower requirement	24
2.1.10 Project Schedule	25
3. COMPLIANCE STATUS – ESAP, ESMMP, LRP, SEP, GRM IMPLEMENTATION	26
3.1 ESAP, ESMMP & REGULATORY COMPLIANCE STATUS	26
3.2 LIVELIHOOD RESTORATION PLAN (LRP) IMPLEMENTATION STATUS	68
3.3 STAKEHOLDER ENGAGEMENT PLAN (SEP) & GRM IMPLEMENTATION STATUS	69
APPENDIX A PHOTO DOCUMENTATION	
APPENDIX B DOCUMENT/INFORMATION REVIEW LIST	
LIST OF TABLES	
TABLE 1-1 SITE VISIT & INTERVIEWS – KEY ACTIVITIES PERFORMED	8
TABLE 2-1 PROJECT DETAILS - SNAPSHOT	11

TABLE 2-2	PROJECT E&S DASHBOARD OF EPC – SEPTEMBER 2024	21
TABLE 2-3	O&M CONTRACTOR E&S KPI'S SEPTEMBER 2024	23
TABLE 2-4	MANPOWER INVOLVED AT SITE	24
TABLE 2-5	CONTRACTOR MANPOWER BREAK-UP	25
TABLE 2-6	PROPOSED PROJECT SCHEDULE VS ACTUAL STATUS	25
TABLE 3-1	ESAP, ESMMP & REGULATORY COMPLIANCE STATUS	27

LIST OF FIGURES

FIGURE 2-1	PROJECT CONTRACTUAL STRUCTURE	12
FIGURE 2-2	PROJECT LOCATION – SATELLITE IMAGERY SNAPSHOT	14
FIGURE 2-3	PROJECT SITE LAYOUT	15
FIGURE 2-4	GAS PIPELINE FINAL ROUTE MAP	17
FIGURE 2-5	LAYOUT OF PROJECT FACILITIES	20

ACRONYMS AND ABBREVIATIONS

Acronyms	Description
AAQ	Ambient Air Quality
AI	Aspect Impact
AIIB	Asian Infrastructure Investment Bank
AoI	Area of Influence
ARIPA	Acquisition and Requisition of Immovable Property Act
BCPA	Bangladesh Crop Protection Association
BECR	Bangladesh Environmental Conservation Rules
BFSCD	Bangladesh Fire Service & Civil Defense
BIWTA	Bangladesh Inland Water Transport Authority
BLA	Bangladesh Labour Act
BLR	Bangladesh Labour Rules
BOD	Biochemical Oxygen Demand
BPDB	Bangladesh Power Development Board
BWA	Bangladesh Water Act
BWR	Bangladesh Water Rule
CAAB	Civil Aviation Authority of Bangladesh
CAR	Corrective Action Request
CCGT	Combined Cycle gas Turbine

Acronyms	Description
CCPP	Combined Cycle Power Plant
CEMS	Continuous Emission Monitoring System
CIA	Cumulative Impact Assessment
CL	Casual Leave
CMB	Common Monitoring Basin
CO2	Carbon di oxide
CoC	Cycle of Concentration
COD	Commercial Operation Date
COVID	Corona Virus Disease
CSR	Corporate Social Responsibility
CW	Cooling Water
DEG	Deutsche Entwicklungs- und Investitionsgesellschaft
DG	Diesel Generator
DIFE	Department of Inspection for Factories and Establishments
DoE	Department of Environment
DWP	Demineralized Water Plant
E&S	Environment & Social
ECA	Environmental Conservation Act
ECA	Ecologically Critical Area
ECC	Environmental Clearance Certificate
EHS	Environment, Health and Safety
EIA	Environmental Impact Assessment
EL	Earned Leave
EMF	Electric and magnetic Field
EMP	Environmental Management Plan
EPC	Engineering, Procurement and Construction
ERM	Environmental Resources Management
ESDD	Environmental and Social Due Diligence
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environment and Social Management System
ETP	Effluent Treatment Plant

Acronyms	Description
FGD	Flue gas Desulphurization
FGL	Finished Grade Level
FNTP	Full Notice to Proceed
GBV	Gender Based Violence
GE	General Electric
GHG	Green House Gas
GIIP	Good International Industry Practice
GIS	Gas Insulated Switchyard
GLC	Ground Level Concentration
GoB	Government of Bangladesh
GRM	Grievance Response Mechanism
GSA	Gas Supply Agreement
GT	Gas Turbine
GW	Ground Water
H ₂ S	Hydrogen Sulphide
HAZOP	Hazard and Operability
HDD	Horizontal Directional Drilling
HFL	High Flood Level
HIRA	Hazard identification and Risk Register
HP Steam	High pressure Steam
HR	Human Resource
HRSG	Heat Recovery Steam Generator
HSD	High Speed Diesel
IDCT	Induced draft-cooling tower
IEC	Installation, Erection and Commissioning
IEE	Initial Environmental Examination
IFC	International Finance Corporation
ILO	International Labour organization
Km/Hr	Kilometer/Hour
KPI	Key Performance Indicator
kV	kilovolt
LESA	Lenders' Environmental and Social Advisor

Acronyms	Description
LGED	Local Government Engineering Department
LoI	Letter of Intent
LOTO	Lock Out Tag Out
LP Steam	Low Pressure Steam
LPG	Liquefied petroleum Gas
LRP	Livelihood Restoration Plan
MPEMR	Ministry of Power, Energy and Mineral Resources
MPR	Monthly Progress Report
MSDS	Material Safety Data Sheet
MW	Megawatt
NAAQS	National Ambient Air Quality Standards
NEPC	Northeast No.1 Electric Power Construction Co Ltd
NFPA	National Fire Protection Association
NG	Natural Gas
NOC	No Objection Certificate
NOx	Nitrogen Oxides
OCC	Optimized for Cycling and Constructability
OPEC	OPEC Fund for International Development
P&ID	Piping and Instrumentation Diagram
PAH	Poly Aromatic Hydrocarbons
PAP	Project Affected Person
PCB	Poly Chlorinated Biphenyls
PEL	Permissible Exposure Limit
PGCB	Power Grid Company of Bangladesh
PLF	Plant Load Factor
PPA	Power Purchase Agreement
PPE	Personal Protective Equipment
PS	Performance Standard
PUC	Pollution Under Control
PVC	Poly Vinyl Chloride
PWD	Public Works Department
RAP	Rehabilitation Action Plan

Acronyms	Description
RCC	Reinforced Cement Concrete
RMS	Regulatory Metering Station
RoW	Right of Way
SCB	Standard Chartered Bank
SE	Socio Economic
SEAH	Sexual Exploitation, Abuse and Harassment
SEP	Stakeholder Engagement Plan
SFL	Strategic Finance limited
SO ₂	Oxides of Sulphur
SPM	Suspended Particulate Matter
ST	Steam Turbine
SUNMP	SFL Unique Nebras Meghnaghat Power PLC
STP	Sewage Treatment Plant
SWAS	Steam and Water Analysis System
TDS	Total Dissolved Solids
TGTDCL	Titas Gas Transmission and Distribution Company Ltd
TL	Transmission Line
TSS	Total Suspended Solids
UHRL	Unique Hotel and Resorts Limited
USP	Unsolicited Proposal
WARPO	Water Resources & Planning Organisation
WHO	World Health Organization
WMP	Waste Management Plan
WTP	Water Treatment Plant

EXECUTIVE SUMMARY

ERM India Pvt. Ltd. (ERM) was commissioned by Deutsche Entwicklungs- und Investitionsgesellschaft ("DEG"), Asian Development Bank (ADB) and Asian Infrastructure Investment Bank (AIIB) (hereinafter collectively referred to as "Lenders") to conduct an independent Environmental and Social Due Diligence (ESDD) for proposed 584 MW gas fired combined power cycle project located in Sonargaon, Narayanganj, Bangladesh ("Project"). A consortium led by Strategic Finance Limited named "SFL Unique Nebras Meghnaghat Power PLC" ("SUNMP"), is developing this project. It is understood that Lenders are evaluating opportunity of equity investment in the project and have appointed ERM as Lenders' E&S Advisor (LESA) to support their due diligence prior to financial close as well as for periodic monitoring during the investment period.

As part of this engagement, ERM has so far conducted initial ESDD in January 2021 followed by five periodic E&S compliance monitoring of the project during construction phase and three periodic E&S compliance monitoring of the project during operation phase. This report present findings/observations of the 3rd operation phase EHSS compliance monitoring audit.

CURRENT PROJECT STATUS

The Engineering, Procurement and Construction (EPC) Contract is awarded to M/S General Electric Global Services (GmbH) whereas M/S Tractebel Engineering Pvt. Ltd. has been identified as the owner's engineer. The EPC Contractor has made consortium with NEPC and have commenced site construction activities, with NEPC-S working as the O&M contractor post declaration of COD. Review of the Monthly Progress Report (MPR) shared by SUNMP for September 2024 indicated the following operational progress status as stated below:

- The Combined Cycle (CC) Plant has been shut down since June 24th, as instructed by NLDC due to the unavailability of fuel gas. However, the Plant has maintained 100% availability during this period. The plant is expected to start production from first week of November as reported by SUNMP management.
- During this shutdown period, the plant imported 1.52 GWh of electrical energy from the national grid.
- Since the plant was in shutdown condition, the plant's (GT & ST) factored fired hours are zero. At the end of the month, the cumulative total factored fired hours (FFH) are 2,374 hours for the GT and 1,765 hours for the ST. Moreover, the plant load factor for the month is 0%, while the target was 60%.
- During September, no Lost Time Incidents (LTIs) were recorded, maintaining a cumulative total of 255 days without any LTIs since COD. One first-aid case (FAC) was recorded in this month.
- As part of CSR activities, focused group discussions were held along with the five-day long sewing training program for 40 community females in two batches, and sewing machines were distributed among the trainees. Provided training on girls' education, awareness on dengue fever & public health etc., and group pensions to vulnerable groups in 54 community households.

- The implementation of the APM and OPM-GE digital solution system by GE, as per CSA, is in progress.
- The punch items listed by the O&M team are currently being worked on, with GE (the EPC) actively addressing them.

ENVIRONMENT LINKED OBSERVATIONS

Wastewater recycling: Review of the site clearance conditions requires SUNMP to develop and implement a plan to facilitate 100% wastewater recycling during operations. However, discussion with EPC consortium reveals that as per the design both Effluent Treatment Plant (ETP) and Sewage Treatment Plant (STP) to be installed and operated will be having two separate outfalls with no provision for wastewater recycling. As verified during the current visit, SUNMP has applied for exemption of 100% water recycling requirement as mentioned in the condition no.5 of approved EIA report vide letter no. UMPL777 -DOE-L-2001 dated 25 March 2024 from DoE. In the letter SUNMP has committed to achieve 75% water recycling for that a plan/framework has been outlined in Wastewater Management procedure towards achieving 75% treated wastewater recycling by December 2028 through installation of two stage Reverse Osmosis (RO) Plant. However, the plan is not found to be comprehensive as it does not outline water balance diagram, the volume of water to be generated, capacity of the RO plant etc.

BERC Registration for Gas Supply Pipeline: With COD declared in January 2024, SUNMP has written to TGDCL vide letter dated 27 October 2024 seeking sharing of the BERC license for gas supply pipeline. However, copy of the same is yet to be shared for review and validation.

Noise Barrier wall: The site has prepared a Noise Prevention and Control Plan for operations with noise barrier wall (~3m height) reportedly to be constructed on top of the project boundary wall for which the budget has already been approved by SUNMP Board of Directors. As observed by ERM team during current monitoring, the construction of 3m boundary wall has been complete and post completion of the wall construction, noise barrier installation is expected to commence in November 2024. Noise barrier material has reached Bangladesh and awaiting customs approval as per status update.

Environmental Monitoring: As per monitoring report dated October 2024, SUNMP is yet to undertake drinking water and ground water monitoring inside the plant boundary as per Schedule 2 of the BECR, 2023. Reportedly the site has installed a Continuous Emission Monitoring System (CEMS) for both main and bypass stack. Review of the online real time values indicate negative values for NO_x (-4.29 mg/m³) with PM values also noted for bypass stack (9.5 mg/m³). Considering the plant is not operational since 24th June, the reason for such high PM concentration in flue gas could not be validated and is ascertained largely due to calibration issues with CEMS, which is reported to be pending.

Hazardous Waste Management: The site has done agreement with M/s. Mesars Saiful Auto Bricks for coprocessing of used oil and oil contaminated waste. The ECC of the party was not available for review. The site is yet to identify an authorized party for the disposal of sludge.

HEALTH & SAFETY LINKED KEY OBSERVATION

Electrical Safety: As noted, the electrical wiring and earthing of the operational units onsite were not found to be subjected to annual review and certification by government licensed Wiring Inspector or Institution as per Bangladesh Labour Rules (BLR), 2015 requirements. Multiples instances were noticed where provision of insulated mats was lacking in front of high voltage electrical panels as per regulatory requirements.

Machine & Equipment Safety: Inspection records of lifting tools and tackles are not maintained in prescribed format (Form 24) as specified in the Bangladesh Labour Rules (BLR), 2015.

Hazardous Chemicals: The site has stored 16 HDPE barrels of aqueous ammonia in steam turbine building without any secondary containment. No gas mask has been provided to the persons handling the same as per requirement displayed in the MSDS.

Life & Fire Safety: SUNMP is yet to obtain a certification from Safety Wings to ensure proper installation of firefighting equipments as per approved firefighting plan. Also, the site is yet to engage a third-party agency for annual inspection and maintenance of the active and passive fire protection system onsite as per BNBC, 2020 norms.

SOCIAL LINKED OBSERVATIONS

Overtime and minimum wage rate compliance: Non-conformity with respect to overtime payment rate and revised minimum wage rate for construction workers (published in August 2021), were highlighted in previous audits. SUNMP has agreed to ensure payment of differential amount of overtime hours performed and minimum wage payment to eligible workers to ensure compliance requirement. In this regard, a detailed assessment on differential amount for eligible workers is prepared.

Releasing of the differential amount is not being initiated now, in view of potential business interruption related risk that were discussed in detail during ERM's 4th E&S monitoring visit. In ERM's 5th E&S Monitoring visit (Feb 2024), it was apprised that project COD was achieved on 19th January 2024 and calculation of differential amount is completed and it has considered period till January 2024.

Next steps towards payment release includes formation of back wage committee, Bank Account opening for depositing the fund for differential amount and the initiating payment to eligible construction workers. It was also apprised that payment disbursement is likely to be initiated by May/June 2024. But political unrest in Bangladesh has delayed the payments that were originally scheduled to begin in May/June 2024.

In ERM's E&S Monitoring visit in Oct 2024 it was apprised that an inventory of workers, including calculations of arrears has been done and a committee has been formed to oversee the payment of back wages. The next steps to be done after issuance of PAC (expected date 15 Nov 2024) is to

- Open a bank account allocated for back wage payments (to be completed within two months of the PAC issuance).
- Begin payment of back wages and overtime (to start in the second month following the PAC issuance).

- Implement monthly progress reporting starting from the second month after the PAC issuance and
- Finalize the disbursement process after completing the 12th month of payments.

LRP Implementation: LRP implantation tasks are being carried as planned. Key activities in terms of imparting different kinds of livelihood trainings and seed capital disbursement is completed for majority of the eligible participants and other associated engagement activities are also being carried out as per the schedule.

1. INTRODUCTION

1.1 BACKGROUND

ERM India Pvt. Ltd. (ERM) was commissioned by Deutsche Entwicklungs- und Investitionsgesellschaft ("DEG"), and Asian Infrastructure Investment Bank (AIIB) (hereinafter collectively referred to as "Lenders") to conduct an independent Environmental and Social Due Diligence (ESDD) for proposed 584 MW gas fired combined power cycle project located in Sonargaon, Narayanganj, Bangladesh (hereinafter referred to as "Project"). Unique Hotel & Resorts Limited (UHRL) is the major sponsor of the project with 51% shareholding. A consortium led by UHRL named "SFL Unique Nebras Meghnaghat Power PLC" (hereinafter referred to as "SUNMP" or "Company"), is developing this project. It is understood that Lenders are evaluating opportunity of equity investment in the project and have appointed ERM as Lenders' E&S Advisor (LESA) to support their due diligence prior to financial close as well as for periodic monitoring during the investment period.

1.2 OBJECTIVES

As Lenders' environmental and Social Advisor (LESA), ERM's overall role is to support Lender's investment decision and follow-up approach by independently assessing the Company's operations and activities (existing and planned) against the Assessment Framework (see Section 1.3). ERM is required to identify gaps, describe necessary mitigation and management measures, assist the finalization of the ESIA report in accordance with the lenders' environmental and social safeguard policies and follow-up actions. This will be followed by periodic Environmental and Social (E&S) Monitoring i.e. quarterly during construction phase, quarterly for 1st year of operations and annually during operation for the following 2 years to verify compliance within assessment framework (Refer Section 1.4).

1.3 WORK SCOPE – PERIODIC E&S MONITORING

The E&S Monitoring will be undertaken during both construction and operational phases in order to verify compliance within the assessment framework stipulated, which will include verifying the following:

- adequacy of the Company's E&S monitoring report.
- adequacy of the Company and contractor staffing and expertise to properly execute and monitor the E&S aspects of the operational activities.
- implementation status of the contractually agreed Environmental and Social Action Plan (ESAP) and all related processes and documents, as well as any deviations.
- adequacy of the Environmental and Social Management System.
- the implementation status of the Environmental and Social Management & Monitoring Program (ESMP) under special consideration of CO₂ emissions (considering use of gas / HFO).
- general site condition and cleanliness, and work execution.
- any known contractual problems with sub-contractors.
- any changes in the original operational plan and their impact.

- any indications for concerns with regard to the relation with local communities, former landowners (or users) or workers.
- any impacts on livelihoods.
- effectiveness and efficiency of stakeholder engagement and GRM.

1.4 APPLICABLE REFERENCE FRAMEWORK

The E&S Monitoring was carried out against the following the Assessment Framework

- Applicable local, national, international environmental, social (including occupational health and safety) legislation, and guidelines.
- ILO conventions covering core labour standards and the basic terms and conditions of employment.
- DEG Exclusion List.
- AIIBs ESP, ESSs and ES Exclusion List
- IFC Performance Standards (PS) 1–8, January 2012.
- World Bank Group General Environmental, Health and Safety (EHS) Guidelines, April 2007.
- World Bank Group General Environmental, Health and Safety (EHS) Guideline for Thermal Power Plants.
- World Bank Group General Environmental, Health and Safety (EHS) Guideline for Transmission Lines.
- World Bank Group General Environmental, Health and Safety (EHS) Guideline for Gas Distribution System.
- IFC`s Stakeholder Engagement Handbook.
- Good Practice Handbook on Cumulative Impact Assessment and Management: Guidance for the Private Sector in Emerging Markets; and
- Recommendation of the Council on Common Approaches for Officially Supported Export Credits and Environmental and Social Due Diligence.

