Environmental and Social Review Summary

Sirajganj 2 Project

This Environmental and Social Review Summary (ESRS) is prepared by MIGA staff and disclosed prior to the date on which MIGA’s Board of Directors considers the proposed issuance of a Contract of Guarantee. Its purpose is to enhance the transparency of MIGA’s activities. This document should not be construed as presuming the outcome of the decision by MIGA’s Board of Directors. Board dates are estimates only.

Any documentation that is attached to this ESRS has been prepared by the project sponsor, and authorization has been given for public release. MIGA has reviewed the attached documentation as provided by the applicant, and considers it of adequate quality to be released to the public, but does not endorse the content.

Country: Bangladesh
Sector: Power
Project Enterprise: North West Power Generation Company Ltd
Environmental Category: B
Date ESRS Disclosed: February 23, 2015
Status: Due Diligence

A. Project Description

Standard Chartered Bank (SCB) has requested MIGA to provide a Non-Honoring of Sovereign Financial Obligation guarantee for up to US$44 million (plus future interest) of the debt financing for the Sirajganj 2 Project (hereafter referred to as ‘the Project’) in Bangladesh. The construction of the Project is being sponsored by North West Power Generation Company Limited (NWPGCL), a state-owned power generation utility that is a 100% wholly owned subsidiary of Bangladesh Power Development Board (BPDB), which was incorporated in 2007. NWPGCL currently has two operating power stations – Sirajganj 1 (225 MW dual fuel Combined Cycle Power Plant (CCPP)) and Khulna (150 MW Peaking Power Plant) – and one station under construction, Bheramara (360 MW CCPP).

The Project involves the construction, installation and operation of a 225 MW dual fuel CCPP (similar to Sirajganj 1) within the Sirajganj Power Complex, comprising a dual-fuel gas turbine, generator, steam turbine and a heat recovery steam generator (HRSG), water treatment and cooling system, as well as the construction of a 230 kV switchyard and an extension of the existing 230 kV switching station within the Sirajganj Power Complex. The Project will utilize the existing jetty for unloading heavy equipment, access roads and water treatment and cooling systems that were constructed for Sirajganj 1.

The Sirajganj Power Complex, which is owned and operated by NWPGCL, was developed in 2007 by in-filling “char land” (i.e. sandy, unconsolidated land that has emerged adjacent to the river through the gradual accumulation of sediment, on the Brahmaputra-Jamuna Floodplain) to create a 58 ha area for the construction of power stations. The Complex includes the Sirajganj 1 operating unit, water treatment and cooling systems, administration buildings, 230 kV switchyard and switching station, gas pressure reducing station and employee accommodation. There is also
currently temporary accommodation for EPC contractor staff within the Complex. While the surrounding area will continue to flood, in order to prevent flooding, the entire Complex area has been built up approximately 10 feet above the surrounding floodplain (based on flood modelling undertaken for construction of the Jamuna Bridge). It is proposed that the Sirajganj Complex will eventually have 4 or 5 operating units. The Project will be the second unit constructed within the Complex. The Project is part of the overall government Power Sector Master Plan to increase energy generation in the country to meet growing energy demand.

The Project is located in Khas Barashimul Mouza in Sirajganj District (about 15 km south-east of Sirajganj town and 130 km north-west of Dhaka). The closest settlements to the Project site, Boroshimul & Ponchosona, are both located approximately 1 km from the Complex. Natural gas, the main fuel for the Project, will be supplied by Petrobangla, and there are already existing pipelines servicing the Complex for the Sirajganj 1 Project. Power from the Project will be evacuated to the national grid through existing 230kV switching station beside the Project site.

An Engineering, Procurement and Construction contractor (a consortium of China National Machinery Import & Export Corporation (CMC) and Fujian Electric Power Survey & Design Institute (FEDI), also from China) has been selected to undertake construction, commissioning and the first 2 years of operation of the Project, after which, operation of the Project will be handed over to NWPGCL. CMC is the consortium leader, and will provide overall project management while FEDI will provide technical expertise, including concept design and basic engineering. The turbines will be supplied by Siemens AG (Germany). The construction period is expected to last 36 months. The same EPC team (CMC, FEDI, Siemens) was responsible for the construction, commissioning and early operation of Sirajganj 1.

