
**Semi-annual Environmental Monitoring Report (Revision 1)
(July to December 2025)**

Project No. 55148-001
December 2025

**ADB Loan Number 4334-BAN (COL): Skills for Industry Competitiveness and
Innovation Program (SICIP) Program (SICIP)**



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LIST OF ACRONYMS

BMET	Bureau of Manpower, Employment and Training
CBLM	Competency-Based Learning Material
CS	Competency Standard
DSC	Design Supervision Consultant
EARF	Environmental Assessment and Review Framework
EMP	Environmental Management Plan
IEE	Initial Environmental Examination
IVA	Independent Verification Agency
KOICA	Korea International Cooperation Agency
MoTJ	Ministry of Textile and Jute
MoU	Memorandum of Understanding
NHRDF	National Human Resource Development Fund
NSDC	National Skills Development Council
NSDP	National Skills Development Policy
PKSF	Palli Karma-Sahayak Foundation
RBL	Result Based Lending
RF	Resettlement Framework
SECPF	Small Ethnic Communities Planning Framework
SECPP	Small Ethnic Communities Peoples Plan
SEIP	Skills for Employment Investment Program
SPS	Safeguard Policy Statement
STTL	Smart Textile Technology Living Lab
SWAp	Sector Wide Approach
TMS	Training Management System
TTC	Technical Training Center
TVET	Technical and Vocational Education and Training

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EXECUTIVE SUMMARY

The Finance Division of the Ministry of Finance, Government of Bangladesh, is implementing the “Skills for Industry Competitiveness and Innovation Program (SICIP)” with financial support from the Asian Development Bank (ADB) to develop a skilled workforce through advanced technical and competency-based training nationwide. The program will establish a comprehensive quality assurance system to strengthen collaboration between training institutes and industries, supporting human resource development in priority sectors. Its outcome will be a more technology-oriented workforce across skill levels, measured by training workers for at least 10 priority and emerging industries with 65% job placement, and by increasing employable and life skills among women and disadvantaged groups. About 220,000 workers are expected to benefit over six years.

SICIP program is currently implementing various civil works includes constructing new training centers and renovating existing centers in different locations across the country. In order to assist with the preparation of preliminary and detail engineering design works, including equipment layouts for the proposed buildings, national and international consultants were hired for this project. These design works will serve as technical specifications for the creation of bidding documents. The proposed structures include classroom and lab facilities at specific universities, two smart textile technology laboratories (STTLs) run by the Ministry of Textiles and Jute (MoTJ), and additional renovations for TVET or polytechnic institutions. For several of the projected infrastructures, the national consultants have been hired to create detailed engineering designs and drawings, along with portions of feasibility reports.

This semi-annual report presents the status of project implementation, details of compliance with environmental regulations of the Government of Bangladesh and Safeguards Policies of ADB, details of compliance with environmental loan covenants and the status of compliance with various aspects of EMP as stated in the IEE reports.

A Contractor is engaged for the civil works for NATI project in July 2025 and the physical works have been started. Another Contractor started civil works in Sylhet TTC in August 2025. Site mobilization work including site office setup and site survey work has been completed during this reporting period.

Contractors for the civil works of STTL and Kumudini Nursing dormitory have been engaged in August 2024. The construction works are progressing day by day in both STTL and Kumudini Nursing dormitory as per the schedule. Environmental Health and Safety Managers are deployed in STTL in Chattogram, Kumudini Nursing dormitory, NATI in Narsingdi and Sylhet TTC projects.

Initial Environmental Examinations (IEEs) have been prepared for the STTL Chattogram, NATI Narsingdi, Kumudini Student Dormitory, and Sylhet TTC subprojects in accordance with the Environmental Assessment and Review Framework (EARF) and ADB Safeguard Policy Statement (SPS 2009). The IEE for BUTEX is under preparation along with the detailed engineering design process. IEEs for EWU, IBA, STTL Gazipur, Khulna TTC, and Kumudini Nursing Institute are at different stages of preparation and review depending on the status of design finalization and procurement activities.

Site Environmental Management Plans (SEMPs/CEMPs) have been prepared and implemented for the active construction sites of STTL Chattogram and Kumudini Student Dormitory, while SEMP preparation and review processes for NATI and Sylhet TTC are ongoing and will be finalized in accordance with construction progress and ADB safeguard requirements.

An Environmental specialist was recruited by competitive events. The Environmental specialist

was deployed at 14 August 2025. Presently Environmental specialist is monitoring the environmental parameters for the civil works under SICIP.

It is noted that intermittent design consultants have been engaged to undertake the preparation of detailed engineering drawings and Bills of Materials (BoMs) for the buildings of East West University, Bangladesh University of Textiles (BUTEX), and Institute of Business Administration (IBA), University of Dhaka. The preliminary drawings for the aforementioned civil works, including IBA, were completed. The detailed engineering designs and final drawings were completed for East West University and IBA in September 2025 and December 2025, respectively. However, detailed engineering designs and final drawings of BUTEX are under preparation.

Baseline surveys were conducted for the NATI and Sylhet TTC packages during June 2025 and November-December 2025, respectively. Key environmental parameters-including ambient air quality, noise levels, and water quality-were monitored and tested. Periodic environmental quality monitoring—including ambient air quality, water quality, and ambient noise level measurements—were conducted during the reporting period at active construction sites. The monitoring results indicate that the measured parameters were generally within the permissible limits of the Government of Bangladesh standards, WHO Standard for Drinking Water Quality and IFC General Environmental, Health and Safety (EHS) Guidelines for ambient air quality, ambient noise levels and surface water quality.

With regard to Occupational Health and Safety (OHS), dedicated OHS personnel were engaged at all active construction sites to supervise implementation of site safety measures. Appropriate Personal Protective Equipment (PPE) was supplied and used by workers and site personnel during construction activities.

No fatal accidents or lost time injuries were reported during the reporting period. However, a limited number of minor first aid cases and near-miss incidents were recorded and managed at site level through immediate corrective measures and safety supervision.

Environmental awareness and occupational health and safety (OHS) training programs were conducted regularly at active construction sites during the reporting period to strengthen environmental safeguard compliance and worker safety awareness. A total of eight (08) training and awareness sessions were conducted at STTL Chattogram, Kumudini Welfare Trust (KWT), NATI Narsingdi, and Sylhet TTC, with participation of approximately 139 workers, contractor staff, and project personnel. The training topics included environmental awareness, PPE usage, occupational safety practices, housekeeping, waste management, and emergency preparedness. First aid boxes, fire extinguishers, and other requisite safety equipment were found to be available and properly maintained during site inspections. Furthermore, no instances of child labor were identified in any of the construction activities.

During the reporting period, stakeholder consultation and coordination meetings were conducted at NATI Narsingdi, Kumudini Welfare Trust (KWT), Sylhet TTC, and STTL Chattogram project sites to discuss environmental safeguard implementation, construction safety, traffic management, dust and noise control, and grievance handling procedures. A total of four (04) consultation meetings were conducted between November and December 2025 with participation from institutional representatives, contractors, workers, local stakeholders, and community members. Key concerns raised during the consultations were addressed through site-specific mitigation measures and regular supervision by the project implementation teams.

At the program level, the Grievance Redress Committee (GRC) was formally established in September 2025. In addition, Site-level GRC Sub-Committees for construction activities were constituted across all sites during September–October 2025, and the names and contact details

of committee members have been publicly displayed. To date, no grievances or complaints have been recorded at either the site level or the program level.

During the reporting period, stakeholder consultation meetings were conducted at NATI, KWT, Sylhet TTC, and STTL sites with participation from institutional representatives, contractors, workers, and local stakeholders. Key discussions included construction safety, dust and noise management, traffic movement, and grievance handling mechanisms. Concerns raised during consultations were addressed through site-specific mitigation measures and regular monitoring.

Furthermore, during the reporting period, a series of coordination meetings were convened with relevant stakeholder institutions to facilitate the effective design and implementation of the designated civil works. These consultations were conducted with representatives of Ministry of Textiles and Jute (MoTJ), East West University (EWU), Bangladesh University of Textiles (BUTEX), Institute of Business Administration (IBA) of University of Dhaka, Kumudini Welfare Trust, Smart Textile Technology Living Lab (STTL) in Chittagong Textile Engineering College, Sylhet Technical Training Center (STTC), and Khulna Technical Training Centre (Khulna TTC).

These meetings were instrumental in ensuring inter-institutional coordination, alignment of technical inputs, and timely progress in the execution of the proposed construction activities.

1 INTRODUCTION

1.1 Background

1. The Asian Development Bank (ADB) is providing financial support through a Results-Based Lending (RBL) modality to assist the Government of Bangladesh in implementing the Skills Development Framework for Economic Competitiveness 2023. The Program is designed to: (i) enhance the supply of technology-oriented skilled workforce across emerging and priority sectors; (ii) promote inclusive skilling and upskilling opportunities, particularly for women and socially disadvantaged groups; (iii) incentivize and strengthen industry–university partnerships to foster innovation capacity and improve industrial competitiveness; and (iv) advance the development of skills necessary for climate-resilient manufacturing processes and the adoption of green technologies.

2. The Finance Division of the Ministry of Finance, Government of Bangladesh, is implementing the *Skills for Industry Competitiveness and Innovation Program (SICIP)* with financial assistance from the Asian Development Bank (ADB). The Program aims to develop a skilled workforce nationwide through the delivery of advanced technical and competency-based training initiatives. The SICIP will establish a complete quality assurance mechanism to facilitate collaborations between training institutes and industries which will ensure in developing human resources for the priority industry sectors.

3. Specifically, the objectives are:

- i) The objectives of scheme 1 is to (i) develop the capacity for advanced technical skills training for emerging and priority industries and (ii) strengthen managerial capabilities, research and development (R&D) driven innovation, and green skills capacity in the industries. These objectives are expected to increase technology-oriented skilled workforce and boost the country's industry competitiveness and innovation capacity.
- ii) The objectives of scheme 2 is to (i) deliver industry-relevant basic and mid-level skills training for priority and emerging industries and (ii) promote inclusive skilling and upskilling opportunities for women and socially disadvantaged groups through targeted training programs. These objectives are expected to enhance the job-ready skills and productivity of the country's workforce, contributing to economic diversification and competitiveness of industries.
- iii) SICIP Scheme-3's activity coverage includes enhancing institutional capacity for skills monitoring and management by coordinating all training and other activities under the SICIP program. Objectives are:
 - Establishment of an Industry Advisory Board in order to prepare s guideline for development of advanced technical skills courses
 - Arrange for wide scale skills-gap analysis to facilitate program effectiveness
 - Build and establish a IT based Trainee Management System to monitor training performance and put quality assurance in place
 - Arrange for necessary analytic studies (e.g. tracer studies, skills trend analysis)
 - Effective management and governance of overall skills development eco-systems.
 - Strengthening skills institutions like NSDA, NHRDF
 - Arrange for financial audits, internal audits and performance audits.
 - Arrange for independent verification of attainment of performance indicators

1.2 Impact and Outcome

4. The impact will be increased income and productivity of the working population aged 15 and over, aligned with NSDP. The outcome will be increased employment in priority sectors and skills for males and females.
5. The outcome for this project is- Technology-oriented skilled workforce increased for priority and emerging industries across skill levels

1.3 Outputs

6. The outputs of this project are:
 - (i) advanced technical skills and managerial capabilities for emerging and priority industries,
 - (ii) industry–university collaborations for R&D projects with applications of advanced or green technologies,
 - (iii) socially inclusive skilling and upskilling for women and people from disadvantaged groups, and
 - (iv) enhanced skills monitoring and coordination.

1.4 Scope of the civil works under this project

7. SICIP involves in various civil works, such as setting up new training centers or renovating existing ones at different locations in Bangladesh. For this new project, the pool of national and international consultants had been engaged to support the preparation of preliminary & detail engineering design works, that include equipment layouts for the proposed buildings; these design works form with technical specifications for preparation of bidding documents. The proposed buildings include two smart textile technology labs (STTLs) under the Ministry of Textiles and Jute (MoTJ), classroom and lab buildings at EWU, BUTEX, IBA campus, a student dormitory building in Kumudini Welfare Trust (KWT), an academic building in Kumudini Nursing Institute, and other renovation works for polytechnics, TTCs or TVET institutes. The locations of the proposed sites are shown in the figure 1.

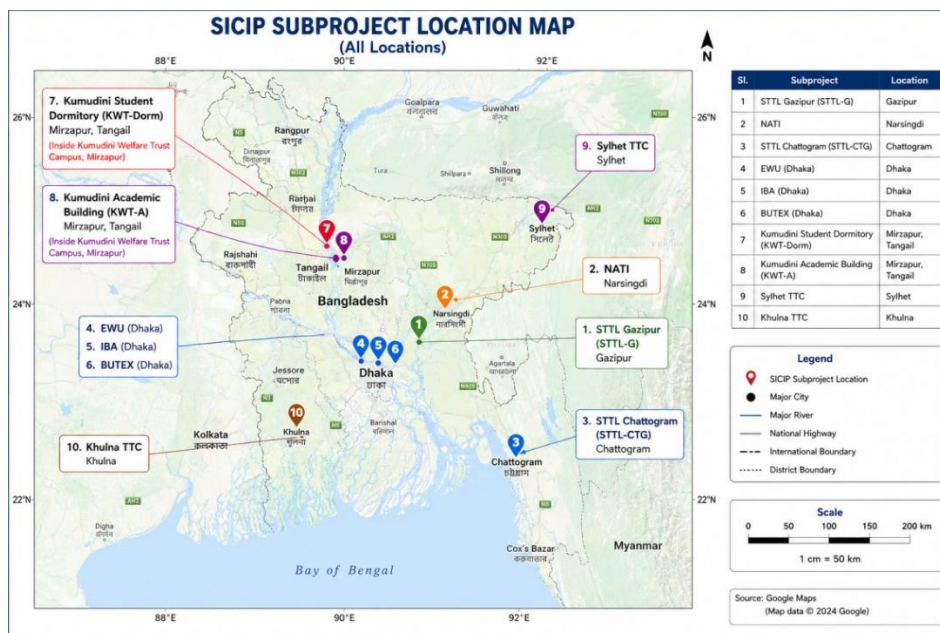


Figure 1: SICIP Subproject Location Map

1.5 Environmental Safeguards Category

8. All SICIP subprojects have been screened in accordance with the Asian Development Bank (ADB) Safeguard Policy Statement (SPS 2009) and the Environmental Assessment and Review Framework (EARF) prepared for the program. The subprojects are classified as Category B for environment and therefore require preparation of Initial Environmental Examination (IEE) reports with corresponding Environmental Management Plans (EMPs).

9. In accordance with the Bangladesh Environment Conservation Act and Environment Conservation Rules (ECR), the subprojects are also subject to national environmental clearance requirements. Depending on the type, scale, and implementation stage of the construction activities, the subprojects require Site Clearance Certificates (SCC), Environmental Clearance Certificates (ECC), or institutional No Objection Certificates (NOCs) from relevant authorities.

10. SICIP requested the Department of Environment (DoE) to issue a No Objection Certificate (NOC) for 10 construction works under the program. In this regard, SICIP held unofficial discussions with the DoE concerning the issuance of the NOC for these construction activities. A total of two unofficial meetings were conducted with the DoE on this matter.

11. In addition, SICIP submitted two formal request letters to the DoE, dated 11 September 2025 and 19 October 2025, seeking the issuance of a No Objection Certificate (NOC) for the 10 construction works. In response, the DoE issued two letters dated 24 September 2025 and 1 December 2025, respectively.

12. It is noted that, through its second response letter dated 1 December 2025, the DoE issued NOCs for nine (09) construction subprojects, excluding the construction of the Nursing Institute at KWT. Copies of the communication exchanged between SICIP and the DoE are attached as Annex-16.

13. For the Kumudini Nursing Institute (KWT Academic Building) subproject, the Department of Environment (DoE) instructed submission of a separate application for Site Clearance Certificate (SCC). Accordingly, the SCC application for the Nursing Institute subproject was submitted to DoE on 26 January 2026 is attached as Annex 17. The revised EMR has been updated to reflect the current status and timeline accordingly.

14. The Department of Environment (DoE) informed that construction projects having a built-up area between 5,000–20,000 square meters fall under the Orange Category in accordance with Schedule-1 of the Environment Conservation Rules (ECR) 2023 and therefore require Environmental Clearance Certificate (ECC) following issuance of Site Clearance Certificate (SCC).

Environmental categorization and SCC/ECC Status of SICIP Subprojects is shown in Table 1-1.

Table 1-1: Environmental Categorization and SCC/ECC Status of SICIP Subprojects

Sl.	Subproject	ADB Environmental Category	National Classification	SCC/ECC Status	NOC Status	Remarks
1	STTL Chattogram	Category B	No specific category	Not Applicable	Obtained	Construction ongoing
2	NATI Narsingdi	Category B	No specific category	Not Applicable	Obtained	Construction ongoing
3	Kumudini Student Dormitory (KWT-Dorm)	Category B	No specific category	Not Applicable	Obtained	Construction ongoing
4	Kumudini	Category B	Orange	Applied for	Not	Applied on

	Academic Building (KWT-A)			SCC	applicable	26 January 2026.
5	Sylhet TTC	Category B	No specific category	Not Applicable	Obtained	Construction ongoing
6	STTL Gazipur	Category B	No specific category	Not Applicable	Obtained	Design stage
7	EWU	Category B	No specific category	Not Applicable	Obtained	Design stage
8	IBA	Category B	No specific category	Not Applicable	Obtained	Design stage
9	BUTEX	Category B	No specific category	Not Applicable	Obtained	Design stage
10	Khulna TTC	Category C	No specific category	Not Applicable	Obtained	Procurement stage

1.6 Description of civil works

15. The list of civil works under SICIP project is shown in Table 1-2.

Table 1-2: Civil Works under SICIP

Sl.	Package Name	Location	Building Type	Storey	Build up Area
1	Construction and Renovation of Narsingdi Automotive Training Institute	Narsingdi	Renovation of existing academic building	3 storey	870 m ²
			New technical training building	3 storey	372 m ²
2	Construction of STTL in Textile College, Chattogram	Chattogram	Academic building	5 storey	820 m ²
			Technical training testing laboratory	4 storey	1295 m ²
			Trainees' dormitory	5 storey	350 m ²
3	Construction of STTL in new Textile College, Gazipur	Gazipur	Academic building	5 storey	820 m ²
			Technical training testing laboratory	4 storey	1,295 m ²
4	Construction of EDC Building at East West University (EWU)	Dhaka	Academic building	8 storey	210 m ²
5	Construction of EDC Building at IBA	Dhaka	Academic building	10 storey	872 m ²
6	Construction of EDC Building at BUTEX	Dhaka	Academic building	6 storey (foundation for 12 storey)	1,015 m ²
7	Construction and Renovation of Sylhet TTC	Sylhet	New technical training building	3 storey	900 m ²
			Renovation of existing training building	3 storey	1,674 m ²
8	Construction of Approach Road, Cafeteria and other Ancillary Works at Khulna TTC	Khulna	Tin shed cafeteria	1 storey	180 m ²
			Internal periphery road	500 m	1,600 m ²
9	Construction of Student Dormitory at Kumudini Welfare Trust	Tangail	Trainees' hostel building	6 storey	2,900 m ²
10	Construction of Academic Building at Kumudini	Tangail	Nursing academic building	2 storey	6,000 m ²

	Welfare Trust				
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1.7 Scope of the report & Reporting period

16. The scope of this monitoring report is specific for the civil works under SICIP of KWT, NATI, STTLs, EDCs Buildings and TTCs under BMET. The reporting period is July to December 2025.

17. The Semi-Annual Environmental Monitoring Report (EMR) presents the status of sub project implementation, details of compliance with environmental regulations of the Government of Bangladesh and safeguards policies of ADB, details of compliance with environmental loan covenants, details of complaints received and their redressal and the status of compliance with various aspects of EMP as stated in the IEE reports. In this report the performance indicators of environmental works under the proposed civil works of SICIP have been summarized and analyzed to measure the monitoring parameters. This semi-annual environmental monitoring report consists of three main parts: an introduction section, Environmental monitoring, Environmental management and conclusion.

1.8 Package and sub-project wise progress status

18. The Skills for Industry Competitiveness and Innovation Program (SICIP) is being implemented through multiple infrastructure development, institutional strengthening, and skills enhancement interventions under four program outputs. The program includes development of advanced technical training facilities, strengthening of managerial and green innovation capacity, expansion of inclusive skills development opportunities, and enhancement of institutional capacity for skills monitoring and management. Several activities under the program are linked with Disbursement Linked Indicators (DLIs) associated with infrastructure development, technical training, institutional partnerships, and skills management systems.

19. During the reporting period (July–December 2025), implementation activities continued under several SICIP subprojects. Major activities included contractor mobilization, site preparation, foundation and structural construction works, environmental safeguard monitoring, stakeholder consultations, environmental quality monitoring, and occupational health and safety (OHS) supervision.

20. Construction activities were ongoing at STTL Chattogram, NATI Narsingdi, Kumudini Student Dormitory (KWT-Dorm), and Sylhet TTC. Several other subprojects remained at design, procurement, approval, or pre-construction stages during the reporting period.

