

**Semi-annual Environmental Monitoring Report**

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**Project No. 54173-001**  
**July 2020**

**BAN: COVID-19 Response Emergency Assistance Project**

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## Environmental Monitoring Report

# **BAN: COVID-19 Response Emergency Assistance Project**

Prepared by the Health Services Division of the Ministry of Health and Family Welfare for the Asian Development Bank

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## EXECUTIVE SUMMARY

1. The Coronavirus Disease 2019 (COVID-19) Response Emergency Assistance Project will support the Government of Bangladesh in addressing the immediate and urgent needs for financial, logistical and systemic support to deal with the COVID-19 outbreak. The project will support the procurement of equipment and supplies, the upgrading of health and testing facilities, and build system and community capacities for surveillance, prevention and response to COVID-19. The project will involve civil works supporting the upgrade/extension of existing facilities for the establishment of (i) screening and quarantine areas at points of entry; (ii) critical care and isolation units in existing healthcare facilities; (iii) microbiological diagnostics facilities in existing medical colleges and hospitals across the country.
2. The project is in design phase and as per the project structure, the project authority is preparing environmental safeguard reports for all the selected land ports, critical care & isolation units, microbiological diagnostics facilities and also meetings are being held both at webinar platform and at the respective offices maintaining safety precautions. The project will be implemented over a period of 3 years and the loan will close on 31 October 2023.
3. The project is rated Category B for environmental safeguards. Most civil and structural works will consist of rehabilitation or minor extensions to buildings within existing premises. Therefore, potential direct, indirect, cumulative and induced impacts of the project are anticipated to be site-specific and minor, few if any of them being irreversible in nature. The project is on primary stage and no civil works has been started during the period of April 2020 to June 2020. The monitoring activities for the project during the reporting period including the preparation of environmental safeguard reports, environmental audits, fill up checklist, preparation of ECoP etc.
4. This project has complied with the environmental provisions of the loan covenant and the environmental safeguards requirement set by the ADB and the DoE. However, according to ADB this project is under Category B and therefore, the limited assessment (Environmental Screening & ECOPs) and Detailed Assessment (IEE including EMP) shall be prepared by the project. The project is on primary stage and no civil works has been started during the monitoring period (April 2020 to June 2020).
5. A virtual inception ADB mission for COVID-19 response emergency assistance project were conducted between 15-23 June 2020. The main objectives of the mission were to establish a working relationship between ADB staff and executing agency (EA)/implementing agency (IA) staff directly involved in implementing the project, finalize the subproject list. Public Works Department (PWD) and Department of Architecture will assist the executing department in order for successful implementation of the project. Needs assessment work was ongoing by comprising of both Executing agency and ADB consultant. This analysis has to be undertaken in order to assess the impact that can be anticipated in the current context.

## I. INTRODUCTION

### A. Project Background

1. COVID-19 is a new disease with similar symptoms as influenza but different in terms of severity and community transmission<sup>1</sup>. The World Health Organization (WHO) declared the COVID-19 as a Public Health Emergency of International Concern on 30 January 2020 under the International Health Regulations (IHR) 2005 and recognized it as a pandemic on 11 March 2020<sup>2</sup>.
2. Given the situation, the Government of Bangladesh (the government), through the Ministry of Health and Family Welfare (MOHFW) requested the Asian Development Bank (ADB) on 23 March 2020 to provide financial, logistics and systems support for preparedness and response to the COVID-19 outbreak.
3. The Coronavirus Disease (COVID-19) Response Emergency Assistance Project (the project) will support the Government of Bangladesh in addressing the immediate and urgent needs for financial, logistical and systemic support to deal with the COVID-19 outbreak. The proposed project follows a request to Asian Development Bank (ADB) from the Ministry of Finance, and the project is an integral and vital part of the National Preparedness and Response Plan for containment, mitigation and management of COVID-19. The project will support the procurement of equipment and supplies, the upgrading of health and testing facilities, and build system and community capacities for surveillance, prevention and response to COVID-19.
4. The project will have three outputs: (i) Output 1: Immediate and urgent needs are met in prevention and control of COVID-19; (ii) Output 2: Infrastructure and related equipment are delivered to support and sustain prevention and management of COVID-19; and (iii) Output 3: Health system and community capacities in combatting COVID-19 are strengthened. In particular, the project will involve civil works supporting the upgrade/extension of existing facilities for the establishment of (i) screening and quarantine areas at points of entry; (ii) critical care and isolation units in existing healthcare facilities; (iii) microbiological diagnostics facilities in existing medical colleges and hospitals across the country.
5. MOHFW has identified at least 37 existing health facilities and medical colleges/hospital located within the eight divisions: (i) Barishal, (ii) Chittagong, (iii) Dhaka, (iv) Mymensingh, (v) Khulna, (vi) Rajshahi, (vii) Rangpur, and (viii) Sylhet including Institute for Epidemiology, Disease Control and Research (IEDCR) and Bangladesh Institute of Tropical and Infectious Diseases (BITID) for support, yet this scope may be subject to change during implementation. This may also include health facilities and passenger screening at entry points coming in by air, water, and/or land.

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<sup>1</sup> WHO Coronavirus disease (COVID-19) is an infectious disease caused by a newly discovered coronavirus. [https://www.who.int/health-topics/coronavirus#tab=tab\\_1](https://www.who.int/health-topics/coronavirus#tab=tab_1).

<sup>2</sup> WHO. International Health Regulations (2005). 3rd Ed. <https://www.who.int/ihr/publications/9789241580496/en>.

## **B. Project Progress Status and Implementation Schedule**

6. The project is in design phase and as per the project structure, the project authority are preparing environmental safeguard reports for all the selected land ports, critical care & isolation units, microbiological diagnostics facilities and also meetings are being held both at webinar platform and at the respective offices maintaining safety precautions. Also, the project authority is regularly collected primary and secondary information regarding the selected place, design development, etc.

7. The project will be implemented over a period of 3 years and the loan will close on 31 October 2023. The project implementation chart recording key implementation activities on a quarterly basis is provided in Table I.1. The activities will be updated annually and submitted to ADB with contract and disbursement projections for the following year.

