

**Final Environmental & Social Action Plan for BCIC**  
**Ghorasal Polash Urea Fertilizer Project Project**

Performance Standards (“PS” or “MIGA PS”)	Due Dates	Indicators for completions
<b>PS1: Assessment and Management of Social and Environmental Risks and Issues:</b>		
<p>1. a) The Project Enterprise will require the EPC contractors to develop and implement a project-specific environmental, social, management system (“ESMS”) for construction that conforms with Bangladesh laws, and in line with the requirements of MIGA PS1.</p> <p>b) Prior to commissioning the Investment Project, the Project Enterprise will develop and implement an ESMS for the operations phase in line with the requirements of MIGA PS1.</p>	<p>Completed.</p> <p>Prior to operation of the Investment Project</p>	<p>a) Submit to MIGA the Investment Project ESMS system document and evidence of implementation (e.g. procedures, checklists, aspects / impacts register).</p> <p>b) Submit to MIGA the Investment Project operation ESMS system document and evidence of implementation (e.g. procedures, checklists, aspects / impacts register).</p>
<p>2. The Project Enterprise will ensure that the EPC contract/ addendum includes specific requirements to comply with MIGA PSs, as well as a provision of resources for environmental and social management and monitoring, including management and monitoring of compliance of subcontractors in line with the requirements of MIGA PS1.</p>	<p>Completed.</p>	<p>Submit to MIGA the E&amp;S sections of the EPC contract.</p>
<p>3. a) The Project Enterprise will appoint a Quality, Health, Safety, and Environmental (“QHSE”) manager and additional environmental officers, health and safety (“EHS”) staff and engineers as required to manage Investment Project E&amp;S risks and impacts during construction and operations in</p>	<p>Completed</p>	<p>a) Submit to MIGA the Project Enterprise QHSE manager’s CV.</p>

Performance Standards (“PS” or “MIGA PS”)	Due Dates	Indicators for completions
<p>line with the requirements of MIGA PS1.</p> <p>b) The Project Enterprise will require the EPC Contractors to appoint a qualified QHSE manager and additional EHS staff and engineers during the construction and commissioning of the Investment Project in line with the requirements of MIGA PS1.</p>	Completed.	b) Submit to MIGA the EPC contractors QHSE manager’s CV.
<p>4. The Project Enterprise will require the EPC contractors to develop a construction management plan for the new Investment Project in line with the requirements of MIGA PS1.</p>	Completed.	Submit to MIGA the construction management plan
<p>5. The Project Enterprise will require the EPC contractors to develop facilities demolition plan for the civil structures in line with the requirements of MIGA PS1.</p>	Completed.	Submit to MIGA the facilities demolition plan
<p>6. a) The Project Enterprise will require the EPC contractors to develop a comprehensive Emergency Preparedness and Response Plan (“EPRP”) for construction to address the facility wide risks including fire and other external emergencies for construction and commissioning in line with the requirements of MIGA PS1.</p> <p>b) The Project Enterprise will develop a comprehensive EPRP to address the facility wide risks including fire and other external emergencies during operation in line with the requirements of MIGA PS1.</p>	<p>Completed.</p> <p>Prior to operation of the Investment Project.</p>	<p>a) Submit to MIGA the EPRP for construction</p> <p>b) Submit to MIGA the EPRP for operation.</p>
<p>7. The Project Enterprise will conduct a comprehensive climate risk vulnerability assessment (“CRVA”) report to assess climate vulnerability and extremes as defined by the Intergovernmental Panel on Climate Change (“IPCC”). The CRVA will include, but not be limited to, rate of climate change and variation to which the Investment Project is exposed,</p>		