21. Detailed engineering design works for EWU and IBA were completed, while detailed design preparation for BUTEX remained ongoing. Contracts were awarded for STTL Chattogram, NATI Narsingdi, Kumudini Student Dormitory, Kumudini Academic Building, and Sylhet TTC construction packages. During the reporting period, structural construction activities progressed at the active sites, including foundation works, slab casting, rebar works, and roof shuttering works. Approximately 26.56% construction progress was achieved at the Kumudini Student Dormitory project, while approximately 22% construction progress was achieved at Sylhet TTC.

22. In addition to infrastructure development activities, several institutional and skills development initiatives progressed during the reporting period. Five industry-academia partnership MoUs, including international partnerships, were signed for advanced technical training in emerging and priority sectors. Business plans and partnership arrangements for Executive Development Centers (EDCs) and priority sector training programs were also advanced. Furthermore, training-related data tracking through the Trainee Management System (TMS), including incorporation of sex-disaggregated data and other monitoring indicators, continued during the reporting period.

Implementation Status of package wise Civil Works of SICIP for the reporting period is in Table 1-3.

Table 1-3: Implementation Status of SICIP Civil Works Packages (July–December 2025)

Sl.	Subproject	Procurement Status	Construction Status	Key Activities During Reporting Period
1	STTL Chattogram	Contract Awarded	Ongoing	Structural works, environmental monitoring, OHS supervision
2	NATI Narsingdi	Contract Awarded	Ongoing	Site preparation, foundation works, structural works, safeguard monitoring
3	KWT Dormitory	Contract Awarded	Ongoing	Structural construction, environmental monitoring, OHS supervision
4	Sylhet TTC	Contract Awarded	Ongoing	Earthworks, site safety implementation, foundation works, environmental monitoring
5	KWT Academic Building	Procurement/Approval Stage	Pre-Construction	SCC application submitted to DoE
6	BUTEX	Design Stage	Not Started	IEE preparation ongoing
7	EWU	Design Stage	Not Started	Design finalization ongoing
8	IBA	Design Stage	Not Started	Design finalization ongoing, Preliminary safeguard planning
9	STTL Gazipur	Planning Stage	Not Started	Awaiting for Planning Commission's approval on its DPP
10	Khulna TTC	Planning Stage	Not Started	Preliminary coordination activities,

23.

Overall implementation progress during the reporting period remained satisfactory for the ongoing construction packages. Environmental safeguard monitoring activities were conducted regularly through site inspections, environmental quality monitoring, consultation meetings, OHS supervision, and contractor coordination. No major environmental non-compliance issues were identified during the reporting period.

1.9 Document preparation for IEE/EARF

24. IEEs have been prepared for several SICIP subprojects in accordance with the Environmental Assessment and Review Framework (EARF) and ADB Safeguard Policy Statement (SPS 2009). The IEEs for the Kumudini Student Dormitory (KWT-Dorm) and Sylhet TTC subprojects have been reviewed and approved. The IEEs for STTL Chattogram and NATI Narsingdi have also been prepared and are currently under review/finalization prior to formal disclosure. IEEs for the remaining subprojects are under preparation in line with detailed design and procurement progress.

25. SEMP's were prepared and implemented for the active construction packages of STTL Chattogram and Kumudini Student Dormitory (KWT-Dorm). For several other awarded packages, including NATI Narsingdi and Sylhet TTC, the SEMP review and finalization process remained ongoing during the reporting period. The delay in final approval was primarily associated with phased contractor mobilization, refinement of site-specific construction methodologies, incorporation of updated occupational health and safety (OHS) measures, and adjustment of mitigation measures following initial site assessments and mobilization activities.

26. Nevertheless, contractors implemented relevant environmental mitigation and safety measures during construction activities under supervision of the project implementation and safeguard teams. The concerned contractors were instructed to finalize and submit updated SEMP's incorporating site-specific safeguard requirements for formal review and approval. Safeguard Documentation & Disclosure Status as of December is shown in Table 1-4.

Table 1-4: Safeguard Documentation & Disclosure Status as of December 2025

Sl.	Subproject	IEE Status	IEE Disclosure Status/Date	SEMP Status	SEMP Approval Status	Remarks
1	Kumudini Student Dormitory (KWT-Dorm)	Prepared & Approved	Not yet	Prepared	Approved	Construction ongoing
2	Sylhet TTC	Prepared & Approved		Prepared	Under Review	Construction ongoing
3	STTL Chattogram	Prepared	Under Review/Not Yet Disclosed	Prepared	Approved	Construction ongoing
4	NATI Narsingdi	Prepared	Under Review/Not Yet Disclosed	Prepared	Under Review/Finalization	Construction ongoing
5	Kumudini Academic Building (KWT-A)	Under Preparation	Not Applicable	Prepared	Under Review	Pre-construction stage
6	BUTEX	Under Preparation	Not Applicable	Not Required Yet	Pending	Design stage
7	EWU	Under Preparation	Not Applicable	Not Required Yet	Pending	Design stage
8	IBA	Under Preparation	Not Applicable	Not Required Yet	Pending	Design stage
9	STTL Gazipur	Under Preparation	Not Applicable	Not Required Yet	Pending	Planning stage
10	Khulna TTC	Under Preparation	Not Applicable	Not Required Yet	Pending	Pre-construction stage

1.10 Status on relevant GOB permits

27. All of the civil works under SICIP will be constructed on the premises of the respective institution, and the site clearances are not mandatory for all sites.

28. SICIP requested the Department of Environment (DoE) to issue No Objection Certificates (NOCs) for 10 proposed construction subprojects under the program. In this regard, SICIP conducted unofficial consultation meetings with the DoE concerning the environmental clearance requirements and issuance of NOCs for the proposed construction activities. A total of two unofficial meetings were held with the DoE on this matter during the reporting period.

29. Subsequently, SICIP submitted formal request letters to the DoE dated 11 September 2025 and 19 October 2025 seeking issuance of NOCs for the 10 construction subprojects. In response,

the DoE issued letters dated 24 September 2025 and 1 December 2025. Through its second response letter dated 1 December 2025, the DoE issued NOCs for nine (09) construction subprojects, excluding the Kumudini Nursing Institute (KWT Academic Building) subproject. Copies of the correspondence exchanged between SICIP and the DoE are attached in Annex-16.

30. For the Kumudini Nursing Institute (KWT Academic Building) subproject, the Department of Environment (DoE) instructed SICIP to submit a separate application for Site Clearance Certificate (SCC). Accordingly, the SCC application for the subproject was submitted to the DoE on 26 January 2026, and the application document is attached in Annex-17.

31. The Department of Environment further informed SICIP that construction projects having a built-up area between 5,000 square meters and 20,000 square meters fall under the Orange Category in accordance with Schedule-1 of the Environment Conservation Rules (ECR), 2023 and therefore require Environmental Clearance Certificate (ECC) following issuance of Site Clearance Certificate (SCC). The status of GoB permit is presented below.

Table 1-5: Status of GOB permits

SI	Subproject	Permit/ Clearance Type	Application Date	Approval Status	Approval/ Issuance Date	Validity Period	Remarks
1	Kumudini Student Dormitory (KWT-Dorm)	DoE NOC	11 Sep 2025 / 19 Oct 2025	Issued	1 Dec 2025	Not Applicable	NOC issued by DoE
2	Sylhet TTC	DoE NOC	11 Sep 2025 / 19 Oct 2025	Issued	1 Dec 2025	Not Applicable	NOC issued by DoE
3	STTL Chattogram	DoE NOC	11 Sep 2025 / 19 Oct 2025	Issued	1 Dec 2025	Not Applicable	NOC issued by DoE
4	NATI Narsingdi	DoE NOC	11 Sep 2025 / 19 Oct 2025	Issued	1 Dec 2025	Not Applicable	NOC issued by DoE
5	Kumudini Academic Building (KWT-A)	SCC	26 Jan 2026	Under process	Pending	Pending	SCC application submitted to DoE
6	BUTEX EDC Building	DoE NOC	11 Sep 2025 / 19 Oct 2025	Issued	1 Dec 2025	Not Applicable	NOC issued by DoE
7	EWU	DoE NOC	11 Sep 2025 / 19 Oct 2025	Issued	1 Dec 2025	Not Applicable	NOC issued by DoE
8	IBA EDC Building	DoE NOC	11 Sep 2025 / 19 Oct 2025	Issued	1 Dec 2025	Not Applicable	NOC issued by DoE
9	STTL Gazipur	DoE NOC	11 Sep 2025 / 19 Oct 2025	Issued	1 Dec 2025	Not Applicable	NOC issued by DoE
10	Khulna TTC	DoE NOC	11 Sep 2025 / 19 Oct 2025	Issued	1 Dec 2025	Not Applicable	NOC issued by DoE
11	IBA EDC Building	CAAB NOC	Not Required	Not Applicable	Not Applicable	Not Applicable	Building height below applicable threshold

12	BUTEX EDC Building	CAAB NOC	Not Required	Not Applicable	Not Applicable	Not Applicable	Building height below applicable threshold
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32. As part of the infrastructure development activities under SICIP, Executive Development Center (EDC) buildings are proposed at the Institute of Business Administration (IBA), University of Dhaka, and Bangladesh University of Textiles (BUTEX). The initially proposed EDC building at IBA was planned as an 11-storey structure; however, the design has subsequently been revised to a G+9 (10-storey) building with a maximum height of approximately 100 feet. Similarly, although the foundation design for the BUTEX EDC building has considered a future 12-storey structure, the current construction plan includes only a G+5 (6-storey) building with a maximum height of approximately 60 feet.

33. Based on the revised building heights and current construction configurations, obtaining a No Objection Certificate (NOC) from the Civil Aviation Authority of Bangladesh (CAAB) is not required for these proposed buildings under the applicable regulatory provisions. The revised EMR has been updated accordingly.

1.11 Implementation and Safeguard Integration of SICIP Civil Works

34. Environmental safeguard requirements under the SICIP subprojects were integrated into the implementation of ongoing civil works activities during the reporting period. Environmental Management Plan (EMP) provisions and safeguard obligations were incorporated into the bidding documents and construction contracts to ensure compliance with applicable environmental regulations, the Asian Development Bank (ADB) Safeguard Policy Statement (SPS 2009), and project safeguard requirements. In line with ADB requirements for transparency, the contracted EMP budgets for the four subprojects currently under construction are summarized below.

Table 1-6: EMP budget for four under construction sites

Sl.	Sub project Name	Contracted EMP Budget (BDT)
1	STTL, Chattogram	3,050,000.566
2	KWT, Dormitory, Tangail	2,540,000.074
3	NATI, Narsingdi	2475000.172
4	Sylhet TTC	1002737.397

35. The contractors were responsible for implementing site-specific environmental mitigation measures, occupational health and safety (OHS) provisions, waste management measures, dust and noise control measures, construction site safety arrangements, and community health and safety measures during construction activities. Safeguard supervision and monitoring activities were carried out regularly by the project implementation and supervision teams through site inspections, consultation meetings, environmental quality monitoring, and review of contractor compliance status.

36. Environmental safeguard monitoring conducted during the reporting period included monitoring of air quality, noise levels, occupational health and safety practices, implementation of mitigation measures, site housekeeping conditions, construction waste management practices, and community safety arrangements at the active construction sites.

37. Detailed qualitative and quantitative environmental monitoring results are presented in the subsequent sections of this Environmental Monitoring Report (EMR).

1.12 Preparation of monitoring checklist

38. The monitoring check lists for EHS status, pollution status, grievance status, labour shed status, worksite traffic and accidents status etc. have been developed based on the following Monitoring parameters as described in the IEE.

Table 1-7: Site Specific Environmental Monitoring Parameters to be monitored during Construction phase

Item	Parameters	Location
Ambient Air Quality	PM _{2.5} , PM ₁₀ , SO ₂ , CO, NO ₂	Around the project site
Groundwater	pH, TDS, EC, DO, BOD ₅ , COD, Chloride, SS, As, Fe, Total-N, Total-P, Total coliform, turbidity, temperature	At the project site
Surface water quality	pH, BOD ₅ , COD, DO, SS, total coliform, Total P, Total N, turbidity	Around the project site
Noise Level	Noise at different locations and to nearest receptors	Around the project site and nearest receptors
Health	Health status of the workers, visual observation and record check	At site

1.13 Training and Capacity Building Activities

39. During the reporting period, environmental awareness and occupational health and safety (OHS) trainings were conducted at the active construction sites under SICIP to improve workers' understanding of environmental safeguard requirements and safe construction practices. The trainings mainly targeted contractor personnel, site engineers, supervisors, and construction workers engaged in the STTL Chattogram, Kumudini Dormitory, NATI, and Sylhet TTC subprojects. The training sessions covered implementation of the Environmental Management Plan (EMP), occupational health and safety requirements, proper use of personal protective equipment (PPE), waste management and housekeeping practices, emergency response and first aid awareness, as well as site cleanliness and hazard prevention measures. These trainings were conducted to strengthen environmental compliance, improve occupational safety awareness, and enhance implementation of mitigation measures at the construction sites. A total of eight (08) training sessions were conducted during July–December 2025 with participation of approximately 139 personnel from different project sites. Details of the trainings conducted during the reporting period are presented in Table 1-8.

Table 1-8: Details of Training conducted during the reporting period July-December 2025

Sl.	Package	Training title	Date and Venue	No. of Participant		
				Male	Female	Total
1	Construction of Smart Textile Living Lab (STTL) at Chittagong Textile Engineering College	Training on Environmental Awareness Program	Date: 02/12/2025 Project Site, STTL, Chittagong	41	0	41
2	Construction of Student Dormitory Building in Kumudini Welfare Trust	Training on Environmental Awareness Program	Date: 25/07/2025 Project, Kumudini Welfare Trust, Tangail	14	0	14
3	Construction of Student Dormitory Building in Kumudini Welfare Trust	Training on Environmental Awareness Program	Date: 21/08/2025 Project, Kumudini Welfare Trust, Tangail	14	0	14
4	Construction of Student Dormitory Building in Kumudini Welfare Trust	Training on Environmental Awareness Program	Date: 18/11/2025 Project, Kumudini Welfare Trust, Tangail	14	0	14
5	Construction and Renovation of Narsingdi Automotive Training Institute	Safety Education	Date: 10/11/2025 Narsingdi Polytechnic Institute, Narsingdi	12	0	12
6	Construction and Renovation of Narsingdi Automotive Training Institute	Environmental Awareness	Date: 08/12/2025 Narsingdi Polytechnic Institute, Narsingdi	14	0	14
7	Renovation and Construction in Sylhet TTC	Environmental Awareness and Safety Education	Date: 02/11/2025 Sylhet TTC	15	0	15
8	Renovation and Construction in Sylhet TTC	Environmental Awareness and Safety Education	Date: 01/12/2025 Sylhet TTC	15	0	15

1.14 Grievance Redress Mechanism (GRM)

40. The Grievance Redress Mechanism (GRM) has been established to address and resolve concerns, complaints, and grievances related to the environmental and social performance of the subprojects. During the reporting period, two-tier GRM committees remained functional at both program and site levels for the ongoing construction activities under SICIP. Two tiers of GRM Committees have been constituted and formally notified through Office Order No. FD/SICIP/GRM/103/2024-2141 (refer to Annex-3). These committees are mandated to function

across Public Training Institutes (PTIs), Industry Associations (IAs), and Non-Government Organizations (NGOs), covering both training and construction-related activities. It is noted that five full GRM Sub-Committees have been formed and remained fully operational during the reporting period. The list of committee members are provided in Annex-4.

41. Complaint boxes were installed at the active construction sites including STTL Chattogram, Kumudini Dormitory, NATI, and Sylhet TTC to facilitate submission of complaints and suggestions by workers, local residents, and other stakeholders. Community consultation and awareness meetings were also conducted during July–December 2025 to inform local communities and workers about project activities, environmental safeguard measures, occupational health and safety provisions, and grievance submission procedures. The consultations involved participation of local community representatives, contractors, workers, site engineers, and project officials. No grievances or complaints were officially recorded during the reporting period. Photographs, attendance sheets, and GRM awareness activities are attached in the Annexes for reference.

Table 1-9: Layer 1 - Program-Level GRM Committee

Sl.	Designation	Position in Committee
1	Deputy Executive Program Director (PM-2), SICIP	Convenor
2	Internal Control Specialist, SICIP	Member
3	Concerned Assistant Executive Program Director, SICIP	Member
4	Gender Specialist, SICIP	Member
5	Md. Shahin-Uz-Zaman, Program Officer (QA), SICIP (for Training), Mobile No: 01700706492	Member
6	Md. Sultan Al Maruf, Program Officer (QA), SICIP (for Construction), Mobile No: 01700706488	Member
7	Assistant Executive Program Director (PM-1), SICIP	Member Secretary

Table 1-10: Layer 2 - GRM Sub-Committee

Layer 2: Site-Level GRM Sub-Committee for Training Activities		
Sl.	Designation	Position in Committee
1.	Center In-Charge/Principal	Convenor
2.	SEC Representative (if found available)	Member
3.	A trainer nominated by PIU	Member Secretary
Layer 2: Site-Level GRM Sub-Committee for Construction Activities		
Sl	Designation	Position in Committee
1	Local Focal Person/Director/Appropriate Representative	Convenor
2	Contractor's Representative	Member
3	SEC Representative (if found available)	Member
4	Site Engineer, SICIP	Member Secretary

Table 1-11: GRM Register Form

Sub project	Complaint Number	Date	Complaint through (phone/letter/site)	Name of Complainer	Complaint Details	Action Taken by Contractor/PMU/CSC	Date- case resolved (days required)	Remarks- further action, if any

	Subproject/work-package Name:							
STTL in textile college in Chattogram (102)	No complaints	-	-	-	-	-	-	-
Kumudini dormitory (201)	No complaints	-	-	-	-	-	-	-

1.15 Stakeholder Consultation and Community Engagement

42. Stakeholder consultation and community engagement activities were conducted during the reporting period (July–December 2025) at different project locations under SICIP to disseminate project information, discuss environmental and safety issues, and obtain feedback from local stakeholders and institutional representatives.

43. The consultations included participation from representatives of project authorities, contractors, local communities, teachers, students, workers, and nearby residents. Key discussions focused on construction impacts, occupational health and safety, dust and noise control, traffic management, grievance redress mechanism (GRM), and construction scheduling. The consultations also aimed to enhance stakeholder awareness regarding environmental safeguards, site safety measures, and complaint handling procedures under the project. A summary of the stakeholder consultation meetings conducted during the reporting period is presented below.

Table 1-12: Summary of Stakeholder Consultation Meetings during July–December

Sl. No.	Project Site	Date	Participants	Key Issues Raised	Response / Action Taken
1	NATI, Narsingdi	10 November 2025	Institute representatives, contractor staff, workers, local stakeholders	Dust generation, worker safety, traffic movement during material transportation	Water spraying increased; PPE enforcement strengthened; traffic movement instructed during off-peak hours
2	Kumudini Welfare Trust (KWT), Tangail	18 November 2025	KWT authority, contractor representatives, local community members	Noise during construction, worker accommodation management, waste disposal	Noise-generating work restricted to daytime; waste bins installed; labor shed cleanliness improved
3	Sylhet TTC	02 December 2025	TTC authority, contractor staff, workers, local participants	Site safety, drainage congestion during rainfall, public access control	Temporary drainage maintained; safety signage and barricading improved
4	STTL, Chattogram	02 December 2025	College authority, contractor representatives, workers	Dust suppression, PPE usage, construction material storage	Regular water spraying conducted; PPE compliance monitored; designated material storage areas maintained

Outcome of Consultations

44. Overall, stakeholders expressed support for the ongoing construction activities under SICIP. Most concerns raised during the consultations were related to temporary construction impacts such as dust, noise, worker safety, and traffic management. The contractors and project management

teams responded positively and implemented mitigation measures in accordance with the approved Environmental Management Plans (EMPs).

45. No major grievances or objections regarding project implementation were recorded during the reporting period.

1.16 Implementation Status of ADB Mission Recommendations

46. During the reporting period, SICIP continued to implement the environmental safeguard-related recommendations provided by ADB review and monitoring missions. Corrective measures recommended through mission discussions and Aide Memoire were communicated to contractors and relevant project personnel for implementation and follow-up monitoring. The implementation status of the key recommendations is summarized below.

Table 1-13: Implementation Status of ADB Mission Recommendations during July–December 2025

Sl. No.	Recommended Corrective Measures	Corrective Action Taken	Responsibility	Compliance Status	Further Action Required
1	Strengthen implementation of Occupational Health and Safety (OHS) measures at construction sites	PPE usage monitoring increased; toolbox meetings conducted regularly; first aid facilities maintained at sites	Contractors and SDCMU	Complied	Continued regular monitoring
2	Ensure preparation and implementation of Site Environmental Management Plans (SEMPs/CEMPs) before commencement of construction activities	SEMP prepared for STTL and KWT Dormitory; preparation ongoing for NATI and Sylhet TTC	Contractors and Environmental Specialist	Partially Complied	Expedite review and approval of pending SEMPs
3	Conduct regular environmental quality monitoring as per EMP requirements	Air, water, and noise monitoring conducted during reporting period at active construction sites	Environmental Specialist and Contractors	Partially Complied	Monitoring frequency to be strengthened in next reporting period
4	Improve documentation of consultation meetings and safeguard records	Consultation records, attendance sheets, and photographs maintained and annexed in EMR	SDCMU and Site Teams	Complied	Continue periodic consultations

5	Strengthen grievance redress and community awareness mechanisms	Site-level GRM committees formed and contact information displayed at sites	SDCMU and Contractors	Complied	Continue awareness activities
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SICIP will continue periodic follow-up of safeguard-related recommendations through site inspections, contractor coordination meetings, and semi-annual environmental monitoring activities.

