



4th Operation Phase E&S
Monitoring Report - 584
MW Gas Fired Combined
Cycle Power Project in
Sonargaon, Narayanganj,
Bangladesh – Oct-Dec
2024
Draft Report

PREPARED FOR



SFL Unique Nebras Meghnaghat
Power Limited

DATE

28 February 2025

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	4th Operation Phase E&S Monitoring Report - 584 MW Gas Fired Combined Cycle Power Project in Sonargaon, Narayanganj, Bangladesh – Oct-Dec 2024
DOCUMENT SUBTITLE	Draft Report
PROJECT NUMBER	0575406
Date	28 February 2025
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	Tufail K Debojyoti K Arijit B	Dhritiman R	Subhradeb P.	28.02.2025	For issue to client

SIGNATURE PAGE

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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

Acronyms	Description
CCGT	Combined Cycle gas Turbine
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

Acronyms	Description
ETP	Effluent Treatment Plant
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

Acronyms	Description
LESA	Lenders' Environmental and Social Advisor
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

Acronyms	Description
RAP	Rehabilitation Action Plan
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
SUNMPL	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" ("SUNMPL"), 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. As per the current status the Provisional Acceptance Certificate has been issued on 02 November 2024 to GmbH after the final handover. However, GE will continue to support the operation till 30 June 2025 as per Schedule-3 of settlement deed dated 29 October 2024. Review of the Monthly Progress Report (MPR) shared by SUNMPL for December 2024 indicated the following operational progress status as stated below:

- During December, no Lost Time Incidents (LTIs) were recorded, maintaining a cumulative total of 347 days without any LTIs since COD. Additionally, no near-miss incidents or first-aid cases occurred during December.
- As part of the Corporate Social Responsibility (CSR) and Community Development initiatives, several impactful activities were undertaken. To ensure ongoing financial support, 54 community households in disadvantaged groups received monthly pensions. Two community members participated in two group conversations that promoted awareness and knowledge sharing on subjects such as winter healthcare, livestock rearing, and children's education. Free health examinations and telemedicine services were provided during two static clinic sessions to improve community access to healthcare.
- The plant's net electrical export energy for the month was 157.94 GWh, with an average capacity factor of 62.5% during a total of 433.18 hours of plant operation. However, the total imported energy from the grid was 0.66 GWh, and the net capacity factor for the month was 36.35%, with a YTD value of 14.53%, whereas the minimum PPA target was 45%.
- The implementation of the APM and OPM-GE digital solution system by GE, as per CSA, is in progress.

- The punch and warranty items listed by the O&M team are currently being worked on, with GE (the EPC) actively addressing them.

E&S MANAGEMENT SYSTEM LINKED OBSERVATIONS

ESMS & ISO Audit: As informed during the current visit, the ESMS draft version is ready and currently under review of SUNMPL management. However, the draft copy was not shared with ERM for review. As per the mail communication from TUV, the ISO certification company on 26 February 2025, the certification audit report is successfully reviewed, and certificate will be issued after completion of final report.

Emergency Preparedness & Response: The Project has been designed with modern systems for fire detection and suppression and most of it have been commissioned at site. However, the project team including the EHS and firefighting team has limited understanding of the systems that have been implemented under the project.

ENVIRONMENT LINKED OBSERVATIONS

BERC License for Independent Power Production: Review of the permitting documentation indicates that SUNMPL 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.

BERC Registration for Gas Supply Pipeline: With COD declared in January 2024, SUNMPL 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 received from TGDCL.

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 SUNMPL 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 has commenced in November 2024 and to be finished by April 2025.

Environmental Monitoring: As per monitoring report dated December 2024, SUNMPL 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 NOx (-4.22 mg/m³) with CO values also noted for HRSG stack (-25.4 mg/m³). Considering the plant is in operation, the reason for such contradictory interpretation could not be validated and is ascertained largely due to calibration issues with CEMS, which is reported to be pending since 2022. The site is yet to undertake stack emission monitoring by third party.

Hazardous Waste Management: The site has identified Azizu Recycling and E-waste company having valid ECC from DoE for managing hazardous and e-waste till 30 January 2026. The site has sent 4kg cotton waste to Azizu in January 2025. However, as per ECC Azizu is not an authorized third party for waste operations like disposal to land fill, co-processing or

incineration. The site is yet to identify an authorized party for the disposal of sludge, used oil and oil soaked cotton.

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.

Hazardous Chemicals: As observed during the site walkthrough, the site has stored 09 HDPE barrels of 200 liters of aqueous ammonia in steam turbine building with a secondary containment. However, the capacity of secondary containment was inadequate. Along with that more than 12 numbers of 50 liters HDPE containers of aqueous ammonia was stored in the designated room without any secondary containment. The site is yet to perform risk assessment for the same. It has been evidenced that the HDPE drums of aqueous ammonia has been kept with bags of Tri Sodium Phosphate, without checking compatibility matrix which was found to be incorrect.

Life & Fire Safety: 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. Site has installed Gas Based Fire Suppression System (GSS) in electrical rooms, Fire detection system in form of smoke detector is available across the plant. However, no dedicated staff was available across the shifts with the competencies of acknowledging fire alarms, announcements for emergencies and actions with GSS alarm. Fire panels were showing multiple loop failures, missing detectors, detector defective alerts and no action identified for the same.

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. SUNMPL 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 Feb 2025 it was apprised that an inventory of workers, including calculations of arrears has been done, verification of list of eligible workers is completed, and a committee has been formed to oversee the payment of back wages.

Communication to the eligible workers for receiving differential amount and collecting their bank account details is started. The next steps toward initiating the process of disbursement of payment to eligible workers are as follows:

- Opening of a bank account in the name of EPC contractor for fund allocation for disbursement to eligible workers by end of February 2025. The account will be solely for the purpose of back wages payment
- Allocation of the arrear amount for total back wages payment including 10% contingency in the EPC contractor bank account by March 2025
- Initiating payment disbursement to eligible workers from April 2025 in batches based on available bank account details of the eligible workers.
- Maintaining monthly records on status of payment disbursement to eligible workers from April 2025
- Undertake completion audit to assess fulfillment of the entire back wage payment process by March 2026 and accordingly back wage disbursement process will be declared closed.

LRP Implementation: LRP implementation tasks are being carried as planned. Key activities in terms of imparting different kinds of livelihood trainings and seed capital disbursement is completed for all 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 "SUNMPL" 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 SUNMPL for the period Oct-Dec 2024 as part of the 4th 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.

Tufail Khan (Social Specialist): Tufail Khan is a Senior Consultant with the Impact Assessment & Planning Practice at ERM India Pvt Limited. Over his 14 years of experience, Tufail have worked with SENES Consultants India Pvt (A Canadian Environment Consultancy firm), THDC India Ltd (A Mini Ratna PSU in Hydro power generation projects) and currently with ERM India Pvt Ltd at Gurgaon. Carrying out studies related to Social Impact Assessment and Resettlement & Rehabilitation have been his core functional areas throughout his total experience. Construction projects, Hydro power project, Thermal power projects, Wind power projects, solar power projects, mining projects etc. are the sectors wherein he has been actively involved and worked. Tufail has also long experience of implementing Resettlement & Rehabilitation action plan and working with communities at very grass root level.