1.5 ERM TEAM

A three-member ERM team had conducted the desktop review of the information shared by SUNMP for the period Jul-Sept 2024 as part of the 3rd E&S monitoring exercise undertaken for the project operation phase. The composition of the ERM team were as follows:

- **Dhritiman Ray (Environment, Health and Safety Specialist & Team Leader):**
Dhritiman has more than 25 years of experience in the field of EIA / ESIA Studies, Independent Environment Reviews, Urban Planning, Environmental Permitting and Waste Management. As an EIA Expert he has been involved in conducting Environmental Impact Assessments and in preparation of Environmental Management Plans for a wide range of projects in India and other countries including Bangladesh, Sri Lanka, Myanmar, Maldives, Zambia, etc. He has undertaken these projects in a cross-section of industrial, infrastructure and developmental sectors for government institutions, private sector clients and also for bilateral and multilateral funding agencies and financial institutions. He has also led and participated in E&S Due Diligences, Audits, Compliance Monitoring for Lenders and Project Developers and is therefore well versed with international/bilateral funding

agency procedures and benchmarks (Equator Principle, World Bank Operational Procedures, IFC Performance Standards requirements) that are applicable for large industrial / infrastructure projects. He also has exposure in formulating mechanisms for implementing such requirements on the ground. He has worked closely with funding agencies and financial institutions like World Bank, IFC, ADB, UNDP, JICA, KfW, DEG, HSBC, Stan C, SMBC, etc. and also with government agencies and private sector clients. He also has considerable experience in working in Bangladesh especially in energy and power sector projects. He is presently working on a number of projects with energy and power sector clients such as Bangladesh Power Development Board (BPDB), Bangladesh Rural Electrification Board (BREB), West Zone Power Distribution Company Limited (WZPDCL), Coal Power Generation Company Bangladesh Limited (CPGCBL), Summit Group, Mitsui, etc.

- **Dwaipayan Dutta (Social Specialist):**

Dwaipayan Dutta is currently working as Managing Consultant with ERM India. He has above 15 years of work experience in the field of Social Development including coordinating and conducting Environment and social impact assessment (ESIA), environment social due diligence studies (ESDD), preparation & implementation of resettlement action plans (RAP), Livelihood Impact Assessment (LIA), public consultation & focused group discussion on social issues, developing social management frameworks and plans, community need assessment, and conducting monitoring and evaluation studies, Independent Reviews of Social assessment/ labour audit as per international standards like IFC, ADB, Equator Principle, JBIC, KfW, GIZ, World Bank etc. in various infrastructure and rural development projects. He has done his Masters in Sociology and Masters in Environment Management. Also, he has done Post-Graduate Diploma in Rural Development. He has gained experience of working across sectors out of which some key sectors include National and State Highways, Railways, Transmission line, Hydro power, Irrigation, Power sector, Renewable energy where he was engaged as social expert. He has worked extensively in Bangladesh undertaking SIA study, preparation of resettlement action plan, Livelihood Restoration Framework, labour audit, due diligence and risk assessment for different infrastructure, manufacturing industry and renewable energy sector. He also has experience of working in several projects in other countries as well like Sri Lanka and Philippines.

- **Debojyoti Kundu (Environment, Health and Safety Consultant):**

Debojyoti holds a master's degree in environmental engineering and presently working at the capacity of consultant based out of ERM's Kolkata office, India. Debojyoti has Seven Years of demonstrated experience in Aluminum, Manufacturing, Textile, Pharmaceuticals and Thermal Power Industry and advisory services across industrial sectors in South Asia (India, Bangladesh). Debojyoti has strong experience in conducting EHS Assessments (Environmental Health & Safety assessments, Compliance, Management Systems.), Sustainability Reporting, Wastewater Treatment, Hazardous Waste Management, Energy Conservation, Occupational Health, and Safety.

1.6 APPROACH – E&S MONITORING

The approach to the E&S Monitoring was broadly divided into the following tasks:

- Kick off Meeting
- Desktop based documentation review.
- Physical visit to the site and consultation with SUNMP and EPC representatives; stakeholders such as workers and affected communities.
- Reporting

1.6.1 KICK OFF MEETING

The site visit began with a kickoff meeting with the E&S management representative of SUNMP and NEPC-S O&M team at the corporate office of Unique Group in Dhaka. The kickoff meeting helped in developing understanding on the current status of the Project implementation and developments at the site. The ERM team also explained the purpose of the assignment as well as shared the approach and key activities that were planned in the course of the monitoring.

1.6.2 DESKTOP DOCUMENTATION REVIEW

A virtual Data Room (VDR) was created before commencement of the review wherein SUNMP had uploaded the relevant documents, as shared through an information request list. The relevant Project documents pertaining to the EHS, and social compliances identified in the ESAP and ESMMP were reviewed at the site. This was aimed at understanding the ongoing implementation, record maintenance, internal monitoring and reporting and mandatory regulatory compliances required for the project. The list of documents reviewed as part of the E&S monitoring exercise has been furnished under **Appendix B**.

1.6.3 SITE VISITS & CONSULTATIONS

The ERM team accompanied by the representatives of the Project team undertook site visits of the key Project components to assess the status and compliance with respect to EHS and social/labour issues and legal obligations. During the site visit the team made physical and visual inspection/verification of the construction and operation phase activities and on-site management of EHS and labour issues. This was followed by the consultations with the project affected communities and worker groups. Key activities undertaken during the course of the E&S monitoring visit is presented in **Table 1.1** below.

TABLE 1-1 SITE VISIT & INTERVIEWS – KEY ACTIVITIES PERFORMED

S. No	Date	Activities
1.	21 October 2024	Discussion with SUNMP senior management regarding findings and overall progress status of ESAP at Corporate Office in Dhaka. Discussed current project execution status. Review of site-specific EHS Procedures and checklist, existing permits, licenses and associated records, Review of stakeholder engagement records, GRM records and discussion on progress of LRP implementation.

S. No	Date	Activities
		Review and detailed discussion on documentary evidence of other HR and labour compliance related pending actions items as per the ESAP.
2.	22 October 2024	Walkthrough at Work area belonging to NEPC subcontractors (Man is Power), Occupational Health Centre, Jetty area, RMS area, Chemical Storage Area, Effluent Treatment Plant (ETP), Hydrogen Building, Batching Plant Area, Raw Water Pump House, Hazardous Waste Storage etc. inside power plant premise. Discussion with housekeeping team, drivers' security personnel (Elite Security). Discussion on ESMP implementation status with NEPC and GE EHS Team. Consultation with local community at Doodhghata village. Consultation with LRP implementation agency at their site office in Doodhghata village.

1.6.4 REPORTING

Information from various sources and direct observations made by ERM have been collated and compared against the reference framework components along with status of the compliance with respect to project ESAP, ESMMP and legal requirements.

1.7 LIMITATIONS & ASSUMPTIONS

While this assessment has endeavored to provide a comprehensive review against the requirements of the Applicable Standards, however, there remain certain limitations to the assessment that should be considered:

- This report is based on the site walkthrough, stakeholder consultations and review of information made available to ERM till date. Note that the findings in this report are subject to change depending upon other information that may come up in future. We cannot guarantee that these activities will necessarily yield complete information.
- The independent review is a high-level assessment of environmental and social risks/issues and should not be construed as a detailed legal compliance review to the conditions stipulated by enforcement agencies in the regulatory approvals and limited to the environmental and social approvals already accorded to the Project and shared with ERM.
- The findings and observations made herein are based on application of professional judgement. The findings should be viewed in the context of the applicable scope and objectives of the study and the limitation on time and resources made available to the consultants for the successful completion of the study. Kindly also note that the scope of work did not include any sampling, analysis of environmental media, collection of primary data, engineering design or development of technical specifications or cost estimates among others.

1.8 USE OF THE REPORT

ERM is not engaged in consulting or reporting for the purpose of advertising, sales promotion, or endorsement of any client interests, including raising investment capital, recommending investment decisions, or other publicity purposes. Client acknowledges that this report has been prepared for their exclusive use and agrees that ERM reports, or correspondence will not be used or reproduced in full or in part for such purposes and may not be used or relied upon in any prospectus or offering circular. Client also agrees that none of its advertising, sales promotion, or other publicity matter containing information obtained from this assessment and report will mention or imply the name of ERM.

Nothing contained in this report shall be construed as a warranty or affirmation by ERM that the site and property described in the report are suitable collateral for any loan or that acquisition of such property by any lender through foreclosure proceedings or otherwise will not expose the lender to potential environmental or social liability.

ERM may grant other financial institutions involved in the financing of the Project ("Other Parties") the right to rely on Services or work product generated by or for ERM pursuant to the Contract ("Work Product"), provided that each Reliant Party is specifically identified by name, any agreed consideration is paid, and that these Other Parties deliver to ERM, a signed copy of ERM's standard reliance letter. The reliance letter shall govern the Other Parties' right to rely on the Work Product.

1.9 LAY OUT OF THE REPORT

The draft report is structured as under:

Section 1 (This Section):	Introduction
Section 2:	Project Appreciation and Current Status of the Project
Section 3:	ESAP & ESMMP – Compliance Status
Appendix A:	Photo Documentation
Appendix B:	List of Documents/Information Reviewed

2. PROJECT APPRECIATION & CURRENT PROJECT STATUS

2.1 THE PROJECT

SFL Unique Nebras Meghnaghat Power PLC (SUNMP), a Joint Venture Company constituted by the consortium consists of Nebras Power Investment Management, Unique Hotel and Resorts Limited (UHL), Strategic Finance Limited (SFL) and GE Capital Global Energy Investment BV, has been incorporated in the year 2018 for development of 600-Megawatt (MW) Gas based Combined Cycle Power Plant (CCPP) project with net output of 588.31 at Doodhghata mauza in Pirojpur union of Sonargaon upazila under Narayanganj district, Bangladesh. The consortium of UHRL, GE and SFL has been selected by Bangladesh Power Development Board (BPDB), Government of Bangladesh (GoB) through Unsolicited Proposal (USP) basis. The LoI (Letter of Intent) was issued by BPDB on 25th June 2018. GE has made a consortium with NEPC for project construction and commissioning activity. Corresponding agreements like Power Purchase Agreement (PPA) with BPDB, Gas Supply Agreement (GSA) with Titas Gas Transmission and Distribution Company Limited (TGTDC), Implementation Agreement (IA) with Power Division, Ministry of Power, Energy and Mineral Resources (MPEMR), GoB and Power Grid Company of Bangladesh (PGCB) have also been executed. The proposed site is located in 21.07 acres of land to the South-west of the Dhaka-Chittagong Highway and right bank of branch channel of Meghna River. This project is expected to be funded by Asian Infrastructure Investment Bank (AIIB), DEG and OPEC Fund for International Development (OPEC Fund) under financial advisory of Standard Chartered Bank (SCB). Summary of the project is presented below:

TABLE 2-1 PROJECT DETAILS - SNAPSHOT

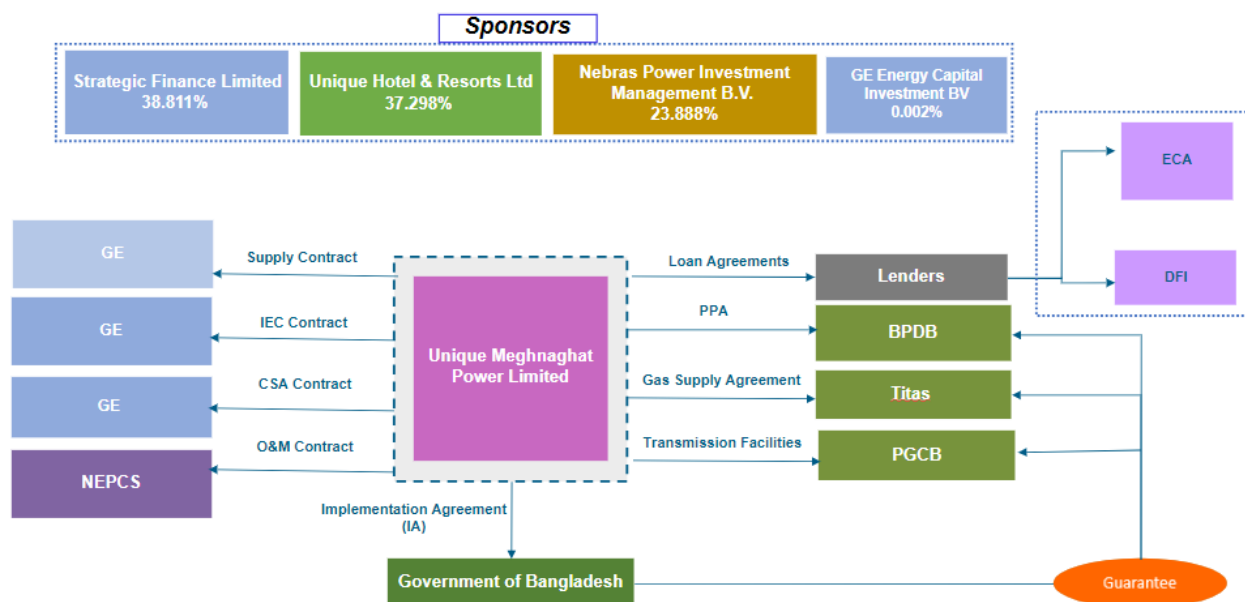
SUNMP 584MW Gas Fired Power Project	
Location	Doodhghata Mouza of Pirojpur union, Sonargaon upazila, Narayanganj district, Bangladesh
Project owner	SFL Unique Nebras Meghnaghat Power limited (SUNMP)
EPC Contractor	General Electric Global Services (GmbH)
Area of Land proposed	21.07 acres
Government Land/Private Land	Private Land from 343 landowners
Plant Load Factor	84.6% with minimum availability of 90%
Electricity Generation	584 MW, however EPC Contractor has guaranteed 588.31 MW
Unit Configuration	Power block of 600 MW with HRSG, one steam turbine and two generators
Fuel Type	Natural Gas (NG)

SUNMP 584MW Gas Fired Power Project	
Gas Supply	Titas Gas Transmission and Distribution Company Limited (TGTDC) through 20-inch diameter subsurface pipeline across the Meghna River
Electricity Off-take	Grid substation of PGCB through 400 kV Single Circuit (S/C) line.
Grid Connection	Nearest Grid Substation of PGCB which is to be located around 800 meters from the project site across the Meghna River near Summit Meghnaghat power project

2.1.1 PROJECT OWNER/COMPANY

SFL Unique Nebras Meghnaghat Power Limited (SUNMP) would be the proponent of the proposed power plant. SUNMP has been duly incorporated under the Laws of People Republic of Bangladesh in the year 2018 as a Limited company to develop, design, finance, build, own, operate and maintain the proposed power plant. SUNMP is a multi-venture company of Nebras Power Investment Management (23.88%), Unique Hotel and Resorts Limited (37.29%), Strategic Finance Limited (38.81%) and GE Capital Global Energy Investment BV (0.002%). Project is expected to be funded by AIIB, DEG and OPEC Fund for International Development (OPEC Fund) executed through EPC contractor. Project contractual structure is presented in **Figure 2.1.**

FIGURE 2-1 PROJECT CONTRACTUAL STRUCTURE



Source: SUNMP

2.1.2 PROJECT LOCATION

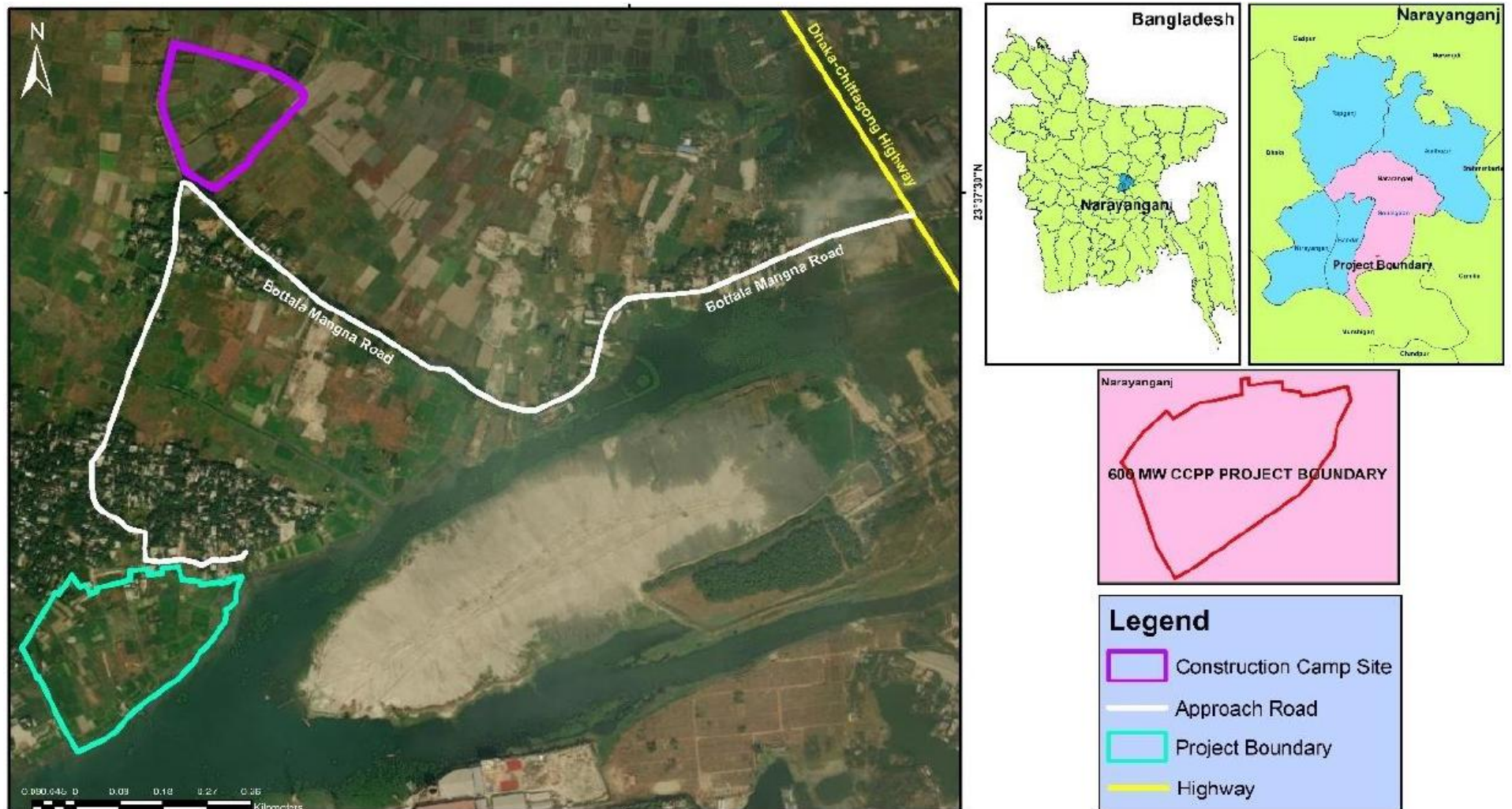
The proposed project site for 584 MW gas fired Combined Cycle Power Plant (CCPP) by SUNMP is located in Doodhghata Mouza of Pirojpur union, Sonargaon upazila, Narayanganj district, Bangladesh. The site is about 1.46 km from Dhaka-Chattogram highway to the south-west,

about 3.49 km south-west of the Sonargaon upazila headquarter and about 3.28 km away from Mograpara bus stand by road. The project site is situated on the right bank of the branch channel of Meghna River. The location of the proposed project site lies, geographically between 23°37'4.57"N; 90°35'19.23"E and 23°36'53.20"N; 90°35'34.55"E. The project location on satellite imagery is presented in **Figure 2.2**.

