

**Comments of Director, Planning -2, BWDB, Dhaka on the NCEA advice regarding ESIA Report of the project “Development Phase of Water Management Infrastructure in Bhola District (DWMIB)”**

We do highly appreciate the advice of NCEA on the ESIA Report in connection to the DWMIB Project. Some comments on their observation are given below:

Sl. no.	Advice of NCEA	Comments of Project Director
1.	Article 2.2: “A better justification of the selected project components (bank protection, embankment rehabilitation and replacement of the sluice). Even within the limited budget available, other project alternatives could have been considered. For example, bank protection only without embankment reinforcement and hydraulic constructions”.	An explanation on selection of the project components has been given in Component 1a: Assessment Current Situation (page: 85-86) and Component 1b: Analysis of Development Scenarios (Article-3.2, page-14).  The reason behind selecting bank protection with embankment for implementation phase has been well defined in Component 4: Project Plan (page- 43).
2.	Article 2.2: “The NCEA does not call these 2 selected locations into question, but recommends that the developer pay due attention to possible interaction with neighbouring locations. The risk that rehabilitation of certain sections of the embankment may increase the risk of breaching of adjacent non-rehabilitated sections is particularly relevant”.	A project named as “Bhola Town Protection Phase-III” has been taken by BWDB at the adjoining location of Location-1 (page: 9, Annex: D-4 Bank protection works, Component 1a), so there is no risk of breaching of adjacent non-rehabilitated sections.  The GoB has given decision to take projects to protect the other vulnerable locations in Bhola in the 2nd Project Steering Committee meeting of this project (decision no: c) on 1 January 2015 (Enclosure -1). Accordingly DPP for different location of east coast is under process for approval.
3.	Article 2.2: “Therefore this EMP needs to be further detailed before project approval or Environmental Clearance be given and cannot be left as a task for the contractor for the construction phase alone. Therefore the EMP should be an integral part of an the ESIA update that is still to come”.	We have the same plan about EMP which has been defined in Appendix-1, Page no-5 of ESIA report stated “The environmental clearance will be provided based on the ESIA report. This can only be done when also the actual location of the project components has

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		been decided upon. This may not happen within the timeframe of the ORIO development phase. It will be taken care of by BWDB and is a normal procedure for all projects the BWDB performs.”
4.	Article 3.1: “The NCEA confirms that an update of the ESIA report, including a RAP, should logically be prepared when the exact location of the proposed interventions is known”.	We have the same plan about RAP which has been defined on Component 2: Environmental and Social Impact Assessment (page-162&164) and Component 4: Project Plan (page-37&72).
5.	Article 3.3: “The NCEA recommends to provide budget and cost figures in US \$ or € as well, because the given indications in Bangladeshi currency are not self explanatory. This can be done in the up-date of the ESIA which has to be prepared anyway at a later stage (see 3.1)”.	It will be complied in the up-dated ESIA report if necessary.
6.	Article 3.3: “Here again the question is, considering the limited budget, why priority is not given to more bank protection works instead of a costly new hydraulic structure? The ESIA report does not explore such an alternative approach.”	Due to fund limitation hydraulic structures has been discarded already according to Component 1b: Analysis of Development Scenarios (Article 3.2, page-14) and Component 4: Project Plan (page-43).
7.	Article 3.3: The choice for bank protection and embankment materials and measurements is difficult to understand for non-technical readers. Although the NCEA does not question the choice of the selected measurements, it could be better explained in terms of why and on what grounds the materials have been chosen (size of the blocks and thickness of layers, etc).	The choice of materials (size of blocks, thickness of layers, etc) is clearly explained in Component 3: Preliminary Design and Cost Estimate (Annex C, Design Calculation).
8.	Article 3.3: “An alternative could be for example to leave out the works on the hydraulic structures and spend all available funds on bank protection on a third location. Therefore the NCEA recommends to either include this explanation and justification for the choices made in the up-date of the ESIA or present an alternative project implementation in which for example only bank protection will take place.”	Same as comment under SI no-6. And further explanation will be given in up-dated ESIA report if needed.