Performance Standards (“PS” or “MIGA PS”)	Due Dates	Indicators for completions
<p>their sensitivity, and adaptive capacity of ecosystems and communities during the entire lifecycle of all the Investment Project components. The Project Enterprise should submit the following to MIGA:</p> <ul style="list-style-type: none"> <li>a) Consultant TORs for review.</li> <li>b) CRVA draft report</li> <li>c) CRVA final report</li> </ul>	<p>Completed</p> <p>4/15/2020</p> <p>05/15/2020</p>	<ul style="list-style-type: none"> <li>a) Submit to MIGA consultant TORs for review.</li> <li>b) Submit to MIGA CRVA draft report</li> <li>c) Submit to MIGA CRVA final report</li> </ul>
<p><b>8.</b> a) The Project Enterprise will require the EPC contractors to develop comprehensive Life Fire and Safety (“LFS”) Manual/procedure in line with international standards, national requirements and Good International Industry Practice (“GIIP”).</p> <p>b) The Project Enterprise will develop an LFS Manual/procedure that in line with national requirements and GIIP and implement it during the operation.</p>	<p>Completed.</p> <p>Prior to operation or the Investment Project.</p>	<ul style="list-style-type: none"> <li>a) Submit to MIGA LFS Manual for Construction.</li> <li>b) Submit to MIGA LFS Manual for operation.</li> </ul>
<p><b>9.</b> The Project Enterprise will hire a consultant to conduct a comprehensive Cumulative Impact Assessment (“CIA”) study.</p> <ul style="list-style-type: none"> <li>a) The Project Enterprise submit CIA ToR for MIGA review.</li> <li>b) Submit the draft report for the CIA study</li> <li>c) Submit the final report</li> <li>d) Implement the CIA study outcomes and proposed action plan to address the potential impacts around project area influence in line with the requirements of MIGA PS1 as agreed with MIGA.</li> </ul>	<p>Completed.</p> <p>Completed.</p> <p>3/15/2020</p> <p>After the CIA study completed</p>	<ul style="list-style-type: none"> <li>a) Submit to MIGA the CIA ToR</li> <li>b) Submit to MIGA the CIA draft report.</li> <li>c) Submit to MIGA the final CIA report.</li> <li>d) Submit to MIGA the updated action plan with completion status.</li> </ul>

Performance Standards (“PS” or “MIGA PS”)	Due Dates	Indicators for completions
<p><b>10.</b> a) The Project Enterprise will share with MIGA the technical committee recommendations and plan to demolish the two old fertilizer plants – i.e., Urea Fertilizer Factory Ltd. (“UFFL”) and Polash Urea Fertilizer Factory Ltd. (“PUFFL”)</p> <p>b) The Project Enterprise will hire an experienced, qualified and competent company to demolish the old plants, manage all the E&amp;S risks including the occupational health and safety risks, disposal of solid and hazardous waste (e.g. asbestos) in line with MIGA requirements.</p>	<p>Completed</p> <p>60 days prior to the demolition of the two old fertilizer plants (UFFL and PUFFL)</p>	<p>a) Submit to MIGA the demolition plan for the two old fertilizer plants (UFFL and PUFFL).</p> <p>b) Submit to MIGA the credentials of the consultant that will conduct the demolition</p>
<b>PS2: Labor and Working Conditions</b>		
<p><b>11.</b> a) The Project Enterprise will require the EPC contractors to develop a human resource (“HR”) policy and procedures that are project specific during construction and are in line with MIGA’s PS2 and with Bangladesh labor laws. The EPC contractors will ensure that all direct and indirect employees are aware of its content. The Project Enterprise will also ensure that the EPC contractors apply these to their sub-contractors.</p> <p>b) The Project Enterprise will develop and update their HR policy for operation to ensure they are in line with MIGA’s PS2 and with Bangladesh labor laws.</p>	<p>Completed.</p> <p>Prior to operation of the Investment Project.</p>	<p>a) Submit to MIGA the EPC contractors’ HR policy and procedures.</p> <p>b) Submit to MIGA the Project Enterprise’s HR policy and procedures.</p>
<p><b>12.</b> a) The Project Enterprise will require the EPC contractors to develop project code of conduct procedures for all workers and applied to the subcontractors during construction in line with the requirements of MIGA PS2.</p> <p>b) The Project Enterprise will develop project code of conduct procedures for all workers for the operations phase of the Investment Project.</p>	<p>Completed.</p> <p>Prior to operation of the Investment Project.</p>	<p>a) Submit to MIGA EPC contractors’ workers code of conduct procedure for construction.</p> <p>b) Submit to MIGA the Project Enterprise’s workers code of conduct procedure during operations.</p>
<p><b>13.</b> The Project Enterprise will require the EPC contractors to develop a worker’s accommodation plan for the construction stage in line with International Finance Corporation</p>	<p>Completed.</p>	<p>Submit to MIGA the workers accommodation plan.</p>