2.1.3 PLANT LAYOUT

The proposed power plant would be consisting of main block area and auxiliary area. The main block would be comprising of gas turbine hall, HRSG, steam turbine hall, main transformer, and HV unit auxiliary transformer. The auxiliary area will include boiler make-up water treatment plant, industrial wastewater treatment plant, chemical dosing room, mechanical draft counter flow cooling tower, C.W. pump house, mechanical accelerated clarifier, raw water intake pump house, comprehensive water pump house, service & firefighting water basin, raw water basin and potable water basin, filter and sanitary wastewater treatment plant. A site layout map is presented in **Figure 2.3**.

FIGURE 2-2 PROJECT LOCATION – SATELLITE IMAGERY SNAPSHOT



Source: SUNMP Project Final ESIA dated 18 Sep 2022

[illegible]

2.1.4 KEY PROJECT COMPONENTS

ERM has the following understanding of the Project, key project facilities and specific requirements for the project operations:

- Single flow open circuit type gas turbine controlled by Local Control Cubicle and the Central Control Room.
- Heat Recovery Steam Generator (HRSG) at downstream of gas turbine and auxiliaries.
- Steam Turbine Generator plant and auxiliaries.
- Feed water system for delivering feed water from low pressure drum to the HRSG economizer inlet header and supplies spray water of HP steam system, HP bypass system and reheat steam system.
- Condensate system to deliver condensate accumulated into condenser hot well to the LP steam drum of HRSG via the condensate extraction pumps.
- Cooling water system to supply make-up water for demineralized cooling water for gas turbine oil coolers, gas turbine generator hydrogen coolers, steam turbine oil coolers, steam turbine generator air coolers, pumps, steam and water samplers, air compressors, and any other equipment requiring cooling water and to reject the waste heat to the auxiliary cooling water via the closed cooling water coolers.
- Plant Water System to draw water from the Meghna River by 2 X 100% raw water make-up pumps located in the intake water pump house. A closed cooling water system employing Induced draft-cooling tower (IDCT) has been envisaged for each proposed unit to minimize the plant water intake requirement.
- Wastewater Treatment System wherein the wastewater from De-mineralized Water plant and other service area will be treated in the neutralizing pit and effluent treatment plant to the required degree. The total effluent available after treatment from effluent Treatment Plant will be utilized partially for plantation and the balance effluent shall be routed to the outfall.
- A 400kV Gas Insulated Switchyard (GIS) for evacuation of power, import of power for start-up / shut down / station auxiliary power through Unit Transformers.

2.1.5 KEY PROJECT FACILITIES

2.1.5.1 NATURAL GAS SUPPLY

As indicated in the ESIA Report daily requirement of Natural Gas would be approximately 96192 million standard cubic foot (mscf). The gas will be supplied by Titas Gas Transmission and Distribution Company Limited (TGTDC), which is at distance of 500-700 m across the Meghna Branch Channel. Gas Supply Agreement (GSA) has already been signed between TGTDC and SUNMP. Reportedly and as observed the site has already laid 20inch dia X ~600m pipeline across the Meghna River using horizontal directional drilling (HDD). Leak test of the pipeline has also been completed with pipeline currently under operation.

FIGURE 2-4 GAS PIPELINE FINAL ROUTE MAP



Source: SUNMP Project Final ESIA Report dated 18 September 2022

2.1.5.2 TEMPORARY JETTY

Two (02) temporary river jetty has been constructed with the following details:

- One (01) temporary jetty (40m X 20m) has been constructed for unloading of construction material, heavy equipment and machinery brought to the site using Meghna waterways. SUNMP has obtained permission from Bangladesh Inland Water Transport Authority for use of foreshore waterfront of Meghna River for construction of temporary Jetty, water pipeline & pump house and RCC guide wall.

- In addition to this, Site is constructing another temporary jetty of approximate dimension of 55m X 12m-16m having 600 MT material handling capacity, for unloading of engines.

As observed and reported during the current visit, SUNMP has completed decommissioning the jetties in May 2024 as the project is currently in operations stage.

2.1.5.3 POWER EVACUATION LINE

Power generated from the proposed power plant will be evacuated to the nearest grid substation of PGCB through 400 kV Single Circuit (S/C) overhead transmission line. 400kV grid sub-station belonging to PGCB will be located around 800 m from the project site. Evacuation of power from the proposed power plant will be done at 400 kV level. The 400-kV single circuit transmission lines between power plant 400 kV substation and PGCB grid sub-station, for this purpose, will be under the scope of this project. Further detailed interconnection plan with PGCB nearest grid substation along with Load flow, short circuit and transient stability with due consideration of capacity addition of proposed 584 MW project will have to be carried out by SUNMP in coordination with PGCB.

2.1.5.4 CONSTRUCTION CAMP/LAYDOWN AREA

A total of 12 acres land in Doodhghata mouza has been taken on temporary lease for three years from Hamdard Laboratories (WAQF), a Bangladeshi Company for setting up construction camp/laydown area. The land was filled up by SUNMP by using river sand up to the road level for constructing temporary construction campsite. As the project has entered operation phase, the construction camp will be decommissioned by August 2024. The construction camp/laydown area presently comprise of the following:

- Office area and living area for SUNMP, GE and NEPC.
- Provision of warehouses comprising of shed warehouse as well as Class A & Class B warehouses.
- Provision of material storage in open storage yards.

2.1.5.5 SEWAGE TREATMENT PLANT (STP) & DISCHARGE PIPELINE

Sewage generated from the site is currently being treated through a modular STP. The STP would consist of Biological Oxidation tank, secondary sedimentation tank, sludge tank and disinfection tank. The treated effluent is being discharged to a public sewage channel through a 105 m long discharge pipeline.

In addition to the above with project now in operations, an Effluent Treatment Plant (ETP) and STP has been installed and being operated in the main plant area to treat the process wastewater and domestic effluent respectively prior to its discharge into the abutting Meghna River.

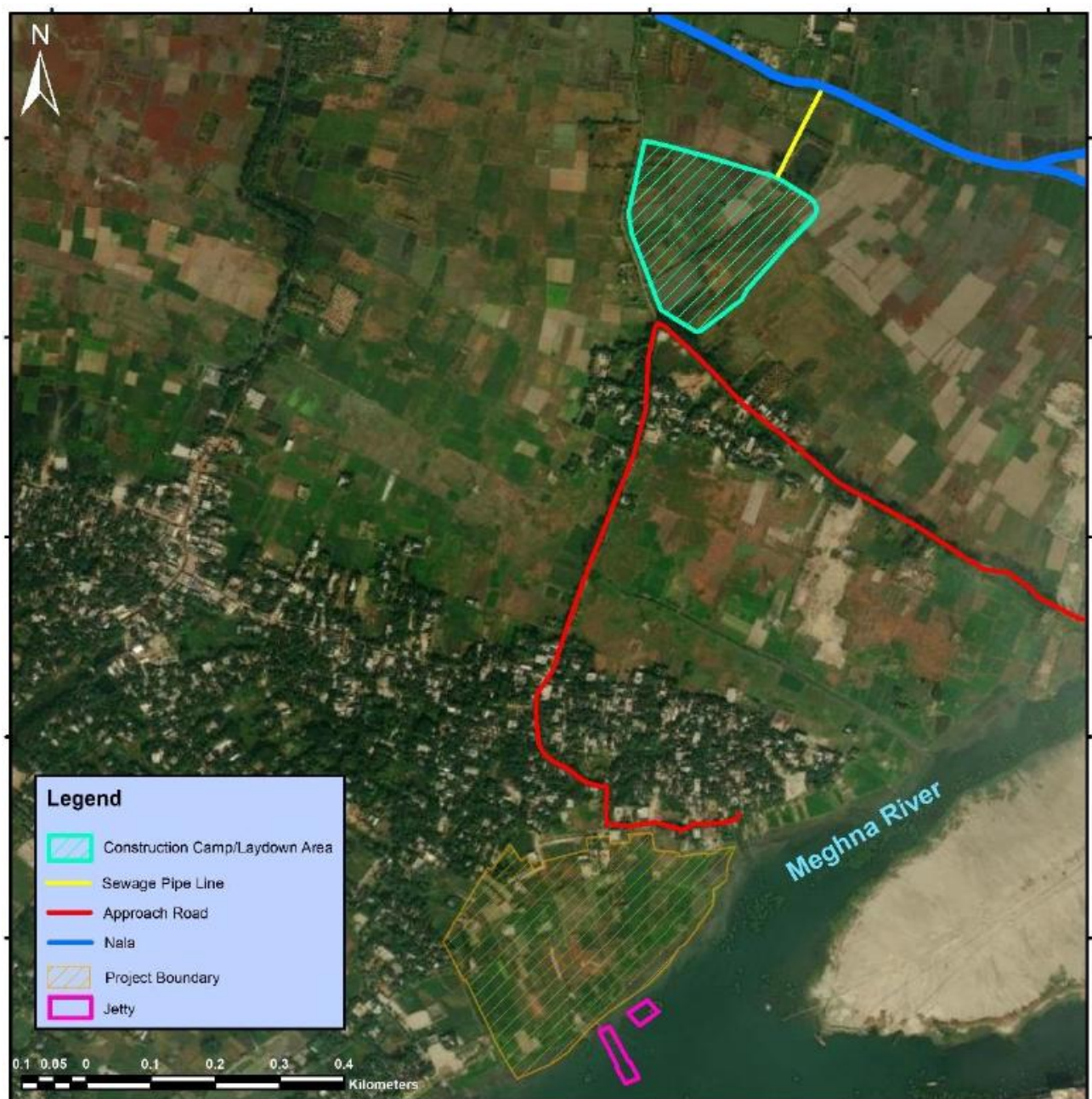
2.1.6 PROJECT ASSOCIATED FACILITIES

2.1.6.1 ACCESS ROAD:

The Project location will be accessed through an earthen branch road coming out from Dhaka-Chittagong Highway. The distance between Highway and project site is approximately 1.5 km. There is no alternate access road available for connecting the site. ERM consider access road widening work as part of associated facility of the project in view of the fact that SUNMP requires an access road to connect site location for viability of the project, especially during construction phase for material transportation.

ESIA report mention that 0.1664 acres (0.0673 Hectare) from 27 landowners were procured along the existing village road between Battala Bazar to Plant Gate for widening and strengthening of existing village road that will also be used as access road for the project. As observed during the site visit, the access road is currently being widened by Local Government Engineering Department (LGED) under the Rural and Culvert Maintenance Program.

FIGURE 2-5 LAYOUT OF PROJECT FACILITIES



Source: SUNMP Project Final ESIA Report dated 18 September 2022

2.1.7 CURRENT PROJECT STATUS

2.1.7.1 EPC CONTRACTOR

The Engineering, Procurement and Construction (EPC) Contract is awarded to M/S General Electric Global Services (GmbH) whereas M/S Tractebel Engineering Pvt. Ltd. has been identified as the owner's engineer. The EPC Contractor has made consortium with NEPC and have commenced site construction activities. Review of the Monthly Progress Report (MPR) shared by SUNMP for September 2024 indicated the progress status as stated below:

- 11.285 M LTI free manhours achieved at site.
- BSCD commissioning has been successfully completed.
- SCLD equipment installation works continued.
- PAC awaited from UMPL, discussions ongoing.

2.1.7.2 O&M CONTRACTOR

- During September, no Lost Time Incidents (LTIs) were recorded, maintaining a cumulative total of 255 days without any LTIs since COD. One first-aid case (FAC) was recorded in this month.
- As part of CSR activities, focused group discussions were held along with the five-day long sewing training program for 40 community females in two batches, and sewing machines were distributed among the trainees. Provided training on girls' education, awareness on dengue fever & public health etc., and group pensions to vulnerable groups in 54 community households.
- The Combined Cycle (CC) Plant has been shut down since June 24th, as instructed by NLDC due to the unavailability of fuel gas. However, the Plant has maintained 100% availability during this period.
- During this shutdown period, the plant imported 1.52 GWh of electrical energy from the national grid.
- Since the plant was in shutdown condition, the plant's (GT & ST) factored fired hours are zero. At the end of the month, the cumulative total factored fired hours (FFH) are 2,374 hours for the GT and 1,765 hours for the ST. Moreover, the plant load factor for the month is 0%, while the target was 60%.
- The implementation of the APM and OPM-GE digital solution system by GE, as per CSA, is in progress.
- The punch items listed by the O&M team are currently being worked on, with GE (the EPC) actively addressing them.

2.1.8 STATUS OF E&S INDICATORS

2.1.8.1 EPC CONTRACTOR

The status of E&S indicators as obtained from the project MPR for September 2024 is presented in Table below:

TABLE 2-2 PROJECT E&S DASHBOARD OF EPC – SEPTEMBER 2024

SL #	Indicators	September 2024	Cumulative
A	Health & Safety		
1.	Fatality	0	0
2.	Significant/Major Injury	0	0
3	Lost Time Incident (LTIs)	0	0

SL #	Indicators	September 2024	Cumulative
4	Near Miss	0	12
5	Medical Treatment Case	0	1
6	First Aid Case	0	30
7	Potential Severe Event	0	1
8	Fire/Explosion	0	1
9	Stop Work – EHS	02	326
10	Warning letter issued	00	240
11	Safety Rewards	02	2202
12	Training Hours	17	46094
13	EHS Inspections	2	394
14	Emergency Drill	0	19
15	Toolbox Talks	29	1679
16	Monthly Manhours	31640	11285696
B	Environment		
1.	Spillage	0	0
2.	Contaminated soil (m3)	0	0
3	Contaminated concrete (m3)	0	0
4	Scrap Metals (tonne)	0	217.25
5	Wooden Palette (tonne)	0	197.4
6	Plastic Packaging (m3)	0	52.39
7	Domestic food waste (bins)	07	2524
8	Used oil (litres)	1200	11020
9.	Contaminated Rags (kgs)	0	111
10	Medical waste (kg)	0	12.6
11	Surface water consumption (m3)	9326	504238
12	Laydown water consumption (m3)	18	4366
13	Treated sewage discharge (m3)	0	846
C	Social		
1.	Grievance Recorded	0	12
2.	Stakeholder Engagement	2	23
3.	Warning Letter	0	240

Source: GE-NEPC MPR Sep 2024

2.1.8.2 O&M CONTRACTOR

The status of E&S indicators as obtained from the project O&M Contractor (NEPC) September 2024 is presented in Table below:

TABLE 2-3 O&M CONTRACTOR EHS KPI'S SEPTEMBER 2024

SL #	Indicators	September 2024
1.	No Lost Time Accidents (LTAs) Since last occurrence (days)	255
2.	Reportable LTA (Monthly)	0
3	Reportable LTA YTD	0
4	Reportable Damage to Asset (Monthly)	0
5	Reportable Damage to Asset YTD	0
6	Reportable Environmental Incidents Monthly	0
7	Reportable Environmental Incidents YTD	0
8	EAR (Equivalent Accident Rate) Monthly	10.42%
9	EAR YTD	1.57
10	EHSS walkdowns performed Monthly	5
11	EHSS walkdowns performed YTD	37
12	Technical walkdowns performed Monthly	5
13	Technical walkdowns performed YTD	37

Source: O&M Contractor Monthly Progress Report – September 2024

In addition to the above, the O&M Contractor (NEPC) has identified the following environmental and social KPIs, with the current status of the said KPIs for the month of September 2024 presented in Table 2.3 below.

TABLE 2-3 O&M CONTRACTOR E&S KPI'S SEPTEMBER 2024

SL #	Indicators	Unit	September 2024	YTD
1.	Number of accidents (air/effluent/spill)	Number	0	0
2.	Total NOx emission	Tons	0	0.7005
3.	Total CO2 emission	Tons	0	3853.17
4.	Effluent generated	M ³	3250	60503
5.	Water Consumed	M ³	8970	482358
6.	Water Recycled	M ³	0	0
7.	General waste generated	kg	1060	5125
8.	Waste Disposed	kg	1060	5125
9.	Waste Recycled	kg	0	0

SL #	Indicators	Unit	September 2024	YTD
10.	Oil cloth generated	kg	1	7
11.	Used oil filter generated	pcs	0	0
12.	Mud cake generated	kg	160	2880
13.	Sludge generated	kg	0	0
14.	Used oil generated	litre	6	6
15.	Medical waste generated	kg	0	0
16.	Grievance Recorded	Number	0	33
17.	Number of grievances redressed	Number	0	33
18.	Stakeholder Engagement	Number	2	12

Source: O&M Contractor Monthly Progress Report – September 2024

2.1.9 PROJECT MANPOWER REQUIREMENT

Overall manpower size deployed for the project has significantly reduced by end of July 2024 and is presented in **Table 2.4 & 2.5** below.

TABLE 2-4 MANPOWER INVOLVED AT SITE

SL #	Employer	Manpower size
1.	SUNMP Employees	45(14 corporate management staff including 2 female + 9 site management staff + 22 Support)
2.	GE employees	11 (7 Officers + 4 Support)
3	NEPCS employees	90 (04 Chinese + 04 Korian+ 82 Bangladeshi)
4	NEPC Management staff employee	4 (03 Chinese + 1 Bangladeshi)
5	NEPC workers (Chinese)	10
6	NEPC Subcontractor Workforce (total of 3 subcontractors engaged)	84
	Total	244

Manpower break-up of the sub-contractors engaged by NEPC is presented below.

TABLE 2-5 CONTRACTOR MANPOWER BREAK-UP

S. No	Sub-contractors	Scope of work	Manpower size
1	Man is Power corporation	Main Plant & Lay down	49
2	Elite Force (Security)	Main plant and lay down	35
	Total		84

2.1.10 PROJECT SCHEDULE

The proposed schedule for the project has been presented in the Table below.

TABLE 2-6 PROPOSED PROJECT SCHEDULE VS ACTUAL STATUS

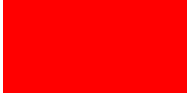
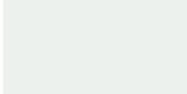
SL #	Project Component	Planned	Actual/Forecast
1.	Signing of EPC Contract between GE and SUNMP	30 August 2019	30 August 2019 (A)
2.	Full Notice to Proceed (FNTF)	23 October 2019	23 October 2019 (A)
3.	Clear and Unhindered access to site	23 October 2019	1 December 2019 (A)
4.	GT on Foundation	7 April 2021	22 January 2022 (A)
5.	HRSO OCC Modules (Installation Started)	25 February 2021	4 September 2021 (A)
6.	GT Generator on Foundation	8 April 2021	22 January 2022 (A)
7.	ST Generator on Foundation	19 April 2021	12 March 2022 (A)
8.	Commencement of Cold Commissioning	17 August 2021	20 March 2023 (A)
9.	Completion of Back Energization	23 August 2021	25 June 2023 (A)
10.	Fuel Gas Available	23 October 2021	5 June 2023 (A)
11.	GT First Firing in Simple Cycle	4 December 2021	15 August 2023 (A)
12.	Completion of 1st Synchronization	12 December 2021	21 August 2023 (A)
13.	Completion of Steam Blowing	24 December 2021	25 October 2023 (A)
14.	First Steam to Turbine	13 January 2022	3 November 2023 (A)
15.	Completion of Trial Operation	16 June 2022	19 January 2024 (A)
16.	Completion of Performance Test	22 June 2022	26 February 2024 (A)
17.	PAC (Provisional Acceptance Certificate) *	22 June 2022	Mid November

Source: SUNMP

* Performance Test Completion and PAC date is contingent upon resolving financial issues between GE and SUNMP management.