**B. Environmental and Social Categorization**

This is a Category B project according to MIGA’s Policy on Environmental and Social Sustainability (2013) because the environmental and social risks and impacts associated with this Project are few in number, generally site-specific, largely reversible and readily addressed through mitigation measures.

The key potential environmental and social issues associated with the Project during both construction and operation relate to air emissions (dust during construction, and NO\textsubscript{x}, possibly SO\textsubscript{2} (depending on the use of diesel), particulates and greenhouse gases during operations), noise, occupational health and safety risks, community health and safety risks (e.g. explosions, traffic accidents), solid and hazardous waste generation, and access to water and wastewater generation. Cumulative impacts related to the construction and operation of multiple power plants at the Sirajganj Power Station must also be considered.

**C. Applicable Standards**

While all Performance Standards (PSs) are applicable to this investment project, current information indicates that the investment will have impacts which must be managed in a manner consistent with the following PSs:
The proposed site is owned by BPDB, and will be leased to NWPGCL. As the site is vacant, no physical or economic resettlement is required, and therefore, PS5 Land Acquisition and Involuntary Resettlement does not apply.

The Project is located adjacent to the Jamuna River and approximately 1 km south of the Jamuna Eco Park. The EIA identified the presence of 12 rare and endangered fish species, including the critically endangered Gangetic River Dolphin in the Jamuna River in the vicinity of the Project. The Project, as currently designed, will not have an impact on river hydrology or water quality, and therefore, is unlikely to affect aquatic fauna in the River. The Eco Park was essentially created as an offset for biodiversity impacts resulting from the construction of the Jamuna Bridge. It is in fairly degraded condition (though there has been some recent plantation undertaken by the Bangladesh Bridge Authority) and it does not contain any habitats or species of conservation significance. The Project may utilize an existing jetty in the Eco Park, and, if the jetty is used, transport heavy equipment through the Eco Park. Impacts from the Project, which could include air emissions (vehicle exhaust and dust) and noise, are likely to be fairly minor and temporary. The Project is not expected to have any significant impact on terrestrial or aquatic biodiversity or ecosystem services, and therefore, PS 6 does not apply.

No indigenous people were identified in the area affected by the project; therefore, PS7 does not apply. As the plant is located is an area that was recently developed with clean fill, no archaeological or historically important structures are present in the area, and the probability of finding significant cultural resources in the Project area is low, therefore PS8 does not apply.

In addition, the WBG EHS General Guidelines and Guidelines for Thermal Power Plants apply to this Project.

D. Key Documents and Scope of MIGA Review

As part of MIGA’s environmental and social due diligence review of the Project, the following documents were reviewed:

- Draft NWPGCL Environment, Health and Safety Policy (undated).
- NWPGCL Sirajganj Project Implementation Unit Organization Chart (2014).
In addition to the documents listed above, MIGA’s due diligence included review of the environmental and social conditions and commitments in the Engineering, Procurement and Construction Contract, as well as other available environmental and social information on the area in the vicinity of the Project. A due diligence site visit was undertaken in January 2015, which included a visit to the Project site and to the Sirajganj 1 Power Plant, and meetings with SCB, NWPGCL, the ESIA consultant and the EPC contractor.