8. MOHFW will be the executing agency (EA) while DGHS will be the implementation agency (IA). The project is expected to be completed by April 2023. A project implementation unit (PIU) will be set up in DGHS to provide the technical, administrative, and logistical support necessary for implementation. An inter-ministerial Project Steering Committee is to be constituted under the project of DGHS under the chairmanship of the Secretary, MOHFW, will provide guidance on policy directions and oversee the overall project implementation. The PIU will work directly with the government entity involved in each activity, such as but not limited to: (i) the COVID-19 Emergency Operation Center (EOC) in preparedness and response; (ii) the various coordination committees at Divisional, District, City Corporation and Upazila levels for civil works activities; and (iii) the Institute of Epidemiology, Disease Control and Research (IEDCR) and other relevant institutes under DGHS in contact tracing support and surveillance strengthening activities. The PIU will conduct regular monitoring and evaluation activities and hold quarterly reviews of progress against the indicators.

**Table I.1 Project Implementation Schedule**

S. N.	Activities	2020												2021												2022												2023									
		Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct		
A	<b>DMF</b>																																														
Output 1	Immediate and medium-term equipment needs for testing and managing COVID-19 met																																														
1	Procure and deliver immediate and medium-term equipment for first response, as identified by MOHFW																																														
Output 2	Infrastructure and related equipment for supporting and sustaining prevention and management of COVID-19 delivered																																														
1	Prepare bid documents and commence bidding for infrastructure and logistics																																														
2	Put supervision and monitoring measures in place																																														
3	Ensure technical norms and guidelines set by MOHFW are met																																														
Output 3	Health system and community capacities in combatting COVID-19 strengthened																																														
1	Prepare bid documents and commence bidding																																														
2	Put supervision and monitoring measures in place																																														
B	<b>Management Activities</b>																																														
1	Establish PIU at DGHS																																														
2	Recruit necessary consultants for construction supervision and project management																																														
3	Establish monitoring and evaluation system																																														
4	Establish a mechanism of regular reviews																																														
5	Environment management plan key activities																																														
6	Semi-annual and/or midterm review																																														
7	Communication strategy key activities																																														
8	Project completion report preparation																																														
9	Loan closing																																														

COVID-19 = Coronavirus Disease 2019, DGHS = Directorate General Health Services, MOHFW = Ministry of Health and Family Welfare, PIU = project implementation unit.

Source: Asian Development Bank.



## **II. COMPLIANCE TO NATIONAL REGULATIONS**

9. The project will comply with the environmental laws, standards, rules, and requirements of the government. These requirements set forth restrictions on project activities to avoid, minimize or mitigate the likely impact on the environment. MOHFW and DGHS will be responsible for ensuring that all activities under the project comply with these requirements from design, construction, and in the operation and maintenance of the facilities.

10. The project will not involve construction of new multi-storied building. Upgrading and construction of additional structures will be within the existing physical footprints of the health facilities, medical colleges, IEDCR and the BITID. As such, no environmental clearance will be required. In the event, construction of new health facility will be involved relevant national environmental requirements will be referred to.

### **A. Infectious Diseases (Prevention, Control and Elimination) Act 2018**

11. This Act provides to “keep or quarantine any suspected person infected with an infectious disease, at a specific hospital, temporary hospital, establishment or home”. This law empowers government in notification, isolation, quarantine, sample collection and testing in emerging diseases. Under section 26, if false or incorrect information is being spread or given by any person who is aware of the correct information, he or she can potentially be found guilty.

12. Design of project components will comply with the provisions under the Act and MOHFW will be acting as responsible agency.

### **B. Medical Waste Management Rules 2008**

13. Any solid, liquid, gaseous, and radioactive waste material generated during the diagnosis, treatment, preventive and curative measure, or in research activities pertaining to disease diagnosis when it is released, discharged, or disposed causing detrimental effect on human health and environment is considered medical waste. Main existing complete code to be followed by all concerned agencies for proper disposal of medical waste to safeguard the environment.

14. Management of medical wastes generated from the 525 health facilities, 37 medical colleges, IEDCR, and BITID will comply with these rules and DoE will be acting as responsible agency.

### **C. Public Health (Emergency Provisions) Ordinance, 1994**

15. Calls for special provisions in case of emergency to prevent the spread of human disease, safeguarding public health and providing them adequate medical service and other services essential to the health of respective community and workers in particular during the construction related work.

16. Design, construction, and operation and maintenance of project components will comply with the special provisions of this Ordinance and Local Government Division will be acting as responsible agency.

**D. National Disaster Management Act 2012**

17. This Act provides for activities on disaster management coordinated, object oriented and strengthened; and to formulate rules that will build up infrastructures of effective disaster management in fighting all types of disaster.

18. Setting-up emergency response procedures under this act and Ministry of Disaster and Relief will be acting as responsible agency.

**E. Environment Court Act 2000 (amended in 2002 and 2010)**

19. This Act ensures the resolution of disputes on environmental and social damages resulting from any development activities. This also allows for the completion of environment-related legal proceedings effectively.

20. This act works as the mechanism for affected persons to file grievances/complaints related to environment safeguard and MoEFCC will be acting as responsible agency.

**F. Vehicle Act 1927, the Motor Vehicles Ordinance 1983, and Bengal Motor Vehicle Rules 1940**

21. These regulations control vehicular emissions and noise including road safety. Vehicles used during upgrading works in the facilities will comply with relevant requirements of the Act. Bangladesh Road and Transport Authority will be acting as responsible agency.

**G. National Environmental Policy, 1992**

22. This policy ensures development components do not pollute the environment or degrade resources and sets out the basic framework for environmental action together with a set of broad sectoral action guidelines.

23. Regulation on vehicles emitting smoke which is harmful to the environment, follow standards on quality of air, water, noise and soil and sets limits for discharging waste. MoEFCC will be acting as responsible agency.

**H. Bangladesh Water Act 2013**

24. Makes provisions for integrated development, management, abstraction, distribution, use, protection and conservation of water resources. Ensures water sources are free from any type of pollution. Construction works will not cause water pollution under this act. Ministry of Water Resources will be acting as responsible agency.

**I. National Safe Drinking Water Supply and Sanitation Policy of 1998**

25. Ensures access to safe water and sanitation services at an affordable cost. Construction and operation of project components will adhere to the relevant provisions. Ministry of Local Government, Rural Development, and Cooperatives will be acting as responsible agency.

