

সোনালী ব্যাংক লিমিটেড

প্রধান কার্যালয়, ঢাকা।

ঝুঁকি ব্যবস্থাপনা বিভাগ।

তারিখ : ১৯.০৮.২০১৩

প্রধান কার্যালয় ইস্তেহার নং-১৫০

ঝুঁকি ব্যবস্থাপনা বিভাগ ইস্তেহার নং-০৭

সকল জেনারেল ম্যানেজার

প্রধান কার্যালয়/জেনারেল ম্যানেজার'স অফিস/স্থানীয় কার্যালয়

সকল ডেপুটি জেনারেল ম্যানেজার/প্রিন্সিপাল/এসিস্ট্যান্ট জেনারেল ম্যানেজার/

ম্যানেজার/শাখা পরিদর্শক/ সিনিয়র অডিটর/ অডিটর

প্রধান কার্যালয়ের সকল বিভাগ/প্রিন্সিপাল অফিস/রিজিওনাল অফিস/

কর্পোরেট শাখা/ স্টাফ কলেজ/ট্রেনিং ইনস্টিটিউট/

সকল শাখা

সোনালী ব্যাংক লিমিটেড

বাংলাদেশ।

**ব্যাংক কর্তৃক অর্থায়নকৃত ও অর্থায়নযোগ্য প্রকল্পের পরিবেশগত ঝুঁকি মান
Environmental Risk Rating (EnvRR) নিরূপন প্রসঙ্গে।**

জলবায়ুর দ্রুত পরিবর্তন পরিবেশের ভারসাম্যের উপর বিরূপ প্রভাব ফেলছে। আবহাওয়ার অস্বাভাবিক পরিবর্তন, গ্রিন হাউজ গ্যাস নিঃসরণ বৃদ্ধি, বায়ু দূষণ প্রভৃতি থেকে পরিবেশকে রক্ষা করার জন্য অন্যান্য সকলের সাথে ব্যবসা প্রতিষ্ঠানগুলোরও দায়িত্ব নেয়া প্রয়োজন। আর এজন্য গ্রিন ব্যাংকিং বা পরিবেশবান্ধব ব্যাংকিং এর মাধ্যমে ব্যাংকসমূহ পরিবেশ রক্ষা তথা অর্থনীতিতে বিশেষ ভূমিকা পালন করতে পারে। সম্পদের সুষ্ঠু ব্যবহার ও কম কার্বন নিঃসরণ করে এমন শিল্প প্রতিষ্ঠানে অর্থায়নের বিষয়ে বিশেষ গুরুত্বারোপ করতে হবে। পরিবেশবান্ধব ব্যাংকিং চালুর লক্ষ্যে বাংলাদেশ ব্যাংকের নির্দেশনার আলোকে অত্র ব্যাংকের ইস্তেহার নম্বর ১২০ তারিখ ১৫-০৪-২০১২ (ঝুঁকি ব্যবস্থাপনা বিভাগ ইস্তেহার নং:০২) ইস্যু করা হয়েছে।

উক্ত ইস্তেহারের ১.২ অনুচ্ছেদ অনুযায়ী ব্যাংকের মূল ঝুঁকি ব্যবস্থাপনায় পরিবেশগত ঝুঁকি অন্তর্ভুক্তকরণ তথা ঋণ প্রদানের ক্ষেত্রে বিদ্যমান ঋণ ঝুঁকি বিশ্লেষণের সময় পরিবেশ ও জলবায়ু পরিবর্তনের ঝুঁকিও বিবেচনা করতে হবে।