Performance Standards (“PS” or “MIGA PS”)	Due Dates	Indicators for completions
and European Bank of Reconstruction and Development Guidance Note on Worker’s Accommodation: Processes and Standards		
<p><b>14. a)</b> The Project Enterprise will require the EPC contractors to develop and make available a worker’s grievance mechanism procedure during the construction in line with the requirements of MIGA PS2.</p> <p><b>b)</b> The Project Enterprise will develop a worker’s grievances mechanism procedures for operations in line with the requirements of MIGA PS2.</p>	<p>Completed.</p> <p>Prior to operation of the Investment Project.</p>	<p>a) Submit to MIGA the workers grievance procedure for construction</p> <p>b) Submit to MIGA the workers grievance procedure for operation.</p>
<p><b>15. a)</b> The Project Enterprise will require the EPC contractors to develop and implement site-specific Occupational Health and Safety (“OHS”) procedures for the construction. The plan will detail out the following issues: hazard identification and assessment; the construction site safety (safety, control of the access, clear demarcation of areas and provision of safety information to visitors, etc.); specific procedures for hazardous works; worker’s safety and training plan; personnel qualification, limitations and equipment needs (e.g. personal protective equipment); site supervision and audit procedures; incident reporting system and intervention measures (first aid etc.) in line with the requirements of MIGA PS2.</p> <p><b>b)</b> The Project Enterprise will develop an OHS procedures for the operation phase and implement it effectively in line with the requirements of MIGA PS2.</p>	<p>Completed.</p> <p>Prior to operation of the Investment Project.</p>	<p>a) Submit to MIGA the OHS procedures and plan.</p> <p>b) Submit to MIGA the OHS procedures and plan.</p>
<b>PS3: Resource Efficiency and Pollution Prevention</b>		
<p><b>16.</b> The Project Enterprise will be required to ensure that the Investment Project will have and implement the following:</p> <p>I. Increase the stack heights of the Investment Project’s boilers and the reformers to 50 meters from the current design of 30 meters</p>	<p>Prior to construction of the Investment Project</p>	<p>Submit to MIGA the revised plant design that indicate the stack heights for the boilers and reformers and Snamprogetti process</p>

Performance Standards (“PS” or “MIGA PS”)	Due Dates	Indicators for completions
<p>to meet the GIIP; and</p> <p>II. Ensure the Investment Project uses the Snamprogetti process and scrubbers to meet the particulate matter guidelines values (50 mg/Nm<sup>3</sup>) for process air emissions levels per the World Bank Group (“WBG”) EHS guidelines for nitrogenous fertilizers manufacturing plants.</p>		
<p><b>17.</b> The Project Enterprise will be required to conduct a full project air quality baseline survey to capture baseline data for the oxides of nitrogen (NO<sub>x</sub>) and by association nitrogen dioxide (NO<sub>2</sub>) and particulate matter (as PM<sub>10</sub> and PM<sub>2.5</sub>) concentration levels for 1 hr (one hour), 24 hr (twenty-four hours) and annual per the Bangladesh and WBG/ World Health Organization Air Quality Standard. The Project Enterprise will submit to MIGA:</p> <p>a. The consultant ToR and CVs for MIGA review.</p> <p>b. Submit the air quality baseline draft report</p> <p>c. Submit the air quality baseline final report</p>	<p>Completed.</p> <p>Prior to construction of the Investment Project</p> <p>Prior to construction of the Investment Project</p>	<p>a. Submit to MIGA the consultant ToR and CVs.</p> <p>b. Submit the air quality baseline draft report.</p> <p>c. Submit the air quality baseline final report</p>
<p><b>18.</b> The Project Enterprise will also be required to develop an air ambient quality monitoring system to monitor NO<sub>2</sub>, PM<sub>10</sub> and NH<sub>3</sub> for the Investment Project during the operations.</p>	<p>Prior to operation of the Investment Project.</p>	<p>Submit to MIGA the Investment Project’s air ambient quality monitoring program.</p>
<p><b>19.</b> a) The Project Enterprise will require the EPC contractors to develop a water management plan which details on the water sources, water use, treatment requirements and estimated consumption during the construction phase of the Investment Project in line with the requirements of MIGA PS3.</p>	<p>Completed.</p>	<p>a) Submit to MIGA the water management plan for construction.</p>