**J. Bangladesh Labour Act 2006 (amended 2013)**

26. These regulations aim to protect the interests and rights of the workers, in provision of comfortable working environment, reasonable working conditions, and to ensure workers' safety. This also provides for the prohibition of employment of children and adolescent.

27. Compliance to provisions on employment standards, occupational health and safety, welfare and social protection, labor relations and social dialogue, and enforcement; Prohibition of employment of children and adolescents (below 14 years old). Ministry of Labour and Employment will be acting as responsible agency.

**K. Bangladesh Labour Rules 2015**

28. Provides for the rules on registration of laborers, misconduct rules, income and benefits, health and fire safety, factory plan. Contractors need to implement occupational health and safety measures and will be liable for compensation for work-related injuries. Department of Labor will be acting as responsible agency.

*i. Bangladesh National Building Code 2006*

29. Sets minimum standards for design, construction, quality of materials, use and occupancy, location and maintenance of all buildings to safeguard, within achievable limits, life, limb, health, property and public welfare.

30. Design of upgrading the existing health facilities, medical colleges, IEDCR, and BITID needs to comply with relevant requirements and specifications. Ministry of Housing and Public Works (MHPW) will be acting as responsible agency.

*ii. Bangladesh Building Construction Rules 2008*

31. These rules seek to control development plot-by-plot and case-by-case. It controls development by imposing conditions on set-backs, site coverage, construction of garages, access to plot, provision of lift, land use of that particular plot and height of building.

32. Regulates technical details of building construction and to maintain standards of building construction. Construction works to comply with relevant provisions, standards, and specifications to ensure structural integrity of existing facilities with upgrading. MHPW and its relevant agencies will be acting as responsible agency.

*iii. Bangladesh Factory Act 2006*

33. The Act requires every workplace including small- or large-scale construction where women are employed to have an arrangement of childcare services. Based on this Act and Labor Laws - medical facilities, first aid and accident and emergency arrangements are to be provided by the authority to the workers at workplaces.

34. Contractors to provide first aid and emergency arrangements for the workers during construction works. Ministry of Labor will be acting as responsible agency.

**iv. Local Government (Pourashava) Act 2009 and the Local Government (City Corporation) Act 2009**

35. Provides guidance for integrated community and workers health and hygiene at the construction, and operation and maintenance stages of the project. Pourashava wide responsibilities in town planning and development, public health and sanitation, water supply and sewage disposal, maintenance of public infrastructure and amenities.

36. Coordinate with pourashava committees on disaster management measures, water and sanitation, and waste management. Local Government Division will be acting as responsible agency.

### **III. COMPLIANCE TO ENVIRONMENTAL REQUIREMENTS FROM THE ADB LOAN AGREEMENT**

37. The Safeguard Policy Statement (SPS) 2009 of ADB sets out the requirements for environmental safeguard that applies to all ADB-financed projects and grants SPS 2009 comprises three key safeguard areas: environment, involuntary resettlement, and indigenous peoples; and aims to avoid adverse project impacts to both the environment and the affected people; minimize, mitigate and/or compensate for adverse project impacts; and help Borrowers to strengthen their safeguard systems and to develop their capacity in managing the environmental and social risks.

38. A virtual inception ADB mission for COVID-19 response emergency assistance project were conducted between 15-23 June 2020. The main objectives of the mission were to establish a working relationship between ADB staff and executing agency (EA)/implementing agency (IA) staff directly involved in implementing the project, finalize the subproject list for isolation centers, critical care units, port of entries and laboratories, and prepare their procurement and implementation schedule & discuss/finalize the scopes and terms of references of the proposed technical assistance to the project. Advise HSD/DGHS to appoint/recruit required officials/consultants/ technical experts for the project implementation unit (PIU) and make full functioning as soon as possible. Public Works Department (PWD) and Department of Architecture will assist the executing department in order for successful implementation of the project. Needs assessment work was ongoing comprising of both Executing agency and ADB. This analysis has to be undertaken in order to assess the impact that can be anticipated in the current context. The primary goal is identifying persisting and anticipatory needs through composite primary and secondary information-based analysis.

39. Overall, the COVID-19 response emergency assistance has complied with the environmental provisions of the loan covenant. The EARF was prepared during processing as guidance for the screening and assessment of subprojects. Based on SPS 2009, the project is rated category B for environmental safeguards as the potential impacts are considered to be site-specific, temporary, with few if any of them irreversible, and in most cases mitigation measures can be designed readily. An Environmental Assessment and Review Framework (EARF) was

prepared to address these impacts and risks. Impacts will be mitigated through the development of guidelines for waste management, health and safety risk assessment and management plans, Environmental Code of Practices, provision of PPE, and trainings with mitigation measures included in Environmental Management Plans, implementation of which shall be closely supervised and monitored. Activities related to building Isolation Unit with at least 50 beds or more within the hospital premise or activities outside the existing facilities or for which impacts are unknown are subject to detailed assessment. Impacts of those activities will be assessed through an IEE along with well-developed EMP.

40. Covenants written into the loan agreement that are related to environmental safeguards are as listed in Table III.1. These refer to actions that need to be taken up during the implementation of sub-project construction activities. Status of compliance with the environmental provisions of the Loan Covenant are shown in Tables III-1 of the report.