দ্বিতীয়ত: ব্যাংকের পর্যাপ্ত মূলধন নিরূপনের লক্ষ্যে ব্যাসেল-২ এর পিলা-২ অনুযায়ী অতিরিক্ত ঝুঁকি হিসাবে পরিবেশগত ঝুঁকি বিবেচনা ও তার বিপরীতে প্রয়োজনীয় মূলধন সংরক্ষণের নির্দেশনা প্রদান করা হয়েছে। পরিবেশগত ঝুঁকি নিরূপন ও তার বিপরীতে প্রয়োজনীয় মূলধনের পরিমাণ নির্ধারণের জন্য বাংলাদেশ ব্যাংকের নির্দেশনার আলোকে ইতোমধ্যে প্রধান কার্যালয় ইস্তেহার নং ১৪৮ তারিখ ২৪-০৬-২০১৩ জারী করা হয়েছে।

ঋণ প্রদানকালে ঋণ ঝুঁকির সাথে অন্তর্ভুক্ত করে পরিবেশগত ঝুঁকি বিশ্লেষণ ও পর্যাপ্ত মূলধন নির্ধারণে পরিবেশগত ঝুঁকি নিরূপনের জন্য বাংলাদেশ ব্যাংক কর্তৃক Environmental Risk Management (ERM) Guidelines ইস্যু করা হয়েছে। বাংলাদেশ ব্যাংকের Environmental Risk Management (ERM) Guidelines (BRPD Circular No-1, dated 30th January 2011) এ বর্ণিত Environmental due diligence checklist (EDD) অন্তর্ভুক্ত করা হয়েছে। উক্ত চেকলিস্ট অনুসরণ করে পরিবেশগত ঝুঁকি মান (Environmental Risk Rating- EnvRR) নির্ধারণ করতে হবে।

ঝুঁকি ব্যবস্থাপনা বিভাগ কর্তৃক প্রণীত Risk Management Checklist (RCL) এর ৫১ হতে ৬৫ পৃষ্ঠায় উক্ত EDD চেকলিস্ট সংযোজিত হয়েছে। বাংলাদেশ ব্যাংকের গাইডলাইনস অনুযায়ী নিম্নোক্ত ঋণ সীমার গ্রাহকদের (কর্পোরেট, প্রাতিষ্ঠানিক, ব্যক্তিগত, ক্ষুদ্র ও মাঝারী উদ্যোক্তা) পরিবেশগত ঝুঁকি রেটিং (EnvRR) নিরূপন করতে হবেঃ

- ১। ২৫ লক্ষ টাকার উর্ধ্বে ক্ষুদ্র ও মাঝারী শিল্প/উদ্যোক্তা (এসএমই) ঋণ;
- ২। ১.০০ কোটি টাকার উর্ধ্বে কর্পোরেট ঋণ এবং
- ৩। ১.০০ কোটি টাকার উর্ধ্বে আবাসন খাতের ঋণ;

প্রসঙ্গত: এসএমই ডিভিশনের ২৮ জুলাই, ২০১১ তারিখের এসএমইডি/পলিসি/২৩২ সংখ্যক পত্রে কুটির, মাইক্রো, ক্ষুদ্র ও মাঝারী শিল্প/উদ্যোগের যে সংজ্ঞা ও ক্ষেত্র প্রদান করা হয়েছে পরিবেশগত ঝুঁকি নিরূপনে তা অনুসরণ করতে হবে।

বাংলাদেশ ব্যাংকের Environmental Risk Management (ERM) Guidelines অনুযায়ী পরিবেশগত আইন, পরিবেশ ছাড়পত্র গ্রহণ, ভূমির ব্যবহার ইত্যাদি যা সকল ক্ষেত্রে সাধারণভাবে প্রযোজ্য সেগুলোর সমন্বয়ে একটি General Environmental due diligence Checklist (EDD) (পরিশিষ্ট-১) প্রণয়ন করা হয়েছে যা সকল সেক্টরের ক্ষেত্রে প্রযোজ্য।

এছাড়াও বিশেষ বিশেষ বৈশিষ্ট্যের কারণে অর্থায়নযোগ্য খাতসমূহকে নিম্নোক্ত ১০টি সেক্টরে বিভক্ত করা হয়েছেঃ