E. Key Issues and Mitigation

PS1: Assessment and Management of Environmental and Social Risks and Impacts

Environmental and Social:

An EIA was undertaken by a local consulting firm, and submitted to the Bangladesh Department of Environment (DoE) in May 2014. The EIA identifies and assesses the potential risks and impacts associated with the Project, and provides management, mitigation and enhancement measures. Key risks, issues and proposed management measures are discussed in the sections below under the appropriate Performance Standard. An Environmental and Social Due Diligence Review was undertaken by independent consultants (AECOM, January 2015) against GoB regulations, IFC / MIGA Performance Standards and the Equator Principles. The due diligence included review of the EIA and other documents (e.g. the feasibility study, EPC Contract and E&S reports for Sirajganj 1) provided by NWPGCL and the EPC contractor, as well as a site visit in September 2014. The findings of the due diligence review indicated that there were some significant gaps in the Project EIA, including only limited consideration of construction impacts; lack of social baseline and stakeholder identification; lack of appropriate assessment of cumulative noise and air quality impacts (considering the presence of Sirajganj 1); and lack of a number of management plans (e.g. waste and hazardous material management) and a stakeholder engagement plan and grievance redress mechanism. Most of these gaps were addressed during the due diligence process through improved analysis of existing data (water use and cumulative impacts). NWPGCL has committed to addressing the remaining gaps through the implementation of an Environmental and Social Action Plan (ESAP) (see attached).

Management Program:

The EIA identifies the major impacts and proposes mitigation measures in an Environmental Management and Monitoring Plan (EMMP). The EMMP in the EIA covers both the construction and operations phases. The EMMP, however, will need to be updated to address the gaps that have been identified (as indicated in the section above).

Both parties of the EPC consortium have International Standard Organization ISO14001:2004 consistent Environmental and Social Management Systems (ESMS) in place. For the construction phase, the EPC consortium will apply an integrated Environmental, Health and Safety (EHS) System, based on ISO 9001:2008, ISO 14001:2004 and British Standard for occupational health and safety management systems OHSAS 18001:2007 standards. The EHS System will ensure systematic implementation of the EMMP and OHS plan. As agreed and indicated in the attached ESAP, prior to commencing construction, the EPC consortium will prepare and provide to MIGA a detailed project specific EMMP to comply with PS1 requirements.
NWPGCL does not currently have a formal ESMS in place for operation of the Sirajganj Power Complex or Sirajganj 1, though there are a number of informal systems in place, including systems for security and occupational health and safety management. NWPGCL has committed to formalizing their management practices into an ESMS for the Sirajganj Power Complex, and MIGA has requested that NWPGCL engage a suitably qualified independent consultant to support development and implementation of the ESMS for operation of the Sirajganj Power Complex and Sirajganj 2.

Organizational Capacity and Competency:
CMC is a wholly owned subsidiary of China General Technology Holding Ltd., a state-owned enterprise under the direct supervision of the Chinese central government. CMC entered the Bangladesh market in 1994, and since then has undertaken 8 projects in Bangladesh. FEDI is a wholly owned subsidiary of Power Construction Corporation of China and also a member of the International Federation of Consulting Engineers. It is a State-Owned Technological Enterprise and is qualified for the planning of power systems, survey & design of power plants and power transmission/transformation works.

The EPC consortium (CMC / FEDI) experience includes the recent construction, commissioning and early operation of the Sirajganj 1. The EPC consortium will be responsible for implementing the EMMP during construction, including the monitoring program, and an EHS Manager will be appointed for the construction phase. The EPC consortium has the responsibility to arrange training of personnel during construction, and have committed to ensuring that all EPC staff and sub-contractors have the experience and training that is required for their specific job.

For the construction, commissioning and handover phases, NWPGCL has established a Project Implementation Unit (PIU), which includes a Project Director, Deputy Project Director and Assistant Engineers (i.e. Civil, Electrical and Mechanical). At the corporate level, NWPGCL has an Assistant Manager – Environment, who is responsible for environmental reporting and overall environmental and social compliance of all NWPGCL projects. There is currently no specific EHS officer at Sirajganj 1, however there are engineers who are individually responsible for components of E&S management (e.g. water, air and noise monitoring; solid waste management). NWPGCL will appoint an EHS Officer for the Sirajganj site. The EHS officer will be responsible for development and day-to-day implementation of the ESMS and EMMP for Operations. During construction, the EHS officer will also be responsible for monitoring the environmental and social performance of the EPC contractor. NWPGCL also has a welfare officer, who is responsible for community liaison and employee welfare and a training and development program for its employees, which includes both on-the-job and classroom based training methods.