Performance Standards (“PS” or “MIGA PS”)	Due Dates	Indicators for completions
<p>b) The Project Enterprise will develop a water management plan which details on the water sources, water use, treatment requirements and estimated consumption during the operation phase of the Investment Project in line with the requirements of MIGA PS3.</p>	<p>Prior to operation of the Investment Project.</p>	<p>b) Submit to MIGA the water management plan for operation.</p>
<p><b>20.</b> a) The Project Enterprise will require the EPC contractor to develop the noise management plan and noise monitoring system and implement measures to manage and minimize noise levels during construction phase to meet requirements of MIGA PS3.</p> <p>b) The Project Enterprise will develop the noise management plan and a noise monitoring system for operations phase to meet requirements of MIGA PS3.</p>	<p>Completed.</p> <p>Prior to operation of the Investment Project.</p>	<p>a) Submit to MIGA the noise management plan and noise monitoring system plan during construction phase.</p> <p>b) Submit to MIGA the noise management plan and noise monitoring system plan during operations phase.</p>
<p><b>21.</b> a) The Project Enterprise will require the EPC contractors to develop a waste management procedure during the construction phase to meet requirements of MIGA PS3.</p> <p>b) The Project Enterprise will require to develop a waste management procedure during the operations phase to meet requirements of MIGA PS3</p>	<p>Completed.</p> <p>Prior to operation of the Investment Project.</p>	<p>a) Submit to MIGA the waste management plan during construction phase.</p> <p>b) Submit to MIGA waste management plan during operations phase</p>
<p><b>22.</b> a) The Project Enterprise will require the EPC contractor to develop a comprehensive hazardous material (“HAZMAT”) procedure that clearly explains the process of managing, the hazardous materials for construction phase in line with the requirements of MIGA PS3.</p> <p>b) The Project Enterprise will develop a comprehensive HAZMAT procedure that clearly explains the process of managing, the hazardous materials for operation phase in line with the requirements of MIGA PS3.</p>	<p>Completed.</p> <p>Prior to operation of the Investment Project.</p>	<p>a) Submit to MIGA a copy of HAZMAT procedure for construction phase.</p> <p>b) Submit to MIGA copy of HAZMAT procedure for operation phase.</p>
<p><b>23.</b> The Project Enterprise will require the EPC contractors to develop an asbestos abatement and management plan, and ensure they include measures to address safe handling of asbestos in</p>	<p>Completed.</p>	<p>Submit to MIGA the asbestos abatement and management plan.</p>

Performance Standards (“PS” or “MIGA PS”)	Due Dates	Indicators for completions
their project-specific EHS plan in line with the requirements of MIGA PS3		
24. The Project Enterprise to identify an appropriate site and construct a secure concrete recovery or disposal facility at the project site to dispose all asbestos and other hazardous waste generated responsibly per MIGA P3.	Before the civil structure’s demolitions.	Submit to MIGA photos of the secure concrete recovery or disposal facility for asbestos.
25. The Project Enterprise to ensure that the hazardous materials (asbestos) are not sent to landfills and these materials are controlled and disposed of in the environmentally sound disposal site.	Before disposal	Submit to MIGA the photos of the secure concrete recovery or disposal facility for asbestos.
26. Asbestos washed water should be collected in a secure pit, the water treated before released into the environment.	Before demolition and disposal	Submit to MIGA the secure pit and the final water quality assessments data.
27. The Project Enterprise will be required to design, plan and implement technically/financially feasible, cost effective measures for improving efficiency of consumption of energy, as well as other resources and material inputs, with a focus on core business activity. Such measures shall integrate cleaner production technology into the design of the Investment Project with the objective of conserving raw materials, energy to the WBG EHS guidelines.	Completed.	Share with MIGA the cleaner production technology implemented in the design and the energy conservation measures put in place to reduce energy consumption.
28. The Project Enterprise to ensure that all the contaminated soil (hazardous) is disposed to a secluded pit per Bangladeshi national and MIGA requirements.	Before contaminated soil disposal.	Submit to MIGA photos of the soil disposal site.