3. COMPLIANCE STATUS – ESAP, ESMMP, LRP, SEP, GRM IMPLEMENTATION

The compliance status based on the desktop review of the documentation undertaken during Aug 2024 has been presented in **Table 3.1** and relevant sub-sections. To define the status of various action items, colour coding has been used for easy referencing, which is as follows:

	Action Item Closed/ Complied		Satisfactory Progress
	Partially Complied		Not Complied/ Delay
	To be assessed during Operations/Decommissioning		Document Pending

3.1 ESAP, ESMMP & REGULATORY COMPLIANCE STATUS

The observations made by the ERM audit team with respect to the project EHS aspects as outlined in the ESAP, EMMP and applicable local and national regulations have been presented in **Table 3.1** below.

TABLE 3-1 ESAP, ESMMP & REGULATORY COMPLIANCE STATUS

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
1.	EHS Regulatory Permitting/Compliance							
1.1	Develop and implement a plan for 100% wastewater recycling for project operations. Update the green belt development plan to ensure 33% coverage of the project area.	S. No 1.1, Table 3.1	SUNMP	Copy of wastewater recycling plan Copy of green belt development plan	6 months prior to COD	Review of the site clearance conditions requires SUNMP to develop and implement a plan to facilitate 100% wastewater recycling during operations. However, discussion with EPC consortium reveals that as per the design both Effluent Treatment Plant (ETP) and Sewage Treatment Plant (STP) has been installed and operated having two separate outfalls with no provision for provision for wastewater recycling. As verified during the current visit, SUNMP has applied for exemption of 100% water recycling requirement as mentioned in the condition no.5 of EIA report vide letter no. UMPL777-DOE-L-2001 dated 25 March 2024 from DoE. In the letter SUNMP has committed to achieve 75% water recycling. SUNMP has outlined a plan/framework in Wastewater Management procedure (Doc No. NEPCSS-MB-EHS-23 effective from 01 January 2024) towards achieving 75% treated wastewater recycling by December 2028 through installation of two stage Reverse Osmosis (RO) Plant. However, the plan is not found to be comprehensive as it does not outline the detailed water balance diagram, volume of water to be generated, capacity of the RO plant etc. Review of the updated green belt development plan indicates that the current area proposed for green belt has now been increased from 6.22 acres to 6.95 acres which represents 33% of the total project area. The site has started implementing green belt development plan within the plant constituting 6.41 acres of the total project area. Remaining green belt (0.54 acres) to be developed outside plant i.e., along the project access road and project peripheral boundary. As noted during the site visit, the site has completed tree plantation in 6.95 acres inside as well as outside of plant boundary. The site has planted fruit trees and Conifers near CCB area, Raw water intake, around		Update and implement the 75% water recycling plan as per timeline set in Wastewater Management Procedure.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
						cooling tower, behind security cabin rear end of GIS area, Warehouse area within the plant premises.		
1.2	Update the BWTA clearance to cover both storm water outfall lines as depicted in the project operations drainage layout.	S. No 1.2, Table 3.1	SUNMP	Copy application seeking amendment Copy of BWTA approval	Immediately, prior to first disbursement Within six (6) to eight (8) months from application date	BWTA clearance obtained by SUNMP for the storm water outfall lines, water intake structure foreshore usage, construction of guide wall, gas pipeline and transmission towers has expired on 31 Aug 2024. As per document review, the site has sent a follow-up letter to the Deputy Director of Meghna River port on 29 July 2024 for license renewal and the fees regarding the renewal has been paid on 3 September 2024. The site is yet to receive the renewed license for current financial year.		Action closed as per the Oct-Dec 2022 E&S monitoring report.
1.3	Coordinate with WARPO to obtain approval for ground water sourcing from all the onsite bore wells on a fast-track basis.	S. No 1.3, Table 3.1	SUNMP	Copy of communication with WARPO	Immediately, prior to first disbursement	Documentation review indicates that SUNMP has obtained permission from WARPO vide letter dated 11 Aug 2022 for abstraction of 450 KLD of ground water to meet construction requirements and 14000 KLD of surface water from Meghna River branch channel. The permit is found to be valid for a period of 2 years i.e. Aug 2024. The site has applied for the renewal of the same on 09 July 2024 and yet to receive the renewed copy.		Action closed as per the Oct-Dec 2022 E&S monitoring report
						Documentation review indicates that SUNMP has made communication with WARPO vide letter dated 7 Sep 2023 seeking enhancement in the surface water withdrawal rate to 16300 KLD as compared to 14000 KLD earlier. In consistent with requirements specified in the last E&S monitoring report, SUNMP has now prepared and submitted water resource availability and ground water abstraction impact assessment study report along with surface and ground water consumption records for the period Jan-Jun 2023 which is found to vary from 25-30 KLD and 42-44 KLD respectively. In this regard, SUNMP has also sought exemption from WARPO in the aforesaid communication regarding the following condition i.e., installation of monitoring well and implementation of		Action closed during the current monitoring.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
						rainwater harvesting system, however no confirmation has been received from WARPO till date. Although SUNMP has sought exemption/waiver towards implementation of rainwater harvesting the water resource availability study undertaken recommends such system implemented along with sustainable groundwater management practices like artificial recharging etc. Discussion with SUNMP representatives indicates that no communication/exemption granted to SUNMP on the above matter. The site has prepared a document regarding rainwater harvesting system and sustainable groundwater management (Doc No. NEPCSS-MB-EHS-019 dated 01 January 2024) which includes calculation details related to the volume of surface run-off to be generated from paved surfaces (including roof tops). The plan also includes information related to the design of two stormwater basins identified inside the plant including implementation timeline.		
1.4	Follow up with WARPO seeking status on the clearance/permission on the riverbank protection for the project.	S. No 1.4, Table 3.1	SUNMP	Copy of communication with WARPO	Immediately, prior to first disbursement	Documentation review reveals indicates that SUNMP has obtained permission from WARPO vide letter dated 27 Sep 2022 for setting up riverbank protection and temporary Jetty at the branch of Meghna River for the proposed project. The permit is found to be valid for a period of 2 years i.e. Sep 2024. The site has applied for the renewal of same on 15 September 2024 and yet to receive the renewed copy.		Action closed as per the Jan-Mar 2023 E&S monitoring report and validated for the current monitoring period.
						Refer response to S. No. 1.3		Demonstrate compliance to the conditions specified in the WARPO permission for construction of riverbank protection and temporary jetty.
1.5	Install indication mark for the pipeline crossing the Meghna River at both sides as per	S. No 1.5, Table 3.1	SUNMP	Photographic evidence of	Immediately, prior to first disbursement	In consistent with the Natural Gas Safety Rules, 1991, SUNMP has applied for and obtained necessary approval for laying of the natural gas pipeline (20' X		Action closed as per the Oct-Dec 2023

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
	applicable regulatory requirements.			installed indication mark		600m) vide Department of Explosives, Bangladesh vide letter dated 30 May 2021. In this regard, SUNMP has notified the Chief Inspector of Explosives of the pipeline leak testing with the same being undertaken on 23 April 2022 and relevant test documentation being maintained as per the aforesaid Rules. With project COD declared on Jan 2024 SUNMP has obtained approval from the Department of Explosives for the pipeline transmission of natural gas vide letter dated 22 May 2023. As noted during the site walkthrough, SUNMP is have noted indication mark of the pipeline passing across the Meghna River at the crossing point of both sides.		E&S monitoring report.
1.6	Follow with up Deputy Commissioner office to seek update on the approval status of LPG storage. Post approval, apply for LPG cylinder storage license to the Department of Explosives, Bangladesh	S. No 1.6, Table 3.1	EPC	Copy of evidence of communication with Deputy Commissioner Copy of communication with Department of Explosives, Bangladesh	Immediately, prior to first disbursement	As per the temporary facilities demolition plan shared by SUNMP indicates that the site is planning to start demolition of worker's camp from 1 October 2024 and finish the activity by 30 November 2024. During the current visit it was observed that the site has started the demolition of temporary facility as per shared agenda and there is no storage of LPG gas cylinders in the laydown area.		Action closed during the current monitoring.
1.7	Seek approval of layout plan of hydrogen plant under construction from Department of Explosives on a fast-track basis.	S. No 1.7, Table 3.1	SUNMP	Copy of approved layout plan	3 months prior to COD	The project involves the installation and operation of hydrogen plant, with the hydrogen to be used for filling up of high-pressure hydrogen cylinders, which in turn is required for generator initial fill up and regular make-up for generator rotor cooling. Documentation review indicated that SUNMP has now obtained license from Department of Explosives for storage of 240 hydrogen cylinders vide letter dated 26 July 2023. The license is found to be valid till 31 Dec 2023. The license is also found to be renewed vide application dated 16 November 2023 and currently valid till 31 December 2024.		None

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
1.8	Obtain license from the District Deputy Commissioner for the storage and usage of acid and alkalis as part of the project DWP regeneration system	S. No 1.8, Table 3.1	SUNMP	Copy of valid acid storage license	3 months prior to COD	Review of the documentation indicate that SUNMP has obtained license for storage of the acids and alkalis in bulk during operations. This includes: - Sulphuric acid: 140 KL - Hydrochloric acid: 140 KL - Caustic soda: 80 KL The license is found to be valid till 30 June 2025.		Action closed during the current monitoring.
1.9	Obtain BERC license as an independent power producer (IPP) prior to project operations.	S. No 1.9, Table 3.1	SUNMP	Copy of valid IPP license	3 months prior to COD	Review of the permitting documentation indicates that SUNMP has obtained temporary license from BERC vide letter dated 18 Sep 2023, which is found to be valid for a year (till 8 October 2024) subjected to submission of license fees. Documentation shared indicated the license fees has been submitted to BERC vide letter 24 Sep 2023. The site has applied for license renewal on 15 September 2024 and yet to receive the renewed copy.		None
1.10	Coordinate with TGTDCI to share the BERC license for supply of natural gas and operation of the gas pipeline for the proposed power project prior to operations	S. No 1.10, Table 3.1	SUNMP/TGTDCI	Copy of valid license for natural gas supply and pipeline operations	3 months prior to COD	<u>With COD declared in January 2024, SUNMP has written to TGTDCI vide letter dated 27 October 2024 seeking sharing of the BERC license for gas supply pipeline. However, copy of the same is yet to be shared for review and validation.</u>		Coordinate with TGTDCI to share BERC license immediately.
1.11	Obtain boiler registration from the Chief Boiler Inspector prior to project operations.	S. No 1.11, Table 3.1	SUNMP	Copy of valid boiler registration	3 months prior to COD	SUNMP has obtained registration for three water tube boilers from Chief Boiler Inspector vide letter dated 10 Sep 2023. As stated in the aforesaid communication, boiler operation certification shall be issued post installation of safety valve and display of registration number which reportedly shall be undertaken prior to COD. With COD declared in January 2024, SUNMP has obtained boiler operation certification which is found to be valid till 25 May 2025. The site has assigned a Class I boiler attendant having valid certificate dated 30 April 2019 for operation, maintenance, and supervision of the boilers as per boiler permit condition.		None
1.12	Follow up with manpower supply agency needed to ensure that they obtain the registration certificate soon.	S. No 1.12, Table 3.1	SUNMP	Copy of communication with Department of	Immediately, prior to first disbursement	For the construction phase, the EPC consortium has deployed one manpower supplier contractor i.e. Manis Power. Document review indicates that aforesaid contractors has obtained license/registration from the		The license should be renewed on an annual basis to ensure compliance

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
				Labour, Bangladesh		Department of Inspection of Factories & Establishment (DIFE) which is found to be valid till 05 th Dec 2024. Copy of the renewed licenses has shared and ERM has reviewed and validated.		and prevent any interruptions in service.
2	PS1: Assessment and Management of Environmental and Social Risks and Impacts							
2.1	Develop and obtain ISO certification for project operations ESMS.	S. No 2.2, Table 3.1	SUNMP	Copy of ISO certification for project operations ESMS	1 year from COD	With project currently in operations and O&M team in the form of NEPC-S now being mobilized, SUNMP is currently in the process of drafting of the operations ESMS, with the certification planned to be obtained by end of 2024 as per the agreed ESAP timelines. Scope and requirements of the ESMS was explained to SUNMP during the present visit		Operation phase ESMS to be prepared before January 2025.
2.2	Incorporate EHS Policies as part of the agreement/employment contract with the third-party agencies and workers.	S. No 2.3, Table 3.1	SUNMP & EPC	Copy of sample agreement/contract	Immediately, prior to first disbursement.	The site has developed the EHS & Social Policy in local language (in Bengali) signed by the GE Project Director and the same was found to be displayed onsite at conspicuous places like site main entrance, worker camp etc. As noted during the last monitoring, SUNMP has integrated the EHS policies in the sample employee appointment letter being issued. Furthermore, worker agreement (<i>Manis Power Corporation & Meghna Enterprise</i>) has also been updated to include the aforesaid policies.		Action closed as per the Jan-Mar 2023 E&S monitoring report.
2.3	Review and update the AI matrix to cover all potential environmental aspects/impacts of the sewage treatment and batching plant operations. The AI matrix mitigation measures also need to be aligned to the project ESMMP and IFC General/Sectoral EHS Guidelines.	S. No 2.3, Table 3.1	EPC	Update project Environment Aspect-Impact (AI) Register	Immediately, prior to first disbursement.	EPC consortium has prepared an Environment Aspect-Impact (AI) Matrix in line with the EHS Risk Assessment template shared in the EHS Plan. Per the earlier E&S monitoring recommendations, the EPC consortium has updated the AI matrix cover the potential environmental impacts and mitigation measures for sewage treatment and batching plant operations for construction phase as per the ESAP requirements. Documentation review indicates that SUNMP along with the O&M contractor - NEPC-S has developed a HIRA matrix as well as an AI matrix to for operations		Action closed during the current monitoring.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
						to include the potential environmental impacts. The current AI matrix includes all the operations and areas. The risks have been classified as per the significance of impact (Probability* Severity+ Legal Exposure) and mitigation measures has been identified accordingly.		
2.4	Develop and maintain an updated E&S regulatory register encompassing applicable regulatory requirements and permit conditions for both construction and operations. Track and record compliance status against regulatory register on a periodic basis	S. No 2.5, Table 3.1	SUNMP, EPC & O&M	Copy of updated regulatory register for construction along with quarterly internal regulatory compliance audits.	Immediately, prior to first disbursement during construction.	In line with the ESAP recommendation, SUNMP along with EPC Consortium has developed a E&S permit and regulatory register to track compliance with the E&S permit conditions and applicable regulations viz. <i>Environmental Conservation Rules, 2023, E-Waste Rules 2021, Air Pollution Control Rules, 2022, BIWTA Rules, BNBC 2020, Solid Waste Rules 2021, Water Rules 2018, Noise Control Rules 2006 etc.</i> The legal register has also been updated to furnish the requirements related to demonstrating compliance with environmental standards prescribed for ground water, treated wastewater, sewage and ambient noise as per the provision of Bangladesh Environmental Conservation Rules (BECR), 2023 and Noise Pollution Control Rules, 2006.		
				Copy of updated regulatory register for operations along with six (6) monthly internal regulatory compliance audits	Three (3) months prior to commencement of COD and ongoing	SUNMP has developed a consolidated legal register for both construction and operations with the operations phase register now updated to cover the following E&S regulations viz. <i>Boiler Act, 1923; Petroleum Rules, 2016; and Acid Control Act, 2002, Natural Gas Rules, 1991 and Boiler Attendant Rules, 1953.</i> The site has also started tracking the regulatory E&S permit conditions for all existing licenses.		Action closed during current monitoring.
2.5	Develop / update and implement the project specific E&S management plans for construction, operations and decommissioning (as applicable) viz. Hydrotest Water Management Plan; Dredged Material Management Plan; Drill Cutting & Drilling Mud Management Plan; Water	S. No 2.6, Table 3.1	SUNMP	Copy of site-specific management plan along evidence of implementation Evidence of closure of gaps identified and	Immediately, prior to first disbursement	As specified in the ESAP and ESMP, the site has presently developed/updated the following management plans as part of the ESIA viz. Hydrotest Water Management Plan; Dredged Material Management Plan; Drill Cutting & Drilling Mud Management Plan; Storm Water Management Plan and Decommissioning Management Plan. As recommended in the last audit, the EPC consortium has development a method statement and a timeline for		Update the following procedures as per the gaps identified - Occupational Health & Safety Management Plan.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
	Management Procedure and Decommissioning Management Plan. Implement Gender Action Plan commitments which includes developing a policy on sexual harassment; constitution of a dedicated committee dealing with sexual harassment issues; organizing awareness session on GBVH with communities and workforce. Implement the Labour Management Plan commitment which includes preparing a Code of Conduct (CoC) for contractor /suppliers which is to form a part of the employment contract and displayed at conspicuous places. Update the Labour Management Plan to encompass specific role and responsibilities of key personnel identified for implementation of the Plan including a checklist to assess compliance with the Plan requirements on a periodic basis.			implementation of the Plans		decommissioning activities to be undertaken at both camp and office including management of waste generated from some activities. The method statement also outlines the potential E&S risks associated with decommissioning activities like height work, material lifting, dust and noise generation etc. along with the mitigation measures/controls to be adopted. SUNMP have an approved 'Sexual Harassment Policy' in place which defines the process of reporting and handling the sexual harassment related cases associated with project. Awareness session on GBVH issues with local communities are being conducted by Sajida Foundation (LRP implementation Agency) under the supervision of SUNMP CDM (Community Development Manager). CDM is also responsible for conducting GBVH awareness session with construction workers. Sexual harassment committee is formed by Sajida foundation to deal with any GBV issues if reported by community. As advised in previous audit, this sexual harassment committee has now ensured representation from SUNMP as well. As advised in previous audit, SUNMP was developed Labour Management Plan document and included COC (code of conduct) that are applicable for all site workers including sub-contractor workers. With project now in operations, NEPC-S – the O&M contractor has developed the following E&S plans/procedures for operations phase: • Permit to Work • Caustic, Acid and Chlorine Handling Procedure • Emergency Response Plan • Electrical Safety Program • First Aid • Spill Prevention and Response Procedure • Waste Management Procedure • Community Development Procedure • Grievance Redressal Mechanism/Procedure • Noise Exposure Evaluation and Hearing Conservation		