- (ক) কৃষি ব্যবসা (পোলট্রি ও ডেইরী) (খ) সিমেন্ট (গ) চামড়া (ট্যানারী) (ঘ) টেক্সটাইল এন্ড এ্যাপারেলস শিল্প
(ঙ) মন্ড ও কাগজ শিল্প (চ) ধাতব ও প্রকৌশল শিল্প (ছ) চিনি ও চিনি উপজাত শিল্প (জ) নির্মাণ ও গৃহায়ন শিল্প
(ঝ) রাসায়নিক শিল্প (ফার্মিলাইজার, পেস্টিসাইড ও ফার্মাসিউটিক্যালস) এবং (ঞ) জাহাজ ভাঙ্গা শিল্প।

উক্ত ১০টি সেক্টরের জন্য আলাদা আলাদা সেক্টর ভিত্তিক চেকলিস্ট (পরিশিষ্ট-২-১৫) প্রণয়ন করা হয়েছে।

কোন প্রকল্পের পরিবেশগত ঝুঁকি নিরূপনে সাধারণ EDD চেকলিস্ট এবং সেক্টর ভিত্তিক EDD চেকলিস্টের মাধ্যমে প্রাপ্ত ঝুঁকি মানের ভিত্তিতে নিম্নোক্তভাবে সামগ্রিক পরিবেশগত ঝুঁকি মান EnvRR নিরূপিত হবেঃ

General EDD	Sector-specific EDD	Overall EnvRR
Low	Low	Low
Moderate/Low	Low/Moderate	Moderate
If any one or both the General and Sector-specific EDD checklists is indicated as “High”		High

ঋণগ্রহীতা পরিবেশগত অনাপত্তি ছাড়পত্র (NOC) সংগ্রহের জন্য পরিবেশ অধিদপ্তরে যে সকল ডকুমেন্ট জমা প্রদান করবে ব্যাংক কর্তৃক নির্ধারিত EDD checklist পরিপালন কালে সে সকল ডকুমেন্ট/কাগজপত্র ব্যাংকের সংগ্রহ করতে হবে।

EnvRR এর মাত্রা (High, Moderate ও Low) অনুযায়ী নিম্নোক্ত ঋণ মঞ্জুর করা হবে ঃ-

- ১। যদি ঋণ প্রস্তাব সংশ্লিষ্ট প্রকল্পের EnvRR উচ্চ (High) হয়, সেক্ষেত্রে ঋণ প্রস্তাবটি ব্যাংকের পরিচালনা পর্ষদ বা এর নির্বাহী কমিটি কর্তৃক অনুমোদিত হতে হবে।
- ২। যদি ঋণ প্রস্তাব সংশ্লিষ্ট প্রকল্পের EnvRR নিম্ন বা মডারেট (Low/Moderate) হয়, তা হলে অর্থায়নের ক্ষেত্রে ব্যাংকের প্রচলিত ক্রেডিট রিস্ক ম্যানেজমেন্ট গাইডলাইন অনুযায়ী সিদ্ধান্ত নিতে হবে।
- ৩। যদি ঋণ প্রস্তাব সংশ্লিষ্ট প্রকল্পের EnvRR অস্পষ্ট হয়, তাহলে ব্যাংক/আর্থিক প্রতিষ্ঠানকে ঋণ গ্রহীতার নিকট থেকে আরো তথ্য সংগ্রহ করতে হবে, যাতে করে উক্ত ঋণ প্রস্তাবের ঝুঁকি নির্ধারণ করা যায় এবং High/ Moderate/ Low যে কোন নির্দিষ্ট মানে উপনিহত হওয়া যায়।