Performance Standards (“PS” or “MIGA PS”)	Due Dates	Indicators for completions
<p><b>30.</b> The Project Enterprise will require the EPC contractors to develop a worker’s influx plan to ensure they manage all the workers migrating and working for the Investment Project in line with the requirements of MIGA PS4.</p>	Completed.	Submit to MIGA workers influx plan.
<p><b>31. a)</b> The Project Enterprise will require the EPC contractors to develop and implement a Security Risk Assessment and a Security Management Plan which captures the key elements of PS4 for construction phase.</p> <p><b>b)</b> The Project Enterprise will develop a Security Management Plan which captures the key elements of PS4 for the operation phase.</p>	<p>Completed.</p> <p>Prior to operation of the Investment Project.</p>	<p>a) Submit to MIGA Security Risk Assessment and a Security Management Plan for construction phase.</p> <p>b) Submit to MIGA Security Management Plan for operation phase.</p>
<p><b>32. a)</b> The Project Enterprise will require the EPC contractors to develop and implement a project-specific traffic management plan to ensure uninterrupted traffic movement during construction.</p> <p><b>b)</b> The Project Enterprise will develop and implement the traffic management plan during operations phase.</p>	<p>Completed.</p> <p>Prior to operation of the Investment Project.</p>	<p>a) Submit to MIGA traffic management plan for construction phase.</p> <p>b) Submit to MIGA traffic management plan for operations phase.</p>
<p><b>33.</b> The Project Enterprise will require that the EPC contractors have hired qualified drivers with licenses and insurance and trained them on defensive driving, road safety and that all the Investment Project vehicles are in good condition, have seatbelts have right documentation to meet MIGA PS4.</p>	Prior to construction of the Investment Project	Submit to MIGA the drivers training records.
<p><b>34.</b> The Project Enterprise to ensure that communities are aware of the transportation routes and the types of materials (hazardous and non-hazardous) and wide loads vehicles to minimize accidents and traffic congestions during the construction phase.</p>	Before construction of the Investment Project	Submit to MIGA the communication shared with communities on the traffic and transportation risks during construction.
<p><b>35. a)</b> The Project Enterprise will require the EPC contractors to develop a stakeholder engagement plan (“SEP”) for construction phase in line with the requirements of MIGA</p>	Completed.	a) Submit to MIGA SEP for construction phase.

Performance Standards (“PS” or “MIGA PS”)	Due Dates	Indicators for completions
<p>PS4.</p> <p>b) The Project Enterprise will develop a SEP for the operation phase in line with the requirements of MIGA PS4.</p>	<p>Prior to operation of the Investment Project.</p>	<p>b) Submit to MIGA SEP for operations phase.</p>
<p><b>36.</b> The Project Enterprise will develop a community grievance mechanism for the Investment Project in alignment with the requirements of MIGA’s PS1 and the Project Enterprise will be responsible for responding to any grievances which are raised in relation to the Investment Project. The EPC contractors will develop a subsidiary community grievance mechanism which will include details of how it will be responsible for responding to any grievances identified by the Project Enterprise that are specific to the Investment Project.</p>	<p>Completed.</p>	<p>Submit community grievance mechanism to MIGA.</p>
<p><b>37.</b> The Project Enterprise will develop an external communications procedure which will include disclosing information to public about the Project Enterprise’s project activities and EHS issues, as well as an external grievance mechanism to provide relevant contacts and processing of any concerns raised by the stakeholders in line with the requirements of MIGA PS4.</p>	<p>3/15/2020</p>	<p>Submit to MIGA the external communications procedure</p>
<p><b>PS5: Land Acquisition and Involuntary Resettlement</b></p>		
<p><b>38.</b> The Project Enterprise will be required to conduct the Environment and Social Impact Assessment (“ESIA”) for the Railway Line per Bangladeshi and MIGA requirements and ensure to disclose the ESIA and all related Investment Project information to the communities.</p>	<p>Prior to construction of the Railway Line and land acquisition</p>	<p>Submit to MIGA the ESIA for the Railway Line and evidence of disclosures (websites and links)</p>
<p><b>39.</b> The Project Enterprise will be required to develop a stakeholder engagement plan for the Railway Line construction (community engagement, consultation, disclosure). Develop and implement a stakeholder engagement plan</p>	<p>Prior to construction of the Railway Line and land acquisition</p>	<p>Submit to MIGA the stakeholder engagement plan.</p>