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
						- Compressed Gas Cylinder Management Procedure - Flammable Liquid Handling Procedure - Machine Guarding Procedure - Pest Control Procedure - Stakeholder Engagement Procedure The site has developed following plans/procedures for operation phase as per the ESMP requirements: Air Quality Management, Wastewater Management Plan, Waste Management, Occupational Health & Safety, Environment Monitoring Plan and Incident Investigation. The above mentioned procedures are effective from 01 April 2024. The site has updated the management plans to close the gaps identified during last audit. <u>However, the site is yet to include the Hazard Identification and Risk Assessment Matrix in the current occupational health & safety management Plan.</u>		
2.6	Ensure mobilization of the remaining EHS Supervisors by NEPC as per the organogram. Document and integrate the roles and responsibilities of the SUNMP EHS Manager and Assistant Manager – Community Development in the EHS Plan.	S. No 2.7, Table 3.1	SUNMP & EPC	Copy of appointment letter NEPC EHS Supervisors. Documented roles and responsibilities SUNMP EHS Manager and Assistant Manager – Community Development	Immediately, prior to first disbursement	In line with the ESAP recommendation, the EPC consortium has deployed a Project EHS Manager (GE), Assistant EHS Manager (GE) and 2 Project EHS Manager (NEPC) and the same has been presented in the EHS organogram along with the EHS Supervisors, Site Doctor & Paramedic, EHS Trainer, Lifting Specialist & Coordinator and Certified Scaffolder. In addition to the above, GE and NEPC has mobilized 7 and 15 EHS Supervisors respectively and the same was found to be depicted in the EHS Organizational chart. Review of the project EHS Plan indicates that the roles and responsibilities of the SUNMP EHS Manager and Assistant Manager – Community Development has now been documented and integrated in the aforesaid Plan. Review of the operations organogram and consultation with SUNMP representative reveals that a total of two (2) managerial level EHS personnel (EHS Head and EHS Engineer) has been mobilized by NEPC-S – the O&M contractor for this project. Reportedly, for managing the E&S risks pertaining to the warranty and transition period, the O&M EPC contractor will be supported by an EHS In charge to be mobilized by the		The site must recruit two fire truck drivers to operate the fire tender in case of an emergency.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
						EPC Contractor along with an EHS Supervisor, EHS Manager, an EHS Engineer, two firemen and one fire truck driver. SUNMP has defined the roles and responsibilities of the EHS personnel of both NEPC-S and EPC Contractor. As verified during current monitoring, the site has recruited one EHS Engineer and one fireman as per the approved organogram. However, the site has not recruited any fire truck driver, the responsibility has been assigned to firemen to operate the fire tender in case of an emergency.		
2.7	Update the EPRP to include the site lay out plan, list of fire prevention and control equipment, updated onsite responders list along with details of medical and firefighting team.	S. No 2.8, Table 3.1	SUNMP and EPC	Updated EPRP Copy of mock drill report	Immediately, prior to first disbursement Six monthly during construction and operation period	The EPC consortium has updated the EPRP to include the list of fire prevention and control equipment, along with contact details of First Intervention Team, Alarm & Evacuation Team, Emergency Coordinators, Search and Rescue Team, Security Team, Tactical Team and Oil Spill Response Team. Documentation review indicates that an annual mock drill schedule has been prepared for 2024, with mock drills being undertaken on a six-monthly basis and results documented. Records indicated that the site has undertaken mock drills on 25 April 2024 with records to be shared for review and validation. The site has conducted mock drill in the presence of representative from BFSCD on 16 July 2024 where total 57 persons from SUNMP participated and record has been maintained in prescribed format (i.e. Form 22A) as per BLR, 2015 requirements. As per BLR 2015, at least 18% workers of every division of the establishment shall be provided with training on fire extinguishing, rescue and first aid and the use of portable fire extinguishing equipment's and from the trained workers fire extinguisher teams, rescue teams and first-aid teams (6% member of every team) shall be formed, and this shall be recorded in accordance with Form- 22. The site has identified 20 persons for fire extinguisher teams, rescue teams and first-aid teams and conducted training from 15- 18 September 2024 in the presence of representative from BFSCD. The record has been		Action closed during current monitoring.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
						maintained in form-22 and signed by Warehouse Inspector of BFSCD.		
2.8	Arrange for a standby boat equipped with life jacket and trained personnel to respond to any project riverine traffic related emergencies.	S. No 2.9, Table 3.1	SUNMP and EPC	Photographic evidence	Immediately, prior to first disbursement	In consistent with the ESAP recommendation, the site has now updated the Emergency Preparedness and Response Plan (EPRP) to encompass emergencies related to road and riverine traffic incidents/accidents along specific response, evacuation and rescue measures. Furthermore, as specified in the EPRP and ESAP, the site has now provided a standby boat equipped with life jacket and trained personnel at the material loading and unloading temporary jetty. The same was found to be made available during the current E&S monitoring visit undertaken.		Action closed as per the Oct-Dec 2022 E&S monitoring report.
2.9	Perform quarterly E&S audits of the manpower supply contractors to assess compliance with applicable regulatory requirement and project E&S plans/procedures. Extend the coverage of the weekly EIC to cover the worker accommodation along with the development of CAPA for all non-conformances identified.	S. No 2.11, Table 3.1	SUNMP & EPC	Copy of quarterly subcontractor audits Copy of weekly EIC	Immediately, prior to first disbursement	The Project EHS Plan developed by the EPC consortium reveals the requirement for performing quarterly audit/inspection of the subcontractor HSE performance with the audit findings and corrective actions/recommendations to be reported to the subcontractor site manager to facilitate necessary closure. Presently, EPC has engaged "Meghna Enterprises" and "Man-Is-Power" as manpower supply contractors for the construction phase of the project. The EPC consortium undertakes quarterly EHS performance audits of the aforesaid subcontractors with audit reports being maintained. As recommended in the last quarter audit, Corrective & Preventive Action Plan (CAPA) is required to be developed for the non-compliance identified as part of such quarterly EHS audits. Review of the sample subcontractor audit report for Manis Power dated 24 October 2023, indicate that non-compliances have been identified with respect to maintenance of weekly records and usage of PPEs by contractor workers for which corrective action has been identified (including the personnel responsible for implementation) and tracked for closure.		Action closed as per the Oct-Dec 2023 E&S monitoring report.
2.10	Update and implement the project Environmental Monitoring Plan to cover all environmental	S. No 2.12, Table 3.1	SUNMP & EPC	Copy of updated Environmental Monitoring Plan	Immediately, prior to first disbursement	Environmental Monitoring Plan (EMP) outlined in the ESIA report for the purpose of environmental monitoring activities is being implemented for		Undertake drinking water and ground water monitoring

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
	attributes and parameters as specified in the regulations and IFC EHS guidelines. The plan to clearly outline the rationale for selection of the monitoring locations.			& Monitoring Reports.		operation phase. Furthermore, as per ECC the site is required to undertaken six monthly monitoring of NOx in flue gas and quarterly monitoring of ambient noise levels and results submitted to DoE, Bangladesh. Reportedly the site has engaged a third-party agency – M/s EQMS Environmental Laboratory to carry out E&S monitoring for the project during operation phase. Review of the EQMS quarterly monitoring report for the period Jul- Sept 2024 indicated revealed the following observations. <i>Ambient Air Quality Monitoring</i> Monitoring of ambient air is undertaken at 6 locations on quarterly basis (24 hr. sampling) at main site. The parameters monitored is limited to PM10 (48.96-82.32 µg/m3), PM2.5 (29.63-52.32 µg/m3), SO2 (19.76-42.85 µg/m3); NOx (19.86-35.12 µg/m3); and CO (0.01-0.07 mg/m3). The result in all cases was found to be in compliance with Schedule 12 of the Air Pollution Control Rules, 2022. <i>Ambient Noise Quality Monitoring</i> Monitoring of ambient noise (both day and night) is undertaken at 7 locations (4 at main plant site, 1 at mixed zone and 2 outside the plant near silent zone viz, Purbapara Mosque, Poschim Para Jame Mosque etc.). The monitoring is being undertaken on a weekly basis with results in all cases found to be in compliance with the day and night-time noise standards prescribed under Noise Rules, 2006. However, for the <u>Poschim Para Jame Mosque and Purba Para Mosque location both day-time equivalent noise levels were found to be higher than the prescribed standards for silent area/zone primarily attributed to anthropogenic activities.</u> <i>Surface Water Quality Monitoring</i> Monitoring of surface water quality is being undertaken at 2 locations – upstream and downstream of Meghna River. The sampling is undertaken on a monthly basis		inside the plant boundary as per Schedule 2 of the BECR, 2023. Conduct third-party point source emission monitoring in accordance with operations ESMP to validate the CEMS monitoring results. Engage a third-party agency to perform calibration of CEMS on a fast-track basis. Commence with the soil quality monitoring for operations phase

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
						and samples analyzed for the following parameters – pH, BOD, DO, COD, TSS, TDS, ammoniacal nitrogen, total chromium, lead, mercury, Total Dissolved Solids (TDS), Oil & Grease and Total Coliform with results found to be in compliance with the newly notified BECR, 2023. <i>Ground Water Quality Monitoring</i> <u>SUNMP is yet to undertake drinking water and ground water monitoring inside the plant boundary as per Schedule 2 of the BECR, 2023.</u> Ground water monitoring has been undertaken for SUNMP Campsite for 15 parameters as per Schedule-2 of BECR 2023. <i>Storm Water Quality Monitoring</i> The site has undertaken monitoring of storm water from the outfall of storm water basin located near RMS building. The monitoring encompasses the following parameters – temperature, pH, TSS, BOD, COD, Phosphate, Sulphate, Total Coliform with the results found to be in compliance with the Schedule 4 of the BECR, 2023 <i>Treated Sewage and Effluent Monitoring</i> Review of the monthly treated STP effluent monitoring report of main plant reveals the effluent has been analyzed for pH, temperature, BOD, COD, TSS, sulphate, phosphate, nitrate, oil and grease and total coliform with results found to be in compliance with the standards prescribed in Schedule 3 of BECR, 2023. The site has tested quality of treated ETP effluent for all 32 parameters mentioned in Schedule-4 of BECR 2023 which is in compliance with the regulatory requirement. The following observations is made with respect to operations environmental monitoring: Reportedly the site has installed a Continuous Emission Monitoring System (CEMS) for both main and bypass stack. Review of the online		

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
						real time values indicate negative values for NOx (-4.29 mg/m³) with PM values also noted for bypass stack (9.5 mg/m³). Considering the plant is not in operation, the reason for such high PM concentration in flue gas could not be validated and is ascertained largely due to calibration issues with CEMS, which is reported to be pending. - SUNMP has not undertaken any third-party source emission monitoring as specified in the operations ESMP for validation of the CEMS results due to closure of operation post June 2024. - The site has not undertaken any soil sampling for operation phase.		
2.11	Update the monthly E&S progress report to include social KPIs along with key environmental KPIs such as water consumption, wastewater generated and discharged, waste recycled/disposed	S. No 2.13, Table 3.1	SUNMP & EPC	Copy of monthly E-S KPIs for construction	Immediately, prior to first disbursement	EPC generates a monthly progress report encompassing Environmental and H&S KPIs along with key E&S incidents/issues and corrective actions. The following key E-S KPIs are reported in the progress report viz. Fatalities, LTIs, Medical Treatment Case, First Aid Case, Fire, Near Misses, Stop Work, Safety Rewards, Training hours, Toolbox Talks, Safe Man hours, EHS Inspections, Spill Incidents, Waste generation etc. As recommended in the last audit report, environmental and social metrics in the form of water consumption, waste generation and stakeholder meetings etc. has been captured in the EPC monthly progress report of August 2023. The same was reviewed and validated for the current monitoring period. Reportedly, O&M KPIs will be documented and reported by the GE-NEPC consortium till the time performance test is complete post which this will be taken up the O&M team (NEPC-S and SUNMP). Review of the monthly progress report of June 2024 (as prepared by the O&M contractor) reveals coverage of E-S KPIs which includes safety KPIs like Loss Time Injury, Damage to Asset, Monthly E-HS walkdowns		Action was closed during current monitoring

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
						and number of accidents (air/effluent/spill). Key environmental and social KPIs include: • Total NOx emission (tons) • Total CO2 emission (tons) • Effluent generated (m3) • Water Consumed (m3) • Water Recycled (m3) • Oil cloth generated (kg) • Used oil filter generated (pcs) • Mud cake generated (kg) • Sludge generated (kg) • Used oil generated (drums) • Total Waste Disposed • Total Waste Recycled • Medical waste generated (kg) • No of Grievances Reported • No of Grievances Resolved • Stakeholder Engagement Kindly refer Table 2.3 to find the monthly and YTD reported value to the indicators. Furthermore, ERM has reviewed the O&M grievance register and has confirmed that it was addressed appropriately.		
2.12	Update the SEP to include a point on specific channel of communication for external stakeholders established on regular basis to register concerns /feedback from general public or any other external stakeholder. A clear reporting format should be developed and used for SEP Implementation. Implement the Grievance Redress Mechanism for community and report regularly.	S. No 2.15, Table 3.1	SUNMP	External Communication procedure document Stakeholder activities to be reported in the ES monitoring report Functional GRM; records and database of grievances (including all formal and informal complaints and	Immediately, prior to first disbursement Ongoing activity Ongoing activity	It was reported in previous ERM's audit report that SEP document has included the specific channel of communication for external stakeholders, and it is being implemented by SUNMP management GRM function appears to be working at satisfactory level. Stakeholder, specifically local community in close vicinity of project are well aware with team responsible for registering their issues and concerns. Records of issues received from stakeholder are recorded and also feature in periodic social monitoring report. A review of the grievance register indicates that one new grievance was reported in May 2024 regarding tree damage that occurred during the construction of a boundary wall. The grievance was resolved by compensating the affected party. ERM has reviewed		Action closed as per the Jul- Sept 2024 E&S monitoring report with implementation to be ongoing.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
				legal court cases) and resolutions: grievances to be reported in the ES monitoring report.		the grievance register along with the compensation payment vouchers and has confirmed that the issue was addressed appropriately.		
2.13	Check effectiveness of GRM for workers through review of grievance records, action taken report, workers' consultations etc.	S. No 2.1 & 2.14, Table 3.1	SUNMP	GRM implementation evidence	Ongoing activity	GRM functions were observed to be operating effectively. A Grievances recording system is in place and are being documented thoroughly.		Action closed as per the Jul- Sept 2024 E&S monitoring report with implementation to be ongoing
3.	IFCPS2: Labour and Working Conditions							
3.1	Update SUNMP HR policies to ensure alignment with IFCPS-2 requirements as well as BLA 2006 requirements.	S. No 2.1, Table 3.4	SUNMP	Updated HR policy	Immediately, prior to first disbursement	In previous audit report for the period July-Sept 2023 visit, it was reported that SUNMP management has updated their HR policy and got it approved by board of directors of the company.		Action closed as per the Jul-Sep 2023 E&S monitoring report
3.2	Facilitate approval of the service rules in coordination with the competent authority	S. No 3.2, Table 3.1	SUNMP	Approved Service Rule	3 months prior to COD	SUNMP has applied for service rule approval on 31 st July 2023 after updating their HR policy. Company has not received further response from Labour department on approval. However as per labour rule 2015, deemed approval is granted for service rule upon completion of three months since the date of application.		Action closed as per the Jul-Sep 2023 E&S monitoring report
3.3	Generate a list of contract workers documenting their overtime work status till date (beginning of construction phase till end of Jan 23), gaps with respect to overtime payment including arrears to be paid.	S. No 3.4, Table 3.1	SUNMP in coordination EPC Contractor	OT work status spreadsheet for contract workers	Immediately, prior to first disbursement	As discussed in previous audit report, SUNMP has agreed to ensure payment of differential amount of overtime hours performed and minimum wage payment to eligible workers in alignment with the revised minimum wage notification that was published in August 2021. In this regard, a detailed assessment on differential amount for eligible workers is prepared. Releasing of the differential amount is not being initiated now, in view of potential business interruption related risk that were discussed in detail during site visit. SUNMP has submitted a memo in this regard along with details on valid reason for delay in releasing the differential amount, disbursement plan as well as details on differential amount calculation sheet. This Memo assures that SUNMP and EPC contractor (GE) will ensure initiating the process to disburse the		SUNMP is responsible to ensure that payment of differential amount to eligible workers, is released by EPC contractor as per the revised disbursement Plan.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
						differential amount payment to the eligible workers immediately after the completion of project construction phase, and within one month after the achievement of project PAC which is likely to be completed by January 2024. In ERM's 5th E&S Monitoring visit (Feb 2024), it was appraised that project COD was achieved on 19th January 2024 and calculation of differential amount is completed and it has considered period till January 2024. Next steps towards payment release includes formation of back wage committee, Bank Account opening for depositing the fund for differential amount and the initiating payment to eligible construction workers. It was also appraised that payment disbursement is likely to be initiated by May/June 2024. In ERM's last E&S monitoring visit (May 2024), it was noted that there has not been any further progress due to political unrest in Bangladesh since previous audit period for facilitating disbursement of different amount. In ERM's E&S Monitoring visit in Oct 2024 it was appraised that an inventory of workers, including calculations of arrears has done and formed a committee to oversee the payment of back wages. The next step to be done after issuance of PAC (expected date 15 Nov 2024) is to: • Open a bank account allocated for back wage payments (to be completed within two months of the PAC issuance). • Begin payment of back wages and overtime (to start in the second month following the PAC issuance). • Implement monthly progress reporting starting from the second month after the PAC issuance. • Finalize the disbursement process after completing the 12th month of payments.		
	Facilitate and complete payment of arrears to the contract workers identified with OT gaps in the list above.	S. No 3.4, Table 3.1	EPC Contractor	Evidence of payment of OT related arrears to the eligible workers.	Prior to COD	Same as above		Same as above

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
	Ensure OT payment to both direct and contractual workforce is undertaken in alignment with Bangladesh Labour Rules (BLR), 2015 from 1 Feb 2023 onwards	S. No 3.4, Table 3.1	EPC Contractor	Documentary evidence of compliance	Same as above	Same as above		Same as above
3.4	Every worker should be issued appointment letter by their respective sub-contractors of EPC contractor as required under section 5 of BLA 2006.	S. No 3.6, Table 3.1	EPC Contractor	Documentary evidence of compliance	Immediately, prior to first disbursement	Following the last monitoring visit, it is assumed that all new workers have received appointment letters from their respective contractors or employers.		Regular follow-up with manpower supply agencies should be maintained to ensure that all new recruits receive their appointment letters on the first day of their joining. This will help confirm that all necessary documentation is in place and facilitate a smooth onboarding process for new workers.
3.5	EPC contractor should also comply with applicable provisions of BLA 2006 w.r.t records and registers required to be maintained as per BLA 2006	S. No 3.7, Table 3.1	EPC Contractor	Documentary evidence of compliance	Immediately, prior to first disbursement	Based on the findings from the last monitoring visit, it is assumed that the manpower supply agency, 'Man is Power,' will be maintaining the relevant compliance-related documents.		None
3.6	Ensure improvement of the driver accommodation conditions at the worker camp as per EBRD guidelines. Ensure the sanitation facilities at the driver accommodation at the worker camp is designed to provide workers with adequate privacy, including ceiling-to-floor partitions. Proper locking arrangements to be provided at all doors of the temporary toilet rooms/ units on-site.	S. No 3.8, Table 3.1	EPC Contractor	Monitoring checklist and monthly monitoring reports on accommodation facility. Photographic evidence	Immediately, prior to first disbursement	Based on site performance in ERM's previous visit, it is being assumed that accommodation arrangement for workers would be in alignment of EBRD guidelines.		Action closed as per the Oct-Dec 2023 E&S monitoring report with implementation to be ongoing Not Applicable in Jul-Sept 2024 E&S monitoring report