Current E&S management practices are Sirajganj 1 are largely consistent with MIGA requirements in key areas, including air emissions, noise, water quality, solid and hazardous waste management and community engagement. As indicated previously, though, management activities are largely informal and undertaken in an ad hoc manner. NWPGCL has committed to formalizing its E&S management practices at the Sirajganj Complex. The formalization of E&S management practices will also address gaps identified, primarily in improving environmental and social monitoring, grievance redress management (both of workers and local communities) and emergency preparedness and response.
SCB is providing financing for the Project. SCB has adopted the Equator Principles, and as part of this commitment, it has commissioned independent technical and environmental consultants (AECOM) to undertake due diligence of the Project. The environmental and social due diligence review was done against national laws, MIGA’s Performance Standards, World Bank Group (WBG) Environmental, Health and Safety (EHS) Guidelines and the Equator Principles.

**Emergency Preparedness and Response:**

There are currently only informal emergency preparedness and response systems in place for Sirajganj 1. NWPGCL has committed to formalizing existing systems into an Emergency Preparedness and Response Plan for the Sirajganj Power Complex prior to the construction of Sirajganj 2.

**Monitoring and Review:**

The EMMP provided in the EIA includes a monitoring plan; however the rationale for the suggested monitoring program (site selection and frequency) is not provided. As indicated in the ESAP, the EMMP will be updated prior to the construction phase to include monitoring sites, parameters to be monitored and monitoring frequency.

NWPGCL currently prepares a quarterly Environmental and Social Monitoring Report for Sirajganj 1 Plant and submits this report to DoE. The contents of this report will be updated following the update of the EMMP. During both construction and operations, in addition to ongoing reporting to DoE, annual environmental and social monitoring reports will be prepared and submitted to MIGA.

**PS2: Labor and Working Conditions**

There are currently 135 permanent employees employed at Sirajganj 1, as well as approximately 30 contractors. During the construction phase, at peak, there will be approximately 700 workers engaged – most from surrounding communities. The EPC Contractor currently has a temporary workers camp for the 30 contractor employees, most of whom are from China. The camp is within the boundary of the Sirajganj Plant site, and has appropriate waste and sanitation services. For the operation of Sirajganj 2, approximately 140 additional permanent employees will be hired by NWPGCL. NWPGCL has accommodation on site for its employees, however a majority (approximately 70%) live off-site in the nearby Sirajganj town. The on-site accommodation has appropriate waste management, sanitary facilities, water supply, air conditioning and fire and life safety equipment.

The EPC contractor(s) and their sub-contractors will follow their respective HR policies and the requirements of Bangladesh national laws, which include consideration of equal opportunity employment and prohibits child labor. In the contract between NWPGCL and the EPC contractor, the contractor agrees not to discriminate against any employee or applicant for employment by reason of race, color or national origin in carrying out this Contract. The EPC contractor uses a local recruitment company to recruit unskilled, short-term workers from the local community. Construction laborers are paid wages consistent with the national minimum wage.
NWPGCL does not have a Human Resources Policy, but it does have a statement of objectives for human resource management, which includes a commitment to robust and comprehensive HR processes and strict and transparent recruitment. Deloitte India was recently engaged to prepare a corporate-level Human Resources Manual, which is expected to be consistent with the requirements of PS 2. NWPGCL has developed an Employee Service Book Rules, 2010, which entails recruitment conditions, remuneration and benefit package, amount of gratuity, accommodation services, medical benefits/allowance, entitlement of leaves, travelling and daily allowances. The Rules are only applicable to employees directly employed by NWPGCL. There are no procedures or protocols in place for management of third-party workers, however it is expected that this will be addressed in the new Human Resources Manual. NWPGCL has a documented grievance mechanism for workers, which allows employees to raise any concerns regarding their working environment. The mechanism, however, does not currently apply to third-party workers. While there is currently no collective agreement in place, NWPGCL have no policies restricting formation of a union and collective bargaining.