**Table III.1 Status of Compliance with the Environmental Provisions of the Loan Covenant 54173-001**

Sl. No.	Covenant	Status of Compliance	Action Required
<b>Environment:</b>			
1.	The Borrower shall ensure, or cause the Project Executing Agency to ensure that the preparation, design, construction, implementation, operation and decommissioning of the project, each Subproject and all project facilities comply with (a) all applicable laws, rules and regulations of the Borrower relating to environment, health and safety; (b) the Environmental Safeguards; (c) the EARF; and (d) all measures and requirements set forth in the respective limited assessment (Environmental Screening & ECOPs) and Detailed Assessment (IEE including EMP), and any corrective or preventative actions set forth in a Safeguards Monitoring Report.	Complied with	Document is under preparation by complying all relevant National Laws, Safeguard Policy Statement (SPS 2009) of ADB, Environment Assessment Review Framework (EARF). The limited assessment (Environmental Screening & ECOPs) and Detailed Assessment (IEE including EMP) shall be prepared by the project consultant. All measures and requirements should be prescribed in IEE and EMP will be considered during implementation stage of the project. Corrective or preventive action plans will be reflected in environment Monitoring Report and project implementation authority will be taken care.
<b>Small Ethnic Community Peoples:</b>			
2.	The Borrower shall ensure, or cause the project Executing Agency to ensure that the preparation, design, construction, implementation and operation of the project and all project facilities comply with (a) all applicable laws, rules and regulations of the Borrower relating to small ethnic community peoples; (b) the indigenous peoples Safeguards; (c) the SECPF, and (d) all measures and requirements set forth in the respective SECDP, and any corrective or preventative actions set forth in a Safeguards Monitoring Report.	Being Complied	No major small ethnic people's impacts will be involved in the project activities.
<b>Human and Financial Resources to Implement Safeguards Requirements:</b>			
3.	The Borrower shall make available, or cause the project Executing Agency to make available, necessary budgetary and human resources to fully implement the EMP, the RP and the SECDP (if any).	Being Complied	Budgetary provisions are not yet included in EMP of the emergency response project. Environment and Social Management Coordinator of PMU/PIU is in place. Human resource (project consultant, i.e. Environmental Specialist) for implementation of EMPs is in place for regular compliance.
<b>Safeguards Related Provisions in Bidding Documents and Works Contracts:</b>			
4.	The Borrower shall ensure, or cause the project Executing Agency to ensure, that all bidding documents and contracts for Works contain provisions that require contractors to: (a) comply with the measures relevant to the contractor set forth in the limited assessment (Environmental Screening & ECOPs) and Detailed Assessment (IEE including EMP), the RP and the SECDP (to the extent they concern impacts on affected people during construction), and any corrective or preventative actions set forth in a Safeguards Monitoring Report; (b) make available a budget for all such environmental and social measures; (c) provide the Borrower with a written notice of any unanticipated environmental, resettlement or indigenous peoples risks or impacts that arise during construction, implementation or operation of the Project that were not considered in the limited	Being Complied	(a) The limited assessment (Environmental Screening) and Detailed Assessment (IEE including EMP) shall be prepared by Project consultant. No bidding document is prepared yet to add with the EMP. The limited assessment (Environmental Screening & ECOPs) and Detailed Assessment (IEE including EMP) will be prepared and corrective measures will be disclosed to contractor and same will be reflected in the "Environment Monitoring Report".  (b) The limited assessment (Environmental Screening & ECOPs) and Detailed Assessment (IEE including EMP) is under preparation and not yet added in the indicates budgetary provisions because the bidding documents is not yet prepared for the project.

Sl. No.	Covenant	Status of Compliance	Action Required
	<p>assessment (Environmental Screening &amp; ECOPs) and Detailed Assessment (IEE including EMP), the RP or the SECDP (if any);</p> <p>(d) adequately record the condition of roads, agricultural land and other infrastructure prior to starting to transport materials and construction, and</p> <p>(e) reinstate pathways, other local infrastructure, and agricultural land to at least their pre-project condition upon the completion of construction.</p>		<p>(d) Haul roads will be marked properly (by avoiding residences and agricultural land) before commencement of transportation of materials.</p> <p>(e) Pathways, land which are likely to be affected for a short period during implementation of the sub project will be restored by concerned construction agency before acceptance of the work. Restoration status will be reflected in post construction monitoring report.</p>
<b>Safeguard Monitoring and Reporting:</b>			
5.	<p>The Borrower shall do the following or cause the project Executing Agency to do the following:</p> <p>(a) submit semiannual safeguards Monitoring Reports to ADB and disclose relevant information from such reports to affected persons promptly/upon submission;</p> <p>(b) If any unanticipated environmental and/or social risks and impacts arise during construction, implementation or operation of the project that were not considered in the limited assessment (Environmental Screening &amp; ECOPs) and Detailed Assessment (IEE including EMP), the RP or the SECDP (if any) promptly inform ADB of the occurrence of such risks or impacts, with detailed description of the event and proposed corrective action plan ; and</p> <p>(c) Report any actual or potential breach of compliance with the measures and requirements set forth in the limited assessment (Environmental Screening &amp; ECOPs) and Detailed Assessment (IEE including EMP), the RP or the SECDP (if any) promptly after becoming aware of the breach.</p>	Being Complied	<p>(a) Generally Environmental Monitoring Report is to be prepared after starting of implementation of the project. As per action plan of ADB, semi-annual Monitoring Report is under preparation, which covers loan covenant part, management plan format and construction compliance.</p> <p>(b) With the development of project and implementation, in case of additional impacts/risks due to change in scope/area, will be reflected in limited assessment (Environmental Screening &amp; ECOPs) and Detailed Assessment (IEE including EMP)and accordingly Executing Agency (EA) will inform the ADB along with corrective action plan which will be reflected in the Monitoring Report.</p> <p>(c) in case of any breach of compliance with the measures and requirements set forth in the EMP; EA will promptly inform ADB and suitable corrective action plan will be planned.</p>
<b>Labor, Health and Anti-Human Trafficking:</b>			
6.	<p>The Borrower, the Project Executing Agency and Participating Pourashavas shall ensure that contractors, comply with all applicable labor, health, and safety laws, rules and regulations of the Borrower and, in particular, (a) do not employ child labor for construction and maintenance activities; and (b) provide appropriate facilities (latrines, etc.) for workers at construction sites. The Borrower shall require contractors not to differentiate wages between men and women for work of equal value. The Borrower and the Project Executing Agency shall ensure that specific clauses are included in bidding documents to ensure adherence to these provisions, and that compliance shall be strictly monitored during Project implementation.</p>	Being Complied	<p>PMU through its Management, Design and Supervision Consultant (MDSC) will supervised and monitored the compliance with labor, health and safety law regulations. The project work will in full compliance with ADB's requirements</p>
7.	<p>The Borrower, the Project Executing Agency and Participating Pourashavas shall ensure that contractors shall disseminate information on the risk of transmission of sexually-transmitted diseases, including HIV/AIDS, in health and safety programs to all construction workers employed under the Project. Specific provisions to this effect shall</p>	Being Complied	<p>Provision will be included are included (as per EMP &amp; BID document) to carry out HIV/AIDS awareness programs for construction contractor, application of all relevant labour laws for health and safety including child labour law and engagement of local labours (preferably from economically backward group) covering women labours. In case of</p>