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
3.7	Remove/replace electric hand power tools using defective/frayed wiring. Appoint designated personnel having valid license for supervision of electrical works and carrying out work on high voltage electrical installations.	S. No 3.12, Table 3.1	EPC	Photographic evidence Copy of wireman permit of all the electricians specifying its validity	Immediately, prior to first disbursement	As observed during the site walk round, handheld power tools being used were found to be equipped with earthing provision and the same is checked monthly using dedicated electrical inspection checklist. As recommended in the last audit, the site has now made provision of double earthing across all arc welding machines in use at the hot work areas onsite. The electric pumps/motors at the worker camp Water Treatment Plant (WTP) have also been equipped with double earthing except for a few which was actioned and completed during the course of the audit. The site has appointed electricians having wireman and supervisory permit to conduct installation and operation of medium and high voltage electrical works in accordance with the provision of Electricity Rules, 2020. Review of sample supervisory certification for two designated electrical supervisors reveals the certificate is valid for undertaking Class A, B and C type electrical equipment installation and maintenance.		Action closed as per the Apr-Jun 2024 E&S monitoring report
3.8	Make provision of standalone lighting at the worker restroom/shelters at the main plant site. Share periodic illumination monitoring records for review and validation. Update the GW monitoring program as specified in S. No. 3.13 of Table 3.1 of the 1 st E&S monitoring report.	S. No 3.13, Table 3.1	EPC	Photographic evidence Illumination records Updated GW monitoring program	Immediately, prior to first disbursement and ongoing	As noted during the current monitoring, the site continues to ensure provision of adequate illumination at all restrooms/shelters provided onsite. Reportedly and documentation review indicates that the site undertakes periodic illumination monitoring for all work areas to assess compliance with the illumination standards prescribed. Review of the monitoring records for the period Aug-Oct 2024, indicates that SUNMP has undertaken illumination monitoring at the following areas viz. steam turbine, gas turbine, dormitory building, monitoring basin, demineralization plant, control building, dormitory, main gate, raw water pump house, cooling tower area, emergency lighting (all areas), control rooms, switchyard, oil storage tanks, transformers and outdoor switchgears with results found to be in compliance with the ENBC 2020 standards. For the groundwater monitoring program, please refer to S. No. 2.10 of this Table.		Action closed during the current monitoring.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
3.9	Ensure locking out (de-charging and leaving open with a controlled locking device) and tagging out (warning sign placed on the lock) devices during service or maintenance. Ensure all hot work activities is performed with use of proper barrier screens and in presence of a standby "fire watch" at all times. Provide toe board with the exiting hard barricading at open end of floor/platform as per BNBC norms. Implement standalone work permits for height work and confined space entry. Ensure provision of SCBAs, rescue watch, first aid etc. for all activities involving confined space entry. Conduct Job Safety Analysis (JSA) for all high hazard activities being undertaken Share details of the Safety Committee composition along with meeting minutes.	S. No 3.14, Table 3.1	EPC	Photographic evidence Work permits for height work and confined space entry. JSA for high hazard works Safety committee composition & meeting minutes	Immediately, prior to first disbursement	<i>Electrical Safety</i> With respect to electrical safety, the site has marked the hazardous areas (electrical rooms, installation etc.), with appropriate safety signages and warning signs. The site uses electrical hand power tools with proper earthing, which is subjected to monthly inspection based on a defined checklist and records maintained. Also as recommended, the site has implemented a robust Lock Out Tag Out (LOTO) program/permit system, which was evidenced during the current monitoring period. Furthermore, the bulk diesel storage tank (~1200 litres capacity) at the fire pump room has been equipped with dual earthing in accordance with the provision of the Petroleum Rules, 2002. The site has inspected 30 earth pits on 15 October 2024 through in-house electricians having valid license for Class A, B & C electrical equipment installation and maintenance. As per the letter dated 9 April 2023 from Chief Electrical Inspector, the site has obtained validation and approval of earthing system. <u>The electrical wiring and earthing of the operational units onsite is not yet subjected to annual review and certification by government licensed Wiring Inspector or Institution as per Bangladesh Labour Rules (BLR), 2015 requirements.</u> <u>Multiples instances were noticed where provision of insulated mats was lacking in front of high voltage electrical panels as per regulatory requirements.</u> <i>Hot Work</i> For hot work-related activities, the site has implemented a work permit system which requires all personnel performing such work to possess requisite competency, use appropriate PPEs and safety equipment viz. flame arrestors, make provision of necessary firefighting equipment at the hot work area etc. Sample document review and physical visit to the site indicates that the site made provision of fire blankets and stand by "fire watch" in the work permits		Ensure provision of insulated mats in front of all high voltage electrical panels on site. Engage licensed agency/personnel to conduct annual review and certification electrical wiring of the operational units as per BLR, 2015 requirements. The site must maintain a Safety Record book as per BLR 2015 requirement. Ensure maintenance of records of all lifting tools and equipment's examination by competency agency in Form 24.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
						as per the IFC General H&S Guideline requirements. Sample inspection of the work areas also indicate the workers involved in such high hazard activities are equipped with appropriate PPEs. <i>Safety Committee</i> In accordance with the BNBC, 2020 requirements, a Safety Committee has now been constituted to efficiently manage all safety related affairs. The GE-Site in Charge acts as the head of the Committee which meets on monthly basis. Documentation review indicates monthly safety committee meeting minutes being maintained and corrective actions identified. The site has constituted a safety committee on 20 October 2024 consisting of 21 members from management, SUNMP PLC and EPC and headed by Mr. Jason Jung (COO&PM) which is valid till 19 October 2026. The second quarterly meeting has been held on 20 October 2024 and minutes of meeting has been shared for review. <i>Safety Record Book</i> Safety record book not found to be maintained and displayed at conspicuous places onsite bearing the following information as specified in the Bangladesh Labour Rules, 2015: • A list of machinery or chemical substances used and preserved in an establishment which may cause danger or risk. • A description of personal safety appliances or equipment's, which are to be used by workers. • The date and number of participants in a fire drill. • Information related to examination of electrical wiring and appliances. • The list of safety committee members, date and number of participants in the relevant training • Information on the safety measures taken by SUNMP. <i>Height work</i>		

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
						As observed during the site walkaround, every open side floor/platform including stairways of under construction building onsite is provided with temporary hard barricading of appropriate height. Also as recommended in the ESAP, the hard barricading railing for such buildings were now provided with toe boards as per BNBC requirements. In this regard and as earlier recommended, site has developed and implemented a standalone height work permit system with all scaffolds being provided with coloured tags specifying its "USE/NO USE" status. Inspection of sample areas indicated workers operating on such scaffolds equipped with appropriate PPEs like safety harnesses etc. For ladders being used, an inspection checklist is also found to be available and implemented. <i>Confined Space Entry</i> In consistent with the earlier monitoring report review of the sample work permit for confined space entry for commissioning indicates that oxygen and LEL levels are now being monitored and values are also being documented in the work permit. <i>Excavation Work</i> Documentation review and physical visit undertaken indicates that the site has developed and implement a permit system for excavation work with barricading now being provided near open trenches/drains near ST building, dormitory building and fire pump room. <i>Machine & Equipment Safety</i> Reportedly, site is involved in the operation of lifting equipment in the form of EOT Cranes, chain pulley blocks, lifts etc. for operations. However, the aforesaid lifting equipment's has been inspected and certified by Servelo Inspection Company having valid approval from Department of Inspection for Factories & Establishment, Bangladesh in form-20 dated 16 May 2023 valid for two years. However, the inspection records are not maintained in prescribed format (Form 24) as specified in the Bangladesh Labour Rules (BLR),		

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
						<u>2015</u> . Regulatory Metering Station (RMS) at the main plant site has now been provided with proper access control. Photographic evidence has been shared for the same.		
3.10	Develop and implement a robust near miss recording system. Conduct regular training of the workforce to enhance awareness on "near miss" definition to improve overall reporting. Update the training program to encompass the refresher training and its frequency. Maintain separate records for all refresher training being provided.	S. No 3.15, Table 3.1	EPC	Near Miss Reporting & Recording Procedure Training Records (including refresher training)	Immediately, prior to first disbursement	Documentation review indicates that site has implemented a safety induction program for the workforce with records found to be maintained. Reportedly and as noted during the documentation review, the site records and reports near miss as part of the monthly EHS KPI report. In this regard, a near miss reporting system has been established and awareness campaigns being undertaken on a monthly basis. Reportedly, refresher trainings are being conducted however the frequency of such trainings have not been defined under the training program and records documented.		Action closed as per the Jan-Mar 2023 E&S monitoring report.
3.11	Develop and implement occupational noise monitoring plan for workers operating near high noise equipment viz. batching plant, grinding machines, concrete mixers etc. and maintain records for the same.	S. No 3.16, Table 3.1	EPC	Occupational noise monitoring plan and records	Immediately, prior to first disbursement	The site has prepared high noise map zone covering a total of 7 areas within main plant viz. main gate, HRSG, dormitory, batching plant, jetty, RMS and STG. Documentation review indicates noise is monitored at these locations 4 times in a day on a monthly basis. In consistent with the ESAP recommendation, the site has undertaken monitoring of occupational noise levels near high noise generating equipment and operations (diesel generator sets, cranes, batching plant, grinding and concrete mixing operations) with results found to be in compliance with the threshold occupational exposure limit of 85 decibels specified under the IFC General EHS Guidelines. The site has prepared an Occupational Noise Monitoring Procedure (Document No: Sun-NEPCs-EHS-22 dated 01 April 2024) which has identified 12 locations inside plant as high noise area, monitoring requirements and noise control measures. Records reviewed for monitoring report from Aug-Oct 2024		Action closed during current monitoring

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
						indicate that SUNMP has undertaken internal workplace noise monitoring at 28 locations within plant and the results are within workplace noise limit (85dB) as specified in the IFC General EHS Guidelines.		
3.12	Ensure all LPG cylinders at the worker camp and main plant are being stored in covered storage and chain linked. For temporary/satellite LPG storages onsite ensure display of appropriate hazard communication.	S. No 3.16, Table 3.1	EPC	Photographic evidence	Immediately, prior to first disbursement	As observed during the site walkthrough, appropriate hazard and safety signages was observed to be displayed at the designated LPG storage area at the worker camp and construction site along with copy of the MSDS (in both English and Bangla). Also as recommended in the earlier monitoring report, the site has made effective provision for chain-linking of the LPG cylinders at storage and usage areas onsite. In this regard, the site has also developed a Compressed Gas Cylinder Management procedure which outlines the process of cylinder unloading in consistent with industry best practices.		Action closed as per the Jul-Sep 2023 E&S monitoring report.
4. IFCPS3: Resource Efficiency and Pollution Prevention								
4.1	Review and validate the project main and bypass stack design in consistent with the IFC General EHS Guidelines requirements. Prepare and implement a Noise Prevention & Control Plan for operations to ensure compliance with the applicable noise standards at the sensitive receptors (both day and nighttime)	S. No 4.1, Table 3.1	SUNMP	Copy of stack height design validation study based on IFC EHS Guidelines. Copy of Noise Prevention and Control Plan along with evidence of implementation.	Immediately, prior to first disbursement	The HRSG stack height of 75m has now been validated in accordance with the IFC General EHS Guidelines and is found to be line with the requirements, which specifies the minimum stack height to be 72.5 m. The site has prepared a Noise Prevention and Control Plan for operations with noise barrier wall (~3m height) reportedly to be constructed on top of the project boundary wall for which the budget has already been approved by SUNMP Board of Directors. Reportedly construction of boundary and retaining wall is expected to commence in Dec 2023 and be completed by Mar 2024, with the installation of noise barrier expected to be completed by August 2024. In this regard, documentation review indicates that the site has already prepared the approved design documentation for boundary & retaining wall including the noise barrier. Signed agreement is also available with the concerned vendors for construction of the boundary wall and noise barrier along with supply of materials for erection of the noise barrier.		Ensure installation of the noise barrier wall in accordance with the updated schedule.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
						As informed by SUNMP EHS team during current site visit, the construction of 3m boundary wall has been complete and post completion of the wall construction, noise barrier installation is expected to commence sometime in November 2024. Noise barrier material has reached Bangladesh and awaiting customs clearance.		
4.2	Perform annual quantification of G-H emissions during operations in accordance with internationally recognized methodologies and good practices. Facilitate implementation of the Climate Change Risk Assessment (CCRA) Study Report	S. No 4.2, Table 3.1	SUNMP	Copy of G-H emission quantification for operations. Report on the implementation progress of CCRA study	Annually during operations.	SUNMP has done G-H scope-1, 2 & 3 emissions calculation through a BAB accredited third party Enviroge for the period Jan- Sept 2024 following IPCC guidelines. The total G-H emission for the period is 341627 TCO ₂ e. SUNMP is also to provide/furnish status of implementation of the CCRA study recommendations.		Provide/furnish status of implementation of the CCRA study recommendations.
4.3	Install flowmeters for all borewells at the site and camp. Maintain water consumption records from such borewells and report it as part of monthly EHS KPI report being generated.	S. No 4.3, Table 3.1	SUNMP & EPC	Copy of flow meters purchase order and monitoring records. Updated monthly EHS KPI report	Immediately, prior to first disbursement	Reportedly, the site is currently operating one borewell at the worker camp with records of such consumption being maintained through installation of flowmeters. Water requirement for construction and operational activities is presently met through surface water source i.e. Meghna River. In line with the earlier recommendation, site is currently maintaining records of both ground and surface water consumption and details furnished as part of the monthly progress report KPIs.		Action closed as per the Jul-Aug 2023 E&S monitoring report.
4.4	Conduct analysis of the riverbed sediment for any potential contaminants by engaging laboratories outside Bangladesh. Implement sediment control measures for the riverbed sand being used for levelling at the worker camp.	S. No 4.4, Table 3.1	SUNMP & EPC	Copy of riverbed sand analysis report. Photographic evidence	Immediately, prior to first disbursement	As mentioned in the last monitoring report, SUNMP has now undertaken analysis of the riverbed sediments (4 samples) by engaging a third-party agency – ALS Technichem HK Pty Ltd, to assess for any potential contaminants viz. PAHs, PCBs, BTEX, TPH and heavy metals. Review of the results with respect to the Dutch Soil Standards (in absence of any national soil standards) reveals in all the cases the concentration of the aforesaid contaminants to be well below the target and intervention values (as presented in the aforesaid standards), which is not indicative of any potential contamination.		Action closed as per the Jan-Mar 2023 E&S monitoring report

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
						During the site walkthrough it was noted that arrangements has been made to prevent overflow of riverbed sand to adjoining community land parcels etc. through use of sandbags. Also observed during the last and current monitoring visit, the site has implemented erosion control measures such as grass matting on the riverbed sand slopes of worker camp/accommodation area.		
4.5	Update the WMP as per the ESAP recommendation to cover all major waste streams, viz. drill cuttings and drilling mud during gas pipeline laying; riverbed sediment from construction of water intake & outfall structures; and septic tank sewage sludge.	S. No 4.5, Table 3.1	SUNMP & EPC	Copy of updated project WMP.	Immediately, prior to first disbursement	In line with recommendation made in the last audit report, the site has placed a request for analysis of sewage sludge through a third-party agency (EQMS) for the following parameters – copper, molybdenum, zinc, arsenic, nickel, lead, cadmium, selenium, benzene, xylene and ethylbenzene in accordance with the Bangladesh Sludge Management Guidelines. The site has undertaken STP sludge monitoring from workers camp prior to decommissioning as per schedule-2 of BECR 2023 and the results are within permissible limit. The EPC consortium has also developed a Sewage Sludge Management Plan which outlines the measures for the treatment of sewage and disposal of sewage sludge generated from the process through licensed waste disposal agencies. Reportedly, the same will be undertaken during the decommissioning of the worker camp following operations. For operations, sludge will be generated from the Effluent Treatment Plant (ETP) and Sewage Treatment Plant (STP), which reportedly will be disposed through authorized third-party vendors. The site has developed a Sludge Management Procedure (Document No: Sun-NEPCS-EHS-24 dated 1 April 2024) for operation phase. The plan includes details regarding sludge generation, storage, handling and disposal and the requirement to analyze the waste sludge prior to identifying the appropriate disposal methodology in accordance with the Bangladesh Standards and Guidelines for Sludge Management.		Action closed during current monitoring