- **Arijit Bhattacharya (Environment, Health and Safety Consultant):**

Arijit Bhattacharya is presently working as a Managing Consultant- Sustainable Operation at ERM India in Kolkata office. With an academic background in MSc Environmental Science, MTech in Safety & Occupational Health Engineering, NEBOSH-IGC, NEBOSH-Process Safety Management and PGD in Environmental Law, Arijit is a proficient professional in the field of Environment, Health, and Safety (EHS). He has 15 years of experience under his belt and demonstrated leadership in implementing EHS Management systems across various sectors. He is a focused Environmental Health Safety expert adept in Environmental Audits, EHS performance and consulting at factories and buildings, adhering to waste disposal regulations, E&S implementation and enforcing environmental laws etc. He has involved in EHS audits for last 9 years for various industry sectors from technology sector (Fortune 500 companies), offices, warehouses, manufacturing plants, Food processing, dairy processing, renewable energy, retail, hospitals etc. to deliver best practices and implementation of Environmental Health Safety management systems. He has worked as consultant for various key projects, which involved ESDDs, E&S Monitoring, ESMS development, Environmental Health Safety and Disaster prevention audit, Food Safety management system audit including support for implementation for various clients from global steel sector, global technology sectors, global healthcare sectors, textile, food processing, dairy, livestock farms and financial institutions like Blackstone, India RF, DEG, responsibility, IFC etc.

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 SUNMPL 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 SUNMPL 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 SUNMPL 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.	10 February 2025	• Discussion with SUNMPL 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,

S. No	Date	Activities
		- Review of stakeholder engagement records, GRM records and discussion on progress of LRP implementation. - Review and detailed discussion on documentary evidence of other HR and labour compliance related pending actions items as per the ESAP. - Discussion on the next steps of disbursement plan for differential amount of wage rate for construction workers.
2.	11 February 2025	- 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 on ESMP implementation status with NEPC and GE EHS Team. - Consultation with local community at Korbanpur village. - Consultation with LRP implementation agency at their site office in Doodhghata village. - Visit to SUNMPL Community office near SUNMPL main gate and review of records maintained in the office.

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 (SUNMPL), 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

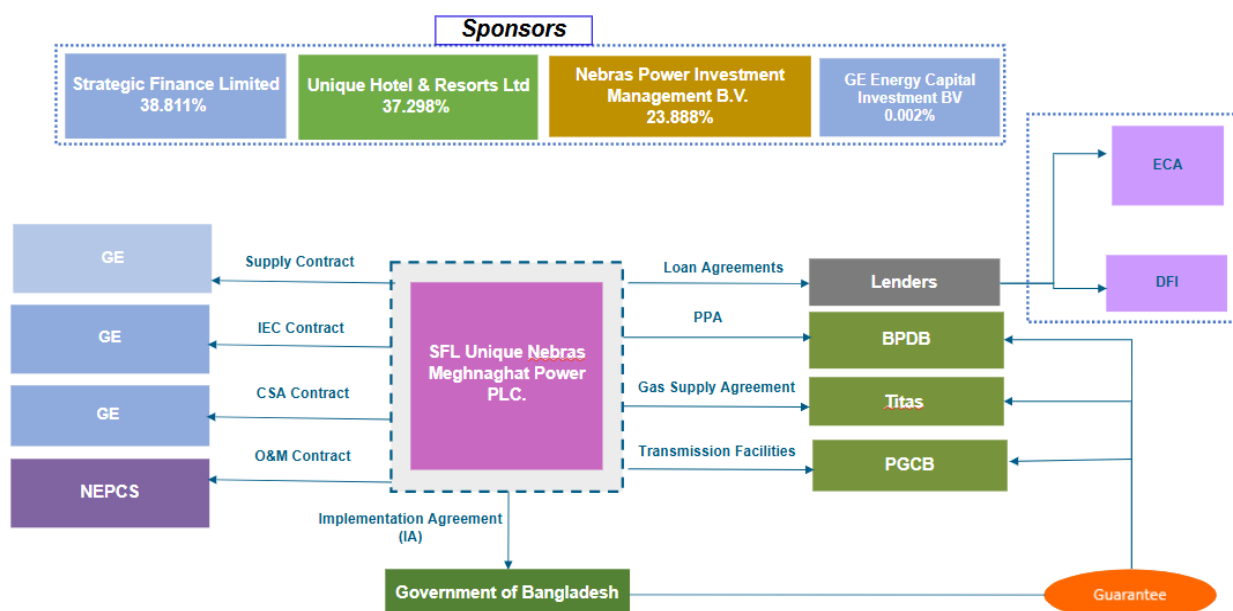
SUNMPL 584MW Gas Fired Power Project	
Location	Doodhghata Mouza of Pirojpur union, Sonargaon upazila, Narayanganj district, Bangladesh
Project owner	SFL Unique Nebras Meghnaghat Power limited (SUNMPL)
EPC Contractor	General Electric Global Services (GmbH)
Area of Land proposed	21.07 acres
Government 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)

SUNMPL 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 (SUNMPL) would be the proponent of the proposed power plant. SUNMPL 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. SUNMPL 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: SUNMPL

2.1.2 PROJECT LOCATION

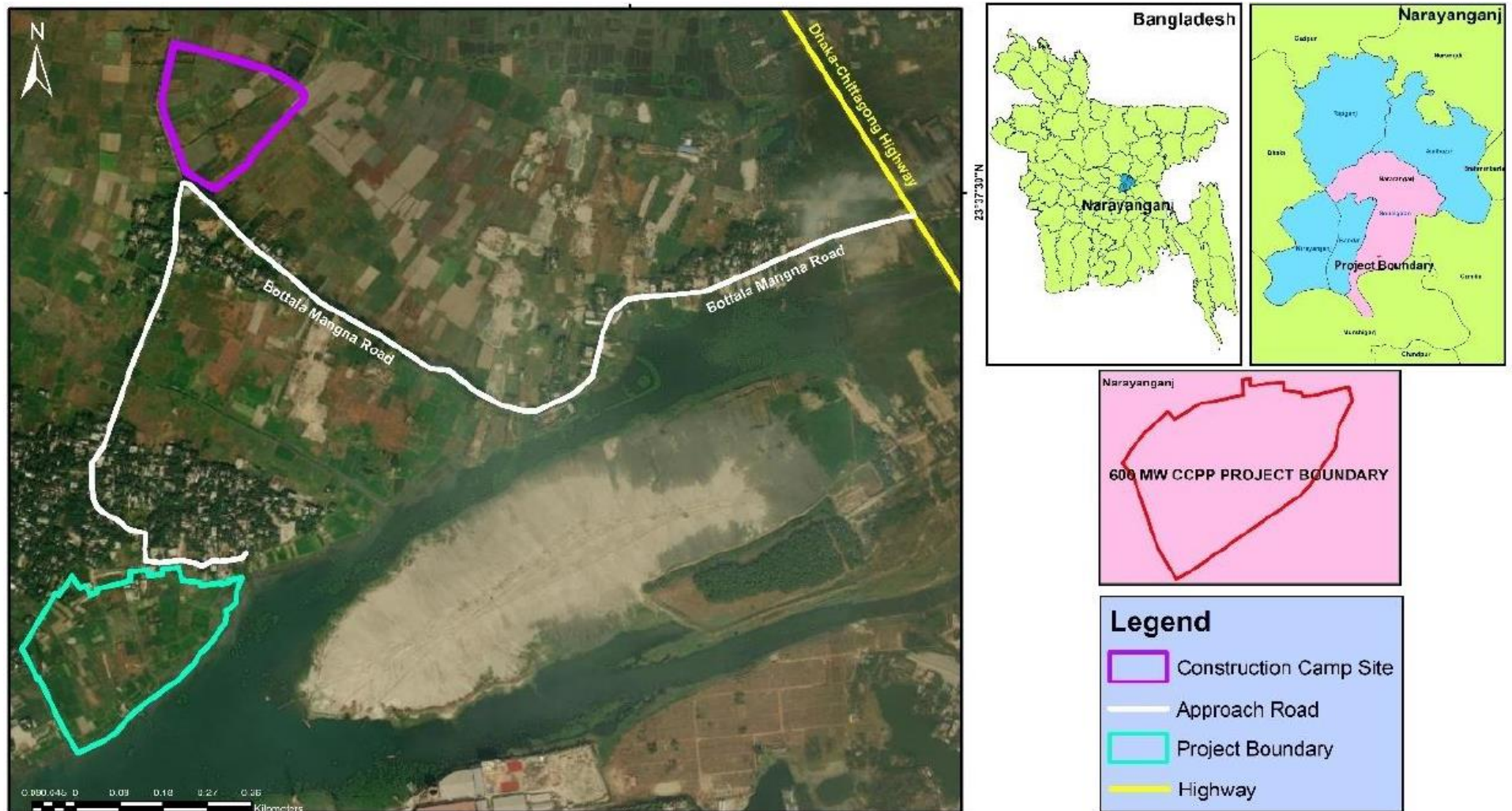
The proposed project site for 584 MW gas fired Combined Cycle Power Plant (CCPP) by SUNMPL is located in Doodhghata Mouza of Pirojpur union, Sonargaon upazila, Narayanganj district, Bangladesh. The site is about 1.46 km from Dhaka-Chattogram highway to the south-