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9.	Article 3.3: "The NCEA recommends to provide more information in the up-date of the ESIA on possibilities for synergy with ongoing and recently completed works. In addition, the ESIA should investigate and confirm that the proposed works do not lead to more erosion elsewhere along the Bhola Island eastern coastline: solving a problem at one location should not lead to creating a problem in another stretch of the coast."	Same as comment under SI no-5 & 2.
10.	Article 3.3: "The NCEA concludes that the site selection by means of the applied MCA can not be verified with the given information. Therefore in the up-date of the ESIA, the background information on the MCA should be added. Currently the locations 1 and 4 have the highest scores, which can possibly be different once parameters would be added/deleted and other weights would be applied (e.g. not '0' for sensitive ecological values but a higher weight)."	It will be complied in up-dated ESIA report if necessary.
11.	Article 3.3: "The NCEA recommends to include more, preferably quantitative, information on the no-project alternative: how many people will be affected by flooding without the project and what will this mean for sources of income of people? When there are uncertainties (which may be the case in the highly dynamic estuary of the Megna river), optionally some scenarios could be described as part of the no-project situation in the up-date of the ESIA (see for instance also paragraph 6.2.3 p. 126 on effects on hydrodynamics and morphology)."	After the detailed design, when the exact location of the project is known quantitative information on the no-project alternative will be provided in the updated ESIA if needed. Table 11-23, page no-93 represents the number of people affected by flooding at location-1 in the Component-4: Project Plan.
12.	Article-3.3: "The NCEA recommends to provide more details in the update of the ESIA on the techniques of the EEWS that will actually be used in the project".	A clear picture on installation of EEWS has been depicted in Component-3: Preliminary Design and Cost Estimates (Article -7).
13.	Article-3.3: It is mentioned that the Construction works will be carried out during the dry period, starting beginning of November till 30 April. No mention is made of the breeding season.	In Appendix 4, Page no-6 of ESIA Report, Activity C8 represents that Construction should take place outside the breeding season, Particularly spawning of Hilsha and some other migratory fishes. This is generally for April to July for common fish and September to October and March to May for Hilsha fish. If necessary work




		may need to be suspended for some days. Department of Fisheries may be consulted for the exact timing of the fish migration particularly hilsha and pangas fishes- the two most important commercial fish species. Monitor fish catch before, during and just after construction.
14.	Article-3.3: "The NCEA has already addressed this issue in Par. 3.3. above (interactions with neighbouring locations). The NCEA considers this issue of utmost importance: the proposed project interventions cannot be seen and assessed in isolation, but should be part of a sound plan for the reinforcement of the whole length of the eastern coast of Bhola island. In the up-date of the ESIA, this part requires further justification and/or explanation how the proposed project is embedded in ongoing coastal protection works and how other locations might be affected"	Same as comment under SI no-2.
15.	Article-3.3: "The NCEA recommends that in the update of the ESIA report more information be provided on stakeholder consultation and required land acquisition during pre-construction. Probably this can be part of the RAP which still needs to be elaborated (see also 3.1)."	Information have been given to consult with the stakeholder about the preparation of detail design, Resettlement Action Plan and land acquisition during pre-construction phase in appendix-4, page no-2, 3 activity schedule P2, P5, P9 of ESIA report. Besides this, in Chapter -7 and Appendix-5 of ESIA report data about the stakeholder consultation, their opinion and impact assessment about the project have been given and more specified and elaborated in the updated ESIA if necessary.
16	Article-3.7, "The NCEA recommends to provide information on public consultation events and results thereof in an up-dated version of the ESIA. This up-date should also include a public participation plan for the pre-construction phase, as at this stage important major negative impacts will occur in terms of relocation of people, their properties, agricultural land and cultural heritage sites. Probably this will be part of the RAP, which will also have to address compensation for physical and economic relocation."	In Appendix -2. Page no-10,11 Consultants have been attached a FGD checklist and Questionnaire for interview of stakeholder for updated ESIA to assess the social and Environmental impact of RWMIB.





17	Article-3.8, "The NCEA notes that indeed Annex 4 to the ESIA report contains tables with activities, impacts, measures, residual impacts, as well as additional columns with responsible parties for implementation, monitoring and cost estimates. However, no timeline is provided."	Timeline is provided in Appendix-6 (Planning), page no-1, 2 of the Project Plan (Component-4).
18	Article-3.8, "Therefore this EMP needs to be available before project approval or Environmental Clearance be given and cannot be left as task for the contractor for the construction phase."	Same as comment under SI no-3.
19.	Article-3.3: "The NCEA recommends the elaboration and integration into the updated version of the ESIA report of a detailed monitoring plan to monitor implementation of the EMP. To ensure execution of the EMP and the monitoring plan, institutional capacity should be identified and appointed as well. Paragraph 8.3 and 8.4 already give some useful information, but this requires further detailing."	Detailed monitoring plan are given in Article 8.3, 8.4 & 8.5 on ESIA report and further detailing will be complied in up-dated ESIA report if necessary.

  
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