নতুন ঋণ মঞ্জুর/বর্ধিত/পুনঃতফসিল/নবায়ন সব ধরনের অর্থায়নে প্রযোজ্য ক্ষেত্রে প্রকল্পের EnvRR বিবেচনা করে সংশ্লিষ্ট সকলকে প্রয়োজনীয় ব্যবস্থা গ্রহণ করতে হবে এবং পর্যাপ্ত মূলধন নিরূপনের ক্ষেত্রে সার্কুলারে বর্ণিত পদ্ধতিতে ঋণ প্রকল্পের পরিবেশগত ঝুঁকি (EnvRR) নিরূপন করে অত্র বিভাগ কর্তৃক ইতঃপূর্বে ইস্যুকৃত সার্কুলার নং ১৪৮ তারিখ ২৪-০৬-২০১৩-এ প্রদত্ত ছক অনুযায়ী পর্যাপ্ত মূলধন নিরূপন সংক্রান্ত তথ্যাদি অত্র বিভাগে প্রেরণ করতে হবে।

পরিশিষ্ট-১ থেকে পরিশিষ্ট-১৫সহ উক্ত সার্কুলার প্রধান কার্যালয়ের সকল বিভাগ, স্থানীয় কার্যালয়, সকল জিএমও ও প্রিন্সিপাল অফিস/রিজিওনাল অফিসসমূহে প্রেরণসহ ব্যাংকের ওয়েবসাইট-এ দেয়া হলো। সংশ্লিষ্ট পিও/আরও সার্কুলার ও পরিশিষ্টসমূহের কপি তাদের আওতাধীন শাখাসমূহে প্রেরণ করবে। ব্যাংকের ওয়েবসাইট (www.sonalibank.com.bd) হতে ডাউনলোড করেও সার্কুলারটি সংগ্রহ করা যাবে।

উপরে বর্ণিত গাইড লাইন অনুযায়ী প্রয়োজনীয় ব্যবস্থা গ্রহণের জন্য সংশ্লিষ্ট সকলকে পরামর্শ দেয়া হলো। এ বিষয়ে কোন জিজ্ঞাস্য (Query) থাকলে ঝুঁকি ব্যবস্থাপনা বিভাগ, প্রধান কার্যালয়, ঢাকার সঙ্গে যোগাযোগ করার জন্য অনুরোধ করা হলো।

বিষয়টি অত্যন্ত জরুরী এবং গুরুত্বপূর্ণ বিবেচ্য।

আপনাদের বিশ্বস্ত,

(মোঃ মুস্তাফিজুর রহমান)
জেনারেল ম্যানেজার

(খান শহীদুল ইসলাম)
এসিস্ট্যান্ট জেনারেল ম্যানেজার(ইনচার্জ)

সংযুক্তি: বর্ণনানুযায়ী।

General Environmental Due-Diligence Checklist

This checklist is to be used for all proposals for financing being considered by the Banks/FIs. If there are no specific checklists for the particular sector under consideration, the General EDD checklist alone, is to be used to determine the EnvRR rating.

Please complete a response to each of these questions as Yes or No or Not Applicable (NA), and determine the EnvRR. If a question does not apply to the sector under consideration, it should be excluded by deducting from the total number of questions used to calculate the percentages in determining the EnvRR. The justification for any exclusion is to be documented separately and retained on file with the EnvRR checklists.

Particulars	Yes / No / NA
Possible sources of environmental risk	
1. Environmental clearances: <i>* In the proposal for financing, have all the applicable compliances to environmental laws, i.e. site clearance certificate and environmental clearance certificate, been obtained from the Department of Environment (DOE)?</i>	
<i>* Have these clearances been obtained after submitting the appropriate documents for the different pollution category of industries (Green, Orange-A, Orange-B and Red)?</i>	
2. Land location / site: <i>Is the land location / site free from vulnerability from an environmental perspective? Vulnerability can arise due to the issues such as the location being on the river bank (floods) and on national parks / forests (non-compliance)?</i>	
3. Climate change: <i>Is the proposal for financing protected against climate change related impacts such as cyclones, storm surges, floods and droughts if relevant?</i>	
Borrower's Environmental Management Systems	
4. Commitment: Is the potential borrower's top management committed to environmental management?	
5. Manpower: Has the potential borrower planned for manpower resources to address environmental issues?	
6. Skills: If so, is the manpower skilled to address environmental issues?	
7. Labour / social issues: <i>Does the management adopt good practices vis-à-vis occupational health & safety and associated issues such as child labour, forced labour, wage compensation, discrimination and working hours?</i>	

Determining overall EnvRR

The italicized questions are the more important / critical ones.