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

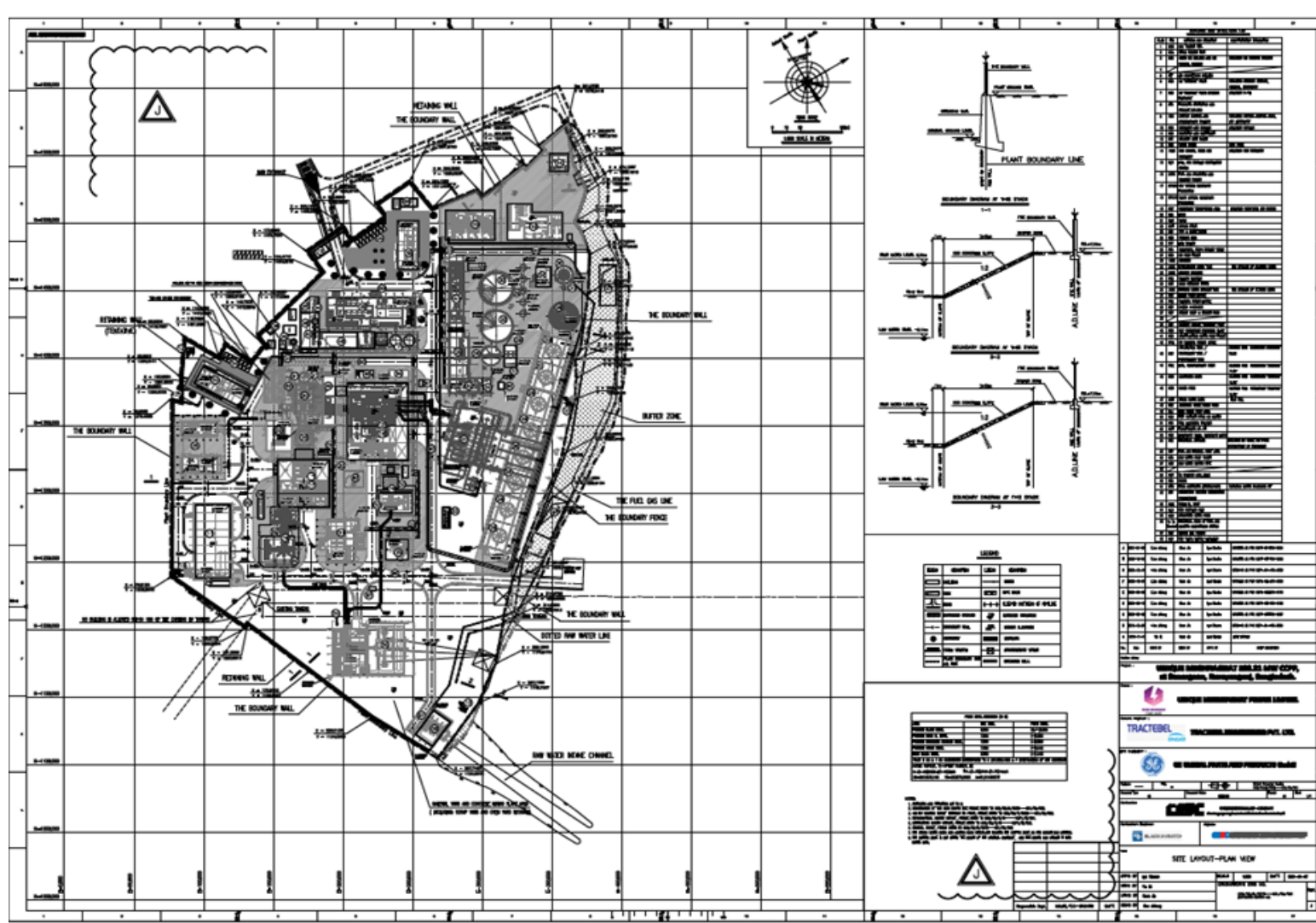
The proposed power plant would be consisting of main block area and auxiliary area. The main block would be comprising of gas turbine hall, HRSG, steam turbine hall, main transformer, and HV unit auxiliary transformer. The auxiliary area will include boiler make-up water treatment plant, industrial wastewater 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: SUNMPL Project Final ESIA dated 18 Sep 2022

FIGURE 2-3 PROJECT SITE LAYOUT



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 SUNMPL. 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: SUNMPL 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. SUNMPL 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, SUNMPL 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 SUNMPL in coordination with PGCB.

2.1.5.4 CONSTRUCTION CAMP/LAYDOWN AREA

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

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

The site started demolition of worker's camp from 1 October 2024 and finished the activity by 30 November 2024. During ERM's current monitoring visit it was informed that the site has completed the demolition work and land had been handed over to the original landowner. However, there was no documentation in place to demonstrate on how potential E&S issues associated with demolition work was managed. SUNMPL is advised to prepare a closure audit report to ensure that site restoration has been properly carried out before handing over the land back to the original landowner (i.e. Hamdard Laboratories).