1.17 Environmental Quality Test

47. Environmental quality monitoring were conducted at the construction sites to assess and verify the prevailing environmental conditions within the project areas. The purpose of these assessments is to support informed decision-making by evaluating potential environmental impacts and their effects on the surrounding communities as well as site personnel.

48. In this regard, air quality monitoring, noise level measurements, and water quality testing were carried out at the construction sites to ensure compliance with applicable environmental standards and regulatory requirements.

Air Quality:

49. Air quality monitoring was conducted at the active construction sites during the reporting period in accordance with the environmental monitoring requirements specified in the approved EMPs. The monitoring schedule and frequency varied depending on the specific requirements of each subproject. For the Kumudini Dormitory subproject, semi-annual air quality monitoring was required under the approved EMP, and one monitoring event was completed during December 2025 in compliance with the monitoring requirement.

50. For the STTL Chattogram subproject, the approved EMP requires quarterly environmental quality monitoring. During the reporting period, one air quality monitoring event was conducted in December 2025. The required quarterly monitoring frequency could not be fully achieved during the reporting period due to delayed mobilization of environmental monitoring activities and associated logistical arrangements. Necessary corrective measures and monitoring plans have been initiated to ensure compliance with the quarterly monitoring schedule during the next reporting period.

51. For the NATI, Narsingdi subproject, quarterly monitoring is required under the approved EMP. During the reporting period, air quality monitoring was conducted two times in September 2025 and November 2025, while the monitoring conducted in June 2025 was considered as baseline environmental monitoring prior to the reporting period.

52. At Sylhet TTC, one air quality monitoring event was conducted in November 2025 following commencement of construction activities. The monitoring results for Sylhet TTC have been considered as baseline environmental monitoring data for future comparison during subsequent monitoring periods.

53. The monitoring results indicate that all measured air quality parameters at the monitored subproject locations remained within the applicable standards of the Department of Environment (DoE), Government of Bangladesh, as well as relevant IFC EHS Guideline limits during the reporting period.

54. Ambient air quality monitoring was conducted at STTL Chattogram, Kumudini Dormitory,

Sylhet TTC, and NATI, Narsingdi during the reporting period. Air quality sampling was conducted on 24 November 2025 at Sylhet TTC, 27 December 2025 at STTL Chattogram, and 28 December 2025 at Kumudini Dormitory, Tangail. In the NATI subproject, monitoring was conducted on 03 September 2025 and 11 November 2025, while the monitoring conducted on 02 June 2025 was treated as baseline monitoring prior to the reporting period. Air quality sampling was conducted at one (01) monitoring location each at STTL and Kumudini sites and at two (02) locations at Sylhet TTC.

55. The monitoring program included measurement of parameters such as PM_{2.5}, PM₁₀, SO₂, NO₂, and CO in accordance with the approved environmental monitoring requirements. At the Sylhet TTC site, additional parameters including SPM, CO₂, and O₃ were also monitored as part of baseline environmental monitoring. Monitoring activities were carried out using portable air quality monitoring equipment including the OCEANUS AQM-09 Air Quality Monitoring Station and Respirable Dust Sampler Model APM860. Relevant information on the equipment used, monitoring locations, and monitoring dates has been incorporated in the revised EMR.

56. The portable OCEANUS AQM-09 Air Quality Monitoring Station shown in Figure 2 (a) was used to collect, measure and document critical pollutants including PM₁₀, PM_{2.5}, NO_x, & SO_x. Air quality data was measured by the Oceanus AQM-09 Machine automatically per minute and directly recorded onsite for measured parameters (PM₁₀, PM_{2.5}, NO_x, & SO_x). Continuously, automatically and real-time monitoring methods were used for particulate matters (PM₁₀, PM_{2.5}), and gaseous particles (NO_x, & SO_x) respectively.

57. Particulate Matters (PM₁₀, and PM_{2.5}), and gaseous parameters (NO_x, & SO_x), were monitored for 8 hours. Therefore, 24 data for each three subproject locations were collected manually by the monitoring team through 20 minutes' interval for the parameters such as PM₁₀, PM_{2.5}, NO_x, & SO_x. Data were analyzed following the descriptive statistical method using MS Excel. After analyzing the data, the results were compared with up-to-date DOE Standard (APCR 2022) and IFC EHS Guidelines April 30, 2007 for ambient air quality.

58. In NATI Narsingdi subproject, air quality samplings were conducted in 02 June, 03 September and 11 November 2025 in the reporting period. The first study dated 02 June 2025 will be accounted as baseline study. In all studies, samplings were done for PM₁₀, PM_{2.5}, SPM, NO₂, SO₂ and CO parameters. In this subproject, Respirable Dust Sampler Model APM860 was used to collect, measure and document critical pollutants including PM₁₀, PM_{2.5}, SPM, NO₂, SO₂ and CO. The equipment Respirable Dust Sampler Model APM860 is shown in Figure 2 (b).

59. The ambient air quality monitoring conducted during the reporting period primarily represented indicative construction-phase and baseline environmental monitoring using portable real-time monitoring equipment. PM_{2.5}, PM₁₀, gaseous pollutants, and related parameters were monitored over approximately 8-hour monitoring periods with interval-based recordings. Therefore, the monitoring results should be interpreted as indicative short-term monitoring data rather than direct 24-hour compliance monitoring results. The revised EMR acknowledges that national ambient air quality standards and WHO/IFC reference standards for particulate matter are generally based on 24-hour averaging periods. Accordingly, the monitoring results have been interpreted considering the limitations associated with short-duration monitoring and portable real-time monitoring methods. Data generated from the monitoring equipment were recorded automatically at specified intervals and subsequently analyzed using descriptive statistical methods. The monitoring results were compared with the applicable Bangladesh Department of Environment (DoE) standards and relevant IFC EHS Guidelines (April 30, 2007) for indicative assessment of ambient air quality conditions at the project sites.

60. Photographic evidence of the monitoring activities, including monitoring equipment setup and sampling locations, is presented in Figure 3. The monitoring activities were conducted to establish baseline and construction-phase environmental conditions and to support assessment of potential air quality impacts associated with ongoing construction works. The monitoring results indicate that the measured concentrations of PM_{2.5}, PM₁₀, SO₂, NO₂, CO, and other monitored parameters generally remained within the applicable reference limits and baseline ranges during the monitoring events conducted at the project sites. Details of the ambient air quality monitoring results are presented in Table 1-14.



Figure 2 (a): Ambient Air Quality Monitoring Equipment (OCENAUS: AQM-09)



Figure 2 (b): Ambient Air Quality Monitoring Equipment (Respirable Dust Sampler Model APM860)

Figure 2: Ambient Air Quality Monitoring Equipment



Photo: STTL, Chittagong, Date: 27 Dec 2025



Photo: KWT, Tangail, Date: 28 Dec 2025



Photo: AAQM1, Sylhet TTC, Date 24 Nov 2025



Photo: AAQM2, Sylhet TTC, Date 24 Nov 2025



Photo: NATI, Narsingdi Date 02 Jun 2025



Photo: NATI, Narsingdi Date 03 Sep 2025



Photo: NATI, Narsingdi Date 11 Nov 2025

Figure 3: Photos of the Air Quality Monitoring

Table 1-14: Test Result of Ambient Air Quality Monitoring

Parameter	National Standard	IFC EHS Standard 2007	STTL(CTG) (Baseline)	STTL(CTG) (Dec 2025)	KWT Dormitory (Baseline)	KWT Dormitory (Dec 2025)	Remarks
PM _{2.5}	65(µg/m ³)	25	25.25	21.18	23.96	13.87	Satisfactory(good)
PM ₁₀	150(µg/m ³)	50	44.31	34.93	36.23	29.52	Satisfactory(good)
SO _x	80(µg/m ³)	20	14.73	12.81	9.81	8.99	Satisfactory(good)
NO _x	80(µg/m ³)	200	16.85	11.77	15.22	11.76	Satisfactory(good)

Parameter	National Standard	IFC EHS Standard 2007	Sylhet TTC AAQM1	Sylhet TTC AAQM2	Remarks
PM _{2.5}	65(µg/m ³)	25	18.31	19.55	Satisfactory(good)
PM ₁₀	150(µg/m ³)	50	48.63	43.41	Satisfactory(good)
SO _x	80(µg/m ³)	20	12.14	11.68	Satisfactory(good)
NO _x	80(µg/m ³)	200	17.13	19.81	Satisfactory(good)
SPM	NYS (µg/m ³)	NYS	74.87	77.52	
CO	5(mg/m ³)	NYS	0.39	0.41	Satisfactory(good)
CO ₂	NYS(mg/m ³)	NYS	213.76	209.45	
O ₃	100(µg/m ³)	100	4.16	5.45	Satisfactory(good)

Parameter	National Standard	IFC EHS Standard 2007	NATI June 2025	NATI Sep 2025	NATI Nov 2025	Remarks
PM _{2.5}	65(µg/m ³)	25	36	30	46	Satisfactory(good)
PM ₁₀	150(µg/m ³)	50	68	60	72	Satisfactory(good)
SO ₂	80(µg/m ³)	20	7.55	6.85	6.85	Satisfactory(good)
NO ₂	80(µg/m ³)	200	12.45	14.25	11.65	Satisfactory(good)
SPM	NYS (µg/m ³)	NYS	135	129	155	
CO	5(mg/m ³)	NYS	0.73	0.67	0.89	Satisfactory(good)

Water quality:

61. Groundwater and surface water quality monitoring were conducted at the active construction sites during the reporting period in accordance with the environmental monitoring requirements specified in the approved EMPs. The monitoring schedule and frequency varied depending on the approved monitoring requirements for each subproject. Monitoring activities were carried out to assess baseline and construction-phase water quality conditions and to identify any potential

impacts associated with ongoing construction works.

- Water quality monitoring for the Kumudini Dormitory subproject was conducted once during the reporting period (December 2025), which is consistent with the approved semi-annual monitoring requirement under the EMP.
- Water quality monitoring for STTL Chattogram was conducted once during the reporting period (December 2025). Although quarterly monitoring is required under the approved EMP, the required monitoring frequency was not fully achieved during the reporting period due to delayed mobilization of environmental monitoring activities and procurement arrangements. Corrective measures have been initiated to ensure full compliance with the quarterly monitoring schedule in the next reporting period.
- Water quality monitoring for NATI, Narsingdi was conducted two times during the reporting period (September and November 2025), while the June 2025 monitoring event has been considered as baseline monitoring conducted prior to the reporting period.
- Water quality monitoring for Sylhet TTC was conducted once during the reporting period as part of baseline environmental monitoring following commencement of site activities.

62. Groundwater quality monitoring included analysis of parameters such as As, Fe, Mn, Nitrate, pH, TDS, Total Coliform, Fecal Coliform, Ammonia and Phosphate for environmental monitoring requirements. Surface water quality monitoring included analysis of parameters such as Ammonia, As, BOD, COD, DO, Fe, Mn, Nitrate, pH, TDS and TSS. Water samples were collected from designated monitoring locations near the project sites and analyzed at laboratory facilities using standard analytical procedures and monitoring methods.

Methodology of Groundwater Sampling Including Parameters as per ECR 2023

63. A total of one (01) groundwater sample were taken from the KWT project corridor on 28.12.2025. From STTL, Chattogram, a total of one (01) groundwater sample were taken from the project corridor on 27.12.2025. A total of one (01) groundwater sample were taken from Sylhet TTC project area dated on 10.12.2025. The sample analysis of Sylhet TTC will be counted as baseline data. In total three (03) ground water samples were taken from NATI project area dated 02.06.2025, 03.09.2025 and 11.11.2025. The first sample analysis of NATI project area dated 02.06.2025 will be accounted as baseline data. Samples were collected following standard procedures and guidelines, including those set out by the American Public Health Association (APHA), which recommend that groundwater samples be taken in clean, non-contaminated, well-sealed containers and tested within 48 hours at an accredited laboratory.

Sampling Procedure:

1. Container Selection: High-Density Polyethylene (HDPE) bottles were selected for their chemical resistance and suitability for water sample preservation.

2. Cleaning and Sterilization: Bottles were initially cleaned using laboratory-grade detergent and rinsed with deionized water. For microbiological analysis, bottles were sterilized by autoclaving to ensure no microbial contamination.

3. Labeling: Each bottle was clearly labeled with a unique Sample ID and sampling location to maintain traceability.

4. Collection & Preservation: Groundwater samples were collected directly from the

bore/submersible well, avoiding contact with external contaminants. The bottles were immediately sealed after collection.

5. Storage & Transport: Samples were placed in a dark, insulated ice cooler immediately after collection to preserve sample integrity. Transport to the laboratories was done within a few hours, ensuring the analysis occurred within 48 hours, in compliance with APHA standards.

6. Laboratory Analysis: Samples were submitted to the BEETLSL – ISO/IEC 17025:2017 accredited laboratory.

The test results were compared against national standards [ECR 2023, Schedule 2(B)] and international guidelines, particularly the World Health Organization (WHO) Drinking Water Standards, 2024. The analysis methods of different parameters of groundwater are given in the following Table 15.

Table 1-15: Methods of Ground Water Quality Monitoring

Sl	Parameter	Unit	Analysis Method	Referred Laboratory	*Bangladesh Standard ECR 2023, Schedule-2 (B)	WHO STANDARD 2024
1	Arsenic (As)	mg/L	AAS	DPHE	0.05	0.01
2	Total Dissolve Solid (TDS)	mg/L	Multimeter	BEETLSL/ DPHE	1000	NYS
3	Coliform (Fecal)	CFU/100ml	MFM	BEETLSL	0	0
4	Coliform (Total)	CFU/100ml	MFM	BEETLSL/ DPHE	0	0
5	Iron (Fe)	mg/L	AAS	DPHE	0.3-1	NYS
6	Manganese (Mn)	mg/L	AAS	DPHE	0.4	0.08
7	pH	-	pH meter	DPHE	6.5-8.5	6.5-8.5
8	Ammonia	mg/L	UVS	DPHE	1.5	NYS
9	Nitrate	mg/L	UVS	DPHE	45	50
10	Phosphate	mg/L	UVS	DPHE	NYS	NYS

*The Environment Conservation Rules (ECR) 2023, Schedule-2 (B) Standard for Safe Drinking Water

* NYS = Not Yet Set

* BEETLSL= Bangladesh Environmental Engineering Training and Laboratory Services Ltd.

Methodology of Surface Water Sampling Including Parameters as per ECR 2023

64. A total of one (01) surface water sample were taken from the KWT project corridor on 28.12.2025. From STTL, Chattogram, a total of one (01) surface water sample were taken from the project corridor on 27.12.2025. A total of one (01) surface water sample were taken from Sylhet TTC project area dated on 10.12.2025. The sample analysis of Sylhet TTC will be counted as baseline data. In total three (03) surface water samples were taken from NATI project area dated 02.06.2025, 03.09.2025 and 11.11.2025. The first sample analysis of NATI project area dated 02.06.2025 will be accounted as baseline data. Samples were collected from the center of the water body approximately 0.5m below the water surface, following standard procedures for container preparation, and sample collection, storage, preservation, and transport. Surface water sampling was conducted in accordance with the APHA Standard Methods for the Examination of

Water and Schedule-2A (1) of the Environmental Conservation Rules (ECR) 2023. Therefore, the APHA Standard Methods for the Examination of Water were followed, particularly the guideline that water samples should be collected in clean, non-contaminated, well-sealed containers and tested within 48 hours at an accredited laboratory.

Sampling Procedure:

1. **Containers:** A 5-litre pre-washed plastic can and a 1-litre sterilized PET bottle were used for sample collection.
 2. **Sterilization:** PET bottles were sterilized either by autoclaving or with 70% ethanol, then air dried before use.
 3. **Rinsing:** All containers were rinsed with the source water prior to final sample collection to avoid contamination.
 4. **Grab Sampling:** Samples were collected using the grab sampling technique from the center of the pond, approximately 0.5 meters below the surface.
 5. **Labeling & Preservation:** Collected samples were immediately labeled, sealed, stored in iceboxes, and preserved as per APHA guidelines.
 6. **Transport:** Samples were transported to the laboratory in clean, non-contaminated, and well sealed containers, ensuring testing occurred within 48 hours of collection.
 7. **Laboratory Analysis:** All analyses were conducted at the Government Laboratory (DPHE) and an ISO/IEC 17025:2017 accredited laboratory (BEETLSL), following standard methods.
65. After the laboratory analysis, surface water results have been compared with the national standards [ECR-2023, schedule-2A (1), cat d & cat f], as the project could be considered as a fish farming and agricultural zone. The name of the water quality parameters and their determination methods, and national standards are given in Table 16.

Table 1-16: Methods of Surface Water Quality Monitoring

Sl	Parameters	Analysis Method	Referred Laboratory	Unit	*Bangladesh Standard ECR 2023, Schedule-2 (A)		IFC EHS Guidelines APR 30 2007
					d	f	
1	Ammonia	UVS	DPHE	mg/L	NYS	NYS	NYS
2	Biochemical Oxygen Demand (BOD)	5 days Incubation with 20° C	DPHE	mg/L	6 or less	12 or less	30
3	Chemical Oxygen Demand (COD)	CRM	DPHE	mg/L	50	100	125
4	Coliform (Total)	MFM	BEETLSL/ DPHE	CFU/100 ml	≤5,000	≤50,000	400a

Sl	Parameters	Analysis Method	Referred Laboratory	Unit	*Bangladesh Standard ECR 2023, Schedule-2 (A)		IFC EHS Guidelines APR 30 2007
					d	f	
							(MPNb /100ml)
5	Dissolved Oxygen (DO)	Multimeter	DPHE	mg/L	5 or more	NYS	NYS
6	pH	pH meter	DPHE	-	6-9	6.5-8.5	6.0-9.0
7	Total Dissolved Solid (TDS)	Multimeter	DPHE	mg/L	1000	1000	NYS
8	Total Suspended Solid (TSS)	Gravimetric Method	DPHE	mg/L	NYS	NYS	NYS
9	Turbidity	Turbidity meter	DPHE	NTU	NYS	NYS	NYS
10	Nitrate	UVS	DPHE	mg/L	7	5	NYS
11	Phosphate	UVS	DPHE	mg/L	0.5	2	NYS
12	As	AAS	DPHE	mg/L	NYS	NYS	NYS
13	Fe	AAS	DPHE	mg/L	NYS	NYS	NYS
14	Mn	AAS	DPHE	mg/L	NYS	NYS	NYS
15	Total P	UVS	BEETLSL	mg/L	NYS	NYS	NYS
16	Total N	UVS	BEETLSL	mg/L	NYS	NYS	NYS

*N. D= Not Detected, bMPN=Most Probable Number

*The Environment Conservation Rules (ECR) 2023, Schedule-2 (A) Standard for Inland Surface Water (d & f)

d. Water usable by fisheries

f. Water usable for irrigation

*NYS = Not Yet Set, BEETLSL= Bangladesh Environmental Engineering Training and Laboratory Services Ltd.

The monitoring results were compared with the applicable standards of the Department of Environment (DoE), Government of Bangladesh, and relevant international reference standards including IFC EHS Guidelines and WHO standards where applicable. The analysis indicates that most monitored groundwater and surface water quality parameters remained within the applicable permissible limits during the reporting period. No significant deterioration of water quality attributable to construction activities was observed at the monitored locations. In a few monitoring locations, minor variations in certain parameters were observed; however, the values generally remained within acceptable ranges and were considered consistent with existing baseline environmental conditions of the surrounding areas. No major exceedances requiring immediate corrective action were identified during the reporting period. Construction contractors were nevertheless instructed to continue implementation of mitigation measures including proper waste management, control of wastewater discharge, housekeeping practices, and prevention of contamination from construction materials and fuel storage areas. Photos of water quality monitoring (both groundwater and surface water) is shown in Figure 4. The detailed monitoring results for groundwater and surface water quality are presented in Table 1-17 and Table 1-18 respectively.