The EPC contractor has developed written procedures for management of occupational health and safety (OHS) for construction in accordance with OHSAS 18001:2007 requirements. The EPC contractor will provide staff with Personal Protective Equipment (PPE) and will ensure that staff is appropriately trained in the health and safety aspects of their jobs. The EPC contractor has committed to conforming to the requirements of ISO 14001:2004, OHSAS 18001:2007, and all respective national legislation as applicable for the scope of work and has identified the following responsibilities:

- Compliance with relevant legal requirements;
- Preparation and Implementation of the Project specific EHS Plan;
- Enforcement of the EPC consortium site rules;
- Monitoring the activities of all subcontractors with regard to EHS, and maintaining corresponding records;
- Providing safety infrastructure and PPE; and
- Job risk analyses are carried out and appropriate training provided.

As part of their Environment, Health and Safety Policy, NWPGCL is committed to providing a safe working environment and inculcating safety awareness among employees. The Sirajganj site has a safety task force, which is responsible for monitoring working conditions at the site and ensuring that improvements are made, as required. The Sirajganj 1 plant site has appropriate safety and firefighting equipment, and it is planned that same will be in place at Sirajganj 2. There is also a medical clinic on site, which is available to staff 24 hours per day. There have been no reported Lost Time Injuries (LTIs) at the Sirajganj Power Complex since construction of Sirajganj 1 started in 2010.

**PS3: Resource Efficiency and Pollution Prevention**

**Resource Efficiency:**

Greenhouse gases: The proposed plant has been designed with consideration for Dual fuel which is natural gas and High Speed Diesel (HSD). The Project will result in the emission of greenhouse gases (GHGs), primarily CO₂. Annual emissions are estimated to be 241,776 tCO₂e per year based on operation with natural gas, which is within the typical range for this type of generating
technology and fuel source. It is anticipated that HSD will only be used as an alternative fuel on a temporary basis when natural gas is not available. Sirajganj 1 is also designed as a dual fuel plant, and has yet to use HSD. The Complex also has back-up diesel generators on site, which may be used infrequently during start-up and maintenance. NWPGCL will quantify direct emissions as well indirect emissions for facilities within the Project boundary (including both Units 1 and 2) annually. This quantification will be provided in the Project’s annual environmental and social monitoring report submitted to MIGA.

Water: During construction, only a small amount of water will be required. Construction water will be taken from the existing on-site water treatment plant. The estimated water requirement for the plant is about 600 m³/hour (14,400 m³/day) during the operation phase of the project, primarily for steam generation and cooling water. This water requirement will be met by groundwater and recycling of cooling water. Deep tube wells are already in place providing water to the water treatment plant on site. This existing plant can supply 30,000 m³ of water per day, which is sufficient for the operation of both Sirajganj 1 and 2.

Pollution Prevention:

Air pollution, noise pollution, water quality/pollution, and solid waste are the main environmental issues associated with the proposed project.

Air emissions: Air emissions from the Project will primarily be dust/particulates during construction and stack emissions (sulfur dioxide (SO₂), nitrogen oxides (NOₓ) and carbon monoxide (CO)) during operations. SO₂ emissions will only occur when the project is operated with HSD. The Project will have a stack height of at least 60 m, which was determined by a standard equation estimating dispersion based on anticipated SO₂ emission rates. Baseline conditions indicate that ambient air quality in the Project Area is within the limits defined by the National Air Quality Standards of Bangladesh (2005), which are consistent with the standards provided in the WBG EHS Guidelines. The EIA indicates that the NOₓ concentration of stack emissions will be below 40 ppm, and when HSD is used, the SO₂ emission rate will be approximately 73 kg/hr. Dispersion modelling, considering emissions from both Sirajganj 1 and Sirajganj 2 will be undertaken prior to the construction of Sirajganj 2.