The EnvRR is determined as follows:

Criteria	EnvRR
If answers to any one of the italicized questions is "No"	"High"
If answers to all italicized questions is "yes" but 50% or more of the non italicized questions is "No"	"High"
If answers to all italicized questions is "yes" and if answers to more than 25% and less than 50% of the remaining questions is "No"	"Moderate"
If answers to all italicized questions is "yes" and if answers to less than 25% of the remaining questions is "No"	"Low"

Sector Environmental Due-Diligence Checklist: Agri-business (Poultry & Dairy)

Poultry

This checklist should be used for all proposals for financing in the poultry sub-sector of the agri-business.

Please complete a response to each of these questions as Yes or No or Not Applicable (NA), and determine the EnvRR.

Legal classification

As per ECR 1997, this is Orange A category up to 250 birds in urban areas and up to 1000 in rural areas. And, this is Orange B category for above 250 birds in urban area and above 1000 in rural areas.

Key issues and proposed technologies / approaches

Particulars	Yes / No / NA
1. Avian influenza: <i>Does the business activity take adequate management measures to protect from animal diseases / pathogens such as Avian influenza (strain HN51)?</i>	
2. Solid waste: * Is there provision for appropriate management of solid waste including waste feed, animal waste, carcasses, sediments and sludge from wastewater treatment facilities? * Are there responsible methods to dispose the solid waste / sludge from the ETP been included in the design?	
3. Wastewater / ETP: * Is there an Effluent Treatment Plant (ETP) or appropriate wastewater management processes to treat the wastewater discharges? * Does the design ensure that there is no bypass arrangement for the ETP or wastewater management processes?	
4. Hazardous materials: Are there adequate systems for the handling, storage and transport of hazardous materials? And, is there adequate check to ensure only permissible hazardous materials are in use?	
5. Monitoring: <i>Has environmental monitoring, particularly protection from disease causing pathogens, been planned?</i>	

Determining overall EnvRR

The italicized questions are the more important / critical ones.

The EnvRR is determined as follows:

Criteria	EnvRR
If answers to any one of the italicized questions is “No”	“High”
If answers to all italicized questions is “yes” but 50% or more of the non italicized questions is “No”	“High”
If answers to all italicized questions is “yes” and if answers to more than 25% and less than 50% of the remaining questions is “No”	“Moderate”
If answers to all italicized questions is “yes” and if answers to less than 25% of the remaining questions is “No”	“Low”

Dairy

This checklist should be used for all proposals for financing in the dairy sub-sector of the agri-business.

Please complete a response to each of these questions as Yes or No or Not Applicable (NA), and determine the EnvRR.

Legal classification

As per ECR 1997, for dairy farm, this is Orange A category for 10 cattle or below in urban areas and 25 or below in rural areas. And, this is Orange B category for above 10 in urban areas and above 25 numbers in rural areas. And, for dairy processing, this is Orange B category.

Key issues and proposed technologies / approaches

Particulars	Yes / No / NA
1. Wastewater / ETP: <i>* Is there an Effluent Treatment Plant (ETP) to treat the wastewater discharges in the design?</i>	
<i>* Does the ETP design ensure that there is no bypass arrangement?</i>	
2. Solid waste: <i>* Are there responsible methods to dispose the solid waste / sludge from the ETP been included in the design?</i>	
<i>* Have proper provisions been made for the management of organic solid waste in dairy processing facilities?</i>	
3. Air emissions: Are air emission prevention and control measures systems installed from the combustion of fuel in turbines, boilers, compressors and other engines for power and heat generation?	
4. Monitoring: Has environmental monitoring, particularly effluent characteristics, been planned?	