 Dec 27, 2025 11:40:40 22.86106146N 91.523973E 307° Project Road, Zorarganj Project F Zorarganj Chittagong Dis Chittagong Divi Altitude:-45.8m Speed:0.0km/h	 Dec 27, 2025 3:41:32 22.86135243N 91.523132E Project Road, Zorarganj Project F Zorarganj Chittagong Dis Chittagong Divi Altitude:-51.4m Speed:0.0km/h
Photo (a1): Groundwater Sampling, GW-1, STTL, inside Project Site, STTL, Chittagong (22.86109572N, 91.52393008E)	Photo (a2): Surface water Sampling, SW-1, STTL, near Project Site Pond, STTL, Chittagong (22.86162598N, 91.52293432E)
 Dec 28, 2025 10:52:12 AM 24.099697N 90.090816E 218° SW Mirzapur Tangail District Dhaka Division Altitude:-40.5msnm Speed:0.0km/h	 Dec 28, 2025 10:56:14 AM 24.099794N 90.091751E 359° N Mirzapur Tangail District Dhaka Division Altitude:-29.6msnm Speed:3.0km/h
Photo (b1): Groundwater Sampling, GW-1, inside Project Site, KWT, Tangail (24.099679N 90.090816E)	Photo (b2): Surface water Sampling, SW-1, near Project Site, KWT, Tangail (24.099794N 90.091751E)
	

Photo (c1): Groundwater Sampling, GW-1, inside Project Site, Sylhet TTC



Photo (c2): Drinking water Sampling, DW-1, in front of Site Office, Sylhet TTC



Photo (d1): Groundwater Sampling, GW-1, inside Project Site, NATI (Date: 02.06.2025)



Photo (d2): Surface water Sampling, SW-1, near Project Site, NATI (Date: 02.06.2025)



Photo (e1): Groundwater Sampling, GW-1, inside Project Site, NATI (Date: 03.09.2025)



Photo (e2): Surface water Sampling, SW-1, near Project Site, NATI (Date: 03.09.2025)



Photo (f1): Groundwater Sampling, GW-1, inside Project Site, NATI (Date: 11.11.2025)

Photo (f2): Surface water Sampling, SW-1, near Project Site, NATI (Date: 11.11.2025)

Figure 4: Photos of water quality monitoring

Table 1-17: Test Result of Water Quality Monitoring (Ground water)

Parameter	National Standard	WHO Standard' 2024	STTL(CTG) (Baseline)	STTL(CTG) (Dec 2025)	KWT Dormitory (Baseline)	KWT Dormitory (Dec 2025)	Remarks
Arsenic	0.05mg/l	0.01 mg/l	0.006 mg/l	0.006 mg/l	0.006 mg/l	0.007 mg/l	Meets the standard (Safe)
Iron	0.3-1 mg/l	NYS	0.35 mg/l	0.88 mg/l	0.07 mg/l	0.30 mg/l	Meets the standard (Safe)
Manganese	0.1 mg/l	0.08 mg/l	0.03 mg/l	0.39 mg/l	0.1 mg/l	0.71 mg/l	Meets the standard (Safe)
Nitrate	10.0 mg/l	50 mg/l	1.3 mg/l	2.1 mg/l	1.1 mg/l	1.7 mg/l	Meets the standard (Safe)
PH	6.5-8.5	6.5-8.5	7.3	7.8	7.7	7.9	Meets the standard (Safe)
TDS	1000 mg/l	NYS	172 mg/l	180 mg/l	220 mg/l	220 mg/l	Meets the standard (Safe)
TC(cfu)	Nil	NYS	Nil	Nil	Nil	Nil	Meets the standard (Safe)
FC(cfu)	Nil	0 CFU/100ml	Nil	Nil	Nil	Nil	Meets the standard (Safe)
Ammonia	0.5mg/l	NYS	0.14 mg/l	0.26 mg/l	0.14 mg/l	0.11 mg/l	Meets the standard (Safe)
Phosphate	NYS	NYS	0.41 mg/l	1.57 mg/l	0.63mg/l	2.8 mg/l	Meets the standard (Safe)

Parameter	National Standard		NATI (Baseline)	NATI (Sep 2025)	NATI (Nov 2025)	STTC (Baseline)	Remarks
Arsenic	0.05mg/l	0.01 mg/l	0.001mg/l	0.001 mg/l	0.001mg/l	0.005mg/l	Meets the standard (Safe)
Iron	0.3-1 mg/l	NYS	0.07 mg/l	0.05mg/l	0.08 mg/l	0.63mg/l	Meets the standard (Safe)
Manganese	0.1 mg/l	0.08 mg/l	0.06mg/l	0.03 mg/l	0.05mg/l	0.007mg/l	Meets the standard (Safe)
Nitrate	10.0 mg/l	50 mg/l	3.5 mg/l	2.1mg/l	4.2mg/l	BDL	Meets the standard (Safe)
PH	6.5-8.5	6.5-8.5	7.4	7.0	7.1	7.9	Meets the standard (Safe)
TDS	1000 mg/l	NYS	220mg/l	180mg/l	180mg/l	322mg/l	Meets the standard (Safe)
TC(cfu)	Nil	NYS	Nil	Nil	Nil	Nil	Meets the standard (Safe)
FC(cfu)	Nil	0 CFU/100 ml				Nil	Meets the standard (Safe)
Ammonia	0.5mg/l	NYS	0.22mg/l	0.14mg/l	0.34mg/l	BDL	Meets the standard (Safe)
Phosphate	NYS	NYS	1.5mg/l	0.60mg/l	1.2mg/l	0.4mg/l	Meets the standard (Safe)

Table 1-18: Test Result of Water Quality Monitoring (Surface water)

Parameter	National Standard	IFC EHS Guideline 2007	STTL(CTG) (Baseline)	STTL(CTG) (Dec 2025)	KWT Dormitory (Baseline)	KWT Dormitory (Dec 2025)	Remarks
Ammonia	0.5mg/l	Not specified	0.24 mg/l	0.19 mg/l	0.24 mg/l	0.25 Mg/l	Satisfactory
Arsenic	0.05mg/l	0.1mg/l	0.005 mg/l	0.002 mg/l	0.018 mg/l	0.004 mg/l	Satisfactory
BOD	2.0 mg/l	30 mg/l	3.8 mg/l	4 mg/l	4.0 mg/l	2 mg/l	Satisfactory
COD	100.0 mg/l	125 mg/l	48 mg/l	8 mg/l	4.0 mg/l	8 mg/l	Satisfactory
DO	6.0 mg/l	Not specified	4.90 mg/l	5 mg/l	6.10 mg/l	5.06 mg/l	Satisfactory
Iron	0.3-1 mg/l	Not specified	0.85 mg/l	0.14 mg/l	0.05 mg/l	0.32 mg/l	Satisfactory
Manganese	0.1 mg/l	Not specified	0.26 mg/l	0.03 mg/l	0.03 mg/l	0.03 mg/l	Satisfactory

Parameter	National Standard	IFC EHS Guideline 2007	STTL(CTG) (Baseline)	STTL(CTG) (Dec 2025)	KWT Dormitory (Baseline)	KWT Dormitory (Dec 2025)	Remarks
Nitrate	10.0 mg/l	Not specified	1.7 mg/l	1.9 mg/l	1.3 mg/l	2 mg/l	Satisfactory
PH	6.5-8.5	6-9	7.2	7.3	7.8	7.4	Satisfactory
TDS	1000 mg/l	Not specified	200 mg/l	210 mg/l	230 mg/l	160 mg/l	Satisfactory
TSS	10 mg/l	50	5.0 mg/l	36 mg/l	5.0 mg/l	58 mg/l	Satisfactory

Parameter	National Standard	IFC EHS Guideline 2007		NATI (Baseline)	NATI (Sep 2025)	NATI (Nov 2025)	STTC* (Dec 2025)	Remarks
Ammonia	0.5mg/l	Not specified		0.34mg/l	0.27mg/l	0.43mg/l	mg/l	Satisfactory
Arsenic	0.05mg/l	0.1mg/l					0.03mg/l	Satisfactory
BOD	6.0 mg/l	30 mg/l					mg/l	Satisfactory
COD	100.0 mg/l	125 mg/l		18mg/l	20mg/l	22mg/l	mg/l	Satisfactory
DO	6.0 mg/l	Not specified		6.8mg/l	6.40mg/l	5.92mg/l	mg/l	Satisfactory
Iron	0.3-1 mg/l	Not specified		0.12mg/l	0.07mg/l	0.22mg/l	0.42mg/l	Satisfactory
Manganese	0.1 mg/l	Not specified		0.07mg/l	0.12mg/l	0.08 mg/l	mg/l	Satisfactory
Nitrate	10.0 mg/l	Not specified		2.7mg/l	1.9 mg/l	3.3mg/l	mg/l	Satisfactory
PH	6.5-8.5	6-9		6.2	6.7	6.8	7.7	Satisfactory
TDS	1000 mg/l	Not specified		335mg/l	275mg/l	295mg/l	215mg/l	Satisfactory
TSS	10 mg/l	50		4 mg/l	1mg/l	6mg/l	mg/l	Satisfactory

*Drinking Water

Noise level:

66. Noise level monitoring was conducted at the active construction sites during the reporting period in accordance with the environmental monitoring requirements specified in the respective Environmental Management Plans (EMPs). Monitoring activities were carried out at selected sensitive locations within and surrounding the construction sites to assess compliance with applicable national standards and project safeguard requirements. The monitoring schedule, frequency, monitoring locations, and compliance status for each active subproject are presented in Table 1-15 below.

Table 1-19: Noise Monitoring Schedule and Compliance Status (July–December 2025)

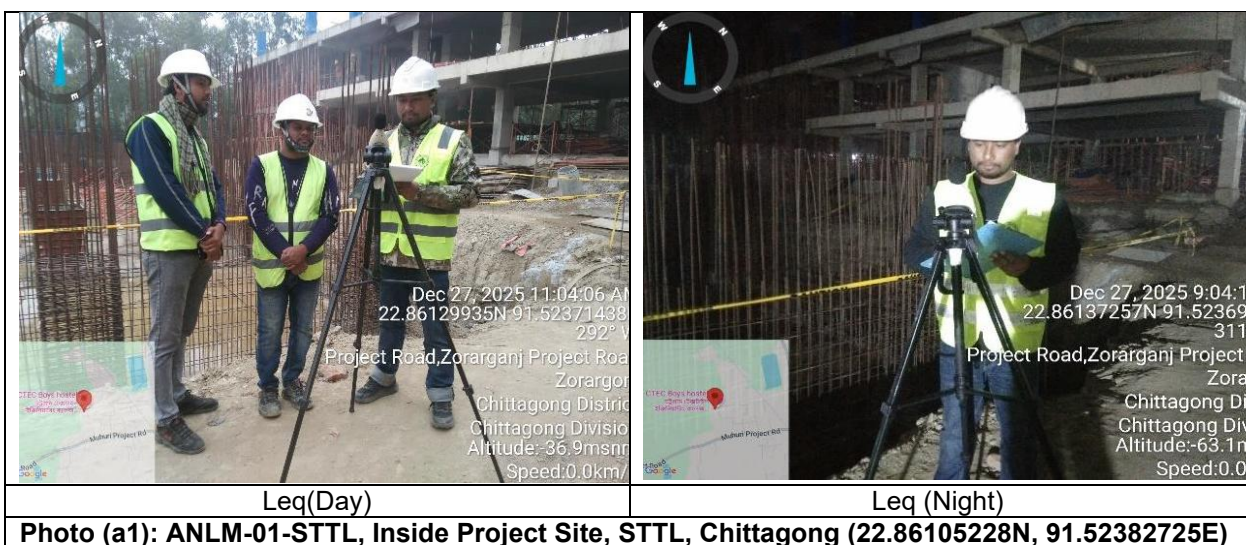
Sl .	Subproject	Monitoring Location	Monitoring Date	EMP Monitoring Frequency	Monitoring Conducted as per EMP	Standard / Limit	Compliance Status
1	STTL Chattogram	Construction site boundary / nearby sensitive receptor	27 Dec 2025	Quarterly	Partially done	DoE/IFC Standard	Partially Complied
2	NATI Narsingdi	Construction site boundary	03 Sep and 11 Nov 2025	Quarterly	Partially done (only day time monitoring)	DoE/IFC Standard	Partially Complied

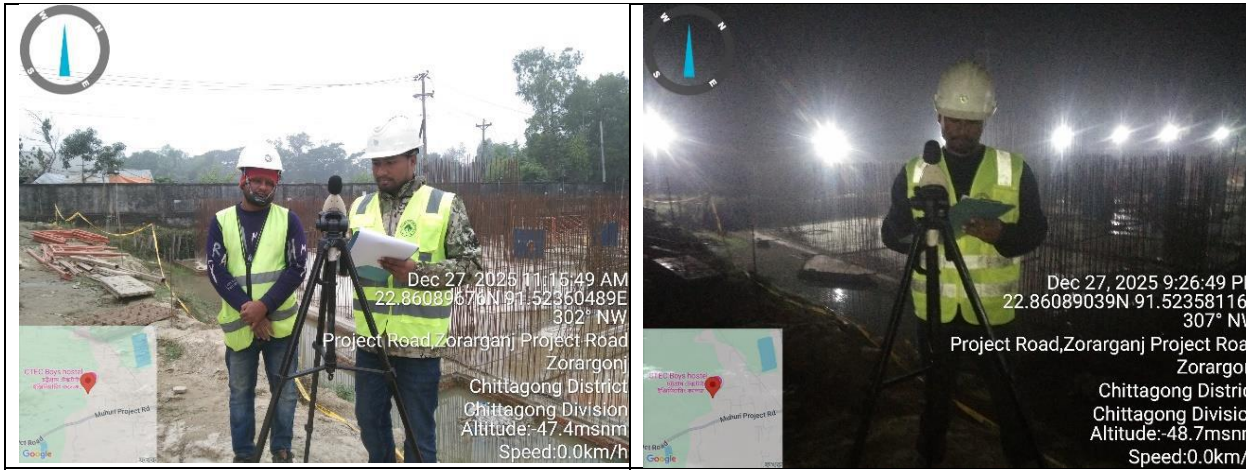
3	Kumudini Student Dormitory (KWT-Dorm)	Near academic/residential area	28 Dec 2025	Semi-annually	Yes	DoE/IFC Standard	Complied
4	Sylhet TTC	Site boundary / nearby receptor	10 Dec 2025 (Baseline study)	Quarterly	No	DoE/IFC Standard	Non Complied

67. Noise measurements were conducted at least two different locations in each subproject site. The Lutron SL-4033SD noise level meter shown in Figure 5 was used for noise level monitoring. The parameters were L-max, L-min, and Leq-day. Noise level monitoring was carried out both at day and night time in all active sites except NATI sub-project. In NATI sub-project, noise monitoring was conducted during day-time periods only due to absence of night-time construction activities during the monitoring schedule. The sampling duration was 1 hour for each location. Measurements were taken at 1-min intervals over the period. The device was recorded data throughout the monitoring period. After getting the raw data from the device, descriptive statistical analysis was applied to calculate Leq for every monitoring location.



Figure 5: Noise Level Monitoring Equipment (Lutron SL-4033SD)





Leq (Day)

Leq (Night)

Photo (a2): ANLM-02-STTL, Project Site, STTL Chittagong (22.86132222N, 91.52394444E)



Leq (Day)

Leq (Night)

Photo (b1): ANLM-01- North Side of Project Site, Kumudini, Tangail (24.099819N, 90.091580E)



Leq (Day)

Leq (Night)

Photo (b2): ANLM-02- South Side of Project Site, Kumudini, Tangail (24.100294N, 90.091363E)



NL1 (Day)



NL1 (Night)

Photo (c1): NL1, Sylhet TTC Project Site



NL2 (Day)



NL2 (Night)

Photo (c2): NL2, Sylhet TTC Project Site



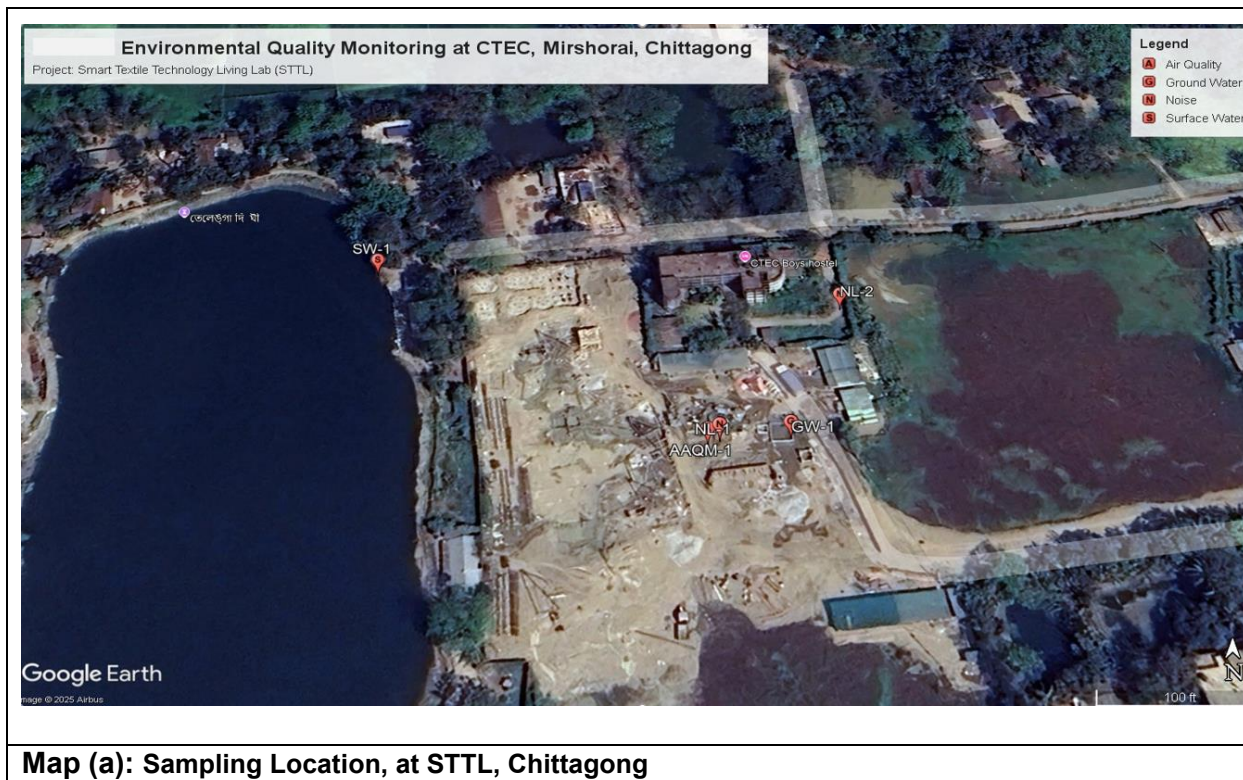
Photo (d): Noise Level Monitoring, NATI Project (Date:02.06.2025)**Photo (e): Noise Level Monitoring, NATI Project (Date:03.09.2025)****Photo (f): Noise Level Monitoring, NATI Project (Date:11.11.2025)****Figure 6: Photos of the AMBIENT NOISE LEVEL MONITORING**

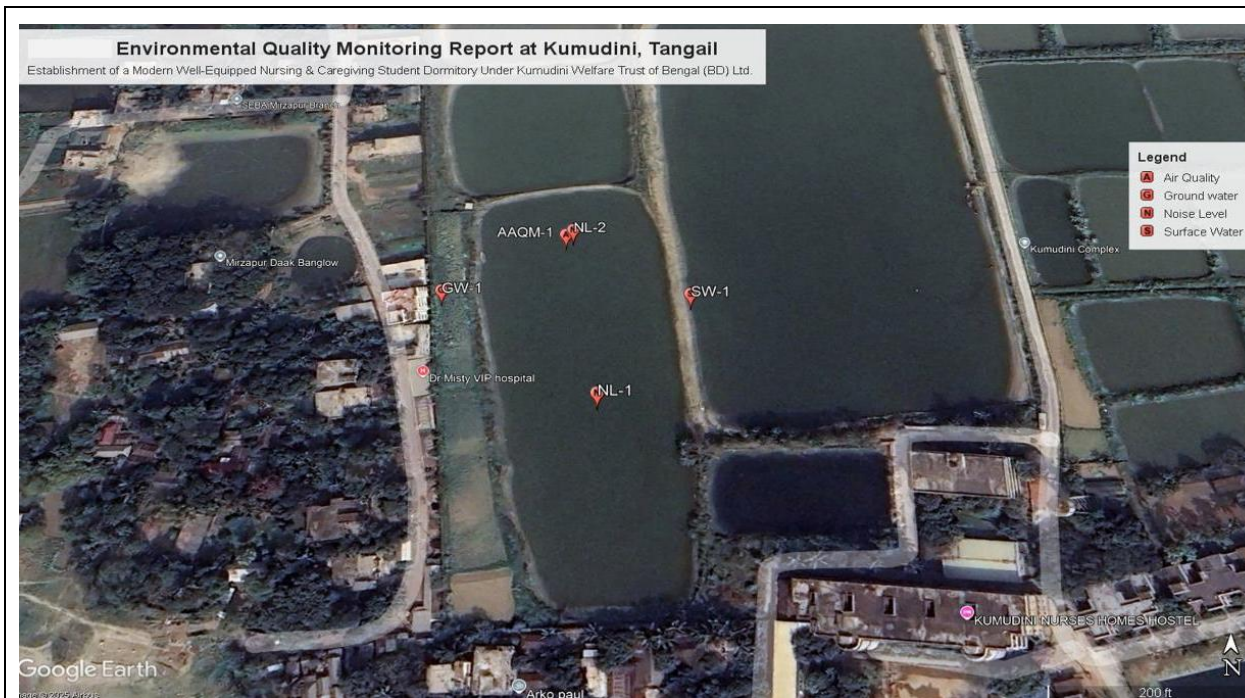
68. The result of the noise level monitored along with details of the sampling location has been shown in the following table. Noise tests were conducted during this period indicated in the table below. The results demonstrate that all measured noise levels comply with the applicable national standards. The monitoring data is compared with international standards also and the comparison is shown in Annex 9. Sampling locations for Environmental Monitoring is shown in Figure 7.