Sl. No.	Covenant	Status of Compliance	Action Required
	be included in bidding documents and civil works contracts, and compliance shall be monitored by the Project Executing Agency and reported to ADB.		any breach of provision, necessary corrective measures as per contract clauses shall be taken. All activities including awareness program will be reflected in "Monitoring Report".
8.	The Borrower, the Project Executing Agency and Participating Pourashavas shall ensure that awareness campaign on anti-human trafficking shall be conducted and that information and print material on anti-human trafficking shall be developed and distributed to all construction workers and the community in the Project areas throughout the project implementation period. Compliance shall be monitored by the Project Executing Agency, and reported to ADB.	Being Complied	



#### **IV. COMPLIANCE TO ENVIRONMENTAL MANAGEMENT PLAN**

41. The Environmental Management Plan (EMP) are attached in the Environmental Assessment Review Framework (EARF) prepared for all the identified environmental impacts during construction and operation stages due to implementation of project activities and associated development. The aim of the EMP is to ensure implementation of the recommended mitigation measures effectively. The mitigation measures are designed either to prevent impacts or by mitigating those to reduce the effect to an acceptable level that complies with the environmental guidelines of DoE and with the guidelines of the ADB's SPS (2009) by adopting the most suitable cost-effective options. The EMP also ensures that the positive environmental impacts are conserved and enhanced. The project is on primary stage and no civil works has been started during the period of April 2020 to June 2020. The monitoring activities for the project during the reporting period including the preparation of environmental safeguard reports, environmental audits, fill up checklist, preparation of ECoP etc. Compliance to the EMP is not possible to address because the project is in preparation stage. However, the EMP is being prepared during the project preparatory stage by EARF and to be added with the bidding document. Sample format for Environmental Management Plan (EMP) for small-scale civil works are given in Appendix I of the report.

42. The list of selected hospitals and land ports under this project are given in Table IV.1.

**Table IV-1. List of Selected Hospitals and Land Ports under this project**

Name of Hospitals	Name of PCR Labs	Name of PoEs	Safeguard Documentation
<b>1<sup>st</sup> Phase</b>			
1. Dhaka Medical College Hospital, Dhaka (Only ICU) 2. Sir Salimullah Medical College & Mitford Hospital, Dhaka. 3. Shaheed Suhrawardi Medical College Hospital. 4. Rajshahi Medical College Hospital, Rajshahi 5. Mugda 500 bed General Hospital, Dhaka 6. Mymensingh Medical College Hospital 7. Sheikh Hasina Medical College, Tangail 8. Faridpur Medical College Hospital 9. Cumilla Medical College Hospital.	1. Dhaka Medical College Hospital, Dhaka 2. Shaheed Suhrawardi Medical College Hospital. 3. M. Abdur Rahim Medical College Hospital, Dinajpur 4. Mymensingh Medical College Hospital 5. Sheikh Hasina Medical College, Tangail. 6. Faridpur Medical College Hospital 7. Cumilla Medical College Hospital. 8. Jashore Medical College Hospital 9. Colonel Malek Medical College Hospital, Manikgonj 10. Patuakhali Medical College Hospital 11. Bangabandhu Sheikh Mujib Medical University 12. National Institute of Laboratory Medicine and referral Center (NILMRC) 13. Institute of Public Health, DGHS, MOHFW 14. IEDCR 15. Fiver (5) IDHs	1. Benapole 2. Bhomra 3. Burimari 4. Akhaura 5. Tamabil 6. Hili 7. Banglabandha	Under Preparation
<b>2<sup>nd</sup> Phase</b>			
1. Sheikh Sayera Khatun Medical College Hospital, Gopalganj	1. Mugda 500 bed General Hospital, Dhaka. 2. Bogra Medical College Hospital 3. Barisal Medical College Hospital 4. Sheikh Sayera Khatun Medical College Hospital, Gopalganj 5. Rangamati Medical College Hospital 6. Nilphamari Medical College Hospital 7. Naoga Medical College Hospital	1. Bibirbazar 2. Nakugaon 3. Sonamasjid 4. Sheola 5. Gobrakura-Koroitali 6. Belonia 7. Birol	Under Preparation

Name of Hospitals	Name of PCR Labs	Name of PoEs	Safeguard Documentation
<b>3<sup>rd</sup> Phase</b>			
1. Dhaka Medical College Hospital, Dhaka (Only Isolation Unit) 2. Khulna Medical College Hospital 3. M. Abdur Rahim Medical College Hospital, Dinajpur 4. Bogra Medical College Hospital 5. Barisal Medical College Hospital 6. Rangpur Medical College Hospital 7. Chittagong Medical College Hospital, Chittagong 8. M A G Osmani Medical College Hospital, Sylhet	1. Sir Salimullah Medical College & Mitford Hospital, Dhaka. 2. Rajshahi Medical College Hospital, Rajshahi 3. Khulna Medical College Hospital 4. Rangpur Medical College Hospital 5. Chittagong Medical College Hospital, Chittagong 6. M A G Osmani Medical College Hospital, Sylhet 7. Netrokona Medical College Hospital		Under Preparation

## V. SAFEGUARDS MONITORING RESULTS AND UNANTICIPATED IMPACTS

43. As the project is in design phase, the implementation of EMP is not yet started. The EMP will be followed and implemented by the contractor while the project construction work starts and the executing agency (DGHS) will be responsible for monitoring and contractor will be responsible for the implementation of the limited assessment (Environmental Screening & ECOPs) and Detailed Assessment (IEE including EMP) as per the suggested guidelines. In case of any unanticipated impacts, the PIU will conduct further assessment of the environmental impact, or reflect in the environmental monitoring report and will mobilize the resources needed to implement required mitigation measures including their monitoring.

## VI. IMPLEMENTATION OF GRIEVANCE REDRESS MECHANISM AND COMPLAINTS RECEIVED FROM STAKEHOLDERS

44. The grievance redress mechanism (GRM) is a process of handling complaints that is understandable, transparent, gender-responsive, culturally-appropriate, and easily accessible to affected persons without cost and retribution. The Grievance Redress Mechanism (GRM) shall resolve complaints in a time-bound and transparent manner. MOHFW will ensure that affected persons will have the chance to express their legitimate grievances or to file a complaint about the project by setting up a GRM as soon as the loan becomes effective. The GRM process will be aligned with the process adopted by MOHFW; however, compliance with the policy principles of ADB SPS 2009 will be ensured. The GRM will be reviewed in consultation with MOHFW and DGHS and finalized before the effectiveness.