Determining overall EnvRR

The italicized questions are the more important / critical ones.

The EnvRR is determined as follows:

Criteria	EnvRR
If answers to any one of the italicized questions is “No”	“High”
If answers to all italicized questions is “yes” but 50% or more of the non italicized questions is “No”	“High”
If answers to all italicized questions is “yes” and if answers to more than 25% and less than 50% of the remaining questions is “No”	“Moderate”
If answers to all italicized questions is “yes” and if answers to less than 25% of the remaining questions is “No”	“Low”

Sector Environmental Due-Diligence Checklist: Cement

This checklist should be used for all proposals for financing in the cement sector.

Please complete a response to each of these questions as Yes or No or Not Applicable (NA), and determine the EnvRR.

Legal classification

As per ECR 1997, this is Red category.

Key issues and proposed technologies / approaches

Particulars	Yes / No / NA
1. Air emissions: <i>Are air emission prevention and control measures systems installed in all point sources of emissions in operational processes and also in the handling and storage of intermediate & final goods?</i>	
2. Wastewater / ETP: * Is there an Effluent Treatment Plant (ETP) to treat the wastewater discharges?	
* Does the ETP design ensure that there is no bypass arrangement?	
3. Solid waste: * Are there responsible methods to dispose the solid waste / sludge from the ETP been included in the design?	
* Have proper provisions been made for the management of solid waste - including clinker production waste and kiln dust?	
4. Noise: Have noise control measures been put in place in grinding, handling and transportation?	
5. Monitoring: <i>Does environmental monitoring for continuous monitoring equipment on all dust emission lines?</i>	

Determining overall EnvRR

The italicized questions are the more important / critical ones.

The EnvRR is determined as follows:

Criteria	EnvRR
If answers to any one of the italicized questions is "No"	"High"
If answers to all italicized questions is "yes" but 50% or more of the non italicized questions is "No"	"High"
If answers to all italicized questions is "yes" and if answers to more than 25% and less than 50% of the remaining questions is "No"	"Moderate"
If answers to all italicized questions is "yes" and if answers to less than 25% of the remaining questions is "No"	"Low"

Sector Environmental Due-Diligence Checklist: Chemicals (Fertilizers, Pesticides and Pharmaceuticals)

Fertilizers

This checklist should be used for all proposals for financing in the fertilizer sector.

Please complete a response to each of these questions as Yes or No or Not Applicable (NA), and determine the EnvRR.

Legal classification

As per ECR 1997, this is Red category.

Key issues and proposed technologies / approaches

Particulars	Yes / No / NA
1. Hazardous chemicals: Does the design provide for handling, storage and transportation of hazardous chemicals in the manufacture of fertilizers?	
2. Wastewater / ETP: <i>* Is there an Effluent Treatment Plant (ETP) to treat the wastewater discharges in the design?</i>	
<i>* Does the ETP design ensure that there is no bypass arrangement?</i>	
3. Solid waste: <i>* Are there responsible methods to dispose the solid waste / sludge from the ETP been included in the design?</i>	
<i>* Does the business activity include an approach towards handling and disposal of spent catalyst / toxic metals, if any? Have provisions been made for the management of these hazardous wastes?</i>	
4. Air emissions: <i>Are air emission prevention and control measures in place for ammonia, nitric oxides and nitrous oxides in nitrogenous fertilizer manufacturing, and in utilities such as boilers?</i>	
5. Noise: Are noise control measures in place for the large-sized rotating machines?	
6. Monitoring: <i>Does environmental monitoring include continuous monitoring systems of storm water for pH, fluoride & ammonia?</i>	

Determining overall EnvRR

The italicized questions are the more important / critical ones.