The EMMP includes measures to reduce dust emissions during construction, including dust suppression and regular maintenance of vehicles. Project design has incorporated a number of mitigation measures to reduce emissions during operations, including installation of a low NOₓ burner and dust filters to capture NOₓ, SO₂ and particulate matter. These are similar to the measures currently implemented at Sirajganj 1. Air quality monitoring undertaken for Sirajganj 1 indicates that the ambient air quality and stack emissions (note – Sirajganj 1 stack height of 45 m) are within the limits of National Air quality Standards of Bangladesh (2005). Sirajganj 2 stack will be equipped with continuous emissions monitoring equipment.

Water Quality: Baseline water quality monitoring undertaken during the EIA process indicates that water quality conditions in the Jamuna River are consistent with Bangladesh surface water quality guidelines. During the construction phase, effluent from the Project will include sanitary sewage (kitchen and domestic waste), oily water and stormwater run-off. There may also be some impact from washing aggregate and sand. To prevent impact on water quality, septic tanks will be installed to manage sewage and construction works and cleared areas will be appropriately designed and
rehabilitated to prevent erosion and sediment transport. Oily water is trapped in an oil/water separator, and the oil removed prior to discharge. The EPC Contractor will establish a water monitoring program for the construction phase. During operations, effluent from the project will include sanitary sewage (kitchen and domestic waste) and oily water. Non-contaminated water will be routed into a storm water system and discharged to the surrounding area. Oily effluent from the engine hall, banded areas, workshop and contaminated stormwater will be collected in an oily water pit. The oily water will be separated on site; oily sludge will be transferred into a road tanker for processing by a licensed contractor, as is currently done for Sirajganj 1. The Project is designed as a closed circuit – cooling water is recycled through the water treatment plan for reuse. It is not anticipated that there will be any discharge of cooling water.

**Noise:** Baseline noise levels in the Project Area (approximately 55 – 85 dB(A), which include the noise associated with Sirajganj 1) currently exceed WBG noise standards for residential areas (55 dB(A) during the day time and 45 dB(A) at night) and at times, exceed the standard for industrial areas (70 dB(A)). These noise measurements, however, were taken at the plant fence line, which is over 500 m from the closest sensitive receptors. The updated monitoring plan will include monitoring of noise at the closest sensitive receptor. As there are no residential areas within 500 m of the Project site and the area between the Project site and the local communities is vegetated, the potential for nuisance noise is limited. The employee accommodation within the Complex is situated approximately 200 m from noise generating equipment. Noise levels at the accommodation are likely to be within daytime standards, but exceed nighttime noise standards. NWPGCL has taken steps to minimize noise impacts on employees residing within the Complex including use of construction materials and windows to minimize noise and the planting of trees between the plant site and the accommodation.

**Hazardous Materials:** Potentially hazardous materials consist of transformer dielectric oils, fuels and chemicals (such as anti-scaling / anti-corrosion agents). Hazardous waste during operation will include clean and used (contaminated) lubricant oil. Hazardous materials are stored in covered, banded areas with appropriate signage. Hazardous waste, primarily waste oil, is collected and sold to secondary users. The updated EMMP will include detailed management plans for hazardous materials and hazardous waste management and spill prevention and clean up.

**Waste:** The majority of wastes will be produced during the construction phase. These wastes will include construction waste, such as spoil, packaging, and scrap metals. Construction wastes will be collected and sorted. Reusable wastes will be sold to a secondary user and remaining solid waste is sent to the municipal waste dump. Waste generated during operations will include paper, packaging materials and food wastes. Recyclable waste materials will be collected separately. The existing high-level EMP in the EIA provides adequate mitigation measures for solid waste management, and on site, there are waste bins and storage areas for reusable waste (i.e. waste that can be sold). The current solid waste management system, however is ad hoc, and therefore a formal Solid Waste Management Plan (WMP) will be developed as part of the detailed EMPs for construction and operation.