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. was supposed to

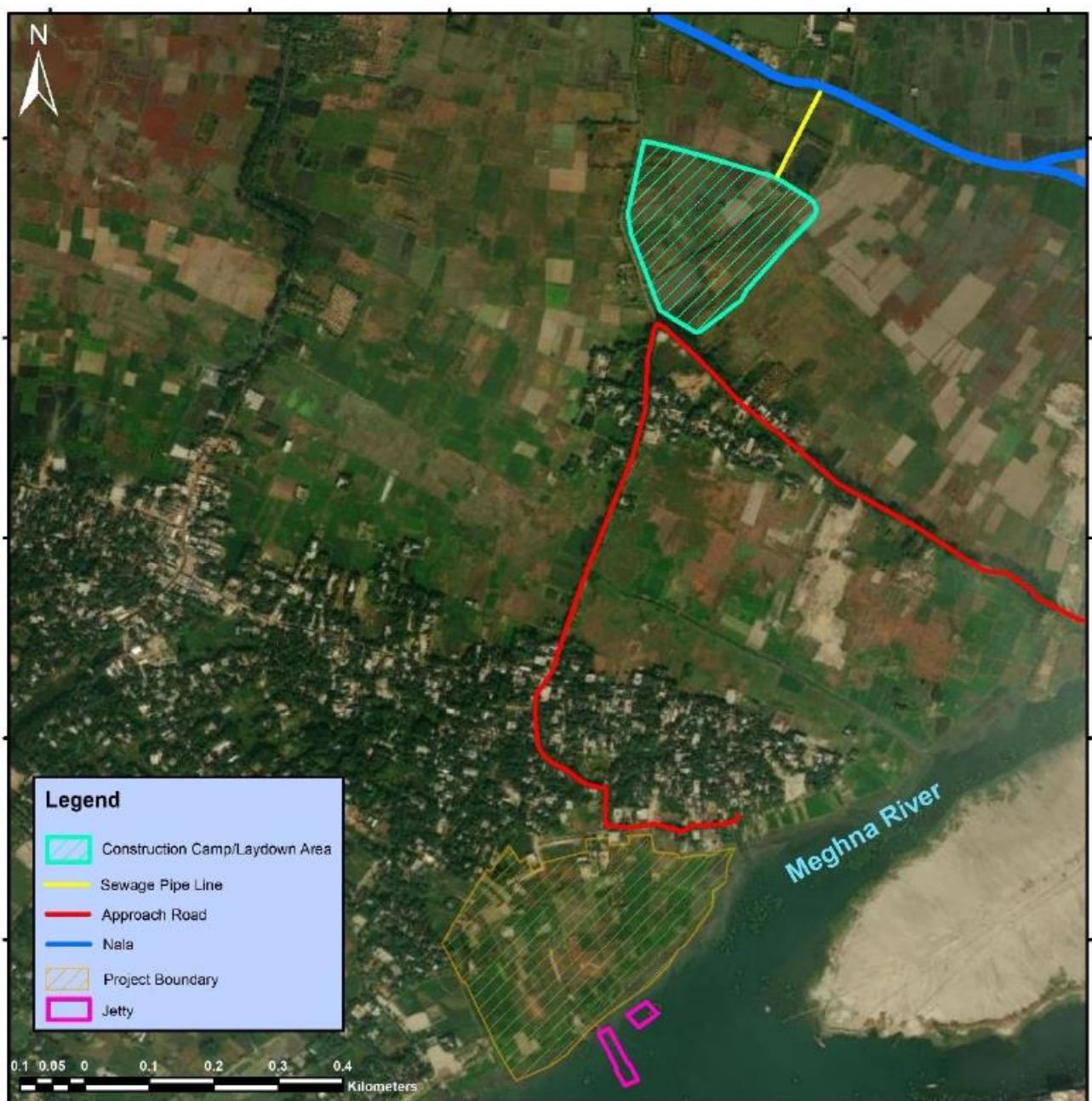
2.1.6 PROJECT ASSOCIATED FACILITIES

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 SUNMPL 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: SUNMPL 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. As per the current status the Provisional Acceptance Certificate has been issued on 02 November 2024 to GmbH after

the final handover. However, GE will continue to support the operation till 30 June 2025 as per Schedule-3 of settlement deed dated 29 October 2024.

2.1.7.2 O&M CONTRACTOR

- During December, no Lost Time Incidents (LTIs) were recorded, maintaining a cumulative total of 347 days without any LTIs since COD. Additionally, no near-miss incidents or first-aid cases occurred during December.
- As part of the Corporate Social Responsibility (CSR) and Community Development initiatives, several impactful activities were undertaken. To ensure ongoing financial support, 54 community households in disadvantaged groups received monthly pensions. Two community members participated in two group conversations that promoted awareness and knowledge sharing on subjects such as winter healthcare, livestock rearing, and children's education. Free health examinations and telemedicine services were provided during two static clinic sessions to improve community access to healthcare.
- The plant's net electrical export energy for the month was 157.94 GWh, with an average capacity factor of 62.5% during a total of 433.18 hours of plant operation. However, the total imported energy from the grid was 0.66 GWh, and the net capacity factor for the month was 36.35%, with a YTD value of 14.53%, whereas the minimum PPA target was 45%.
- The implementation of the APM and OPM-GE digital solution system by GE, as per CSA, is in progress.
- The punch and warranty 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

O&M CONTRACTOR

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

TABLE 2.2 O&M CONTRACTOR EHS KPIS DECEMBER 2024

SL #	Indicators	December 2024
1.	No Lost Time Accidents (LTAs) Since last occurrence (days)	347
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

SL #	Indicators	December 2024
8	EAR (Equivalent Accident Rate) Monthly	0
9	EAR YTD	1.07
10	EHSS walkdowns performed Monthly	01
11	EHSS walkdowns performed YTD	38
12	Technical walkdowns performed Monthly	01
13	Technical walkdowns performed YTD	38

Source: O&M Contractor Monthly Progress Report – December 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 December 2024 presented in Table 2.3 below.

TABLE 2.3 O&M CONTRACTOR E&S KPI'S DECEMBER 2024

SL #	Indicators	Unit	December 2024	YTD
1.	Number of accidents (air/effluent/spill)	Number	0	0
2.	Total NOx emission	Tons	4.498	5.198
3.	Total CO2 emission	Tons	1405.85	5259.02
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	1610	10045
8.	Waste Disposed	kg	1470	8435
9.	Waste Recycled	kg	0	0
10.	Oil cloth generated	kg	2	13
11.	Used oil filter generated	pcs	0	0
12.	Mud cake generated	kg	405	3725
13.	Sludge generated	kg	0	0
14.	Used oil generated	litre	0	13
15.	Medical waste generated	kg	0	0
16.	Grievance Recorded	Number	0	35
17.	Number of grievances redressed	Number	0	35
18.	Stakeholder Engagement	Number	2	18

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 December 2024 and is presented in **Table 2.4 & 2.5** below.

TABLE 2.4 MANPOWER INVOLVED AT SITE

SL #	Employer	Manpower size
1.	SUNMPL Employees	45(14 corporate management staff including 2 female + 9 site management staff + 22 Support)
2.	GE employees	08 (6 Officers + 2 Support)
3	NEPCS employees	85 (07 Chinese + 01 Korian+ 77 Bangladeshi)
4	NEPC Management staff employee	4 (03 Chinese + 1 Bangladeshi)
5	NEPC workers (Chinese)	10
	Total	152

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	SATCO Services	Main Plant	25
2	King Force (Security)	Main plant	38
	Total		63

2.1.10 PROJECT SCHEDULE

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

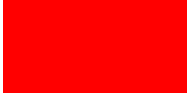
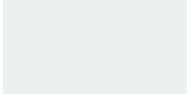
TABLE 2.6 PROPOSED PROJECT SCHEDULE VS ACTUAL STATUS

SL #	Project Component	Planned	Actual/Forecast
1.	Signing of EPC Contract between GE and SUNMPL	30 August 2019	30 August 2019 (A)
2.	Full Notice to Proceed (FNTP)	23 October 2019	23 October 2019 (A)

SL #	Project Component	Planned	Actual/Forecast
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	02 November 2024(A)