The EnvRR is determined as follows:

Criteria	EnvRR
If answers to any one of the italicized questions is “No”	“High”
If answers to all italicized questions is “yes” but 50% or more of the non italicized questions is “No”	“High”
If answers to all italicized questions is “yes” and if answers to more than 25% and less than 50% of the remaining questions is “No”	“Moderate”
If answers to all italicized questions is “yes” and if answers to less than 25% of the remaining questions is “No”	“Low”

Pesticides

This checklist should be used for all proposals for financing in pesticide sector.

Please complete a response to each of these questions as Yes or No or Not Applicable (NA), and determine the EnvRR.

Legal classification

As per ECR 1997, this is Red category.

Key issues and proposed technologies / approaches

Particulars	Yes / No / NA
1. Guidelines: <i>Is the pesticide manufacturing been carried out in line with the WHO Guidelines, Stockholm Convention and Rotterdam Convention?</i>	
2. Hazardous chemicals: Does the design provide for handling, storage and transportation of hazardous chemicals in the manufacture of pesticides?	
3. Wastewater / ETP: <i>* Is there an Effluent Treatment Plant (ETP) to treat the wastewater discharges in the design?</i>	
<i>* Does the ETP design ensure that there is no bypass arrangement?</i>	
4. Solid waste: <i>* Are there responsible methods to dispose the solid waste / sludge from the ETP been included in the design?</i>	
<i>* Has provision been made for the proper management of solid waste (e.g. chemical residues and filtrates) and liquid waste (e.g. spent solvents)?</i>	
5. Air emissions: Are proper air pollution control devices included to tackle emissions during pesticide manufacturing, formulating and packaging?	
6. Fire / explosions: <i>Have proper design provisions been made to prevent fire and explosion hazards that may arise from solvent use, handling and storage?</i>	
7. Monitoring: Is environmental monitoring, particularly the effluent characteristics, proposed on a periodic / regular basis?	

Determining overall EnvRR

The italicized questions are the more important / critical ones.

The EnvRR is determined as follows:

Criteria	EnvRR
If answers to any one of the italicized questions is “No”	“High”
If answers to all italicized questions is “yes” but 50% or more of the non italicized questions is “No”	“High”
If answers to all italicized questions is “yes” and if answers to more than 25% and less than 50% of the remaining questions is “No”	“Moderate”
If answers to all italicized questions is “yes” and if answers to less than 25% of the remaining questions is “No”	“Low”

Pharmaceuticals

This checklist should be used for all proposals for financing in the pharmaceutical sector.

Please complete a response to each of these questions as Yes or No or Not Applicable (NA), and determine the EnvRR.

Legal classification

As per ECR 1997, this is Orange B category. This is classified as life saving drugs.

Key issues and proposed technologies / approaches

Particulars	Yes / No / NA
1. Hazardous chemicals: <i>Have methods been included for the safe storage and use of hazardous chemicals?</i>	
2. Wastewater / ETP: <i>* Is there an Effluent Treatment Plant (ETP) to treat the wastewater discharges in the design?</i>	
<i>* Does the ETP design ensure that there is no bypass arrangement?</i>	
3. Solid waste: <i>* Are there responsible methods to dispose the solid waste / sludge from the ETP been included in the design?</i>	
<i>* Are there responsible methods to dispose off-specification drugs / damaged medicines?</i>	
4. Air emissions: <i>Have methods to manage the hazardous air pollutants (e.g. benzene and carbon tetrachloride and toluene) and odorous compounds (e.g. mercaptans)?</i>	
5. Genetic resources: Have proper procedures been followed if there is the use of particular genetic resources that have threats to biodiversity?	
6. Bioethics: Are good bioethics management approaches been adopted if genetically modified foods or related new areas of work are involved?	
7. Monitoring: Is environmental monitoring, particularly of the air emissions (stack and fugitive), proposed on a periodic / regular basis?	

Determining overall EnvRR

The italicized questions are the more important / critical ones.