Table 1-20: Test Result of Noise quality level

Parameter	National Standard	STTL(CTG) (Baseline)		STTL(CTG) (Dec 2025)		KWT Dormitory (Baseline)		KWT Dormitory (Dec 2025)		Remarks
		AN LM 01	AN LM 02	ANLM 01	ANLM 02	ANLM 01	ANLM 02	ANLM 01	ANLM 02	
Day	75dB	70.0	64.7	67.5	67.1	60.80	59.3	58.51	57.6	meets the standard(safe)
Night	70dB	60.80	57.5	56.8	62.4	51.6	50.5	46.4	51.7	meets the standard(safe)

Parameter	National Standard	NATI (Baseline)		NATI (Sep 2025)		NATI (Dec 2025)		STTC (Baseline)		Remarks
		ANLM 01	ANLM 02	ANLM 01	ANLM 02	ANLM 01	ANLM 02	ANLM 01	ANLM 02	
Day	75dB	62.2	64.3	64.2	62.2	62.8	66.8	73.3	69.17	meets the standard(safe)
Night	70dB	Not Monitored	Not Monitored	Not Monitored	Not Monitored	Not Monitored	Not Monitored	61.15	60.21	meets the standard(safe) in STTC. Noise monitoring at the NATI site was conducted during day-time periods only due to absence of night-time construction activities during the monitoring schedule.





Map (b): Sampling Location, at KWT, Tangail



Map (c): Sampling Location, Sylhet TTC

Figure 7: Map of Sampling locations for Environmental Monitoring

Corrective actions: Instruments were lubricated properly, old instruments were replaced with the new one for noise reduction.

1.18 Implementation arrangements

69. The Finance Division in the MOF will be the executing and implementing agency. The SDCMU—established under SEIP—will continue to serve as the program management unit to facilitate, coordinate, and monitor all project activities. The SDCMU is headed by the Executive Program Director (EPD). The National Program Director (NPD), Secretary of the Finance Division will continue to provide policy advice, review funding, and release funds for the RBL program. All the staff of the SDCMU are recruited competitively with required expertise and experience. The SDCMU is responsible for facilitating, coordinating, and monitoring the implementation of the RBL program.
70. An inter-ministerial project steering committee (PSC), chaired by secretary of the Finance Division, includes selected senior officials from key ministries, institutions, and NSDA, with the EPD of the RBL program as the member-secretary. The PSC will provide overall policy advice and oversight, approve annual operation plans, review achievements against targets, and ensure compliance with fiduciary oversight arrangements.
71. The key implementing partner ministries include the Technical and Madrasah Education Division in the Ministry of Education; Bureau of Manpower, Employment and Training in the Ministry of Expatriates' Welfare and Overseas Employment; Ministry of Industries; and Ministry of Textiles and Jute. The Skills Development Implementation Committee (SDIC) headed by the EPD with representatives from all the public and private partner agencies will provide a common forum to discuss implementation issues and to make joint efforts to resolve problems emanating from implementation. If problems cannot be resolved at this level, these will be escalated to the PSC level for resolution.
72. The Project Implementation Unit (PIU), headed by a National Program Director (NPD), is established to coordinate policy issues and monitor implementing activities of the project.
73. Project management and coordination functions for the project are provided by the Skills Development Coordination and Monitoring Unit (SDCMU). SDCMU is also responsible for providing secretarial support to the PSC and ensuring overall coordination for implementation of the project. The SDCMU is headed by an Executive Program Director (EPD), supported by 4 Deputy Executive Program Directors and 10 Assistant Executive Program Directors.
74. Within the Skills Development Coordination and Monitoring Unit (SDCMU), the Deputy Executive Program Director (PM-2) serves as the focal person responsible for coordination, monitoring, and reporting of safeguard-related activities under SICIP. The Environmental Specialist is engaged intermittently to provide technical support and guidance on environmental safeguard compliance and monitoring activities.
75. The construction firms are responsible for implementation of the Environmental Management Plans (EMPs) under the supervision of SDCMU, with necessary technical support from the Environmental Specialist. To strengthen environmental, health, and safety compliance during construction activities, the contractors have appointed Environment, Health and Safety (EHS) Officers for the ongoing projects at STTL Chattogram, Kumudini Welfare Trust (KWT) in Tangail, NATI Narsingdi, and Sylhet TTC.

The detailed information is listed below:

SI	Designation	Email Address	Position	Contact no.
1.	Md Manjur Alam Prodhhan Joint Secretary Deputy Executive Program Director (DEPD-2), SICIP	manjur@sicip.gov.bd	Convenor	+880255138753-5 or +8801332810882

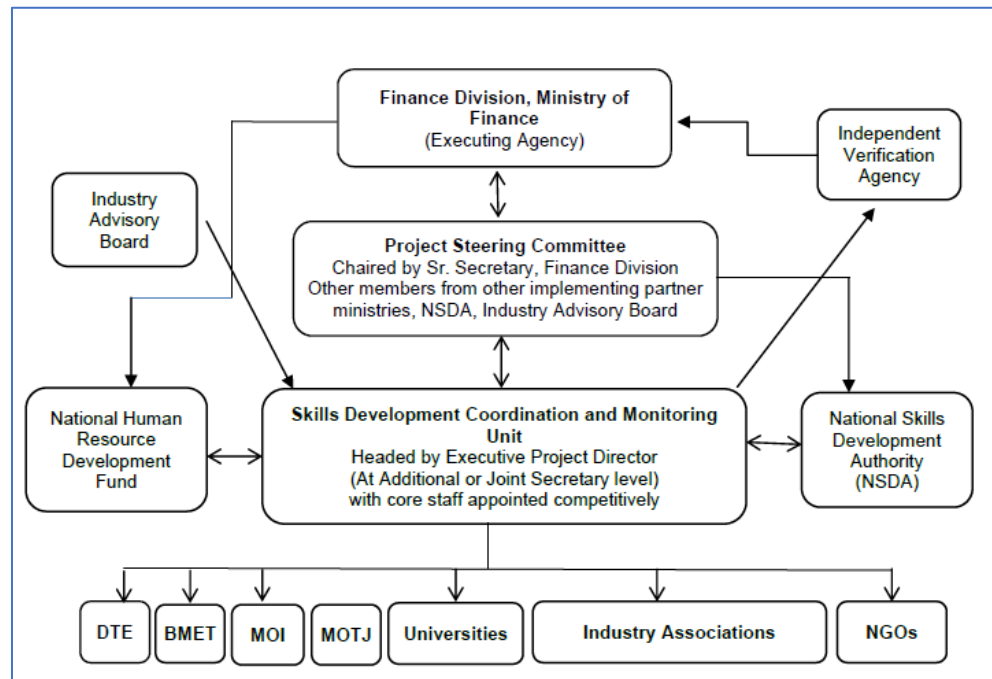
Detailed information of Environmental Specialist is below:

SI	Name	Designation	Contact number	Email address
1	Dr. A H M Mojammal	Environmental Specialist	+8801758428271	mojammal.ahm@gmail.com

Detailed information on Environment, Health and Safety Managers is below:

Subproject	Name	Designation	Educational Qualification	Years of Experience	Contact Number	Email Address
Construction of Smart Textile Technology Living Lab (STTL) at Chittagong Textile Engineering College (CTEC)	Md. Habibullah	Environment, Health & Safety Officer (EHSO)	Diploma in Civil Engineering	8	0131345 0122	construction36@sheltechengineering.com.bd
Establishment of a Modern Well-Equipped Nursing & Caregiving Student Dormitory Under Kumudini Welfare Trust of Bengal (BD) LTD.	Shuvo Biswas	Environment, Health & Safety Officer (EHSO)	B.Sc. in Civil Engineering	8.5	0131345 0130	construction70@sheltechengineering.com.bd
Renovation and Construction in Sylhet Technical Training Centre (STTC)	Md. Abir Ahmed	Environment, Health & Safety Officer (EHSM)	B.Sc. in Civil Engineering	4 years	0164865 0946	Abirahmed.tealbd@gmail.com
Renovation and Construction in Narsingdi Auto-tech Training Institute (NATI)	Md. Rubel Mia	Environment, Health & Safety Officer (EHSO)	Diploma in Civil Engineering	6.5	0179390 9787	mdr286954@gmail.com

The project operational organogram of SICIP is presented below.



2 ENVIRONMENTAL MONITORING

2.1 IEE, EARF & SEMP compliances

76. An Environmental Assessment and Review Framework (EARF) was prepared for the overall SICIP program in accordance with the requirements of ADB's Safeguard Policy Statement (SPS), 2009. The EARF was disclosed in SICIP website. In addition, separate Initial Environmental Examination (IEE) reports have been prepared for individual construction subprojects under SICIP.

77. During the reporting period, IEEs were prepared for the Kumudini Student Dormitory (KWT-Dorm), NATI Narsingdi, and STTL Chattogram subprojects. The IEE of Sylhet TTC was prepared in 2021. Among these, the IEEs for Sylhet TTC and Kumudini Student Dormitory (KWT-Dorm) have been approved and only IEE of Sylhet TTC disclosed on the ADB website. The IEEs for NATI Narsingdi and STTL Chattogram are currently under review prior to final approval and disclosure.

78. The site-specific construction environmental management plans (SEMP/CEMP) have been prepared for STTL, Chittagong and KWT dormitory project. Both the CEMPs are under review prior to final approval and disclosure. The CEMPs for NATI and Sylhet TTC are under preparation.

79. Frequent site visit and monitoring was conducted by the consultant for the construction sites. Table 2-1 shows consultant monitoring visit to sub-project sites during the reporting period.

Table 22-1: Itinerary of monitoring visits during July to December 2025

Package	Location of construction site	Date of inspection	Inspection conducted by
WD-102	STTL, Chattogram	08/12/2025	Md. Badruzzaman - Engineering specialist, Ahammad Kabir – Engineering Specialist , Sohel Mahmud - AEPD (PM-7),
WD-201	KWT, Tangail	06/11/2025	Md. Badruzzaman - Engineering specialist, Ahammad Kabir – Engineering Specialist , AHM Mojammal - Environmental Specialist, Sohel Mahmud - AEPD (PM-7)
WD - 202	TTC, Sylhet	16/02/2026	Md Ododour Rahman - Site Engineer, Md. Badruzzaman - Engineering specialist, Ahammad Kabir – Engineering Specialist , AHM Mojammal - Environmental Specialist, Sohel Mahmud - AEPD (PM-7)
WD - 101	NATI, Narsingdi	14/09/2025	Md. Badruzzaman - Engineering specialist, Ahammad Kabir – Engineering Specialist , AHM Mojammal - Environmental Specialist, Sohel Mahmud - AEPD (PM-7)

2.2 Status Monitoring parameters/Plan

80. During the present reporting period, no significant environmental issues were observed. As the civil works are currently in progress and remain within the planned scope,

no activities—such as tree felling or other major construction operations—have been undertaken that could potentially cause degradation of the existing environmental conditions at the proposed construction sites or in the adjoining areas.

Table 2-2: Monitoring Status during the reporting period July-Dec 2025

a) Monitoring Status at STTL Chattogram during the reporting period July-Dec 2025.

Parameter	Monitoring Indicator / Activity	Monitoring Conducted During July–December 2025	Frequency / Period	Findings / Results	Compliance Status
CONSTRUCTION PHASE					
1. Surface Water	Soil erosion and sediment control measures implemented at work sites	Site inspections conducted by Site Engineer and EHSO during Jul–Dec 2025	Monthly site inspection; quarterly water quality monitoring	Exposed soil areas covered with mulches/fiber mats; runoff control and sediment management measures maintained near stockpiles and excavation areas	Being complied
2. Surface Water, Groundwater & Soil	Fuel, oil, and chemical management; leak and spill prevention measures	Regular inspection of equipment condition and fuel storage areas conducted during Jul–Dec 2025	Monthly inspection	Equipment maintained in good condition; routine leak checks conducted; spill prevention measures observed during refueling and servicing	Being complied
3. Surface Water	Sanitation facilities for workers maintained at construction sites	Toilets and septic facilities inspected during reporting period	Once at beginning of construction and monthly thereafter	Adequate toilet facilities installed and maintained for workers	Complied

Parameter	Monitoring Indicator / Activity	Monitoring Conducted During July–December 2025	Frequency / Period	Findings / Results	Compliance Status
4. Air Quality	Dust suppression and material covering measures implemented	Visual monitoring conducted throughout reporting period; air quality observation by EHSO	Weekly observation; semi-annual/quarterly monitoring	Water spraying and covering of stockpiles practiced to minimize dust generation	Complied
5. Air Quality	Maintenance of construction equipment and vehicle emissions control	Inspection of construction machinery and vehicles conducted during reporting period	Weekly inspection; quarterly monitoring by EHSO	Construction equipment maintained in operational condition to minimize emissions	Complied
6. Soil	Site reinstatement and erosion prevention measures implemented	Site inspections conducted during construction activities	Weekly during construction	Drainage control and site reinstatement measures implemented where applicable	Being complied
7. Flora and Fauna	Protection and compensatory plantation activities	Monitoring of tree protection and plantation activities conducted during reporting period	Once before clearing and monthly thereafter	Trees protected and plantation activities conducted regularly	Being complied
(ii) SOCIOECONOMIC AND CULTURAL ENVIRONMENT					
8. Acoustic Environment	Noise control and restricted working hour practices implemented	Site observation and stakeholder consultation conducted during reporting period	Weekly observation; monitoring during heavy haul periods	Construction activities limited to daytime; equipment maintained to reduce noise impacts; no major	Being complied

Parameter	Monitoring Indicator / Activity	Monitoring Conducted During July–December 2025	Frequency / Period	Findings / Results	Compliance Status
				complaints reported	
9. Public Safety	Site fencing, traffic safety, and controlled public access maintained	Safety inspections conducted throughout reporting period	Weekly during construction	Construction sites adequately fenced; public access and worker movement managed safely	Complied
10. Public Safety	Worker code of conduct and camp management practices maintained	Monitoring and worker awareness activities conducted during reporting period	Monthly during construction	Regular awareness and behavioral guidance provided to workers	Complied
11. Public Health	Worker sanitation and camp hygiene maintained	Inspection of sanitation and camp facilities conducted during reporting period	Once at start of construction and monthly thereafter	Adequate toilet and septic systems maintained; no evidence of raw sewage discharge observed	Complied
12. Worker Health & Safety	Occupational health and safety measures and PPE use implemented	Regular safety inspections and toolbox sessions conducted during reporting period	Weekly during construction	Workers provided with task-specific PPE and observed following safety requirements	Complied
13. Worker Health	COVID-19 and communicable disease prevention measures maintained	Health and hygiene monitoring conducted during reporting period	Weekly during construction	Face masks, handwashing, and sanitizing arrangements maintained at work sites	Complied

Parameter	Monitoring Indicator / Activity	Monitoring Conducted During July–December 2025	Frequency / Period	Findings / Results	Compliance Status
14. Livelihoods	Local employment opportunities prioritized	Review of labor recruitment practices conducted during reporting period	Prior to recruitment of workers/subcontractors	Local workers from nearby areas prioritized for construction employment	Complied
(iii) WASTE MANAGEMENT					
15. Construction Waste	Waste segregation, collection, and disposal practices implemented	Waste management practices monitored during reporting period	Monthly during construction	Separate waste bins installed; waste collection and disposal conducted as per Waste Management Plan	Complied

b) Monitoring Status at NATI, Narsingdi during the reporting period July-December 2025

Parameter	Monitoring Indicator / Activity	Monitoring Conducted During July–December 2025	Frequency / Period	Findings / Results	Compliance Status
A. PRE-CONSTRUCTION PHASE					
(i) IMPLEMENTATION READINESS					
1. Environmental Baseline	Baseline monitoring of ambient air quality, surface water, groundwater, and ambient noise conducted prior to construction activities	Baseline environmental sampling conducted on 10 June 2025 prior to commencement of site clearing activities	One-time baseline sampling before construction	None of the analyzed parameters exceeded applicable standards under ECR 2023, Air Pollution Control Rules 2022, and Noise Pollution Control Rules 2006. Baseline data retained in EMR for future comparison purposes	Complied
2. Verification of Environmental Clearances	Verification of Site Clearance Certificate (SCC) and Environmental Clearance Certificate (ECC), including incorporation of DOE conditions into EMP/CEMP	Review of environmental clearance documents conducted during reporting period	Once before start of procurement/construction	NOC/ECC obtained from DoE and relevant environmental conditions incorporated into project documents	Complied

Parameter	Monitoring Indicator / Activity	Monitoring Conducted During July–December 2025	Frequency / Period	Findings / Results	Compliance Status
3. CEMP Verification	Review and verification of Contractor's CEMP, including monitoring and reporting responsibilities	Draft CEMP under review by PIU and supervision team during reporting period	Once before start of construction	CEMP preparation and review process ongoing. Final verification and approval pending	Under Preparation – Verification Pending. Responsible Party: Contractor and PIU. Expected completion: Prior to full-scale construction activities
4. Grievance Redress Mechanism (GRM)	Establishment and disclosure of central GRM and workers' GRM	GRM establishment verified during reporting period	Once before start of construction	GRM committee formed and grievance procedures communicated to workers and stakeholders	Complied
5. EMP Training	Environmental awareness and EMP implementation training for contractor personnel and workers	EMP and safety training sessions conducted on 10 Nov 2025 and 08 Dec 2025	Central training before construction and periodic site briefings during construction	Environmental awareness, occupational safety, and EMP compliance training provided to workers and contractor staff	Complied
B. CONSTRUCTION PHASE					
6. Surface Water, Groundwater & Soil	Equipment maintenance, spill prevention, and fuel storage management	Site inspections and monitoring conducted during Jul–Dec 2025	Monthly during construction	Equipment regularly checked and maintained; spill prevention and leak	Complied

Parameter	Monitoring Indicator / Activity	Monitoring Conducted During July–December 2025	Frequency / Period	Findings / Results	Compliance Status
				control measures observed during inspections	
7. Surface Water	Worker sanitation and septic management facilities maintained	Monitoring of worker sanitation facilities conducted during reporting period	Once at start of construction and monthly thereafter	Two worker toilets installed and maintained at construction site	Being complied
8. Air Quality	Dust suppression and stockpile covering measures implemented	Visual monitoring and EHSO observations conducted throughout reporting period	Weekly observation; quarterly monitoring by EHSO	Regular water spraying conducted; material stockpiles covered to minimize dust emissions	Being complied
(ii) SOCIOECONOMIC AND CULTURAL ENVIRONMENT					
9. Acoustic Environment	Noise and vibration control measures implemented at site	Site inspections and worker awareness activities conducted during reporting period	Weekly observation; monitoring during heavy haul activities	EMP awareness and noise control instructions provided to workers; no major community complaints reported	Being complied
10. Public Safety	Worker behavior management and construction camp safety measures implemented	Monitoring and awareness activities conducted during Sep–Dec 2025	Monthly during construction	Access of unauthorized persons to labor camp restricted; awareness activities continued	Partially Complied – Additional monitoring and enforcement measures to continue during next reporting period

Parameter	Monitoring Indicator / Activity	Monitoring Conducted During July–December 2025	Frequency / Period	Findings / Results	Compliance Status
11. Public Health	Worker sanitation, hygiene, and camp health management maintained	Inspections conducted during reporting period	Once at start of construction and monthly thereafter	Two worker toilets installed and maintained; sanitation conditions satisfactory during inspections	Complied
12. Worker Health & Safety	Occupational Health and Safety (OHS) measures and PPE use enforced	Regular site safety inspections conducted during Jul–Dec 2025	Weekly during construction	Contractor enforced PPE use and conducted routine safety supervision at work sites	Being complied
13. Worker Health	Worker hygiene and communicable disease prevention measures maintained	Health and hygiene monitoring conducted during Jul–Dec 2025	Weekly during construction	Handwashing liquid and hygiene facilities provided at construction site	Being complied
(iii) WASTE MANAGEMENT					
14. Construction Waste	Waste segregation, collection, and disposal measures implemented under Waste Management Plan	Waste management monitoring conducted during reporting period	Monthly during construction	Separate waste bins installed and waste collection practices maintained at site	Being complied

C) Monitoring Status at Dormitory at KWT during the reporting period July-December 2025

Parameter	Monitoring Indicator / Activity	Monitoring Conducted During July–December 2025	Frequency / Period	Findings / Results	Compliance Status
A. PRE-CONSTRUCTION PHASE					
(i) IMPLEMENTATION READINESS					
1. Verification of Environmental Clearances	Verification of SCC/ECC approval and incorporation of DOE conditions into EMP, EMoP, and CEMP	Environmental clearance documents reviewed on 01 December 2025	Once before start of procurement/construction	NOC/ECC obtained from DoE	Complied
2. CEMP Verification	Review and approval of Contractor's CEMP, including environmental monitoring and reporting responsibilities	Draft CEMP submitted and reviewed during September 2025	Once before start of construction	Draft CEMP reviewed by environmental expert and supervision team; comments provided to Contractor for revision and finalization	Under Review – Verification Pending. Responsible Parties: Contractor, Environmental Expert, and PIU. Expected final approval prior to commencement of full-scale construction activities
3. Grievance Redress Mechanism (GRM)	Establishment and disclosure of central GRM and workers' GRM	GRM establishment verified on 08 September 2025	Once before start of construction	GRM committee established and grievance procedures circulated among workers and stakeholders	Complied