45. **Objectives:** The GRM aims to resolve complaints in a time-bound and transparent manner. MOHFW will ensure that: (i) all complaints are registered, investigated and resolved in a manner consistent with the requirements of SPS 2009 and the government; (ii) the complainants are kept informed on the status of their concerns and the resolutions available to them; and (iii) adequate staff and resources will be made available to implement the GRM.

46. **Filing a complaint:** Affected persons can submit a complaint either verbally or in written form. Verbal complaints can be submitted through a phone call, walk-in or in person while written complaints can be posted through mail/letter, comments/suggestions drop-box, MOHFW website, email, or fax. However, due to the restrictions of face-to-face communication as a result of the COVID-19 outbreak, complaint submission in written format or through phone calls will be recommended.

47. DGHS has a web-based, text message-based, and phone-based platform for citizen engagement that can be used as a complementary way of submitting a complaint; its link is MOHFW will designate a staff as the GRM Focal Person.

48. **Structure:** The grievance redress mechanism will be under the responsibility of the Project Implementation Committee (PIC) under the chairmanship of DG, DGHS. MOHFW and DGHS will ensure the representation of women in the committee.

49. **Levels of grievance redress.** The complainant is not restricted to seek redress through the legal system at any point in the GRM process. Complainants or affected persons can seek redress to their complaints in three levels (see figure VI.1)

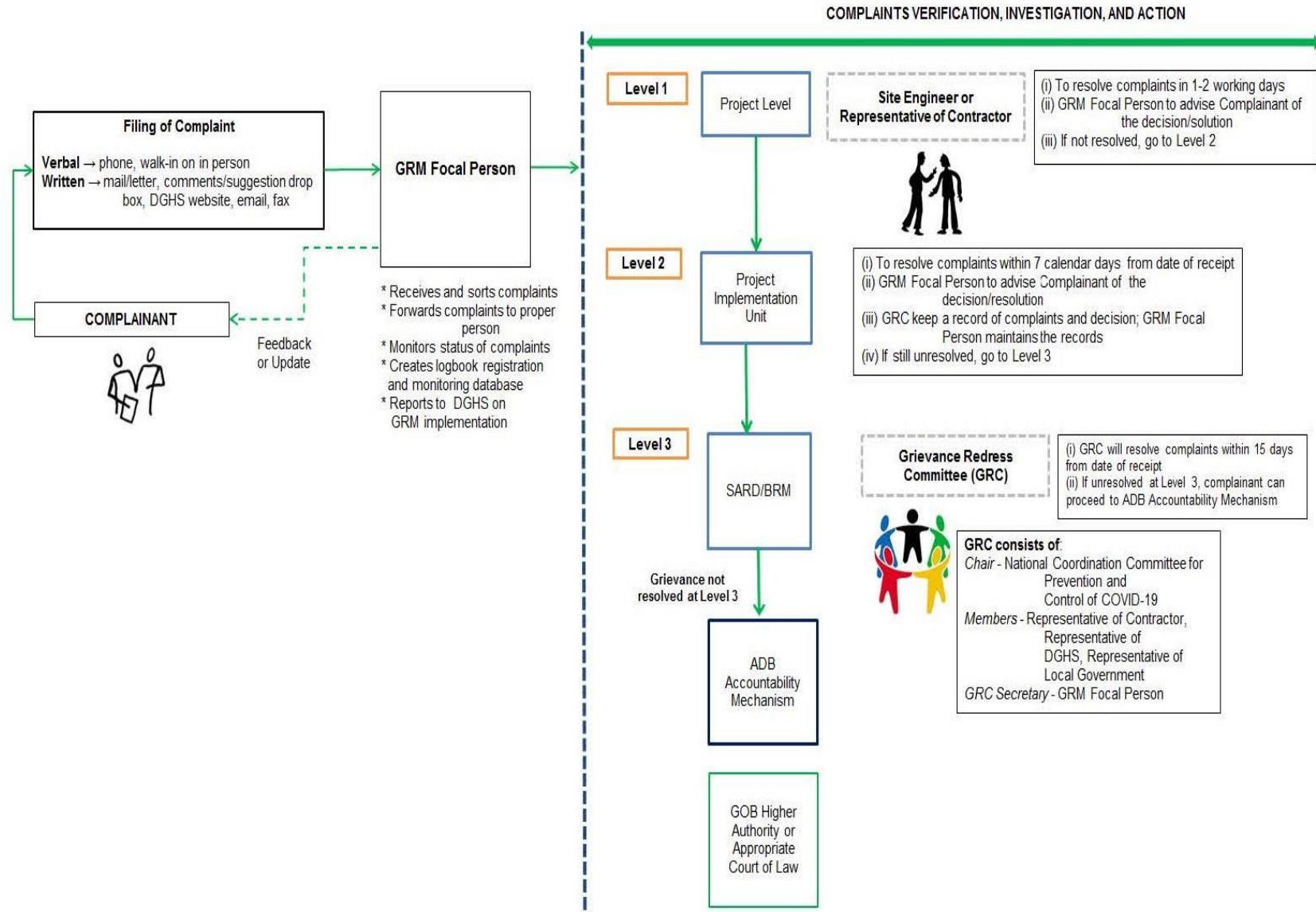


Figure VI.1: Grievance Redress Mechanism

## **VII. CONCLUSION AND RECOMMENDATIONS**

50. Overall, the COVID-19 response emergency assistance project has substantial compliance to the environmental safeguard's requirement set by the ADB and the GoB. The environmental safeguard monitoring report preparation was ongoing by project authority. No notices of violation were received by the PMU for any of the centers. On-site monitoring was not conducted for any centers because the project is in preparation stage and no construction work yet now.

51. COVID-19 response emergency assistance has complied with the environmental provisions of the loan covenant and the environmental safeguards requirement set by the ADB and the DoE.