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 (February 2025)	Progress Status	Recommendations
1.	EHSS 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	SUNMPL	Copy of wastewater recycling plan Copy of greenbelt development plan	6 months prior to COD	Review of the site clearance conditions requires SUNMPL 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, SUMPL 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 SUNMPL has committed to achieve 75% water recycling. <u>SUNMPL has outlined a plan/framework in Wastewater Management procedure (Doc No. NEPCSS-M3-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. The site has added a table quantifying daily wastewater generation. However, the plan is not found to be comprehensive as it does not properly outline the detailed water balance diagram, capacity of the RO plant etc.</u> 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		SUNMPL to prepare the water recycling plan with proper water balance calculations and considering both non-monsoon and monsoon seasons.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
						cooling tower, behind security cabin rear end of GIS area, Warehouse area within the plant premises.		
1.2	Update the BIWTA clearance to cover both stormwater outfall lines as depicted in the project operations drainage layout.	S. No 1.2, Table 3.1	SUNMPL	Copy application seeking amendment Copy of BIWTA approval	Immediately, prior to first disbursement Within six (6) to eight (8) months from application date	BIWTA clearance obtained by SUNMPL for the stormwater 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. During the current monitoring it was observed that the site has obtained renewed license for foreshore use from BIWTA dated 06 January 2025 valid till 31 August 2025.		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	SUNMPL	Copy of communication with WARPO	Immediately, prior to first disbursement	Documentation review indicates that SUNMPL 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 received the renewed license copy on 24 August 2024. which is valid for next two years. However the site is yet to comply with the consent conditions like: - Installation of monitoring well - Monitoring daily ground water consumption and quality.		Comply with the consent conditions and send half yearly compliance report to WARPO.
						Documentation review indicates that SUNMPL 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, SUNMPL has now prepared and submitted water resource availability and ground water abstraction impact assessment study report along with surface and ground water		Action closed during the current monitoring.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
						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, SUNMPL has also sought exemption from WARPO in the aforesaid communication regarding the following condition i.e., installation of monitoring well and implementation of rainwater harvesting system, however no confirmation has been received from WARPO till date. Although SUNMPL 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 SUNMPL representatives indicates that no communication/exemption granted to SUNMPL on the above matter. The site has prepared a document regarding rainwater harvesting system and sustainable groundwater management (Doc No. NEPCSS-M3-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	SUNMPL	Copy of communication with WARPO	Immediately, prior to first disbursement	Documentation review reveals indicates that SUNMPL 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 received the renewed permission on 24 th December 2024 which is valid from 27 September 2024 for next two years.		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

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
								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 applicable regulatory requirements.	S. No 1.5, Table 3.1	SUNMPL	Photographic evidence of installed indication mark	Immediately, prior to first disbursement	In consistent with the Natural Gas Safety Rules, 1991, SUNMPL has applied for and obtained necessary approval for laying of the natural gas pipeline (20" X 600m) vide Department of Explosives, Bangladesh vide letter dated 30 May 2021. In this regard, SUNMPL 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 SUNMPL 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, SUNMPL is have noted indication mark of the pipeline passing across the Meghna River at the crossing point of both sides.		Action closed as per the Oct-Dec 2023 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 SUNMPL 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	SUNMPL	Copy of approved lay out 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 SUNMPL has now obtained		Follow-up with DoEx for license renewal.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
						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. SUNMPL has submitted application for renewal to Department of Explosives on 03 December 2024 yet to receive the same		
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	SUNMPL	Copy of valid acid storage license	3 months prior to COD	Review of the documentation indicate that SUNMPL 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	SUNMPL	Copy of valid IPP license	3 months prior to COD	Review of the permitting documentation indicates that SUNMPL 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.		Follow-up with BERC for license renewal.
1.10	Coordinate with TGTDCCL 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	SUNMPL/TGTDCCL	Copy of valid license for natural gas supply and pipeline operations	3 months prior to COD	<u>With COD declared in January 2024, SUNMPL has written to TGDCL vide letter dated 27 October 2024 seeking sharing of the BERC license for gas supply pipeline. However, even after repeated follow-ups copy of the same is yet to be received from TGTDCCL.</u>		Follow-up with TGTDCCL to share BERC license.
1.11	Obtain boiler registration from the Chief Boiler Inspector prior to project operations.	S. No 1.11, Table 3.1	SUNMPL	Copy of valid boiler registration	3 months prior to COD	SUNMPL 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, SUNMPL has obtained boiler operation certification which is found to		None

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
						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.		
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	SUNMPL	Copy of communication with Department of Labour, Bangladesh	Immediately, prior to first disbursement	For the construction phase, the EPC consortium has deployed one manpower supplier contractor i.e. 'Man is Power'. Registration certificate received from DIFE for this manpower supply agency was valid till 5 th Dec 2024 and SUNMPL was asked to follow up with this contractor for updating their registration certificate. In 9 th E&S monitoring visit, it was noted that a new manpower agency (SETCO) has replaced 'Man Is Power' and this agency had valid registration certificate in place.		
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	SUNMPL	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, SUNMPL is currently in the process of drafting of the operations ESMS. As informed during the current visit, the ESMS draft version is ready and currently under review of SUNMPL management. However, the draft copy of the ESMS was not shared with ERM for review. ERM has advised the site team to interlink the ESMS with the currently existing company policy and procedures. As per the mail communication from TUV, the ISO certification company on 26 February 2025, the certification audit report is successfully reviewed, and certificate will be issued after completion of final report.		Operation phase ESMS to be prepared before end of Q4 i.e. March 2025 and share with ERM for review.
2.2	Incorporate EHS&S Policies as part of the agreement / employment contract with the third-party agencies and workers.	S. No 2.3, Table 3.1	SUNMPL & 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, SUNMPL has integrated the EHSS policies in the		Prepare an EHS Policy for SUNMPL operations and make it a part of agreement contract with the third-party agencies.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
						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. The site is currently in operational phase and the EHS policy presented during current visit is developed by the O&M contractor NEPCS. SUNMPL management is yet to develop company EHS Policy for own operation and make it a part of agreement contract with the third-party agencies.		
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 SUNMPL along with the O&M contractor - NEPC-S has developed a HIRA matrix as well as an AI matrix to for operations 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.		Action closed during the current monitoring.
2.4	Develop and maintain an updated EHSS 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	SUNMPL, 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, SUNMPL 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		

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
						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	SUNMPL 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 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.	S. No 2.6, Table 3.1	SUNMPL	Copy of site-specific management plan along with evidence of implementation Evidence of closure of gaps identified and implementation of the Plans	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 developed a method statement and a timeline for 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. SUNMPL 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 SUNMPL 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		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 (February 2025)	Progress Status	Recommendations
	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.					reported by community. As advised in previous audit, this sexual harassment committee has now ensured representation from SUNMPL as well. As advised in previous audit, SUNMPL 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 • 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 three operation phase audits. <u>However, the site is yet to include the Hazard Identification and Risk Assessment Matrix in the current occupational health & safety management Plan.</u>		

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
						No action has been taken during current monitoring period.		
2.6	Ensure mobilization of the remaining EHS Supervisors by NEPC as per the organogram. Document and integrate the roles and responsibilities of the SUNMPL EHS Manager and Assistant Manager – Community Development in the EHS Plan.	S. No 2.7, Table 3.1	SUNMPL & EPC	Copy of appointment letter NEPC EHS Supervisors. Documented roles and responsibilities SUNMPL 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 SUNMPL EHS Manager and Manager – Community Development has now been documented and integrated in the aforesaid Plan. Review of the operations organogram and consultation with SUNMPL 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 EPC Contractor along with an EHS Supervisor, EHS Manager, an EHS Engineer, two fireman and one fire truck driver. SUNMPL 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, one fireman and one fire truck driver as per the approved organogram. <u>However, as per the duty register shared there is no alternate option for fireman and fire truck driver whenever one of them are on leave.</u>		The site must prepare a team of at least three fire truck driver and three fireman to ensure at least one of them are present in every shift 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	S. No 2.8, Table 3.1	SUNMPL and EPC	Updated EPRP Copy of mock drill report	Immediately, prior to first disbursement	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		Update current emergency response plan to add fire extinguisher team,