B. CONSTRUCTION PHASE					
4. Surface Water	Soil erosion prevention and sediment control measures implemented at work sites	Site inspections and environmental monitoring conducted during reporting period	Monthly site inspection; quarterly monitoring by EHSO	Exposed soils covered with mulches/fiber mats; runoff and sediment control measures maintained near stockpiles and excavation areas	Being complied
5. Surface Water, Groundwater & Soil	Fuel handling, equipment maintenance, and spill prevention measures implemented	Monitoring and inspection conducted during October 2025 and subsequent routine checks	Monthly during construction	Equipment maintained in good condition; regular leak inspections conducted; spill prevention measures observed during fuel handling activities	Being complied
6. Surface Water	Worker sanitation and septic management facilities maintained	Inspection of worker sanitation facilities conducted during reporting period	Once at beginning of construction and monthly thereafter	Adequate number of toilets installed and maintained for workers	Complied
7. Air Quality	Dust suppression and material covering measures implemented	Visual monitoring and EHSO observations conducted during reporting period	Weekly observation ; quarterly monitoring by EHSO	Regular water spraying conducted and stockpiles covered to minimize dust emissions; semi-annual air quality	Complied

				monitoring completed	
8. Air Quality	Construction equipment maintenance and emissions control measures implemented	Equipment inspections conducted during reporting period	Weekly observation ; quarterly monitoring by EHSO	Construction equipment maintained in good operational condition to minimize emissions	Complied
9. Soil	Soil erosion prevention and site reinstatement measures implemented	Site inspections conducted throughout construction activities	Weekly during construction	Drainage management, soil protection, and site reinstatement measures implemented where applicable	Being complied
10. Flora and Fauna	Tree protection and compensatory plantation activities implemented	Monitoring conducted during reporting period	Once before site clearing and monthly thereafter	Tree plantation and protection measures implemented regularly during reporting period	Being complied
11. Flora and Fauna	Compensatory Tree Planting Plan preparation and implementation	Planning and coordination activities initiated during November 2025	Twice during final three months of construction phase	Preparation of Tree Plantation Plan initiated; implementation activities to continue in subsequent reporting period	Under Preparation – Verification Pending. Responsible Parties: Contractor and PIU. Expected completion during next reporting period
(ii) SOCIOECONOMIC AND CULTURAL ENVIRONMENT					
12. Acoustic Environment	Noise and vibration control measures implemented	Site inspections and stakeholder consultations conducted during reporting period	Weekly observation ; monitoring during heavy haul periods	Construction activities restricted to daytime; haul truck management	Being complied

				nt and equipment maintenance implemented; no significant complaints reported	
13. Public Safety	Site fencing, traffic safety, and controlled public access maintained	Safety inspections conducted throughout reporting period	Weekly during construction	Construction sites adequately fenced and secured to restrict unauthorized entry and ensure safe movement around work zones	Complied
14. Public Safety	Worker behavior management and camp supervision implemented	Monitoring and awareness activities conducted during reporting period	Monthly during construction	Regular awareness and behavioral guidance provided to workers; no significant public complaints reported	Complied
15. Public Health	Worker sanitation, hygiene, and camp health management maintained	Inspection of worker facilities conducted during reporting period	Once at start of construction and monthly thereafter	Adequate toilet and septic systems installed and maintained; sanitary conditions satisfactory during inspections	Complied
16. Worker Health & Safety	Occupational Health and Safety (OHS) measures and PPE use enforced	Regular safety inspections and toolbox meetings conducted during reporting period	Weekly during construction	Workers provided with task-specific PPE and compliance monitored regularly by	Complied

				Contractor and EHS personnel	
17. Worker Health	Hygiene and communicable disease prevention measures maintained	Monitoring conducted throughout reporting period	Weekly during construction	Face masks and hygiene materials provided; handwashing and sanitizing arrangements maintained at work sites	Complied
18. Livelihoods	Local employment opportunities prioritized during recruitment	Review of labor recruitment practices conducted during reporting period	Prior to recruitment of workers/subcontractors	Local workers from Chattagram and nearby areas prioritized for construction employment	Complied
(iii) WASTE MANAGEMENT					
19. Construction Waste	Waste segregation, collection, and disposal measures implemented under Waste Management Plan	Waste management monitoring conducted during reporting period	Monthly during construction	Separate waste bins installed and waste collection/disposal practices maintained in accordance with CEMP requirements	Complied

d) Monitoring Status at Sylhet TTC during the reporting period July-December 2025

Parameter	Monitoring Indicator / Activity	Monitoring Conducted During August–December 2025	Frequency / Period	Findings / Results	Compliance Status
A. PRE-CONSTRUCTION PHASE					
(i) IMPLEMENTATION READINESS					
1. Environmental Baseline	Baseline monitoring of ambient air quality, surface water, groundwater, and ambient noise conducted prior to construction activities	Environmental baseline sampling conducted during November–December 2025	One-time sampling prior to start of site clearing	None of the analyzed parameters exceeded the applicable standard limits. Recorded air quality parameters included PM _{2.5} : 23.37 µg/m ³ , PM ₁₀ : 46.43 µg/m ³ , SO ₂ : 13.93 µg/m ³ , NO ₂ : 17.62 µg/m ³ , and CO: 0.43 mg/m ³	Complied
2. Verification of Environmental Clearances	Verification of SCC/ECC approval	Environmental clearance documents reviewed on 01 December 2025	Once before start of procurement/construction	NOC obtained from DoE	Complied
3. CEMP Verification	Review and approval of	Initial preparation	Once before start of construction	Draft CEMP under	Partially Complied –

Parameter	Monitoring Indicator / Activity	Monitoring Conducted During August–December 2025	Frequency / Period	Findings / Results	Compliance Status
	Contractor's CEMP, including environmental monitoring and reporting responsibilities	and internal review activities conducted during reporting period		preparation and review by Contractor and environmental specialists. Final verification and approval pending	Responsible Parties: Contractor, Environmental Specialist, and PIU. Expected completion and approval: February 2026, prior to commencement of full-scale construction activities
4. Grievance Redress Mechanism (GRM)	Establishment and disclosure of central GRM and workers' GRM	GRM establishment verified on 08 September 2025	Once before start of construction	GRM committee established and grievance procedures circulated among workers and stakeholders	Complied
5. EMP Training	Environmental awareness and EMP implementation training for contractor personnel and workers	Local/site-level EMP training conducted on 02 November 2025 and 01 December 2025	Central EMP workshop before construction and periodic site briefings during construction	Environmental awareness and safety training provided to workers and contractor personnel during reporting period	Partially Complied – Site-level training completed during reporting period. Central EMP training scheduled for January 2026 and will be reported in the next EMR. Responsible

Parameter	Monitoring Indicator / Activity	Monitoring Conducted During August–December 2025	Frequency / Period	Findings / Results	Compliance Status
					Parties: Contractor and PIU
(iii) PROCUREMENT					
6. Labor	Recruitment of local workers for construction activities	Review of labor recruitment practices conducted during August 2025	Once prior to start of construction	Local workers from Sylhet and surrounding areas engaged in construction activities	Complied

3 ENVIRONMENTAL MANAGEMENT

3.1 Compliance with Environmental Mitigation and Management Plan (EMP)

81. The EMP has been developed for 4 sites only, such as STTL, NATI, Kumudini and Sylhet TTC. The project will ensure all the compliance related to EMP and mitigation measures as described in the IEE.

Table 3-1: Status of Environmental Management Plan

(a) EMP Status of STTL, Chattogram

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
Verification of Environmental Clearances	Confirm SCC and ECC have been granted and DOE conditions incorporated into EMP, EMoP, and CEMP	NOC/ECC obtained from DoE. Relevant environmental conditions incorporated into project environmental documents and reviewed by PIU and EHS personnel. Supporting documents maintained at project office.	Complied	Continue renewal/update of environmental clearances as required by DoE.
CEMP Verification	Review CEMP to ensure Contractor responsibilities, monitoring, and reporting requirements are fully reflected	Draft CEMP prepared by Contractor and reviewed by environmental specialists and PIU. Monitoring and reporting requirements incorporated in the updated CEMP. Site implementation monitoring ongoing.	Partially Complied – Verification Pending	Final approval and verification of updated CEMP to be completed before full-scale construction activities.
Grievance Redress Mechanism	Establish and publicize central GRM and workers' GRM	GRC committee formed and grievance register maintained at site. GRM contact information displayed at construction site and communicated	Complied	Continue regular monitoring and documentation of grievances and resolutions.

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
		during worker briefings.		
EMP Training	Conduct central and site-specific EMP training	One central EMP training and one site-specific EMP training completed during reporting period. The training records include number of participants, gender-wise participation, training topics, attendance sheets, agendas, and photographs maintained by Contractor, PIU, and EHS personnel.	Complied	Continue periodic refresher training during construction phase.
Climate Change Mitigation	Integrate energy efficiency, ventilation, landscaping, solar systems, water-saving measures, and low-carbon design features into facility design	Solar panels, rainwater harvesting system, and energy-efficient fittings incorporated into design. Cross-ventilation and natural lighting provisions included in building layout. Plantation and landscaping activities planned around facility areas. Some measures such as green roofs and hollow wall structures were not feasible/applicable at current design stage. Design records and drawings maintained by PIU and Contractor.	Complied	Continue verification of climate-resilient features during detailed construction and landscaping stage.
Climate Change Adaptation	Integrate flood resilience,	Lightning protection, drainage	Complied	Continue monitoring

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
	ventilation, temperature reduction, and climate adaptation measures into design	considerations, cross-ventilation provisions, rainwater management system, and energy-efficient design features incorporated into facility design. Plantation activities planned to improve micro-climatic conditions. Certain measures such as green roofs will be reviewed during future implementation stages where feasible.		implementation of adaptation features during construction and operational stages.
Public Health and Safety	Maximize ventilation and safe internal building layout	Site safety measures implemented including safety signage, sanitation facilities, restricted access arrangements, and routine safety inspections. Monitoring records and photographs maintained by Contractor and EHS personnel.	Complied	Continue regular public safety inspections and documentation.
Occupational Health and Safety	Ensure safe operational and ventilation arrangements within facilities	PPE provided to workers and monitored during site inspections. Toolbox meetings and safety briefings conducted regularly. Safety inspection records and PPE monitoring maintained at site.	Complied	Continue routine OHS inspections and refresher training.

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
Occupational Health and Safety	Engage qualified laboratory specialist and prepare operational protocols including waste management plans	Relevant technical personnel and supervision team engaged during planning and implementation process. Waste management and operational procedures incorporated into project planning documents.	Complied	Finalize operation and maintenance procedures before operational phase.
Waste Management	Incorporate waste segregation, storage, recycling, and disposal arrangements into facility design	Separate waste collection bins installed for domestic and construction waste. Temporary waste storage areas designated at site. Waste collection vendor appointed for disposal. Waste segregation practices monitored by Contractor and EHS personnel.	Complied	Include quantitative waste generation and recycling data in subsequent EMRs.
Labor	Prioritize local employment	Local workers from nearby areas engaged in construction activities. Labor records maintained by Contractor.	Complied	Continue prioritizing local workers where feasible.
Materials Sourcing	Obtain BSTI certificates for bulk materials	Construction materials collected from approved suppliers. Material quality documents maintained by Contractor where applicable.	Complied	Continue verification of supplier compliance documents.
Materials Sourcing	Prioritize nearby material sources	Construction materials sourced from nearby locations to reduce transportation	Complied	Continue monitoring local sourcing practices.

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
		impacts where feasible.		
Water Quality	Prepare Spill Prevention and Response Plan and conduct training	Spill prevention measures and fuel handling procedures implemented at site. Workers instructed regarding spill prevention during toolbox meetings and safety briefings. Monitoring conducted by EHS personnel.	Complied	Continue routine inspection of fuel and chemical storage areas.
Water Quality	Cover stockpiles and control runoff from exposed materials	Construction materials and exposed stockpiles covered with tarpaulins. Drainage and runoff control measures maintained near stockpile areas. Site inspections conducted regularly.	Complied	Continue monitoring runoff management during rainy periods.
Air Quality	Prevent vehicle idling and minimize emissions	No-idling practice communicated to drivers and workers during site supervision activities. Vehicle movement monitored within construction site.	Complied	Continue monitoring and enforcing no-idling measures.
Air Quality	Dust suppression and stockpile management	Water spraying conducted regularly during dry conditions. Construction materials covered with tarpaulins during storage and transportation. Site inspections conducted by EHS personnel.	Complied	Continue regular dust suppression and monitoring activities.

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
Air Quality	Use tarpaulin-covered trucks and maintain clean roads	Haul trucks observed using tarpaulins during material transportation. Internal roads cleaned and sprayed where necessary to reduce dust generation.	Complied	Continue inspection of transportation and road cleaning activities.
Soil	Protect exposed soils and maintain vegetative cover	Exposed soils managed through temporary covering and controlled material storage. No major soil erosion observed during inspections.	Complied	Continue erosion control monitoring during earthworks.
Public Safety	Monitor site safety and coordinate traffic safety measures	Construction areas fenced and warning signs installed. Security personnel monitored site access to prevent unauthorized entry. No public safety incidents recorded during reporting period.	Complied	Continue safety inspections and monitoring of access control measures.
Worker Health and Safety	Enforce no-idling policy for trucks	Drivers and workers instructed to avoid unnecessary engine idling within project site. Monitoring conducted during site inspections.	Complied	Continue awareness and monitoring activities.
Worker Health and Safety	Integrate pandemic response measures into operations	Handwashing facilities, sanitizers, and hygiene awareness measures maintained at site. Workers instructed regarding health and hygiene	Complied	Continue maintaining hygiene and health awareness arrangements.

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
		practices during toolbox meetings.		
Solid Waste	Ensure proper waste management procedures and waste collection arrangements	Waste bins provided at construction site and waste collection vendor appointed for regular collection and disposal. Site housekeeping monitored regularly by Contractor and EHS personnel.	Complied	Strengthen waste segregation and maintain disposal records for future reporting.

B) EMP Status for NATI

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
IEE and EMP Update	Review IEE and EMP to ensure post-approval changes are addressed and EMP included in bid and contract documents	SEMP/CEMP prepared and implemented at site. EMP requirements incorporated into contractor contract documents and monitored by PIU and EHS personnel during site inspections.	Complied	Continue periodic review of EMP implementation during construction activities.
Verification of Environmental Clearances	Confirm SCC and ECC approval and incorporation of DOE conditions into EMP, EMoP, and CEMP	NOC/ECC obtained from DoE. Relevant environmental conditions incorporated into project environmental documents and maintained at site office.	Complied	Continue monitoring validity and renewal requirements of environmental clearances.
CEMP Verification	Review CEMP to ensure Contractor responsibilities are reflected, including monitoring and reporting	CEMP prepared and implemented at site. Environmental monitoring and reporting responsibilities assigned to Contractor and EHS personnel.	Complied	Continue periodic review and updating of CEMP as required.
Grievance Redress Mechanism	Establish and publicize central	GRC committee formed and grievance register	Complied	Continue maintaining grievance

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
	and workers' GRM	maintained at site. GRM contact information displayed at construction site.		records and resolution tracking.
EMP Training	Conduct central and site-specific EMP training	Three site-specific EMP trainings and one central training completed during reporting period. Training topics included EMP implementation, OHS, waste management, PPE use, GRM, and emergency response. Attendance sheets, agendas, and photographs maintained by Contractor, PIU, and EHS personnel.	Complied	Continue refresher training and toolbox meetings during construction phase.
Climate Change Mitigation	Integrate GHG reduction, ventilation, landscaping, solar systems, water-saving devices, and low-carbon design measures	Solar panel provisions, rainwater harvesting system, and energy-efficient fittings incorporated into approved design. Some additional measures proposed in EMP, such as green roofs, extensive shade tree plantation, hollow wall structures, and additional water-saving fixtures, were not incorporated into the final design or	Partially Complied	Continue assessment of feasible climate-resilient features during detailed implementation and landscaping stage.

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
		remain conceptual at this stage.		
Climate Change Adaptation	Integrate flood resilience, lightning protection, ventilation, and temperature-moderating features	Rainwater management provisions, energy-efficient fittings, and basic climate-responsive design considerations incorporated into project design. Some adaptation measures such as green roofs and extensive shade tree plantation were not implemented in current design stage.	Partially Complied	Review feasibility of additional climate adaptation measures during future implementation stages.
Labor	Hire mostly local workers	Majority of workers engaged at site were recruited from nearby/local areas. Total workforce varied approximately between 30–40 workers during reporting period.	Complied	Continue prioritizing local labor recruitment where feasible.
Materials Sourcing	Prioritize nearby bulk material suppliers	Construction materials sourced from nearby areas to reduce transportation distance and emissions where feasible.	Complied	Continue monitoring material sourcing practices.
Surface Water, Groundwater, and Soils	Maintain equipment properly and prevent leakage/spills	Construction equipment regularly inspected and maintained. Daily visual checks conducted to identify leakage and mechanical	Complied	Continue equipment maintenance and spill prevention monitoring.

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
		issues. Spill prevention measures monitored by Contractor and EHS personnel. Maintenance records/logbooks maintained at site.		
Surface Water	Install adequate worker toilets and septic facilities	At NATI project site, two (02) worker toilets and one (01) office toilet were installed and maintained. Sanitation facilities regularly cleaned and inspected.	Complied	Continue maintenance and monitoring of sanitation facilities.
Air Quality	Dust suppression, stockpile covering, and covered haul trucks	Water spraying conducted regularly during dry weather. Construction stockpiles covered with tarpaulins. Haul trucks observed using tarpaulin covers during material transportation.	Complied	Continue dust suppression and transportation monitoring during dry periods.
Air Quality	Maintain fuel-efficient and properly functioning equipment	Construction equipment and vehicles regularly maintained to minimize emissions and operational issues. Maintenance activities monitored during inspections.	Complied	Maintain equipment servicing records and continue monitoring emissions control practices.
Flora and Fauna	Protect existing trees and vegetation through marking and fencing	No trees were cut during reporting period. Existing trees within NATI site were preserved and	Complied	Continue protection and monitoring of existing vegetation during

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
		protected through temporary fencing and controlled movement of equipment and materials.		construction activities.
Flora and Fauna / Watercourse Protection	Establish buffer near watercourse and prevent sediment runoff	Natural drainage canal adjacent to site identified during construction activities. Construction activities controlled near drainage areas and no obstruction to drainage flow observed during inspections.	Partially Complied	Strengthen monitoring of runoff control and install additional temporary sediment control measures during rainy season if necessary.
Acoustic Environment	Restrict work hours and maintain equipment to reduce noise	Construction work conducted during daytime hours only. Equipment operation monitored during inspections to minimize excessive noise generation.	Complied	Continue monitoring work hours and equipment condition.
Public Safety	Fence site, provide signage, and implement traffic management measures	Construction site adequately fenced and warning/safety signage installed at active work zones. Access control measures maintained to prevent unauthorized public entry.	Complied	Continue inspection of fencing, signage, and traffic safety arrangements.
Public Health	Implement Construction Camp Management Plan and sanitation measures	Worker sanitation facilities maintained at site. Hygiene awareness discussed during toolbox meetings	Complied	Continue monitoring sanitation and worker hygiene practices.

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
		and routine inspections conducted by EHS personnel.		
Worker Health and Safety	Implement Occupational Health and Safety Plan and PPE use	PPE including helmets, gloves, safety shoes, and reflective vests provided to workers. Toolbox meetings and safety briefings conducted regularly. Site safety inspections conducted by Contractor and EHS personnel. No major accidents reported during reporting period.	Complied	Continue routine safety inspections and refresher safety training.
Worker Health and Safety	Conduct camp safety audits and maintain adequate camp conditions	Regular inspection and cleaning conducted for worker camp, sanitation, and eating areas. Fire extinguishers and first aid arrangements maintained at site.	Complied	Continue periodic camp inspection and maintenance activities.
Construction Waste	Implement Waste Management Plan and segregate wastes	Waste bins provided at construction site for collection of domestic and construction waste. Waste materials collected regularly through designated disposal arrangements.	Complied	Improve waste segregation practices and maintain disposal records.
Air Quality	Use tarpaulins, misting, and prohibit stone crushing	Tarpaulin covering and water spraying enforced during material handling and	Complied	Continue monitoring dust suppression and stockpile

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
		storage. No stone crushing activity observed within project site.		management practices.
Air Quality	Cover trucks and spray internal roads	Trucks carrying materials observed using tarpaulin covers. Internal roads sprayed where necessary to control dust generation.	Complied	Continue regular road cleaning and monitoring during dry weather.
Acoustic Environment	Prohibit stone crushing activities	No stone crushing activities conducted within NATI project site during reporting period.	Complied	Continue monitoring compliance during future construction activities.
Worker Health and Safety	Enforce no-idling policy for trucks	Drivers instructed to minimize unnecessary engine idling within project area during site supervision activities.	Complied	Continue awareness and monitoring activities.
Worker Health and Safety	Integrate pandemic response measures	Handwashing facilities and hygiene materials maintained at site. Health and hygiene awareness discussed during toolbox meetings.	Complied	Continue maintaining hygiene and health monitoring arrangements.
Worker Health and Safety	Incorporate Emergency Response Plan and conduct training	Emergency Response Plan incorporated into site management procedures and communicated to workers during safety briefings.	Complied	Conduct periodic emergency response orientation and mock drill activities where feasible.
Solid Waste	Ensure proper waste management procedures	Waste collection bins installed at site and waste collection/disposal arrangements	Complied	Maintain waste collection records and strengthen segregation practices.