## APPENDICES

### ANNEX I: Sample EMP for Small-Scale Construction Project according to EARF

Phase	Impact/Issue	Mitigation Measure
<b>Design</b>	Drawing and planning the construction of buildings by adapting to adjoining physical landscape and minimizing possible environmental issues.	Minimization measures for adverse environmental impacts should be introduced in the construction design.
	Barrier-free will be integrated in the design to the extent possible.	Care will be taken in the design to provide easy access to persons with mobility challenges in all public areas of the building.
	Safe disposal of sewer water from toilets	To the extent possible, sewer will be treated in appropriate septic tank for anaerobic treatment with retention of at least 48 hours and be disposed of in town sewer if existing. Where town sewer is not available, an aerobic treatment will be provided in the form of a soak away pit. The pit will be located at least 40 meters away from any water wells.
	Increased volume of water, sanitation and related effluent discharges in the existing 525 health care facilities	Increased volume of water requirement, sanitary facilities and related effluent discharges at all 525 health care facilities will be reviewed at the design phase and facilities to be increased and issues will be addressed as safe management practice.
<b>Construction</b>	Dispersion of dust, debris, and suspended particulates from construction sites to surrounding structures may cause nuisance to surrounding families and businesses, especially vulnerable persons (children, elders, etc.).	Contractors to spray water to exposed areas, excavated materials, adjacent vegetation to reduce dust during the dry season and regularly clean debris to contain dust generation
	Increase in dust levels from construction vehicles and traffic volume	<ul style="list-style-type: none"> <li>• Impose speed limits for construction vehicles</li> <li>• Proper maintenance of service vehicle</li> <li>• Implement site-specific EHS Plan and subsequent monitoring will reduce air emission at acceptable air emission standards (IFC-WB EHS General Guidelines 2007 and ECR 2005).</li> </ul>
	Increase noise level and intermittent vibration from construction machinery, equipment and vehicles will cause disruption to patients in the facilities, nearby residents, and other institutions	<ul style="list-style-type: none"> <li>• Civil works will generate noise and low vibration (i.e. given the scale of upgrading activities). Compliance to the limits set by the Noise Pollution Control Rules 2006 will be strictly enforced.</li> <li>• Measures such as work scheduling of noise-generating activities, use of temporary enclosures, enforcing of speed limits for construction vehicles, use of horns by vehicles will be prohibited.</li> <li>• Keep loading and staging areas onsite within the perimeter protected by the recommended temporary noise barrier</li> </ul>



Phase	Impact/Issue	Mitigation Measure
		<p>and at least 50 m away from the noise-sensitive properties offsite.</p> <ul style="list-style-type: none"> <li>• Stop the construction work during prayer time and night time (6pm-7am)</li> <li>• Noise level at the boundary of the construction sites will be monitored to ensure compliance to Noise Pollution Control Rules 2006 and IFC-WB EHS General Guidelines 2007</li> </ul>
	<p>Impact to surface water quality due to silt runoff, hazardous liquid wastes, and chemicals that may be used in construction</p>	<ul style="list-style-type: none"> <li>• Construction run off will be required to have internal drainage system to collect construction runoff into a temporary pit.</li> <li>• Hazardous liquid waste, hazardous materials and other liquid waste will be stored in impermeable bunded area with 110% volume for temporary period before treating to a treatment plant and subsequently discharge in a designated disposal site.</li> <li>• Implement appropriate Environmental Codes of Practice to prevent runoff and manage waste at work sites</li> <li>• Good housekeeping at construction sites will be observed at all times to maintain IFC-WB EHS General Guidelines 2007</li> </ul>
	<p>Poor sanitation and solid waste disposal in construction work sites that may cause possible transmission of communicable diseases (such as STI's and HIV/AIDS) from workers to local populations</p>	<ul style="list-style-type: none"> <li>• Good housekeeping will be observed in all work sites at all times. Contractors will be required to provide workers with sanitary facilities and safe drinking water supply separately from the existing health facilities and medical colleges.</li> <li>• Prior to any civil works, orientations/briefing on communicable diseases and good sanitation will be conducted by the contractors under the supervision of MOHFW</li> <li>• WHO (Interim Guidance, 19 March 2020) on water, sanitation, hygiene, and waste management for the COVID-19 virus will be referred to.</li> <li>• Workers will be locals and worker-based camps will be to provide a temporary safe place during breaks from daily work. Vacuum truck will be involved in case of excessive sewage water at camp site to suck sewage liquid and treat in a treatment plant before discharging in the designated disposal site.</li> </ul>
	<ul style="list-style-type: none"> <li>• Creation of temporary breeding habitats for diseases such as those transmitted by mosquitoes and rodents</li> <li>• Possibility of temporary waterlogging if civil works will be done during the rainy season</li> </ul>	<ul style="list-style-type: none"> <li>• Review of the drainage system of the existing health facilities and medical colleges will be conducted by the Contractors to assess if improvement will be needed</li> </ul>

Phase	Impact/Issue	Mitigation Measure
		<ul style="list-style-type: none"> <li>• Good housekeeping in all work sites will be enforced at all times.</li> <li>• Regular inspection of work sites to check for presence of potential temporary breeding habitats will be conducted.</li> </ul>
	Potential social conflicts if workers from other regions or countries are hired	<ul style="list-style-type: none"> <li>• Civil works are expected to be minor. Only locally unavailable skilled labour will be hired from other regions and most of others works will be carried out by the local workforce to avoid any such conflicts.</li> </ul>
	Large population influx during project construction that causes increased burden on social infrastructure and services (such as water supply and sanitation systems)	<ul style="list-style-type: none"> <li>• Civil works are considered to be minor. Local workforce will be given preference.</li> <li>• Sufficient separate sanitary facilities and water shall be provided to the labor force to avoid any such conflict or contact with the local people.</li> </ul>
	Community safety risks due to both accidental and natural causes, especially where the structural elements or components of the project are accessible to members of the affected community or where their failure could result in injury to the community during construction period	<ul style="list-style-type: none"> <li>• Appropriate design features to meet national and international standards will be included, and measures/plans and procedures will be implemented to minimize risks.</li> <li>• Unauthorized public access to the construction sites and laboratories will be prohibited.</li> <li>• Environmental audit and risk assessment will be conducted during implementation</li> </ul>
	Generation of wastes and other construction debris	<ul style="list-style-type: none"> <li>• Contractor will be required to reduce waste generation, whenever feasible. General municipal waste and hazardous wastes to be screened at source, separated and disposed temporarily in the bin at two different designated locations as non-hazardous designated place and hazardous materials designated places for time-bound disposals.</li> <li>• Accordingly, non-hazardous will be disposed to designated municipality owned disposal site.</li> <li>• Generation of solid waste will comply with relevant provisions in the City Corporation Act 2009 on waste removal, collection and management and maintain 3R.</li> <li>• Hazardous wastes will be disposed of at designated disposal sites following the requirements of Basel Convention.</li> <li>• Construction area will be separated with temporary barriers to avoid potential infection from the hospital premises to the construction workers</li> </ul>
	Wastewater discharges during renovation of existing facilities and potential for	<ul style="list-style-type: none"> <li>• Sewage water runoff will be collected through separate internal drainage system to a temporary impermeable pit for</li> </ul>