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
	responders list along with details of medical and firefighting team.				Six monthly during construction and operation period	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 SUNMPL 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 maintained in form-22 and signed by Warehouse Inspector of BFSCD. <u>The Site is yet to update the ERP dated 01 January 2024, adding the recent updates regarding the trained workers fire extinguisher team, rescue team and first-aid team.</u> the Project has been designed with modern systems for fire detection and suppression and most of it have been commissioned at site. <u>However, the project team including the EHS and firefighting team has limited understanding of the systems that have been implemented under the project.</u>		rescue team and first-aid team. Ensure proper capacity building and awareness generation involving the contractors who have commissioned the systems.
2.8	Arrange for a standby boat equipped with life jacket and trained personnel to respond to	S. No 2.9, Table 3.1	SUNMPL 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		Action closed as per the Oct-Dec 2022 E&S monitoring report.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
	any project riverine traffic related emergencies.					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.		
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	SUNMPL & 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. EPC had 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. Presently another manpower supply contractor (SETCO) has replaced 'Man is Power' and performance assessment audit for this new agency has also been conducted and the assessment report indicates lack of formal accident/incident reporting and investigation procedure. The contractor has been asked to ensure maintaining accident/incident register by end of February 2025.		SUNMPL is required to monitor E&S performance assessment compliance for the new manpower agency- SETCO
2.10	Update and implement the project Environmental Monitoring Plan to cover all environmental attributes and parameters as specified in the regulations and IFC EHS guidelines. The plan to clearly outline the rationale for	S. No 2.12, Table 3.1	SUNMPL & EPC	Copy of updated Environmental Monitoring Plan & Monitoring Reports.	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 operation phase. Furthermore, as per ECC the site is required to undertake 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		Complete installation of noise barrier to reduce ambient noise level adjacent to plant boundary and also undertake appropriate noise monitoring to

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
	selection of the monitoring locations.					- 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 Oct- Dec 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 <i>PM10 (57.87-72.55 µg/m3), PM2.5 (38.56-59.62 µg/m3), SO2 (07.11-11.92 µg/m3); NOx (5.79-10.41 µg/m3); and CO (0.02-0.07 mg/m3)</i>. The result in all cases was found to be in compliance with Schedule 12 of the <i>Air Pollution Control Rules, 2022</i>. <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, <i>Purbapara Mosque, Poschim Para Jame Mosque</i> 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. <u>However, for the <i>Purba Para Mosque</i> location both day-time and nighttime 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 5 locations - 2 no. upstream and 2 no. downstream of Meghna River and jetty area. The sampling is undertaken on a monthly basis 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		evaluate the level of attenuation that is being achieved. Undertake drinking water and ground water monitoring inside the plant boundary as per Schedule 2 of the <i>BECR, 2023</i>. 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. Compare the soil quality monitoring report with Dutch standards for Soil.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
						and Total Coliform with results found to be in compliance with the newly notified BECR, 2023. <i>Ground Water Quality Monitoring</i> SUNMPL is yet to undertake drinking water and ground water monitoring inside the plant boundary as per <u>Schedule 2 of the BECR, 2023.</u> <i>Storm Water Quality Monitoring</i> The site has undertaken monitoring of stormwater 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. <i>Soil Quality Monitoring</i> The site has undertaken soil quality monitoring inside plant boundary for parameters like: pH, electrical conductivity, salinity and heavy metals. However, the results are not being compared against any regulation as there is no national regulation. The following observations is made with respect to operations environmental monitoring:		

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
						- 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 NOx (-4.22 mg/m3) with CO values also noted for HRSG stack (-25.4 mg/m3). Considering the plant is in operation, the reason for such contradictory interpretation could not be validated and is ascertained largely due to calibration issues with CEMS, which is reported to be pending since 2022. - SUNMPL has not undertaken any stack emission monitoring by third-party as specified in the operations ESMP for validation of the CEMS results even though plant is operational from December 2024.		
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	SUNMPL & EPC	Copy of monthly EHS 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 EHS KPIs are reported in the progress report viz. <i>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.</i> 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 SUNMPL). Review of the monthly progress report of June 2024 (as prepared by the O&M contractor) reveals coverage of EHS KPIs which includes safety KPIs like Loss Time Injury, Damage to Asset, Monthly EHSS walkdowns		Action was closed during current monitoring

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	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	SUNMPL	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 SUNMPL 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 (February 2025)	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	SUNMPL	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.	IFC PS 2: Labour and Working Conditions							
3.1	Update SUNMPL HR policies to ensure alignment with IFC PS-2 requirements as well as BLA 2006 requirements.	S. No 2.1, Table 3.4	SUNMPL	Updated HR policy	Immediately, prior to first disbursement	In previous audit report for the period July-Sept 2023 visit, it was reported that SUNMPL 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	SUNMPL	Approved Service Rule	3 months prior to COD	SUNMPL 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	SUNMPL in coordination EPC Contractor	OT work status spreadsheet for contract workers	Immediately, prior to first disbursement	As discussed in previous audit report, SUNMPL 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. In previous audits, reasons for delay in initiating disbursement of back wage have been discussed (Refer 3 rd Operation phase E&S monitoring report for detail). In 4 th Operation phase E&S monitoring visit (Feb 2025), it was apprised that an inventory of workers, including calculations of arrears has been done, verification of list of eligible workers is completed, and a committee has been formed to oversee the payment		SUNMPL is advised to adhere to the revised timeline on key milestones for back wage disbursement plan.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
						of back wages. Communication to the eligible workers for receiving differential amount and collecting their bank account details is started. The next steps toward initiating the process of disbursement of payment to eligible workers are as follows: - Opening of a bank account in the name of EPC contractor for fund allocation for disbursement to eligible workers by end of February 2025. The account will be solely for the purpose of back wages payment - Allocation of the arrear amount for total back wages payment including 10% contingency in the EPC contractor bank account by March 2025 - Initiating payment disbursement to eligible workers from April 2025 in batches based on available bank account details of the eligible workers. - Maintaining monthly records on status of payment disbursement to eligible workers from April 2025 - Undertake completion audit to assess fulfillment of the entire back wage payment process by March 2026 and accordingly back wage disbursement process will be declared closed.		
	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
	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

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
								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.		<i>Action closed as per the Oct-Dec 2023 E&S monitoring report with implementation to be ongoing</i> Not Applicable in Jul-Sept 2024 E&S monitoring report
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		<i>Action closed as per the Apr-Jun 2024 E&S monitoring report</i>

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
						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.		
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 Nov2024- Jan2025, indicates that SUNMPL 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 BNBC 2020 standards. For the groundwater monitoring program, please refer to S. No. 2.10 of this Table.		Action closed during the current monitoring.
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	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	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		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

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
	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.			composition & meeting minutes		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. The site has provided insulation mats in front of electrical panels. <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. As informed during the current audit, the purchase order for the job has been released in the favour of Reverie Power and Automation Engineering Limited.</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 as per the IFC General EHS 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.		BLR.2015 requirement.