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
		maintained by Contractor.		

C) EMP Status of Dormitory building at KWT

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
IEE and EMP Update	Review IEE and EMP to ensure post-approval changes are addressed and EMP included in bid and contract documents	SEMP/CEMP prepared and implemented at site. EMP provisions incorporated into contractor contract documents and monitored through regular supervision by PIU and EHS personnel.	Complied	Continue periodic review of EMP implementation during construction activities.
Verification of Environmental Clearances	Confirm SCC and ECC approval and incorporation of DOE conditions into EMP, EMoP, and CEMP	NOC/ECC obtained from DoE and maintained at project site office. Relevant environmental conditions incorporated into project environmental management documents.	Complied	Continue monitoring validity and renewal requirements of environmental clearances.
CEMP Verification	Review CEMP to ensure Contractor responsibilities	CEMP prepared and implemented at site. Contractor environmental	Complied	Continue periodic review and updating of CEMP during

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
	are reflected, including monitoring and reporting	responsibilities communicated through supervision and monitoring activities.		construction phase.
Grievance Redress Mechanism	Establish and publicize central and workers' GRM	GRC committee formed and grievance register maintained at site. GRM contact information displayed at project site.	Complied	Continue maintaining grievance records and tracking resolutions.
EMP Training	Conduct central and site-specific EMP training	Three site-specific EMP trainings and one central training completed during reporting period. Training included EMP implementation, occupational health and safety, PPE use, waste management, emergency response, and GRM procedures. Attendance sheets, agendas, and photographs maintained by Contractor, PIU, and EHS personnel.	Complied	Continue refresher training and toolbox meetings during construction phase.
Climate Change Mitigation	Integrate GHG reduction, ventilation, landscaping, solar systems, and energy-efficient features into design	Solar panel provisions, rainwater harvesting system, and energy-efficient fittings incorporated into approved design. Other proposed EMP measures, including cross-ventilation design,	Partially Complied	Continue review of feasible climate-resilient measures during future landscaping and implementation stages where practicable.

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
		landscaping with shade trees, green roofs, and efficient generators, were not installed at the Kumudini Dormitory project site.		
Climate Change Adaptation	Integrate flood resilience, lightning protection, ventilation, and temperature-moderating features	Basic climate-responsive measures incorporated through rainwater management and energy-efficient fittings. Proposed measures such as green roofs, extensive landscaping with shade trees, cross-ventilation arrangements, and efficient generators were not installed at the project site.	Partially Complied	Assess feasibility of incorporating additional climate adaptation measures during later project stages if technically and financially feasible.
Labor	Hire mostly local workers	Majority of workers employed during construction activities were recruited from nearby/local areas.	Complied	Continue prioritizing local workers where feasible.
Materials Sourcing	Prioritize nearby bulk material suppliers	Construction materials sourced from nearby locations where practicable to reduce transportation distance.	Complied	Continue monitoring environmentally preferable sourcing practices.
Surface Water, Groundwater, and Soils	Maintain equipment and prevent leakage/spills	Construction equipment regularly inspected and maintained. Daily	Complied	Continue regular maintenance and monitoring of construction equipment.

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
		visual checks conducted to identify oil leakage and mechanical defects. Maintenance records maintained by Contractor.		
Surface Water	Install adequate toilets and septic systems	At the KWT Student Dormitory project site, eight (08) worker toilets and two (02) office toilets were installed and maintained during the reporting period. Sanitation facilities were regularly cleaned and inspected by Contractor personnel.	Complied	Continue regular maintenance and sanitation monitoring of toilet facilities.
Air Quality	Dust suppression, stockpile covering, and covered haul trucks	Regular water spraying conducted during dry weather. Construction material stockpiles covered with tarpaulins and haul trucks observed using covers during transportation activities.	Complied	Continue dust suppression measures and monitoring during dry periods.
Air Quality	Maintain fuel-efficient and properly functioning equipment	Construction vehicles and motorized equipment regularly maintained to minimize emissions and operational problems.	Complied	Continue maintaining equipment servicing and inspection records.
Flora and Fauna	Protect existing trees and	No trees were cut during reporting	Complied	Continue monitoring and

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
	vegetation through marking and fencing	period. Existing trees within and around project site were preserved and protected from construction activities.		protecting existing vegetation during construction activities.
Flora and Fauna / Watercourse Protection	Establish buffer near watercourse and prevent sediment runoff	Natural drainage channels near the site remained unobstructed during construction activities. No significant sediment discharge observed during inspections.	Partially Complied	Continue monitoring runoff control measures, particularly during rainy season.
Acoustic Environment	Restrict work hours and maintain equipment to reduce noise	Construction work conducted only during daytime hours. Equipment operation monitored to minimize excessive noise generation. No major noise complaints received during reporting period.	Complied	Continue monitoring working hours and equipment condition.
Public Safety	Fence site, provide signage, and implement traffic management measures	Construction site adequately fenced and safety/warning signage installed at work zones. Site access controlled to restrict unauthorized public entry.	Complied	Continue inspection and maintenance of fencing and signage.
Public Health	Implement Construction Camp Management Plan and	Worker sanitation facilities maintained regularly. Hygiene awareness discussed during	Complied	Continue monitoring sanitation, hygiene, and housekeeping practices.

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
	sanitation measures	toolbox meetings and site inspections conducted by EHS personnel.		
Worker Health and Safety	Implement Occupational Health and Safety Plan and PPE use	PPE including helmets, gloves, safety shoes, and reflective vests provided to workers. Regular toolbox meetings and safety briefings conducted by Contractor and EHS personnel. No major accidents reported during reporting period.	Complied	Continue routine safety inspections and refresher safety training.
Worker Health and Safety	Conduct camp safety audits and maintain adequate camp conditions	Worker camp, eating areas, and sanitation facilities inspected regularly. Fire extinguishers and first aid facilities maintained at site.	Complied	Continue regular inspection and maintenance of worker camp facilities.
Construction Waste	Implement Waste Management Plan and segregate wastes	Waste bins installed at construction site for collection of domestic and construction waste. Waste collected regularly through designated disposal arrangements.	Complied	Strengthen waste segregation and maintain disposal records during subsequent reporting periods.
Air Quality	Use tarpaulins, misting, and prohibit stone crushing	Tarpaulin covering and water spraying enforced during material handling and storage activities. No stone crushing	Complied	Continue monitoring dust suppression and stockpile management practices.

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
		activity observed within project site.		
Air Quality	Cover trucks and spray roads to control dust	Trucks carrying construction materials observed using tarpaulin covers. Internal roads sprayed during dry conditions where necessary.	Complied	Continue regular road cleaning and dust monitoring.
Acoustic Environment	Prohibit stone crushing activity	No stone crushing activities conducted within project site during reporting period.	Complied	Continue monitoring compliance during future construction activities.
Worker Health and Safety	Enforce no-idling policy for trucks	Drivers instructed to minimize unnecessary engine idling during material loading and unloading activities.	Complied	Continue awareness and supervision activities.
Worker Health and Safety	Integrate pandemic response measures	Handwashing facilities and hygiene materials maintained at site. Health and hygiene awareness provided during toolbox meetings.	Complied	Continue maintaining hygiene and health monitoring arrangements.
Worker Health and Safety	Incorporate Emergency Response Plan and conduct training	Emergency Response Plan incorporated into site management procedures and communicated to workers during safety briefings.	Complied	Conduct periodic emergency preparedness orientation and mock drills where feasible.
Solid Waste	Ensure proper waste management procedures	Waste collection bins installed at site and regular waste collection/disposal arrangements	Complied	Continue improving waste segregation and recordkeeping practices.

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
		maintained by Contractor.		

d) Environmental Status of Sylhet TTC

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
Confirmation of NOCs from local agencies and authorities	- Confirm NOC has been obtained from STTC itself. - Declare site clearance from STTC itself so that no future conflict occurs and DoE has legal documentation confirming site ownership by CTEC.	TTC site was officially handed over to the Contractor. Relevant NOC and site clearance documents are maintained at the site office and PIU office for verification.	Complied	Continue maintaining updated records of approvals and site handover documentation.
Verification of environmental clearances	- Confirm Site Clearance Certificate (SCC) and Environmental Clearance Certificate (ECC) have been granted, and that conditions imposed by DoE are reflected in EMP, EMoP, and CEMP.	Environmental clearance related NOC documents were received from DoE. Relevant conditions have been incorporated into EMP implementation and site management procedures.	Complied	Continue monitoring validity and renewal requirements of environmental clearances.
CEMP verification	- Review CEMP to ensure all primary Contractor responsibilities are fully reflected, including monitoring and reporting.	Draft CEMP has been prepared by the Contractor and submitted for review by PIU and supervision consultants. Final approval process is ongoing prior to commencement of major construction activities.	Partially Complied	Contractor to finalize and obtain approval of CEMP before full-scale construction activities commence. PIU and CSC to complete review and verification process.
Specialized plans verification	Confirm preparation of: - Construction Camp Management Plan - Waste Management	Draft specialized plans including Waste Management Plan, Emergency Response Plan, Occupational	Partially Complied	Contractor to finalize and implement all specialized plans prior to major construction activities.

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
	Plan - Emergency Response Plan - Compensatory Tree Planting Plan - Construction Traffic Management Plan - Soil Erosion Prevention Plan - Site Reinstatement Plan - Occupational Health and Safety Plan including COVID-19 measures	Health and Safety Plan, and Construction Camp Management Plan have been prepared and incorporated within the draft CEMP. Review and approval are ongoing.		PIU/CSC to verify implementation through regular inspections.
Grievance Redress Mechanisms	- Confirm that central GRM and workers' GRM have been established and publicized.	Central GRM and site-level GRM were established. GRC committee was formed and GRM register is maintained at site. GRM contact information has been displayed for workers and stakeholders.	Complied	Continue regular documentation and monitoring of grievances and resolutions.
EMP training	- Confirm that central EMP training and site-specific EMP training are held.	One central EMP training and two site-specific EMP training sessions were completed during the reporting period. Training topics included environmental safeguard measures, occupational health and safety, PPE use, waste management, emergency response, and GRM procedures. Attendance	Complied	Continue periodic refresher training throughout construction phase.

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
		sheets, agendas, and photographs are maintained by Contractor and PIU.		
Climate change mitigation	- Integrate GHG-limiting measures into facility designs including photovoltaic systems, energy-efficient equipment, cross-ventilation, landscaping, green roofs, water-saving fixtures, and low-carbon construction practices.	Water-saving toilets, faucets, and energy-efficient fittings have been incorporated into the approved design. Provision for solar energy systems has also been considered in the design. Other proposed measures such as green roofs, extensive shade tree landscaping, hollow wall structures, and enhanced cross-ventilation remain under consideration and have not yet been incorporated into the current design.	Partially Complied	Assess feasibility of incorporating additional climate resilience and energy efficiency measures during detailed design and construction stages where practical.
Climate change adaptation	- Integrate lightning arrester, flood protection measures, green roofs, shade trees, and cross-ventilation features into facility design.	Lightning protection and selected climate adaptation measures are being considered in the design process. However, green roofs, extensive landscaping with shade trees, and enhanced cross-ventilation systems are still under review and not yet incorporated into	Partially Complied	Finalize climate adaptation features during detailed design review and document incorporated measures in updated design drawings.

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
		the approved design.		
Groundwater resources	- Conduct baseline monitoring of groundwater, surface water, air, soil, and noise quality. - Maximize groundwater recharge through rainwater harvesting, efficient fixtures, low-water landscaping, and stormwater infiltration measures.	Baseline environmental monitoring for groundwater, surface water, air quality, soil, and noise was conducted to establish benchmark conditions. Water-efficient sanitary fixtures have been incorporated into the design. Rainwater harvesting was assessed; however, implementation is currently limited due to site-specific design and drainage conditions.	Partially Complied	Continue environmental monitoring during construction and reassess opportunities for groundwater recharge and rainwater harvesting where feasible.
Public health and safety	- Design STTC building layout to maximize user spacing and improve indoor air turnover.	Public health and safety provisions have been incorporated into construction management procedures and contract requirements. Routine site inspections confirmed use of PPE, housekeeping practices, and worker awareness measures. No major health and safety incidents were reported during the reporting period.	Complied	Continue routine health and safety inspections, toolbox meetings, and documentation of monitoring records.
Water quality	- Store fluids within dedicated	Fuel, lubricants, and chemicals are	Complied	Continue regular inspection and

Parameter	Measures Proposed in the IEE/EMP	Actual Measures Taken	Compliance Status	Recommended Action
	storage areas with secondary containment equal to or exceeding 115% of the largest container volume. - Routinely inspect storage areas and tanks for leakage and take corrective action.	stored in designated areas. Routine inspections are conducted to identify leakage and spill risks. No major spill or water contamination incidents were observed during the reporting period.		maintenance of storage and containment systems.

3.2 Compliance with ADB SPS 2009 policies

82. The compliances including IEE and CEMP of civil works under SICIP program are being listed and updated in the following table.

Table 3-2: The compliance status of SICIP with respect to ADB SPS 2009

ADB Safeguard Policy Statement		Contract Package Status			
		NATI	STTL	Sylhet TTC	KWT
(i) IEE	Preparation status	Prepared	Prepared	Prepared	Prepared
	Approval status	Under review	Under review	Approved	Approved
	Disclosure status	Not yet	Not yet	Disclosed	Not yet
	Compliance status	Partially Complied	Partially Complied	Complied	Complied
(ii) CEMP	Preparation status	Under preparation	Prepared	Under preparation	Prepared
	Approval status	Not yet	Under Review	Not yet	Under Review
	Disclosure status	Not yet	Not yet	Not yet	Not yet
	Compliance status	Partially Complied	Partially Complied	Partially Complied	Partially Complied
(iii) Information disclosed		Partially Complied	Partially Complied	Partially Complied	Partially Complied
		Disclosure of the EMR on the SICIP website has not yet been completed during the reporting period. Disclosure is planned rather than already undertaken.			
(iv) Consultation and participation have been done and public opinion has been used in project design phase.		Complied	Complied	Complied	Complied
		Consultations were done during IEE development.			
(v) Establishment of GRC and notes of grievances		Complied	Complied	Complied	Complied
		GRCs established for each package.			
(vi) Monitoring and reporting: client will document regular monitoring results, in case of adverse significant affects		Complied	Complied	Complied	Complied
		Semi-annual environmental monitoring report is being submitted for July to December 2025.			

ADB Safeguard Policy Statement	Contract Package Status			
	NATI	STTL	Sylhet TTC	KWT
external NGO will be involved as third party monitoring				
(vii) Unanticipated environmental impacts	Complied	Complied	Complied	Complied
	Unanticipated environmental impacts not found yet			
(viii) Biodiversity Conservation and Sustainable Natural Resource Management: The borrower/client will assess the significance of project impacts and risks on biodiversity and natural resources as an integral part of the environmental assessment process	Complied	Complied	Complied	Complied
	The assessment was done during the development of IEE. The project does not impact any critical habitat.			
(ix) Pollution prevention: During the design, construction, and operation of the project the borrower/client will apply pollution prevention and control technologies and practices consistent with international good practice, as reflected in internationally recognized standards such as the World Bank Group's Environment, Health and Safety Guidelines.	Complied	Complied	Complied	Complied
	The project applied pollution prevention and control measures during the design, construction, and operation phases in accordance with international good practices and relevant national regulations. Pollution prevention and control technologies and practices were implemented consistent with the World Bank Group Environmental, Health and Safety (EHS) Guidelines and applicable environmental safeguard requirements. These measures included dust suppression, proper waste management, control of wastewater discharge, noise reduction measures, safe handling and storage of construction materials and fuels, housekeeping practices, and implementation of site-specific Environmental Management Plans (EMPs) and Construction Environmental Management Plans (CEMPs) at the project sites.			
(x) Health and safety: The	Complied	Complied	Complied	Complied

ADB Safeguard Policy Statement	Contract Package Status			
	NATI	STTL	Sylhet TTC	KWT
	Contractors have developed OHS plans in the respective sites.			
(xi) Physical and cultural resources: The borrower/client is responsible for siting and designing the project to avoid significant damage to physical cultural resources	Complied	Complied	Complied	Complied
	The project design considered the important cultural and physical resources in the project sites			

3.3 Compliance with loan covenants

83. The compliance with loan covenants with status are presented in the following table.

Table 3-3: The compliance status with respect to loan covenants

Sched-ule	Para No.	Description	Compliance Status	Time frame for CAP, if any	Remarks
4	1	Implementation Arrangements The Borrower shall ensure, or cause the Program Executing Agency to ensure, that the Program is implemented in accordance with the detailed arrangements set forth in the PID. Any subsequent change to the PID shall become effective only after approval of such change by the Borrower and ADB. In the event of any discrepancy between the PID and this Loan Agreement, the provisions of this Loan Agreement shall prevail.	Ongoing/ Being Complied	Project period	Program implementation arrangements are being followed in accordance with the PID and Loan Agreement requirements.

Sched-ule	Para No.	Description	Compliance Status	Time frame for CAP, if any	Remarks
4	2	Implementation Arrangements The Borrower shall ensure that the aggregate amount of Eligible Expenditures under the Program is equal to or exceeds the Loan proceeds withdrawn by the Borrower for the Program. Such Eligible Expenditures are part of the expenditures incurred under SDF, but they exclude any expenditures for (a) procurement of works, goods and services from countries which are not members of ADB; (b) procurement of works, goods and services from persons or entities debarred or suspended by ADB; (c) procurement involving High-Value Contracts; (d) any activities which are classified as category A for environmental impact under the SPS; (e) any activities assessed as likely to have significant adverse impacts that are sensitive, diverse, or unprecedented on environment and/or affected people; and (f) any activities which are prohibited investment activities provided in Appendix 5 of the SPS.	Ongoing/ Being Complied	Project period	Eligible expenditure requirements and exclusion criteria are being monitored during program implementation.
4	3	DLI Compliance and Program Dialogue The Borrower shall ensure that all DLIs achieved under the Program continue to be complied with for the duration of SDF.	Ongoing/ Being Complied	Project period	Achieved DLIs are being monitored and maintained during program implementation.
4	4	DLI Compliance and Program Dialogue The Borrower shall keep ADB informed of discussions with other multilateral or bilateral aid agencies that may have implications for the implementation of SDF and the Program and shall provide ADB with an opportunity to comment on any resulting proposals. The Borrower shall give due consideration to ADB's views before finalizing and implementing any such proposal.	Ongoing/ Being Complied	Project period	ADB is informed as required regarding relevant discussions and program-related coordination activities.

Sched-ule	Para No.	Description	Compliance Status	Time frame for CAP, if any	Remarks
4	5	DLI Compliance and Program Dialogue Within 9 months of the Effective Date, the Borrower shall appoint an independent verification agency with qualifications, experience, and expertise acceptable to ADB to provide independent verification of the achievement of the DLIs.	Ongoing/ Being Complied	Project period	Appointment process for the IVA is ongoing.
4	6	Technical Requirements The Borrower shall ensure that all Program Actions in the area of technical requirements are implemented in a timely and efficient manner.	Ongoing/ Being Complied	Project period	Technical requirements are being implemented during program execution.
4	7	Financial Management The Borrower shall ensure that all Program Actions in the area of financial management are implemented in a timely and efficient manner.	Ongoing/ Being Complied	Project period	Financial management activities are being implemented in accordance with program requirements.
4	8	Procurement The Borrower shall ensure that each contract under the Program is awarded on the basis of the Program's procurement system, having due regard for principles of competition, economy and efficiency, transparency, and fairness and equal opportunity.	Ongoing/ Being Complied	Project period	Procurement activities are being conducted following the approved procurement procedures and guidelines.
4	9	Procurement The Borrower shall ensure that all Program Actions in the area of procurement are implemented in a timely and efficient manner.	Ongoing/ Being Complied	Project period	Procurement-related actions are under implementation.
4	10	Environmental and Social Safeguards The Borrower shall ensure that all Program Actions in the area of environmental and social safeguards are implemented in a timely and	Ongoing/ Being Complied	Project period	Environmental and social safeguard activities are being implemented and monitored during project execution.