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
4.6	Create a centralized, covered and paved hazardous waste storage facility at both main site and construction camp. All hazardous waste storage containers at the said facility to be appropriately labelled bearing hazard codes. Maintain a waste inventory and manifests for hazardous waste being generated and collected from site in accordance with the WMP requirements.	S. No 4.6, Table 3.1	SUNMP&EPC	Photographic evidence. Copy of waste inventory and manifests. Details pertaining to drilling cutting and drilling mud disposal.	Immediately, prior to first disbursement	The site has established a centralized hazardous waste storage area as per the ESAP recommendation. The hazardous waste comprising of used oil was found to be kept on a paved area with spill kit and firefighting and eyewash provisions. Reportedly, the site has engaged Meghna Enterprises for the collection and disposal of both general and hazardous waste. Review of the communication received from DoE reveals that aforesaid agency is not required to obtain Environmental Clearance Certificate (ECC) for such waste collection and disposal activities. As communicated, Meghna Enterprise is involved in selling of the used oil to a third-party agency – Min Oil Unit-2 Ltd, having ECC which is found to be valid till April 2024. Documentation review also indicates that Meghna Enterprises has an agreement with the aforesaid agency for disposal of hazardous waste, which is found to be valid for a year. The site has developed a Waste Management Procedure (Document No: SUN-NEPCS-EH-S-10 dated 01 April 2024) for operations in consistent with applicable legal requirement and IFC EH-S guidelines. The site has implemented colour coding system for bins for segregation of hazardous and non-hazardous waste. All the hazardous wastes are kept inside newly constructed shed having impervious flooring with proper signage and secondary containment. The site has done agreement with M/s. Mesars Saiful Auto Bricks for coprocessing of used oil and oil contaminated waste. <u>The ECC of the party was not available for review. The site is yet to identify an authorized party for the disposal of sludge.</u>		Ensure availability of ECC copy of third-party hazardous waste vendors. In case DOE has stopped providing ECC to waste management facilities, conduct periodic audit of the facilities to ensure proper waste management.
4.7	Ensure all hazardous and medical waste generated from the construction site and worker camp is collected and disposed through third party agencies having valid agreement and permission from regulatory authorities.	S. No 4.7, Table 3.1	SUNMP&EPC	Copy of valid agreement & license/approval for all third-party waste management agencies.	Immediately, prior to first disbursement	Based on the documentation review and interaction with SUNMP and GE representatives, it is understood that collection and disposal of solid wastes (including hazardous waste) and biomedical waste from site is being managed through third party agencies – M/s Meghna Enterprise and M/s Prism		Action closed as per the Oct-Dec 2023 E&S monitoring report.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
	Conduct screening audits to assess the performance of the waste treatment and disposal facilities/agencies identified prior to their engagement. Renew the biomedical waste disposal agreement with M/s Suvoccha hospital.			Copy of audit report of third-party VMAs. Copy of renewed agreement with biomedical waste disposal agencies		Review of the agreement with Meghna Enterprise is found to be valid till 31 Mar 2024, while the agreement with Prism is found to be valid till November 2024. As earlier stated, Meghna Enterprise is not required to obtain Environmental Clearance Certificate (ECC) from DoE, Bangladesh for current nature of waste management activities. For Prism, ECC was found to be available and valid till 23 October 2024. Furthermore, in line with the ESAP recommendation, the EPC consortium has conducted an audit of Meghna Enterprises and Prism in Nov 2023 with records being maintained. As recommended earlier, a corrective action plan has also been developed as part of such audits in order to track closure of the audit recommendations.		
4.8	Make provision of emergency showers/eye wash at all hazardous chemical/fuel storage sheds of EPC. Avail and display concise version of MSDS of fuel/chemicals in Bangla language. Perform analysis of the transformer oil being used for the presence of PCBs. For oil storage at the worker camp, ensure provision of secondary containment and spill kit as per the Hazardous Material Handling and Storage Management Plan	S. No 4.8, Table 3.1	EPC	Photographic evidence. Analysis report of transformer oil for PCBs Photographic evidence	Immediately, prior to first disbursement	The diesel, lubricant and engine oil storage containers were found to be kept at the designated covered fuel and chemical storage sheds marked with hazard labels/pictograms. Material safety data sheets (MSDS) were found to be available for the aforesaid areas in both English and local language as recommended in the ESAP. Similar observation was made at the standalone hydrogen storage building and bulk acid and storage tanks of hydrochloric acid, sulfuric acid and sodium hydroxide which are presently operational. Furthermore, the site has made provision of emergency eye wash at the aforesaid hazardous fuel and chemical storage areas including the diesel storage area at the worker camp and operational site. The emergency shower/eye-wash stations were found to be functional and also subjected to monthly inspection evident through the inspection tags observed. As per the evidence shared during current audit, the site has started maintaining information regarding the supply of specific PPEs (as outlined in the MSDS) in the form of vapour mask, hand gloves, splash resistant goggles and coverall for workers engaged in		Perform risk assessment and ensure secondary containment and gas mask is provided at aqueous ammonia storage room.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
						dangerous operations like handling of DM and cooling tower dosing chemicals etc. in Form 23 as per BLR, 2015. Furthermore, during the previous visit to the steam turbine building it was noted that at least 10 drums bearing hydrazine (identified as highly flammable chemical per MSDS available) was found to be appropriately labelled to display the hazard signages. The site has also provided an emergency eyewash, spill kit along with proper secondary containment at the said location. During the site visit to the DM plant, bulk acid and alkali storage unit, bulk diesel storage tank (near fire pump room) and hypochlorite dosing unit/plant it was noted that SUNMP maintain physical copies of MSDS of the chemicals (PAC, diesel, sodium hypochlorite, HCl and NaOH) used/stored in the aforesaid area; the chemical MSDSs were displayed in all such areas as per provision of BLR, 2015. The site has provided spill kits at the following chemical storage and handling areas viz. water purifying chemical storage room (DM Plant), bulk acid & alkali storage unit and bulk diesel storage (fire pump room) as per specific MSDS requirement. Display of hazard labels and precautionary signages has also been provided on bulk storages of diesel, HCl, NaOH and NaOCl. Key gaps/deviations identified include: As observed during the site walkthrough, the site has stored 16 HDPE barrels of aqueous ammonia in steam turbine building without any secondary containment. The site is yet to perform risk assessment for the same. No gas mask has been provided to the persons handling the same as per requirement displayed in the MSDS.		
4.9	Obtain and share the renewed license of the third-party agency involved in pest control activities onsite.	S. No 4.9, Table 3.1	SUNMP & O&M Contractor	Copy of renewed license of pesticide	Immediately, prior to first disbursement	The EPC consortium has engaged a third-party agency (Care Pest Control Services Ltd.) for performing pest control activities onsite and camp on a weekly basis. Documentation review indicates that the license of the		Action closed as per the Jan-Mar 2024 E&S monitoring report.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
	Discontinue the Bromadiolone and any WHO Classified Hazard Class Ia (extremely hazardous); or Ib (highly hazardous) pesticides. Update the Pest Control Procedure to introduce pesticide screening and selection based on WHO Recommended Classification of Pesticides.			application agency Notice communicating the discontinuation of WHO Class Ia & Ib pesticides Updated pest control procedure		atoresaid agency as issued by the Department of Agriculture, Plant Protection Wing, Bangladesh is currently valid till 23 July 2025. As reported the agency uses the following pesticides onsite viz. Lambda Cyalothrin, Cypermethrin, Permethrin and Darsun, which do not fall within the category of Class Ia/Ib pesticide as per WHO classification. EPC has also updated the Pest Control Procedure (U-EHS-PD-037) to clearly prohibiting the selection and use of WHO Class Ia and Ib pesticides with same now being communicated to the pest control agency.		
5.	IFCPS4: Community Health, Safety and Security							
5.1	Obtain relevant certification from concerned agency stating that the power project buildings/structures conform to BNBC requirements prior to commencement of operations. Conduct HAZOP study of the natural gas pipeline – identified as an associated facility of the project through a reputed third-party agency. Implement the recommendation of the HAZOP study in the natural gas pipeline design.	S. No 5.1, Table 3.1	SUNMP&EPC	Copy of BNBC certification from competent EPC personnel Copy of HAZOP report for natural gas pipeline	6 months prior to COD Immediately, prior to first disbursement	Vysus China Inc. was engaged NEPC to carry out a HAZOP study of the power project. Review of the HAZOP Report dated 8 October 2021 indicates that it covers the following: Main & Secondary Cooling Water System; Water Supply and Treatment; Demineralized Water System; Biocide Dosing System Cooling Water; Closed Cooling Water; Wastewater; Hydrogen Storage and Distribution; Compressed Air System and Fuel gas system. As specified in the Oct-Dec 2022 monitoring report, HAZOP study has been extended to cover the natural gas pipeline. As discussed, and recommended in the last monitoring report, the HAZOP report has been updated to include the gas pipeline node to assess the provision of appropriate engineering controls. The review of the report indicates that there are no recommendations with respect to the gas pipeline node safety risks and controls available.		Action closed as part of the Jul-Sep 2023 E&S monitoring report.
5.2	Prepare and implement a medical screening procedure for all workforce engaged in the project. Undertake specific medical test viz. audiometry, vision, colour blindness etc. for specific target	S. No 5.2, Table 3.1	SUNMP&EPC	Copy of pre-employment medical screening procedure along with medical examination	Immediately, prior to first disbursement for construction phase.	Reportedly and as observed during the earlier and current visit, the EPC consortium have made provision of a total of sanitation facilities at the main plant site to prevent exposure to water/vector borne disease resulting from improper sanitation and hygienic conditions. In addition, as per the ESAP recommendation, adequate toilet facilities have also		Action closed during current monitoring and to be continuously monitored.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
	worker groups based on the nature of work to be performed. Ensure the sanitation facilities at the driver accommodation at the worker camp is designed to provide workers with adequate privacy, including ceiling to floor partitions. Proper locking arrangements to be provided at all doors of the temporary toilet rooms/units onsite. Make provision of additional first aid boxes and certified first aiders at the main plant site as per BNBC norms.			reports for construction phase Annual medical examination report for operations Photographic evidence	Annually during operations Immediately, prior to first disbursement	been provided at the SUNMP/NEPC/GE employee cabins at the worker camp for both males and females. The aforesaid sanitation facilities are adequately lighted and observed to be subjected to daily cleaning by designated housekeeping team. As recommended in the ESAP and the Oct-Dec 2022 monitoring report, the worker sanitation facilities has made provision of privacy arrangement at the worker sanitation facilities at the camp. Regarding the preparation of worker pre-employment and periodic medical surveillance procedure, the same has now been prepared and documented as U-EHS-PD-043. The procedure outlines the list of health screening parameters to be checked based on the nature of work activities. Reportedly EPC Consortium undertakes pre-employment medical screening of all workers (including security and housekeeping workforce). As earlier recommended, the site undertakes specific tests like audiometry, vision and colour blindness for designated target groups along with blood tests, ECG etc. and the same was validated as part of the sample medical records review undertaken during the current visit. With respect to first aid, as recommended in the ESAP the EPC consortium has now made provision of a 14 first aid box at the main plant site and worker camp. The first aid box contents are subjected to periodic checks based on a defined checklist. Reportedly, a total of 22 trained and certified first aiders have been deployed onsite with name and contact details of the first aiders being displayed at the worker resting areas onsite. For operations, NEPC-S has developed an occupational health surveillance checklist for operations workforce which is to be implemented on an annual basis. As specified in the Jan-Mar 2024, the O&M team is required to undertake pre-employment medical examination of the operational workforce (~80) through a registered practitioner and issue a certificate of fitness in Form 26(A) and maintain the health		

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
						examination records in Form 26 as per the provision of the BLR, 2015. In view of the above recommendation, SUNMP has reportedly undertaken pre-employment medical examination of 72 O&M workforce and 19 contractual workers with the records maintained in a health register (Form 26). Sample fitness certification in Form 26(A) has also been shared for few workers. Furthermore, the site has also developed and implemented an Occupational Health Surveillance Procedure (SUN-NEPCS-EH-S-002 dated 01 April 2024) to this regard.		
6.	IFCPS5: Land Acquisition and Involuntary Resettlement							
6.1	Facilitate engagement of LRP implementation monitoring agency on a fast-track basis.	S. No 6.2, Table 3.1	SUNMP	Engagement letter of LRP agency LRP implementation report	Immediately prior to first disbursement Quarterly during project construction and operations phase	LRP implementation agency (i.e. M/s. Sajida Foundation) and External Monitoring agency for LRP implementation (i.e. M/s. SSCL) are already on board and implementation activities are progressing as planned in their inception report. Current update on LRP implementation based on is provided in sub-section 3.2 of this report.		None
7.	IFCPS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources							
7.1	Promote local fish breeding site in consultation with the Fishery Department as per ESMP requirement.	S. No 7.2, Table 3.1	SUNMP	Evidence of engagement with Fishery Department Local fish breeding progress report	Immediately, prior to first disbursement Quarterly during project construction and operations phase	In consistent with the recommendation of the Oct-Dec 2022 monitoring report, SUNMP has engaged with the Upazila Fisheries Department and local fishermen group with respect to promotion of local fish breeding sites. In this regard, the site was also visited by the local Fisheries Department Officer, who recommended the release around 100kgs of carp fish fingerlings of local species such as <i>Ruhi</i> , <i>Katla</i> , <i>Kalibaush</i> , <i>Mrigel</i> & <i>Sorputi</i> , <i>Bata</i> etc. by end of July to August when water level will be higher, and fishes get enough oxygen and natural feeding provisions. This is also captured as part of the SUNMP Corporate Social Responsibility (CSR) Plan. As part of first phase of the plan, SUNMP has released 120kgs of fish fingerlings (<i>ruhi</i> , <i>katla</i> , <i>kalibaush</i> ,		Continue to maintain a quarterly progress update report on implementation of the fish breeding promotion program.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
						mrigel, grass carp and sorputi) in the Meghna River on 27th August 2023. In the ceremony, SUNMP Site personnel, EPC personnel, Fisheries Dept. personnel, community people and fishermen were also present, and it was well appreciated by the local fishermen. A meeting was organized with the local fishermen on 21 Feb 2024 to assess the implementation of the fish breeding program. Key observations from this engagement have been presented below: 50% of the released fish could not be sustained as those fish fingers were caught by the bamboo structures/cages at the bank of the river. The fish were sold to the nearby markets. - For the future release, the fishermen advised to release the fishes to a different location away from the cages. <i>Jul- Sept 2024 E&S monitoring report:</i> On October 6, 2024, SUNMPL successfully completed the second and final phase of its fish breeding initiative by releasing 130 kg of fish fingerlings into the Meghna River. The species released included ruhi, katla, kalibaush, brigade, grass carp, silver carp, and bata. The ceremony was attended by SUNMPL and EPC personnel, local community members, and fishermen. In response to feedback received during the first phase and ongoing monitoring discussions, the fingerlings were released in multiple locations. Some were released from the river ghat, while the majority were distributed throughout the river using a boat. The community and fishermen expressed their appreciation for SUNMPL's efforts to promote local fish breeding. SUNMPL also requested that fishermen and community members refrain from fishing for the next two months to allow the fish to grow. This approach aims to increase the size and value of the catch, ultimately benefiting local families.		
8.	IFC General E&S Guidelines & IFC E&S Guidelines for Thermal Power Plants							
8.1	Develop and implement a dust control procedure for managing fugitive emission from	S. No 8.1, Table 3.1	EPC	Copy of dust control procedure with	Immediately, prior to first disbursement.	In consistent with the recommendation specified in the Oct-Dec 2022 monitoring report, the EPC Consortium has now developed a standalone "Dust Control		Action closed as part of the Oct-Dec 2023

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
	construction activities/operation in accordance to the "IAQM Guidance on the assessment of dust from demolition and construction."			evidence of implementation.		Procedure" as per the IAQM guidance document as recommended in the ESAP. As specified in the plan, the EPC consortium has made provision of designated area for concrete mixer and vehicle washing, with the wash water getting collected in the storm water basin constructed. Also, with the project now in operations, only limited volume of wash water is generated from commissioning activities.		E&S monitoring report.
8.2	Update the Environmental Monitoring Plan for construction to undertake monitoring of treated sewage and storm water discharges from the main plant and worker camp to assess conformance with the discharge standards specified in BECR, 1997 and IFC Sectoral EHS Guidelines. Make provision of proper drainage arrangement at the construction plant site to prevent water stagnation. Ensure provision of sedimentation tank for collection and treatment of vehicle wash water. Ensure functionality of batching plant wastewater treatment system in order to prevent wash water overflows. Share copy of construction site drainage plan and relevant design documentation to validate the design of the septic tank system being utilized for sewage disposal at the main plant site.	S. No 8.3, Table 3.1	SUNMP, EPC & O&M Contractor	Updated EMP and records of treated sewage and storm-water monitoring Photographic evidence Copy of construction site drainage plan and septic tank design documentation	Immediately, prior to first disbursement and ongoing as per the frequency specified in the EMP. Immediately, prior to first disbursement. Immediately, prior to first disbursement.	The EPC consortium has installed a modular STP at the worker camp in accordance with the ESMMP requirements. The treated effluent from the modular STP is currently being discharged into the nearby natural sewer/drainage channel. Review of the third party quarterly environmental monitoring report (Apr-Jun 2023) indicates that both treated sewage and surface run-off is being monitored to assess compliance with the discharge standards specified in Schedule 3 of the BECR, 2023 and IFC General EHS Guidelines. For further details, please refer to S. No. 2.10 of this Table. As earlier mentioned in the Oct-Dec 2022 report, the sewage at the main plant site for construction is being disposed into septic tanks and is periodically cleaned/removed through third party waste management agencies for disposal at an external location (not known). Design documentation of the septic tank and soak pit has been shared for review and validation. In accordance with the ESMMP, wastewater generated from concrete batching plant in the form of washing of transit mixers, vehicles etc. along with surface run-off etc. to be subjected to treatment through temporary sedimentation tank prior to discharge into Meghna River conforming to the standards specified in the BECR, 2023. However as recommended in the Oct-Dec 2022 monitoring report, the site has made provision of designated washing bay with wash water getting collected in the storm water basin being constructed. For the main plant site, the drainage plan shared indicate the provision of 2 outfall equipped with catch		Action closed as part of the Jul-Sep 2023 E&S monitoring report.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
						pits. For further details with respect to stormwater outfall monitoring please refer to S. No. 2.10 of this Table.		
8.3	Evaluate installation of automated bleed/feed controllers, and use of inert construction materials to reduce chemical treatment requirements for cooling tower. Select and use chemical additives devoid of heavy metals like chromium and zinc, being used as corrosion inhibitors. Apply intermittent shock dosing of chlorine as opposed to continuous low-level feed.	S. No 8.4, Table 3.1	SUNMP, EPC & O&M Contractor	Copy of design of cooling towers Details of chemical additives to be used for treatment of condenser cooling water	3 months prior to COD	Review of the cooling tower design shared indicates use of inert material for construction. As per the Cooling Water Chemical Dosing System documentation, no specific additives are required except for sodium hypochlorite and sulphuric acid for dosing to prevent biofouling of the condenser and prevention of scaling respectively.		Action closed as part of the Jul-Sep 2023 E&S monitoring report.
8.4	Ensure all LPG cylinders (both empty and filled) are kept in covered storage and chain linked to prevent any accidental fall. All such cylinder to be marked as empty/filled as per BNBC norms. Update the monthly construction equipment inspection checklist to encompass gas-based welding equipment and maintain records of the same.	S. No 8.5, Table 3.1	SUNMP & EPC	Photographic evidence along with quarterly inspection records of welding equipment Updated monthly construction equipment checklist	Immediately, prior to first disbursement and ongoing	During the walkaround of the worker camp, reportedly empty LPG cylinders (45 kg capacity each) were found to be kept chain linked and in covered storage. Within the storage area, both the "empty" and "filled" LPG cylinders are separated out and marked for ease of identification. In view of the ESAP recommendation, the site has developed and implemented a Gas Cutting Equipment Inspection Checklist (U-EHS-PD-001) to assess the availability and functioning of the engineering safety controls viz. non-return valves, flash back arrestors, condition of LPG/oxygen lines etc.		Action closed as part of the Oct-Dec 2022 E&S monitoring report.
8.5	Perform characterization of waste sludge for operations and facilitate its reuse/disposal in accordance with the Bangladesh Standards and Guidelines for Sludge Management as notified by the Department of Environment (DoE), Bangladesh.	S. No. 8.6, Table 3.1	O&M Contractor	Copy of clarifier sludge analysis report and disposal plan	6 months from COD or following generation of sludge, whichever is earliest	For operations, sludge will be generated from the Effluent Treatment Plant (ETP) and Sewage Treatment Plant (STP), which reportedly will be disposed through authorized third-party vendors. Per the design shared, ~72 kg of sludge is computed to be generated from the wastewater treatment operations. Presently the aforesaid treatment units have commenced operations since Jan 2024, with low volume of sludge generated till date. The site has developed a Sludge Management Procedure (Document No: Sun-NEPCS-EHS-24 dated 1 April 2024) for operation phase. The plan includes		Action closed during current monitoring.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
						details regarding sludge generation, storage, handling and disposal and the requirement to analyze the waste sludge prior to identifying the appropriate disposal methodology in accordance with the Bangladesh Standards and Guidelines for Sludge Management.		
8.6	Ensure providing a mechanical shaft to the pinion at all the concrete mixers being used at labour camp area. Provide adequate guard to the rotating part of the concrete mixer	S. No. 8.7, Table 3.1	EPC	Photographic evidence	Immediately, prior to first disbursement	During the site walkthrough it was observed that the portable concrete mixers being used have been provided with mechanical shaft to the pinion along with mechanical covering of rotating parts except for one, where wooden log is being used as shaft. Photographic evidence shared also indicates that movable guards installed for the rotating parts of the concrete mixers deployed while operating the machine.		Action closed as part of the Oct-Dec 2022 E&S monitoring report.
8.7	Arrange for nylon nets 3m to 4 m below the working level along the periphery of tall buildings under construction at the main plant site.	S. No. 8.8, Table 3.1	EPC	Photographic evidence	Immediately, prior to first disbursement	As specified in the earlier monitoring reports, EPC Consortium has developed and implemented full body harness inspection checklist (U-EHS-PD-02). Documentation review indicates that this inspection is being undertaken on a weekly basis and records maintained. Furthermore, as the site has made provision of nylon nets for all exterior height work activities as per BNBC, 2020 requirement and this was validated during the site walkthrough undertaken at the construction areas. During the Jan-Mar 2024 monitoring period no external height work activity was found to be undertaken requiring the provision of fall protection arrangement in the form of nylon nets as per BNBC requirements.		Action closed as part of the Jul-Sep 2023 E&S monitoring report.
8.8	Develop a driver guide on road and vehicular safety in consistent with the requirements of the Traffic Management Plan. Conduct campaigns and develop brochures to enhance community awareness on pedestrian safety.	S. No. 8.9, Table 3.1	SUNMP&EPC	Copy of driver guide on road and vehicular safety both on-site and off-site. Photographic evidence and copy of road safety	Immediately, prior to first disbursement.	The project has developed a guideline for road and vehicular safety for drivers and nearby communication. Safety brochures have been prepared in local language in line with the above guidelines and also shared with local communities to enhance their awareness on road and pedestrian safety.		Action closed as part of the Jul-Sep 2023 E&S monitoring report.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
				communication material.				
8.9	Ensure periodic inspection of all firefighting equipment (particularly hose reels, hydrants, sand buckets) based on a defined checklist and maintain records for the same. Make provision for fire extinguisher and smoke detection system at the driver accommodation within the worker camp. Install fire extinguishers near all temporary electrical panels and LPG storages onsite (both camp and main plant). Ensure paints/varnishes storages onsite are constructed of fireproofing material.	S. No. 8.10, Table 3.1	EPC	Copy of firefighting equipment inspection checklist and records. Photographic evidence. Photographic evidence. Fire rating enclosure certification of paint /varnish store on-site	Immediately, prior to first disbursement	Review of the firefighting equipment layout for both worker camp and main plant and site walkthrough indicate that the site has made provision of fire extinguishers, hydrants, hose reel boxes and sand buckets at strategic locations onsite viz. paint, chemical, hazardous waste storages etc. In addition, provision has also been made for temporary water storage facilities to serve for emergency firefighting. Smoke detection system has been installed at the worker camp offices and GE/NEPC/SUNMP employee accommodation onsite. The site has also made provision of fire hydrant/hose reel system and smoke detection system at the driver accommodation. Wooden enclosure has been removed for the flammable chemical storages in conformance with the BNBC, 2020 requirements. Documentation review indicate that the site has obtained approval of the firefighting floor plan from BFSCD for the operational buildings which covers total floor area of 389989.4 sq. ft. The site has obtained fire license (Building Usage Class: Essential Service E-3 valid till 30 June 2024) for total floor area of 400371 sq. ft. The site has updated the current firefighting floor plan, and it has been approved by BFSCD on 15 October 2024 for total floor area of 400371 sq. ft. In accordance with the BFSCD approved plan, site has made provision of active and passive fire protection system in the form of multi detectors, smoke detectors, sprinklers, gas detector, gas suppression system, manual call points, diesel storage area, emergency lighting etc. at strategic locations viz. hydrogen storage buildings, turbine and substation building. Based on document verification and site visit undertaken the site has amended the firefighting floor plan to include Nitrogen plant building, hypochlorite dosing unit building (for STP) and bulk acid and alkali storage unit and firefighting equipments has been installed accordingly.		Obtain certificate from Safety Wings to ensure adequacy of firefighting equipments as per approved firefighting Plan. Engage a third-party agency for annual inspection and maintenance of onsite active and passive fire protection system installed as per BNBC requirements.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
						Furthermore, SUNMP is yet to obtain a certification from Safety Wings to ensure proper installation of firefighting equipments as per approved firefighting plan. Also, the site is yet to engage a third-party agency for annual inspection and maintenance of the active and passive fire protection system onsite as per BNBC, 2020 norms.		
8.10	Initiate conducting a Fire Safety assessment to assess the fire protection requirements	S. No. 8.11, Table 3.1	SUNMP and EPC	Copy of Fire Safety Assessment Report	6 months prior to COD.	As required under Section 8.1.3 of Project EHS Plan, Site is required to undertake a Fire Safety Assessment to verify and validate the design to assess the fire protection requirements. Reportedly the site has engaged Safety Wings to conduct the Fire Safety assessment. Review of the report dated 12 February 2023 suggests that in part-1 of the report BNBC 2020 requirements has been referenced followed by part-2 where a total of 22 buildings have been identified and details of fire-fighting equipment's required in each building has been listed down. The third party, safety wings has done two assessments on 16 January 2024 and 4 February 2024 to check the compliance status of firefighting equipment installation. As mentioned in the final assessment, installation of all kinds of Fire Protection & Detection System has been completed and complying to the NFPA & BNBC rules.		Action closed as part of the Jan-Mar 2024 E&S monitoring report.
9. IFC EHS Guidelines for Gas Distribution Systems								
9.1	Facilitate installation of gas detection and alarm system at the RMS in consistent with the IFC EHS Guidelines.	S. No 9.1, Table 3.1	SUNMP & EPC	Copy of RMS design indicating provision of gas detection and alarm	During designing of RMS	As verified during the site visit, the site has installed a methane gas detection system in RMS building as per BFSCD approved firefighting plan.		Action closed during current visit.
9.2	Assess the occupational risks associated with gas pipeline laying and operation with respect to welding activities and considering the presence of any	S. No 9.2, Table 3.1	O&M Contractor	Copy of occupational risk assessment report for	3 months prior to pipeline laying & operations	The site has completed with the pipeline laying activities across the Meghna River, with potential safety risk and mitigation measures being discussed under "Method Statement of Fuel Gas Pipeline HDD Construction for Crossing the Meghna River"		Action closed as part of the Jul-Sep 2023 E&S monitoring report