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						The site has constituted a safety committee on 20 October 2024 consisting of 21 members from management, SUNMPL 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 SUNMPL. <i>Height work</i> 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		

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						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 Cranes, chain pulley blocks, lifts etc. for operations. The aforesaid lifting equipment's has been inspected and certified by Liftsol Bangladesh Company having valid approval from Department of Inspection for Factories & Establishment, Bangladesh in form-20 dated 16 May 2024 valid for two years. The inspection records are not maintained in prescribed format (Form 24) as specified in the Bangladesh Labour Rules (BLR), 2015. 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	S. No 3.15, Table 3.1	EPC	Near Miss Reporting & Recording Procedure Training Records (including	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		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 (February 2025)	Progress Status	Recommendations
	separate records for all refresher training being provided.			refresher training)		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.		
3.11	Develop and implement occupational noise monitoring plan for workers operating nearing 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 November 2024-January 2025 indicate that SUNMPL 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.		Action closed during current monitoring
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		Action closed as per the Jul-Sep 2023 E&S monitoring report.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
						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.		
4.	IFC PS 3: 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	SUNMPL	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 SUNMPL 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. As informed by SUNMPL 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. During the current visit it was observed that noise barrier installation is under progress and the job is expected to finish by end of April 2025.		Finish noise barrier installation by end of April 2025.
4.2	Perform annual quantification of GHG emissions during operations in accordance with internationally	S. No 4.2, Table 3.1	SUNMPL	Copy of GHG emission quantification for operations.	Annually during operations.	SUNMPL has done GHG scope-1, 2 & 3 emissions calculation through a BAB accredited third party Envoage for the period Jan- Sept 2024 following IPCC guidelines. The total GHG emission for the period is		The site must maintain GHG inventory on quarterly basis.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
	recognized methodologies and good practices. Facilitate implementation of the Climate Change Risk Assessment (CCRA) Study Report			Report on the implementation progress of CCRA study		341627 TCO2e. The site has not calculated GHG emission for the quarter from Oct-Dec 2024. During the current visit, it was informed that a detailed vulnerability assessment will be undertaken in June 2025 and the site has taken an internal timeline till December 2025 to implement all CCRA 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	SUNMPL & 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	SUNMPL & EPC	Copy of riverbed sand analysis report. Photographic evidence	Immediately, prior to first disbursement	As mentioned in the last monitoring report, SUNMPL has now undertaken analysis of the riverbed sediments (4 samples) by engaging a third-party agency - <i>ALS Technichem HK Pty Ltd</i> , 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. 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		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 (February 2025)	Progress Status	Recommendations
						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	SUNMPL & 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
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	S. No 4.6, Table 3.1	SUNMPL & EPC	Photographic evidence. Copy of waste inventory and manifests.	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.		Ensure availability of ECC copy of third-party hazardous waste vendors and compatibility before

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	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.			Details pertaining to drilling cutting and drilling mud disposal.		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-EHS-10 dated 01 April 2024) for operations in consistent with applicable legal requirement and IFC EHS 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. During the current visit 3 used oil barrels were stored inside shed, the site is yet to generate any ETP sludge. The site has identified Azizu Recycling and E-waste company having valid ECC from DoE for managing hazardous and e-waste till 30 January 2026. The site has sent 4kg cotton waste to Azizu in January 2025. <u>However, as per ECC Azizu is not an authorized third party for waste operations like disposal to land fill, co-processing or incineration. The site is yet to identify an authorized party for the disposal of sludge, used oil and oil-soaked cotton.</u>		disposal of hazardous and e-waste. Conduct periodic audit of the third-party 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	S. No 4.7, Table 3.1	SUNMPL & 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 SUNMPL 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 (February 2025)	Progress Status	Recommendations
	permission from regulatory authorities. 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 Suveccha hospital.			Copy of audit report of third-party WMAs. 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 proper secondary containment having at least 10% of the total volume of all containers and correct compatibility matrix.

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						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 SUNMPL 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: <u>As observed during the site walkthrough, the site has stored 09 HDPE barrels of 200 litres of aqueous ammonia in steam turbine building with a secondary containment. However, the capacity of secondary containment was inadequate. Along with that more than 12 numbers of 50 litres HDPE containers of aqueous ammonia has been stored in the same designated room without any secondary containment. The site is yet to perform risk assessment for the same. SUNMPL has provided gas mask for the employees handling aquas ammonia containers. It has been</u>		

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
						<u>evidenced that the HDPE drums of aqueous ammonia has been kept with bags of Tri Sodium Phosphate, without checking compatibility matrix. The compatibility matrix displayed in that room was also found to be incorrect.</u>		
4.9	Obtain and share the renewed license of the third-party agency involved in pest control activities onsite. 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.	S. No 4.9, Table 3.1	SUNMPL & O&M Contractor	Copy of renewed license of pesticide application agency Notice communicating the discontinuation of WHO Class Ia & Ib pesticides Updated pest control procedure	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 aforesaid 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 Darsbun, 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.		Action closed as per the Jan-Mar 2024 E&S monitoring report.
5.	IFC PS 4: 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	SUNMPL & 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: <i>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.</i> 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		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 (February 2025)	Progress Status	Recommendations
						recommendations with respect to the gas pipeline node safety risks and controls available.		
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 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.	S. No 5.2, Table 3.1	SUNMPL & EPC	Copy of pre-employment medical screening procedure along with medical examination reports for construction phase Annual medical examination report for operations Photographic evidence	Immediately, prior to first disbursement for construction phase. Annually during operations Immediately, prior to first disbursement	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 been provided at the SUNMPL/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		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 (February 2025)	Progress Status	Recommendations
						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 examination records in Form 26 as per the provision of the BLR, 2015. In view of the above recommendation, SUNMPL 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-EHS-002 dated 01 April 2024) to this regard.		
6.	IFC PS 5: 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	SUNMPL	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.	IFC PS 6: 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	SUNMPL	Evidence of engagement with Fishery Department	Immediately, prior to first disbursement Quarterly during project	In consistent with the recommendation of the Oct-Dec 2022 monitoring report, SUNMPL 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		Continue to maintain a quarterly progress update report on implementation of

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
				Local fish breeding progress report	construction and operations phase	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 SUNMPL Corporate Social Responsibility (CSR) Plan. As part of first phase of the plan, SUNMPL has released 120kgs of fish fingerlings (ruhi, katla, kalibaush, mrigel, grass carp and sorputi) in the Meghna River on 27th August 2023. In the ceremony, SUNMPL 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		the fish breeding promotion program.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
						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 EHS Guidelines & IFC EHS Guidelines for Thermal Power Plants							
8.1	Develop and implement a dust control procedure for managing fugitive emission from construction activities/operation in accordance to the "IAQM Guidance on the assessment of dust from demolition and construction."	S. No 8.1, Table 3.1	EPC	Copy of dust control procedure with evidence of implementation.	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 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 stormwater basin constructed. Also, with the project now in operations, only limited volume of wash water is generated from commissioning activities.		Action closed as part of the Oct-Dec 2023 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	S. No 8.3, Table 3.1	SUNMPL, 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		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 (February 2025)	Progress Status	Recommendations
	the design of the septic tank system being utilized for sewage disposal at the main plant site.					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 stormwater basin being constructed. For the main plant site, the drainage plan shared indicate the provision of 2 outfall equipped with catch 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	SUNMPL, 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	SUNMPL & 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.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
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 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.
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 3 m 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.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
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	SUNMPL & EPC	Copy of driver guide on road and vehicular safety both on-site and off-site. Photographic evidence and copy of road safety communication material.	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.
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/SUNMPL 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		Engage a third-party agency for annual inspection and maintenance of onsite active and passive fire protection system installed as per BNBC requirements. Train the emergency response team members regarding automatic gas suppression system.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
						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. SUNMPL has obtained completion certification from Safety Wings to ensure proper installation of firefighting equipments as per approved firefighting plan on 12 January 2025. <u>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. However, it was informed that an engagement order has been released in favour of Safety Wings to undertake the job.</u> Site has installed Gas Based Fire Suppression System (GSS) in electrical rooms, Fire detection system in form of smoke detector is available across the plant. However following gaps are identified: <u>No dedicated staff was available across the shifts with the competencies of acknowledging fire alarms, announcements for emergencies and actions with GSS alarm.</u> <u>Fire panels were showing multiple loop failures, missing detectors, detector defective alerts and no action identified for the same.</u>		
8.10	Initiate conducting a Fire Safety assessment to assess the fire protection requirements	S. No. 8.11, Table 3.1	SUNMPL 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		Action closed as part of the Jan-Mar 2024 E&S monitoring report.