Performance Standards (“PS” or “MIGA PS”)	Due Dates	Indicators for completions
<p>scaled to identified Railway Line project risks and impacts and development stages that is tailored to the characteristics and interests of the affected communities and includes differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable. Stakeholder engagement shall verify that community representatives such persons do in fact represent the views of affected communities and that the representatives faithfully communicate the results of consultations to their constituents.</p>		
<p><b>40.</b> The Project Enterprise will be required to conduct an Informed Consultation and Participation (“ICP”) for the construction of the Railway Line and will result in the affected communities’ informed participation. ICP involves a more in-depth exchange of views and information, and an organized and iterative consultation, leading to the client’s incorporating into their decision-making process the views of the Affected Communities on matters that affect them directly, such as the proposed mitigation measures, the sharing of development benefits and opportunities, and implementation issues. The Project Enterprise will document the process, in particular the measures taken to avoid or minimize risks to and adverse impacts on the affected communities and will inform those affected about how their concerns have been considered.</p>	<p>Prior to the construction of the Railway Line</p>	<p>Submit to MIGA all the meetings minutes and the number of project consultations conducted.</p>
<p><b>41.</b> The Project Enterprise is required to develop a community grievance mechanism for the Railway Line construction. The Project Enterprise will Implement and maintain a procedure for external communications that includes methods to (i) receive and register external communications from the public; (ii) screen and assess the issues raised and determine how to address them; (iii) provide, track, and document responses, if any; and (iv) adjust the management program, as appropriate. The grievance mechanism shall ensure that</p>	<p>Prior to the construction of the Railway Line</p>	<p>Submit to MIGA the community grievance mechanism for the Railway Line.</p>

Performance Standards (“PS” or “MIGA PS”)	Due Dates	Indicators for completions
grievances from affected communities and external communications from other stakeholders are responded to and managed appropriately.		
42. The Project Enterprise will be required to establish compensation fund for the Railway Line construction project affected people in line with MIGA PS 5 requirements to substitute for the difference between the national requirements and MIGA PS 5.	Prior to the construction of the Railway Line	Submit to MIGA paperwork and evidence of the fund set up.
43. The Project Enterprise will ensure that the land acquisition, resettlement, and compensation process for the affected and impacted households and people is done per the local laws and in line with MIGA PS5 requirements.	Prior to construction of the Railway Line and land acquisition	Submit to MIGA the adequate evidence of full program implementation.
44. The Project Enterprise will develop and implement a resettlement action plan (“RAP”) The RAP shall incorporate applicable requirements of PS5 regardless of the number of people affected, including compensation at full replacement cost for land and other assets lost. Elements of the RAP shall be designed to mitigate the negative impacts of displacement; identify development opportunities; develop a resettlement budget and schedule; and, establish the entitlements of all categories of affected persons including host communities.	Prior to construction of the Railway Line and land acquisition process.	Submit to MIGA the RAP for review and provide action plans with specific completion dates to ensure completion of all actions required to fully implement in accordance with planned activities.
45. The Project Enterprise will develop and implement a livelihood restoration plan (“LRP”). The plan shall be designed to compensate affected persons and/or communities and offer other assistance to meet the objectives of PS5. The LRP shall establish the entitlements of affected persons and/or communities and shall ensure that these are provided in a transparent, consistent, and equitable manner	12/30/2020	Submit to MIGA the LRP for review.  Provide action plans with specific completion dates to ensure completion of all actions required to fully implement in accordance with planned activities.