**PS4: Community Health, Safety and Security**

The EIA does not provide a thorough assessment of the potential community health and safety risks, however based on Project location (in a fairly remote area with no communities immediately adjacent to the site), design and proposed management plans, it is likely that there is only a very
limited risk to public health and safety. NWPGCL currently has a good relationship with local municipal bodies such as the fire service, police and ambulance, and community health and safety will be continue to be coordinated with these groups. These commitments will be elaborated in the ESMS and revised EMMP, which will include consideration of community health and safety risks and impacts, and will provide management measures to response to these risks and impacts.

The existing main road network to the project site is in fairly good condition. During construction, materials will be transported to site primarily by river (utilizing the jetty at the site during the wet season, and the jetty in the Eco Park during the dry season) or rail. A traffic management plan will be developed and implemented during construction. Traffic movements during operation will be limited to personnel and maintenance vehicles, and it is considered that the existing road network has sufficient capacity to accommodate such movements without significant impact.

Security Arrangements:
The Sirajganj Power Complex has a Central Security Committee in place to supervise security of the site, and a Security Manual has been prepared. At the Corporate level, NWPGCL has an Assistant Management – Security and Investigation, Security Supervisor and Security Guards, who is responsible for security at all NWPGCL facilities. The Sirajganj Power Complex is raised approximately 10 ft. above the surrounding area and is fully fenced, with one gate to access the Complex, and a second internal gate to access the plant site. Both gates have security guards posted 24 hours a day. CCTV cameras, which will be monitored from the central control room, will be cover the Sirajganj 2 plant site.

Security guards at the site are a combination of contractors directly engaged by NWPGCL and paramilitary troops assigned by the Government. Though the Government is ultimately responsible for management and training of paramilitary security forces stationed at the site, while on site, the security personnel are also required to respond to directions from the NWPGCL Site Manager.

F. Environmental Permitting Process and Community Engagement

The Bangladesh Department of the Environment (DoE) categorizes power generation projects as “Red Category”. Red Category projects are required to prepare and submit to DoE an Initial Environmental Examination (IEE) and an Environmental Impact Assessment (EIA) in order to obtain Site Clearance and Environmental Clearance Certificates. For this Project, NWGCL applied to DoE requesting an exemption for the IEE. This application included a detailed Terms of Reference (TOR) for the EIA study for approval. The request for exemption and TOR for the EIA were approved by DoE in September 2013. The EIA was undertaken by a local consulting firm, and submitted to DoE for approval in May 2014. DoE subsequently approved the EIA July 2014.

Consultation undertaken during the EIA process consisted of two participatory focus group discussions (one with local residents and another with community leaders) and one-on-one interviews was a random sample (150 people) of local residents. Interviews with “key informants”, including local Government officials and representatives of a local NGO (MMS). The results of consultation meetings indicated that the Project is well received by the local administration and residents.
A Stakeholder Engagement Plan (SEP) will be developed to include the consultation and disclosure activities that will occur throughout Project preparation and implementation, as required in the ESAP. The SEP will include including formal grievance redress mechanism. The existing stakeholder consultation/disclosure process will be articulated within the SEP and will include stakeholders identified by the project company as directly affected and vulnerable people.

NWPGCL has a Corporate Social Responsibility (CSR) Program, which identifies initiatives through a multi-stakeholder engagement program. In the Sirajganj area, the CSR program has supported improvements to the local mosque and donated computers to the local schools.

G. Availability of Documentation

- **Environmental and Social Action Plan (ESAP)** (January 2015)

The above listed documentation is available electronically as PDF attachments to this ESRS at www.miga.org. The Final EIA Report is also available for viewing at the following locations:

- Abu Ahmed Akhtar Hossain
  Project Director, Sirajganj Unit 2
  North West Power Generation Company Ltd.,
  Level-14, Bidyut Bhaban, 1 Abdul Gani Road, Dhaka-1000, Bangladesh
  E-mail: pdsgccpp@nwpgcl.org.bd
  Fax: 88 02 9573877

- Link: EIA Report will also be available on the NWPGCL website under the “Report” tab.