Phase	Impact/Issue	Mitigation Measure
	contamination of drinking water pipeline system of adjacent neighbors	temporary storage and will be collected through vacuum truck into the sewage treatment plant prior to discharge
	During renovation of existing facilities health facilities, construction workers may be infected by COVID-19 from patients	<ul style="list-style-type: none"> <li>• Renovation works to be completed before placement of COVID-19 infected patients in the facility.</li> <li>• Construction areas to be separated completely from other areas of the hospital or HCF under construction/renovation. In case renovation works continue during presence of COVID-19 infected patients, all workers will have three days prior training, awareness about community transmission, social distancing, WHO certified PPE for each worker for each day, PPE discarding separate areas, separate washing areas and subsequent designated disposal sites for PPE for incineration.</li> </ul>
	Pedestrian safety and security risks particularly for the children, elderly, and persons with disability, and traffic congestion	<ul style="list-style-type: none"> <li>• Contractor to provide temporary fence enclosing work sites</li> <li>• Speed limits will be imposed and to designate a traffic signal person</li> <li>• Provide temporary crosswalk for mobility challenges</li> </ul>
	Interruption of public services such as water, electricity, telephone, and transport routes.	<ul style="list-style-type: none"> <li>• Contractor to coordinate with local authorities and notify them if there is a need to interrupt services</li> </ul>
	Inform local government units on the schedule of civil works, possible interruption of services, etc.	<ul style="list-style-type: none"> <li>• Contractor to provide clear and visible signs on the schedule of construction activities</li> </ul>
<b>Post Construction/Operation</b>	Health hazards arising from inadequate design of facilities for receiving, storing, and handling of chemicals, medical/clinical wastes and other hazardous wastes	<ul style="list-style-type: none"> <li>• Qualified design team will evaluate existing facilities and will address probable volumes, sorting areas of hazardous and non-hazardous, medical/clinical wastes at sources and subsequent disposal under site-specific EHS plan</li> </ul>
	Health hazards arising from inadequate design of facilities for receiving, storing, and handling of chemicals, medical/clinical wastes and other hazardous wastes	<ul style="list-style-type: none"> <li>• Qualified design team will evaluate existing facilities and will address probable volumes, sorting areas of hazardous and non-hazardous, medical/clinical wastes at sources and subsequent disposal under site-specific EHS plan</li> </ul>
	Risks and vulnerabilities related to occupational health and safety due to physical, chemical, biological, and radiological hazards during project operation	<ul style="list-style-type: none"> <li>• Implement site-specific EHS plan</li> <li>• Use of WHO-certified PPE for protection from COVID-19 infection</li> <li>• prior health safety training to workers</li> <li>• Segregation of wastes at sources in specific bins</li> </ul>

Phase	Impact/Issue	Mitigation Measure
		<ul style="list-style-type: none"> <li>• Time-bound transfer of wastes to designated waste disposal sites</li> <li>• Routine health checkup of health workers and staff</li> <li>• Compliance to WHO certified biological waste management, handling and disposal process of waste from COVID-19 infection</li> <li>• Compliance to Bangladesh Medical Waste Management Rules 2008</li> </ul>
	<p>Risks to community health and safety due to the transport, storage, and use and/or disposal of materials such as explosives, fuel and other chemicals during operation</p>	<ul style="list-style-type: none"> <li>• No explosives will be used</li> <li>• Mandatory use of appropriate PPE, Reagents and chemicals used in testing protocols, while complex, are in pure solution following the guidelines and requirements of WHO</li> <li>• Temporary storage will refer to WHO specific guidelines</li> <li>• Fuel and other chemicals will be kept appropriately designed storage area</li> </ul>
	<p>Community safety risks due to both accidental and natural causes, especially where the structural elements or components of the project are accessible to members of the affected community or where their failure could result in injury to the community throughout project operation and decommissioning</p>	<ul style="list-style-type: none"> <li>• Appropriate design features to meet national and international standards will be included, and measures/plans and procedures will be implemented to minimize risks.</li> <li>• Unauthorized public access to the construction sites and laboratories will be prohibited.</li> <li>• Environmental audit and risk assessment will be conducted during implementation.</li> <li>• Regular monitoring will be done under direct management of a professional Occupational Health &amp; Safety Officer.</li> </ul>
	<p>Community health and safety risks due to generation of solid and hazardous waste, and its transportation to designated disposal site</p>	<ul style="list-style-type: none"> <li>• Trained and qualified waste transport company will be employed and the same will be required to comply with WHO certified COVID-19 contamination control guidelines for handling waste including hazardous waste</li> <li>• General municipal waste and hazardous wastes to be screened at source, separated and disposed temporarily in the bin at two different designated locations as nonhazardous designated place, and hazardous materials designated places for time-bound disposals</li> <li>• Non-hazardous will be disposed to municipality owned disposal site.</li> <li>• Generation of solid waste will comply with relevant provisions in the City Corporation Act 2009 on waste removal, collection and management</li> <li>• Medical waste management will comply with the requirements of WHO proposed</li> </ul>

Phase	Impact/Issue	Mitigation Measure
		<p>guidelines for COVID-19 and Medical Waste Management Rules 2008.</p> <ul style="list-style-type: none"> <li>• Hazardous wastes will be disposed of at designated disposal sites following the requirements of Basel Convention.</li> <li>• All generated wastes will be managed based on site-specific waste management plan under strict supervision of an EHS Officer of the existing medical facilities.</li> </ul>