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
						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.		
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	SUNMPL & 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 buried utility infrastructure in near vicinity. Coordinate with TGTDCCL 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.	S. No 9.2, Table 3.1	O&M Contractor	Copy of occupational risk assessment report for 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 pipeline laying & operations 3 months prior to COD or pipeline operations, whichever is earliest. Prior to confined space entry work during 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" (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.		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 (February 2025)	Progress Status	Recommendations
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 SUNMPL 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 TGTDCCL. Submit the same to the Department of Explosives (DoE), Bangladesh.	S. No 9.4, Table 3.1	O&M Contractor & TGTDCCL	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. SUNMPL has submitted a letter to TGTDCCL on 27 October 2024 requesting them to submit O&M plan to Department of Explosives.		Request TGTDCCL management to submit 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 TGTDCCL. Communicate the potential 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.	S. No 9.5, Table 3.1	SUNMPL, O&M Contractor & TGTDCCL	Copy of offsite emergency response and preparedness plan with evidence of implementation.	3 months prior to COD or operations of pipeline, whichever is earliest.	The site has developed an Offsite Emergency Response Plan (Doc No: NEPCS-M3-EHS-020 dated Jan 2024). Review of the offsite emergency response plan developed indicates that the site has properly identified offsite emergency scenarios like: • 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		Action closed during current monitoring

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
						site has also included list of firefighting equipments and MSDSs of the chemicals/fuel being stored/handled.		
10	IFC EHS 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 workers, use of rated hoisting equipment by trained operator.	S. No 10.3, Table 3.1	EPC	Copy of updated height work procedure with evidence of implementation.	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 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.		Action closed as part of the Jul-Sep 2023 E&S monitoring report.
10.4	Develop and implement an EMF Safety Program prior to the commencement of project operations	S. No 10.4, Table 3.1	SUNMPL & O&M Contractor	Copy of EMF Program with evidence of implementation	Prior to COD or energization of the transmission	SUNMPL 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		Action closed as part of the Jan-Mar 2024 E&S monitoring report with

S. No	Action item	Reference in ESDD Report	Responsibility	Deliverable	Suggested Timeline for completion	ERM Observations (February 2025)	Progress Status	Recommendations
					line, whichever is earliest.	program has been conducted on 05 May 2024 which has been attended by 29 workers.		implementation to be ongoing.
10.5	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	SUNMPL & 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

SUNMPL 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 all major planned activities are accomplished now. Major LRP implementation progress achieved till December 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 was 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 4th operation phase E&S monitoring 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 are completed.
- Training on micro business completed for all the 151 participants and seed capital disbursed to 90 participants. Remaining 61 participants were also provided seed capital during 4th E&S monitoring period.
- 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 have been provided in December 2024.
- Twelve static clinics provided healthcare to 154 individuals, along with 48 telemedicine consultations. The project also hosted 48 forums with 414 participants on health and socio-economic topics. Static clinic will be continued till 31st Jan 2026.
- Staff training on community mobilization strategies and transitional aid helped stabilize households economically.
- Internal Mid-term evaluation of the LRP program will be completed by Sajida Foundation by February 2025.

SUNMPL 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 SUNMPL and they also submitted their 4th Monitoring Report in LRP implementation progress. 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.

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 SUNMPL, is leading stakeholder engagement activities at site, with the support of a dedicated field staff who sits in Community relationship office set up by SUNMPL in Doodhghata village, near plant gate. Based on ERM's consultation with community in Korbanpur village, it was noticed that community members are well aware with the formal engagement system established by SUNMPL 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.

SUNMPL 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 documented for records. Community Development team have established a good connect with local stakeholder and also acting as chain of communication between SUNMPL 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 two new grievance was reported during the 4th operational phase E&S monitoring period in Nov 2024. In one case, one local person from Doodhghata village reported a complain of damage to a bamboo holding electric cable and this complain was addressee through giving adequate compensation to the aggrieved person. In another case, a recipient of monthly vulnerable pension holder from Doodhghata village requested for changing banking details for receiving the monthly pension that was duly addressed as per request of the recipient.



APPENDIX A PHOTO DOCUMENTATION



Photo 1: Noise barrier installation on boundary wall



Photo 2: Insulation mat provided in front of electrical panel



Photo 3: Aqueous Ammonia stored in steam turbine building



Photo 4: Gas Mask provided for handling aqueous Ammonia



Photo 5: Fire control panel in CCB room

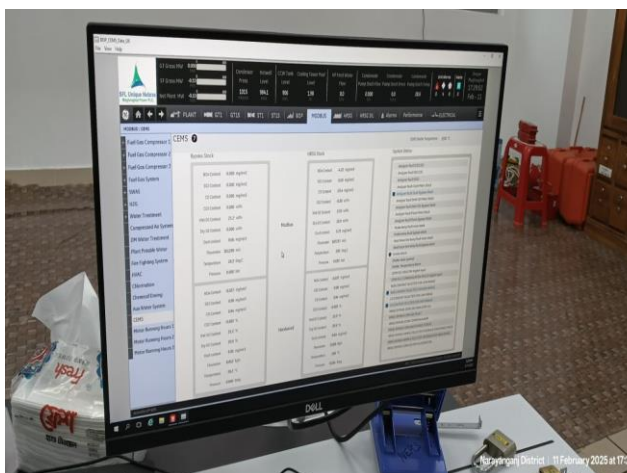


Photo 6: CEMS display tab in CCB room



Photo 7: community consultation by LRP implementation agency- Sajida



Photo 8: Community consultation in adjacent village



Photo 9: Spill Kit provided near bulk acid-alkali storage



Photo 10: DM Water Plant



Photo 11: Hazardous Waste Storage Shed



Photo 12: Treated Effluent Storage Basin



APPENDIX B DOCUMENT/INFORMATION REVIEW LIST



ERM

- Monthly progress report for the quarter,
- PAC (Provisional Acceptance Certificate) from GE,
- Figure 2.1 Project Contractual structure
- BIWTA clearance renewal and name change approval,
- WARPO surface water license renewal letter 24.08.2024.
- Letter from WARPO dated 27.02.2022 riverbank protection and subsequent renewal letter dated 24.12.2024,
- SETCO labour license
- SETCO Induction training records.
- List of Boiler attendant and certificates,
- Demobilization and closure report of Labour camp, Project office,
- List and Duty roaster of Fire Man, Fire track operator.
- CEMS Method statement from OEM,
- Power tools checklist along with other electrical safety documents,
- Illumination record and Lux meter calibration record.
- Lifting Equipment: Form 24, list of lifting equipment
- Near Miss Reports,
- Latest Noise monitoring reports,
- Noise barrier specification, attenuation factor.
- E waste and Hazardous waste documents for disposal, manifest, inventory.
- Form 26 medical health examination records
- Annual medical test SOP
- Certificate from Safety Wing
- Environment AI Matrix
- Legal Register
- Application to DoEx 03.12.2024 for Hydrogen Cylinder Storage License renewal.
- BERC License for IPP
- Environmental Monitoring Report
- Revised back wage disbursement action plan
- Manpower details and registration certificate of manpower supply agencies
- A report on Fish Breeding Promotion Program at Meghna River
- LRP progress Report and Plan Update
- Proposed Wage structure for operation phase workers
- Grievance Summary Report





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