Sched-ule	Para No.	Description	Compliance Status	Time frame for CAP, if any	Remarks
		efficient manner.			
4	11	Environmental and Social Safeguards (a) The Borrower shall ensure, or cause the Program Executing Agency to ensure that no construction or rehabilitation works under the Program involve significant adverse environmental impacts that may be classified as category A under the SPS. Prior to commencing any construction or rehabilitation works under the Program, the Borrower shall conduct, or cause the Program Executing Agency to conduct, a screening to ensure that any works that may be classified as category A for environment impacts within the meaning of SPS are excluded from the Program.	Complied;	Project period	Environmental screening was conducted for subprojects prior to commencement of construction activities. No Category-A activities were included under the Program.
4	11	Environmental and Social Safeguards (b) The Borrower shall ensure, or cause the Program Executing Agency to ensure, that the preparation, design, construction, implementation, operation and decommissioning of all activities under the Program comply with: (i) all applicable laws, regulations and guidelines of the Borrower relating to environment, health and safety; (ii) the Environmental Safeguards; and (iii) all measures and requirements, including monitoring requirements set forth in the Program Action Plan.	Ongoing/ Being Complied	Project period	Environmental safeguard measures, monitoring activities, and OHS requirements are being implemented at active construction sites.
4	12	Environmental and Social Safeguards The Borrower shall ensure, or cause the Program Executing Agency to ensure, that the Program does not involve any resettlement risks or impacts within the meaning of the SPS. If due to unforeseen circumstances, the Program involves any such impacts, the Borrower shall ensure that the Program complies with (a) all applicable laws and regulations of the Borrower relating to resettlement; (b) Involuntary Resettlement Safeguards; and (c) all measures and requirements,	Complied	Project period	No involuntary resettlement impacts were identified under the Program during the reporting period.

Sched-ule	Para No.	Description	Compliance Status	Time frame for CAP, if any	Remarks
		including monitoring requirements set forth in the Program Action Plan.			
4	13	Environmental and Social Safeguards The Borrower shall ensure, or cause the Program Executing Agency to ensure, that the preparation, design, construction, implementation, operation and decommissioning of all activities under the Program comply with: (a) all applicable laws and regulations of the Borrower relating to tribes, minor races, ethnic sects and communities; (b) Indigenous Peoples Safeguards; and (c) all measures and requirements, including monitoring requirements set forth in the Program Action Plan.	Complied	Project period	No impacts on tribes, minor races, ethnic sects, or Indigenous Peoples were identified under the Program.
4	14	Gender and Social Equality The Borrower shall ensure that all Program Actions in the area of gender and social equality are implemented in a timely and efficient manner.	Ongoing/ Being Complied	Project period	Gender and social equality activities are being implemented under the Program.
4	15	Governance and Anticorruption The Borrower shall ensure, or cause the Program Executing Agency to ensure that the Program complies with the Anticorruption Guidelines and that all appropriate and timely measures are taken to prevent, detect and respond to allegations of fraud, corruption or any other prohibited activities relating to the Program in accordance with the Anticorruption Guidelines.	Ongoing/ Being Complied	Project period	Governance and anticorruption measures are being maintained during program implementation.
4	16	Governance and Anticorruption The Borrower shall, or cause the Program Executing Agency to (a) promptly inform ADB of any allegations of fraud, corruption or any other	Ongoing/ Being Complied	Project period	Necessary institutional arrangements remain in place for reporting and cooperation requirements.

Sched-ule	Para No.	Description	Compliance Status	Time frame for CAP, if any	Remarks
		prohibited activities relating to the Program; and (b) cooperate fully with any investigation by ADB on such allegations and extend all necessary assistance, including providing access to all relevant records, for satisfactory completion of such investigation.			
4	17	Governance and Anticorruption Within 90 days of the Effective Date, the Borrower shall, or cause the Program Executing Agency to, update its public website to (a) provide information on bidding procedures, bidders, contract awards and physical progress of the Program; (b) post the audited annual financial statements for the Program, as such financial statements become available; and (c) disseminate other relevant information on Program implementation.	Ongoing/ Being Complied	Project period	Relevant program information is being updated on the public website periodically.
Article IV		4.02 (a) The Borrower shall (i) maintain separate accounts and records for the Program; (ii) prepare annual financial statements for the Program in accordance with financial reporting standards acceptable to ADB; (iii) have such financial statements audited annually by independent auditors whose qualifications, experience and terms of reference are acceptable to ADB, in accordance with auditing standards acceptable to ADB; (iv) as part of each such audit, have the auditors prepare a report, which includes the auditors' opinion(s) on the financial statements and the use of the Loan proceeds, and a management letter (which sets out the deficiencies in the internal control of the Program that were identified in the course of the audit, if any); and (v) furnish to ADB, no later than 9 months after the end of each related Fiscal Year, copies of such audited financial statements, audit report and management letter, all in the English language, and such other information concerning these documents and the audit thereof as ADB shall from time to time reasonably request.	Ongoing/ Being Complied	Project period	Financial management and audit activities are being carried out in accordance with ADB requirements.
Article IV		4.02 (b) ADB shall disclose the annual audited financial statements for the Program and the opinion of the auditors on the financial statements	Complied	Project period	Requirement acknowledged and subject to ADB

Sched-ule	Para No.	Description	Compliance Status	Time frame for CAP, if any	Remarks
		within 14 days of the date of ADB's confirmation of their acceptability by posting them on ADB's website.			disclosure procedures upon acceptance of audit documents.
Article IV		4.02 (c) The Borrower shall enable ADB, upon ADB's request, to discuss the financial statements for the Program and the Borrower's financial affairs where they relate to the Program with the auditors appointed pursuant to subsection (a)(iii) hereinabove, and shall authorize and require any representative of such auditors to participate in any such discussions requested by ADB. This is provided that such discussions shall be conducted only in the presence of an authorized officer of the Borrower, unless the Borrower shall otherwise agree.	Complied	Project period	Necessary arrangements for cooperation with ADB and auditors are in place.

4 STRATEGY FOR COVID-19 PANDEMIC AND H&S GUIDELINE

84. In the COVID-19 pandemic, the DSC expert has completed all design, drawings, technical specifications and BoQ through using different virtual meetings, site visit, analysis after allowing International Flight following safety guidelines as suggested by GoB and ADB. Safeties' included hand hygiene, respiratory hygiene & physical distancing. Individual transports were used during the site visits and virtual media were used for communications.

Table 4-1: The compliance status of SICIP with respect to COVID-19

SL	COVID-19 Response questions	NATI	STTL-CTG	Kum Dorm	Sylhet TTC
1	Site re-opening and entry protocol				
	Locate the closest medical establishment equipped with COVID -19 response facilities.	Being complied	Being complied	Being complied	Being complied
	Engage a full time EHS professional at site	Being complied	Being complied	Being complied	Being complied
	Purchase thermometer gun, soap, hand sanitizer, disinfectants and PPEs (mask, hand gloves, hard shoes etc.) and keep it at worksite office.	Being complied	Being complied	Being complied	Being complied
	Establish site entrance protocol. Redesign the site safety notices/signboards/protocol according to the ADB guidelines	Being complied	Being complied	Being complied	Being complied
	Arrange washbasin, soap and clean water at the entrance of every worksite/campsite. Also keep either a disinfectant tub for shoes or keep disinfectant spray that must be sprayed under the boots/hard shoes of the persons entering worksite.	Being complied	Being complied	Being complied	Being complied

SL	COVID-19 Response questions	NATI	STTL-CTG	Kum Dorm	Sylhet TTC
	Provide every personnel working in the site with mask, hand gloves and hard shoes for their personal use.	Being complied	Being complied	Being complied	Being complied
	Everyone entering the worksite must wear a mask, gloves and hard shoes	Being complied	Being complied	Being complied	Being complied
2	Daily worksite protocol				
	A designated EHS and medical person should stay all time during work. The EHS/Medical person should also monitor campsite. He/she will be in charge of ensuring physical distances (minimum 1m) among workers, disinfecting surfaces that are commonly used and investigate workers/site personnel health and safety.	Being complied	Being complied	Being complied	Being complied
	At the start and end of the day disinfect the total worksite.	Being complied	Being complied	Being complied	Being complied
	Encourage site personnel/camp dwellers to not touch their eyes, mouth or nose if not washed thoroughly with soap recently. Also discourage hand shaking or hugs.	Being complied	Being complied	Being complied	Being complied

SL	COVID-19 Response questions	NATI	STTL-CTG	Kum Dorm	Sylhet TTC
	Arrange a mandatory site brief on COVID awareness in the morning. The session must be conducted by the EHS/medical professional.	Being complied	Being complied	Being complied	Being complied
	While worksites are commonly well ventilated (if not make sure the work sites are well ventilated), ensure that the camp sites including the rooms designated for the camp dwellers are well ventilated and spacious.	Being complied	Being complied	Being complied	Being complied
	Before sharing common tools/machines at worksite, ensure to disinfect.	Being complied	Being complied	Being complied	Being complied
	Discourage site personnel to gather and gossip at any time, rather encourage physical distance while chatting/discussing.	Being complied	Being complied	Being complied	Being complied
	Restrict worksite personnel to go outside unnecessarily. Also restrict campsite personnel to go outside without any valid cause.	Being complied	Being complied	Being complied	Being complied

SL	COVID-19 Response questions	NATI	STTL-CTG	Kum Dorm	Sylhet TTC
	If any person related at worksite/campsite fall victim to COVID-19 or being kept isolated for pre-caution, consider paid leave with no exception allowed.	Being complied	Being complied	Being complied	Being complied
3	Every day training				
	Train workers on how to properly put on, use/wear, and take off protective clothing and equipment. The on-site EHS/Medical person should be in-charge of these trainings. These trainings must maintain the WHO's social distancing protocol. Make these trainings mandatory at worksites. Provide 10-15 minutes of a workday for such 'training and encouragement' activities.	Being complied	Being complied	Being complied	Being complied

5 OCCUPATIONAL HEALTH AND SAFETY (OHS) IMPLEMENTATION STATUS

During the reporting period (July–December 2025), Occupational Health and Safety (OHS) measures were implemented across all active construction sites under SICIP, including STTL Chattogram, Kumudini Dormitory (KWT), NATI Narsingdi, and Sylhet TTC. Site-specific OHS practices were monitored regularly by the Site Engineer and site supervision teams to ensure compliance with the Environmental Management Plans (EMPs) and applicable safety standards.

5.1 Site Security and Access Control

- All construction sites were secured with boundary fencing or barricading
- Controlled entry/exit points were established with site registers
- Safety signage (mandatory PPE, hazard warnings, restricted access) installed at key locations
- Workers and visitors were allowed entry only with permission and basic safety compliance

5.2 Personal Protective Equipment (PPE)

Contractors supplied PPE including:

- Safety helmets
- High-visibility vests
- Safety shoes
- Hand gloves
- Dust masks (where required)

Field observations confirmed that:

- PPE usage was generally compliant across sites
- Minor gaps (e.g., inconsistent glove/mask use) were corrected through supervision

5.3 Accident and Incident Reporting

No major accidents were reported during the reporting period. The summary of incidents is presented in Table 5-1.

Table 5-1: Summary of Incidents

Type of Incident	STTL	KWT Dormitory	NATI	Sylhet TTC	Total
Fatal Accidents	0	0	0	0	0
Lost Time Injuries	0	0	0	0	0
First Aid Cases	2*	1*	1*	1*	5
Near Miss Incidents	1*	1*	0	1*	3

*Note: Minor first aid and near-miss cases were managed at site level and recorded in site registers.

5.4 First Aid and Emergency Preparedness

- First aid boxes were available at all sites with basic supplies
- Fire extinguishers were installed at:
 - Site offices
 - Material storage areas
- Workers were informed about emergency contact procedures
- No major emergency incidents occurred during the reporting period

5.5 Toolbox Meetings and Safety Training

- Contractors conducted regular toolbox meetings (daily basis at most sites)
- Topics covered included:
 - Safe working practices

- PPE usage
- Working at height
- Electrical safety

Summary of toolbox meetings:

Site	Frequency	Estimated No. of Sessions
STTL	Daily	~90 sessions
KWT Dormitory	Daily	~85 sessions
NATI	Daily	~80 sessions
Sylhet TTC	Daily	~78 sessions

In addition, formal safety training sessions were conducted (refer Section 1.14).

5.6 Overall Assessment

Overall, OHS implementation across project sites is satisfactory, with:

- No fatal or serious injuries recorded
- Adequate PPE provision and usage
- Functional first aid and emergency systems
- Regular safety awareness through toolbox meetings

Continuous monitoring and enforcement are recommended to further strengthen compliance, particularly in consistent PPE usage and incident documentation.

6 CONCLUSION AND RECOMMENDATION

85. The civil works under the Skills for Industry Competitiveness and Innovation Program (SICIP) are being implemented within the premises of the respective academic institutions and are associated with only minor and insignificant environmental impacts. In accordance with the Asian Development Bank Safeguard Policy Statement (SPS), 2009, the subprojects are classified as Category B. The construction works of Kumudini Nursing Institute fall under the “Orange” category as defined by the Department of Environment, indicating activities that may entail limited adverse impacts requiring appropriate mitigation measures. SICIP requested the Department of Environment (DoE) to issue No Objection Certificates (NOCs) for the proposed construction subprojects under the program and conducted consultation meetings with the DoE regarding the applicable environmental clearance requirements. Subsequently, SICIP submitted formal request letters to the DoE seeking issuance of NOCs for the proposed construction activities. In response, the DoE issued official correspondence dated 24 September 2025 and 1 December 2025, through which NOCs were issued for nine (09) construction subprojects.
86. The Department of Environment further informed SICIP that construction projects having a built-up area between 5,000 square meters and 20,000 square meters fall under the Orange Category in accordance with Schedule-1 of the Environment Conservation Rules (ECR), 2023 and therefore require Environmental Clearance Certificate (ECC) following issuance of Site Clearance Certificate (SCC). For the Kumudini Nursing Institute (KWT Academic Building) subproject, the DoE instructed SICIP to submit a separate SCC application. Accordingly, the SCC application for the KWT Academic Building subproject was submitted to the DoE on 26 January 2026. The revised EMR clarifies that the NOCs issued by the DoE were communicated through official correspondence; however, the formal environmental regulatory approval process under ECR 2023 is administered through the SCC and ECC procedures, as applicable to the concerned subprojects.
87. The Skills Development Coordination and Monitoring Unit (SDCMU) has undertaken comprehensive measures to ensure effective implementation of mitigation actions and full compliance with environmental requirements throughout the construction phase. Environmental Management Plans (EMPs), inclusive of associated environmental costs, have been duly incorporated into the bidding and contract documents and are being implemented by the respective contractors.
88. As all activities are confined within existing institutional premises, there is no anticipated impact on involuntary resettlement, small ethnic communities, or agricultural land. Nevertheless, SDCMU remains fully committed to ensuring compliance with all applicable national laws and regulations, as well as the safeguard requirements stipulated under the SPS 2009, including those relating to environmental protection, occupational health and safety, involuntary resettlement, and small ethnic communities.
89. A dedicated Grievance Redress Mechanism (GRM) has been established at both the SDCMU and site levels to address any grievances arising

from construction activities in a timely and transparent manner. In compliance with the requirements of the Asian Development Bank and the Department of Environment, construction workers, contractors, and their personnel have received occupational health and safety orientations, including guidance on COVID-19 preventive measures. Contractors are maintaining up-to-date health and safety protocols in line with ADB's interim COVID-19 recommendations.

90. Furthermore, SDCMU continues to oversee and ensure adherence to the Initial Environmental Examination (IEE), Environmental Management Plan (EMP), Environmental Assessment and Review Framework (EARF), and any corrective or preventive actions identified in the Environmental Monitoring Reports during the implementation of civil works. To date, no significant environmental or health hazards have been observed at the construction sites, and no accidents have been reported.

91. Both the STTL, Chattogram project and the student dormitory project at KWT, Tangail have outlined corrective action plans to address the partial and complete noncompliant issues with a timeline and accountability that will be tracked over the upcoming monitoring period. The corrective action plans are written below.

Table 6-1: Corrective action plan of STTL, Chattogram Project for July-December 2025

Sl.	Environmental Issues	Recommended Corrective Measures	Responsibility	Timeline
1	Drainage System	Proper drainage system will be ensured to prevent water pollution.	SEL	December, 2026
2	Tree plantation plan	Tree plantation plan will be prepared	SEL	June, 2026
3	Air pollution	Keep air pollution within limit and maintain air pollution control measures	SEL	June, 2026
4	Water management plan	Water pollution control measures will be taken	SEL	June, 2026
5	Noise pollution	Noise barrier will be installed	SEL	June, 2026
6	Climate change and carbon footprint	Rainwater harvesting, or renewable energy source will be implemented	SEL	June, 2026

Sl.	Environmental Issues	Recommended Corrective Measures	Responsibility	Timeline
8	Stakeholder Consultation Meeting on GRM	Stakeholder consultation meetings will be conducted with the surrounding community	SEL	June 2026

Table 6-2: Corrective action plan of Student dormitory project at KWT, for July-December 2025

Sl.	Environmental Issues	Recommended Corrective Measures	Responsibility	Timeline
1	Drainage System	Proper drainage system will be ensured to prevent water pollution.	SEL	December, 2026
2	Tree plantation plan	Tree plantation plan will be prepared	SEL	Jne, 2026
3	Air pollution	Keep air pollution within limit and maintain air pollution control measures	SEL	June, 2026
4	Water management plan	Water pollution control measures will be taken	SEL	June, 2026
5	Noise pollution	Noise barrier will be installed	SEL	June, 2026
6	Climate change and carbon footprint	Rainwater harvesting, or renewable energy source will be implemented	SEL	June, 2026
8	Stakeholder Consultation Meeting on GRM	Stakeholder consultation meetings will be conducted with the surrounding community	SEL	June 2025

92. ADB has provided several recommended actions for both the STTL and KWT sites in the most recent previous EMR, which are intended to be implemented during this reporting period (July - December 2025). Table 6-3 and Table 6-4 show the implementation status with corrective action plans of the previous EMR of the STTL, Chattogram Project, and Student Dormitory Project in KWT, Tangail, respectively.

Table 6-3: Implementation status with Corrective Action Plans of previous EMR for STTL Project Site

Sl.	Environmental Issues	Recommended Corrective Measures	Actual Action taken	Targeted Date	Compliance Status
1	Drainage System	Proper drainage system will be ensured to prevent water pollution.	Not Applicable right now. Temporary drains are completed	December 2026	Partially complied
2.	Tree plantation Plan	Must need Tree plantation plan.	Site selection and, making a tentative plan is ongoing. Planted many trees along side the project.	June, 2026	Partially Complied.
3	Air Pollution	Keep air pollution within limit and maintain air pollution control measures	water is sprayed across the site twice daily-morning and afternoon. All construction machinery is regularly monitored and maintained.	December 2025	Complied
4.	Water Management Plan	Water pollution control measures will be taken	Water usage at the construction site is carefully monitored to prevent wastage, with proper storage to ensure efficient and sustainable water management.	December, 2025	Complied
5	Noise	Noise barrier should be used	Install barriers and continue periodic noise monitoring and worker awareness programs.	December, 2025	Complied

Sl.	Environmental Issues	Recommended Corrective Measures	Actual Action taken	Targeted Date	Compliance Status
6	Climate change and carbon footprint	Rainwater harvesting, or renewable energy source will be implemented	Regular monitoring of fuel use, maintenance of machinery to reduce emissions, and initial tree plantation with plans for expansion after construction.	December, 2025	Partially Complied
7	Complaint Box	Complaint box will be installed	Complaint box were installed	Novemver 2025	Complied
8	Stakeholder Consultation Meeting on GRM	Stakeholder consultation meetings will be conducted with the surrounding community		December, 2025	Non complied

Table 6-4 : Implementation status with Corrective Action Plans of previous EMR for Student Dormitory Project in KWT, Tangail

Sl.	Environmental Issues	Recommended Corrective Measures	Actual Action taken	Targeted Date	Compliance Status
1	Drainage System	Proper drainage system will be ensured to prevent water pollution.	Not Applicable right now. Temporary drains are completed	December 2026	Partially complied
2.	Tree plantation Plan	Must need Tree plantation plan.	Site selection and, making a tentative plan is ongoing. Planted many trees along side the project.	June, 2026	Partially Complied.
3	Air Pollution	Keep air pollution within limit and maintain air pollution control measures	water is sprayed across the site twice daily-morning and afternoon. All construction	December 2025	Complied

Sl.	Environmental Issues	Recommended Corrective Measures	Actual Action taken	Targeted Date	Compliance Status
			machinery is regularly monitored and maintained.		
4.	Water Management Plan	Water pollution control measures will be taken	Water usage at the construction site is carefully monitored to prevent wastage, with proper storage to ensure efficient and sustainable water management.	December, 2025	Complied
5	Noise	Noise barrier should be used	Install barriers and continue periodic noise monitoring and worker awareness programs.	December, 2025	Complied
6	Climate change and carbon footprint	Rainwater harvesting, or renewable energy source will be implemented	Regular monitoring of fuel use, maintenance of machinery to reduce emissions, and initial tree plantation with plans for expansion after construction.	December, 2025	Partially Complied
7	Complaint Box	Complaint box will be installed	Complaint box were installed	Novemver 2025	Complied
8	Stakeholder Consultation Meeting on GRM	Stakeholder consultation meetings will be conducted with the surrounding community		December, 2025	Non complied

Annex-1: Site Pictures



Grievance Meeting in NATI, Narsingdi



EMP Training in NATI, Narsingdi