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
	buried utility infrastructure in near vicinity. Coordinate with TGTDCI to ensure all confined space entry works are undertaken in accordance with a confined space entry procedure and appropriate work permits. Ensure usage of ventilation and oxygen / explosive level detection and alarm equipment prior to any confined space access.			natural gas pipeline. Copy of confined space entry procedure for pipeline laying. Records of work permit with oxygen level detection level for confined space entry works.	3 months prior to COD or pipeline operations, whichever is earliest. Prior to confined space entry work during operations.	(UNQ/00/K/UEP--ADP/MS/038). With project declared COD in Jan 2024 and gas pipeline in operations the aforesaid requirements could not be assessed at this stage.		
9.3	Identify and locate existing gas and other buried utility infrastructure, if any prior to excavation for installation or repair of gas pipelines. Ensure installation of visual marking of gas pipeline as part of installation and carry out purging of gas from pipelines prior to welding/cutting activities.	S. No 9.3, Table 3.1	EPC&O&M Contractor	Copy of underground utility infrastructure layout along the pipeline RoW. Photographic evidence	Prior to laying of gas pipeline. Prior to COD or operations of pipeline, whichever is earliest.	As communicated by the SUNMP construction team, there exists no utility infrastructure along the natural gas pipeline RoW. However, copy of supporting documentation to be shared for review and validation. Provision of visual marking of the natural gas pipeline supplying the project has already been installed and validated as part of the Jan-Mar 2024 monitoring visit.		Action closed as part of the Jul-Sep 2023 E&S monitoring report.
9.4	Develop and implement an O&M plan for the natural gas pipeline in coordination with TGTDCI. Submit the same to the Department of Explosives (DoE), Bangladesh.	S. No 9.4, Table 3.1	O&M Contractor & TGTDCI	Copy of O&M plan submitted to the Department of Explosives	3 months prior to COD	With gas supply line currently in operations, an O&M plan is yet to be developed and shared for the pipeline operations in accordance with the requirements of the Natural Gas Safety Rules (NGSR), 1991. The O&M is also required to be submitted to the Department of Explosives, Bangladesh. SUNMP has submitted a letter to TGTDCI on 27 October 2024 requesting them to submit O&M plan to Department of Explosives.		Ensure that TGTDCI has submitted the O&M plan for natural gas pipeline to DoE.
9.5	Develop and implement an offsite emergency response and preparedness plan in coordination with TGTDCI. Communicate the potential	S. No 9.5, Table 3.1	SUNMP, O&M Contractor & TGTDCI	Copy of offsite emergency response and preparedness plan with	3 months prior to COD or operations of pipeline,	The site has developed an Offsite Emergency Response Plan (Doc No: NEPCS-MB-EH-S-020 dated Jan 2024). Review of the offsite emergency response plan developed indicates that the site has properly identified offsite emergency scenarios like:		Action closed during current monitoring

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
	hazards presented by the gas supply line, safety measure/controls in place and response measures to be adopted in case of any emergencies in the form of pipeline leaks/explosions. Implement a telephone notification system to respond to reports of leaks or questions of general safety from the affected community and other interested parties.			evidence of implementation.	whichever is earliest.	- Fire & Explosion - Release of toxic gas - Oil & chemical Spill. - Chemical and heat Burns to human and livestock. - Overpressure shocks to human and livestock - Damage to private and public property. Emergency mitigation & evacuation plan, communication procedure, roles & responsibilities are also well defined in line with the current operations E&S organogram in case of emergency along with emergency contact details. As recommended in the Jan-Mar 2024 monitoring report, the plan has now been updated to include list of the emergency response equipment, chemical and fuel inventory. The site has also included list of firefighting equipments and MSDSs of the chemicals/fuel being stored/handled.		
10	IFCEHS Guidelines for Electric Power Transmission & Distribution							
10.1	Ensure installation of marker balls for the power transmission line to prevent bird collisions.	S. No 10.1, Table 3.1	EPC	Photographic evidence	Prior to COD or energization of the transmission line, whichever is earliest.	During the earlier visits it was noted that marker balls have been installed on the transmission lines to prevent bird collisions		Action closed as part of the Jul-Sep 2023 E&S monitoring report.
10.2	Ensure provision of effective grounding for the towers supporting the live transmission lines in accordance with the regulatory requirement.	S. No 10.2, Table 3.1	EPC	Records of earthing resistance.	Prior to COD or energization of the transmission line, whichever is earliest.	Reportedly, all transmission towers have been provided with effective grounding in the form of earth pits. The same has been subjected to inspection internally by the EPC consortium with records being maintained.		Action closed as part of the Jul-Sep 2023 E&S monitoring report.
10.3	Updated height work procedure to include work on transmission lines, rescue of fall arrested	S. No 10.3, Table 3.1	EPC	Copy of updated height work procedure with	Immediately, prior to first disbursement.	GE-NEPC consortium has developed a Work at Height Procedure (U-EHS-PD-016) which outlines the hazards associated with height including general and specific requirements to be followed for carrying out such high		Action closed as part of the Jul-Sep 2023 E&S monitoring report.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (October 2024)	Progress Status	Recommendations
	workers, use of rated hoisting equipment by trained operator.			evidence of implementation.		hazard activity. The procedure also specified the inspection and training requirements for effective implementation of the Plan. In addition to the above, there is also a Work at Height Rescue Plan prepared and implemented for tower erection works which includes a checklist for rescue actions along with procedure for notification, emergency response actions, rescue team risk assessment and medical evaluation and retrieval requirements. The contact details of both onsite and offsite emergency/rescue responders have also been furnished in the Plan.		
104	Develop and implement an EMF Safety Program prior to the commencement of project operations	S. No 10.4, Table 3.1	SUNMP & O&M Contractor	Copy of EMF Program with evidence of implementation	Prior to COD or energization of the transmission line, whichever is earliest.	SUNMP has developed a training module and implemented an EMF Safety Program as per the IFC Sectoral EHS Guidelines which includes source, effect of EMF and safety controls along with roles & responsibilities during the operation. A training program has been conducted on 05 May 2024 which has been attended by 29 workers.		Action closed as part of the Jan-Mar 2024 E&S monitoring report with implementation to be ongoing.
105	Display cautionary signs and install barriers to prevent public contact with transmission towers located outside the project. Perform grounding of conducting objects (e.g. fences or other metallic structures) installed near power lines, to prevent shock.	S. No 10.5, Table 3.1	SUNMP & O&M Contractor	Photographic evidence	Prior to COD or energization of the transmission line, whichever is earliest.	As noted during the earlier monitoring visit, cautionary signages and safety barricading was evidenced for the transmission towers. Electrical grounding was also noted for the transmission tower footings in accordance with the IFC Sectoral EHS Guidelines.		Action closed as part of the Jan-Mar 2024 E&S monitoring report with implementation to be ongoing.

3.2 LIVELIHOOD RESTORATION PLAN (LRP) IMPLEMENTATION STATUS

SUNMP has engaged Sajida Foundation as a LRP implementing agency and has engaged SSCL as an external Monitoring & Evaluation Agency for LRP implementation. LRP implementation activity is currently in progress, and inception report has been submitted by Sajida Foundation and SSCL to SUNMP. Sajida foundation has established their site office, and their field team are mobilized at site. Major LRP implementation progress achieved till September 2024 as observed based on review of review of the implementation progress document is summarized below:

- Process of registration of all targeted households completed which is essential for essential for the structured delivery of services and aid.
- Transitional aid disbursement was completed for 130 households.
- One-time grant support distributions to 56 fishermen were completed which is directly addressing the needs of this critical stakeholder group.
- Community engagement activities were continued, and additional consultations and engagement activities were also organized during 3rd operation phase E&S monitoring period. Total 48 FGDs (4/week) and 12 static clinic sessions were organized during reporting period.
- For capacity building, a comprehensive training was imparted on the newly developed SOPs and Telehealth services, to enhance the capabilities of project staff, ensuring effective and efficient project delivery.
- Training on livestock for all the 145 PAPs completed. Seed capital disbursed to 103 PAPs who received livestock training. Disbursement of seed capital to remaining eligible 42 PAPs will be completed by November 2024.
- Training on micro business completed for all the 151 participants and seed capital disbursed to 90 participants. Remaining 61 participants will be provided seed capital by end of November 2024.
- Vocational training for 4 participants and sewing machine training for 60 participants are completed. Sewing machines have been distributed to all 60 participants. Certificate to the 4 vocational trainees will be provided by December 2024.

SUNMP has also engaged SSCL (Sustainability Safeguard Compliance Limited) as External Monitoring consultant for LRP monitoring. SSCL has submitted their work plan as part of final Inception Report to SUNMP and they also submitted their 4th Monitoring Report in LRP implementation progress in the month of March 2024. Quarterly monitoring reports have not been submitted by SSCL since April due to political unrest. SSCL is also assigned the task of developing community development plan (CDP) for the project.

SUNMP has also engaged SSCL (Sustainability Safeguard Compliance Limited) as External Monitoring consultant for LRP monitoring. SSCL has submitted their work plan as part of final Inception Report to SUNMP and they also submitted their 4th Monitoring Report in LRP implementation progress in the month of March 2024.

3.3 STAKEHOLDER ENGAGEMENT PLAN (SEP) & GRM IMPLEMENTATION STATUS

A well-qualified and trained personnel in the capacity of Community Development Manager (CDM) engaged by SUNMP, is leading stakeholder engagement activities at site, with the support of a dedicated field staff who sits in Community relationship office set up by SUNMP in Doodhghata village, near plant gate. Based on ERM's consultation with PAHs from Doodhghata village, it was noticed that community members are well aware with the formal engagement system established by SUNMP and also quite familiar and comfortable with the CDM and his team in terms of sharing any sort of issues connected with the project activities.

SUNMP Community Development team have established a system of documentation of their engagement with PAHs and other stakeholder. Minutes of meeting of all important meetings carried out by CSR Manager is being documented for records. Community Development team have established a good connect with local stakeholder and also acting as chain of communication between SUNMP Management and local community.

GRM system is well established. GRM process is displayed at notice board. Workers are informed about this at the time of their induction training. Grievance boxes are placed across multiple locations in plant area and campsite. It was noticed that workers are familiar with this system, and they hesitate a little in using the formal channel. Instead, they prefer communicating their issues with their respective site supervisors. Although workers are encouraged to use formal channel of GRM by site level executives. Community issues are being taken care of by Community Development department.

A review of the grievance register indicates that one new grievance was reported during the 3rd operational phase of the Environmental and Social (E&S) monitoring period in May 2024. This grievance involved tree damage resulting from boundary wall construction. The grievance was effectively addressed by providing compensation to the affected party. ERM has reviewed both the grievance register and the compensation payment vouchers and has confirmed that the grievance was resolved appropriately.



APPENDIX A PHOTO DOCUMENTATION



Photo 1: Eyewash in Chemical Dosing Room in DM Plant



Photo 2: Spill kit provided at acid-alkali bulk storage



Photo 3: Aqueous Ammonia stored in steam turbine building



Photo 4: Chemical storage room for DM water plant



Photo 5: Fire control panel in CCB room

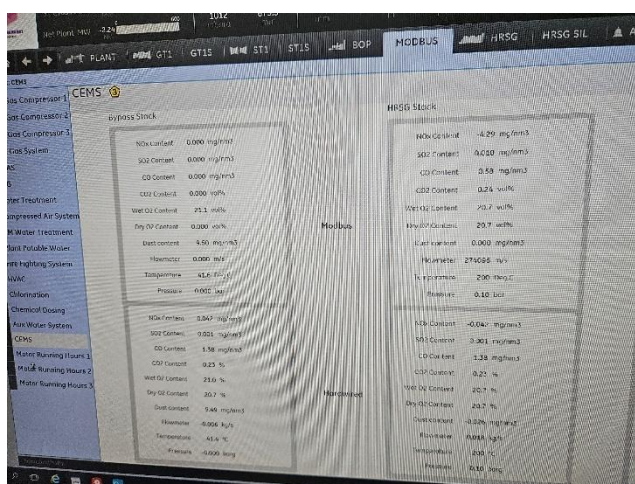


Photo 6: CEMS display tab in CCB room



Photo 7: Gas suppression system in DM water building control room



Photo 8: community consultation by LRP implementation agency- Sajida



Photo 9: Chemical compatibility matrix



Photo 10: DM Water Plant



Photo 11: Hazardous Waste Storage Shed



Photo 12: Treated Effluent Storage Basin



Photo 13: Multi Detector installed in Hypo chloride doing building



Photo 14: Online effluent quality monitoring



Photo 15: LRP Training Session



Photo 16: Satellite clinic organized by Sajida foundation



Photo 17: Consultation with project beneficiaries at village Doodhghata



Photo 18: Consultation with workers



Photo 19: Fish release program at River Meghna

[Source: SUNMP]



Photo 20: Fish release program at River Meghna using boat



APPENDIX B DOCUMENT/INFORMATION REVIEW LIST



ERM

- Wastewater Management Plan
- Waste Management Plan
- Sludge Management Plan
- Occupational Health Monitoring Plan
- Air Emissions Management Plan
- Fire NOC
- Work Permit Sample
- Induction Training Record
- Waste Disposal Agreement
- Renewal application for licenses
- SUNMP Organogram
- Legal Register
- Rainwater Harvesting System and Sustainable Groundwater Management Plan
- Environmental Aspect Impact Matrix
- Roles & Responsibilities of EHS personnel
- Form 22 (Training Record) & 22A (Joint Mock drill Report with BFSCD)
- GE Monthly Progress Report
- SUNMP Monthly Report
- Illumination Monitoring Record
- Earthing Test Report
- Details of Safety Committee and Meeting Minutes
- Noise Monitoring Report
- Pre-employment Health Assessment Report
- Register regarding health assessment of workers employed in dangerous operating tasks
- On-site emergency response plan
- PPE Register for Hazardous Operation
- Fire Safety Plan of SUNMP
- Letter to DoEx for submission of O&M procedure for gas pipeline
- Environmental Monitoring report
- LRP implementation progress update summary
- Current manpower data
- Contractor License
- Grievance register
- Fish breeding promotion program report
- Labour Back Payment disbursement plan prepared
- Committee details for payment of back wages



ERM

- Final LRP prepared by AECOM
- Livelihood restoration project Progress Report of SAJIDA Foundation, Oct 2024



ERM HAS OVER 160 OFFICES ACROSS THE FOLLOWING
COUNTRIES AND TERRITORIES WORLDWIDE

Argentina	The Netherlands
Australia	New Zealand
Belgium	Peru
Brazil	Poland
Canada	Portugal
China	Romania
Colombia	Senegal
France	Singapore
Germany	South Africa
Ghana	South Korea
Guyana	Spain
Hong Kong	Switzerland
India	Taiwan
Indonesia	Tanzania
Ireland	Thailand
Italy	UAE
Japan	UK
Kazakhstan	US
Kenya	Vietnam
Malaysia	
Mexico	
Mozambique	

ERM India Private Limited
Building 10B
3rd Floor, DLF Cyber City,
Gurgaon, NCR- 122002
India

T : +91 124 4170300

F : +91 124 4170301

www.erm.com