The EnvRR is determined as follows:

Criteria	EnvRR
If answers to any one of the italicized questions is “No”	“High”
If answers to all italicized questions is “yes” but 50% or more of the non italicized questions is “No”	“High”
If answers to all italicized questions is “yes” and if answers to more than 25% and less than 50% of the remaining questions is “No”	“Moderate”
If answers to all italicized questions is “yes” and if answers to less than 25% of the remaining questions is “No”	“Low”

Sector Environmental Due-Diligence Checklist: Engineering and basic metal

This checklist should be used for all proposals for financing in the engineering and basic metal sector.

Please complete a response to each of these questions as Yes or No or Not Applicable (NA), and determine the EnvRR.

Legal classification

As per ECR 1997, this is Orange B category for engineering works up to BD Tk 10,00,000 and re-rolling. And, this is Red category for engineering works above BD Tk 10,00,000.

Key issues and proposed technologies / approaches

Particulars	Yes / No / NA
1. Air emissions: <i>Have appropriate air pollution control equipment at the emissions points and also exhaust provisions in the various metal manufacturing processes?</i>	
2. Wastewater / ETP: * Has an ETP for the cleaning and rinsing streams included in the design? * Does the ETP design ensure that there is no bypass arrangement?	
3. Solid wastes: * Are there responsible methods to dispose the solid waste / sludge from the ETP been included in the design? * Is proper management of the different types of solid wastes been undertaken?	
4. Noise: Are measures to control noise from the mechanical equipment and physical activities?	
5. Fire / explosions: <i>Have proper design provisions been made to prevent fire and explosion hazards that may arise from operations?</i>	
6. Monitoring: Is environmental monitoring, particularly of the air emissions (stack and fugitive), proposed on a periodic / regular basis?	

Determining overall EnvRR

The italicized questions are the more important / critical ones.

The EnvRR is determined as follows:

Criteria	EnvRR
If answers to any one of the italicized questions is “No”	“High”
If answers to all italicized questions is “yes” but 50% or more of the non italicized questions is “No”	“High”
If answers to all italicized questions is “yes” and if answers to more than 25% and less than 50% of the remaining questions is “No”	“Moderate”
If answers to all italicized questions is “yes” and if answers to less than 25% of the remaining questions is “No”	“Low”

Sector Environmental Due-Diligence Checklist: Housing

This checklist should be used for all proposals for financing in the housing sector.

Please complete a response to each of these questions as Yes or No or Not Applicable (NA), and determine the EnvRR.

Legal classification

As per ECR 1997, this is not classified.

Key issues and proposed technologies / approaches

Particulars	Yes / No / NA
1. Sewage: <i>* Has a sewage treatment plant (STP) of a size appropriate to the requirements been included in the design? Is there a justification for the chosen size?</i>	
<i>* Does the STP design ensure that there is no bypass arrangement?</i>	
2. Dust: Does the proposed business activity have appropriate measures to control the dust pollution during construction?	
3. Noise: Are measures to control noise from the large construction activities?	
4. Debris: Are there measures to manage the construction debris?	
5. Monitoring: Is environmental monitoring, particularly of the air emissions and effluent discharges, proposed on a periodic / regular basis?	

Determining overall EnvRR

The italicized questions are the more important / critical ones.

The EnvRR is determined as follows:

Criteria	EnvRR
If answers to any one of the italicized questions is "No"	"High"
If answers to all italicized questions is "yes" but 50% or more of the non italicized questions is "No"	"High"
If answers to all italicized questions is "yes" and if answers to more than 25% and less than 50% of the remaining questions is "No"	"Moderate"
If answers to all italicized questions is "yes" and if answers to less than 25% of the remaining questions is "No"	"Low"

Sector Environmental Due-Diligence Checklist: Pulp & paper

This checklist should be used for all proposals for financing in the pulp & paper sector.

Please complete a response to each of these questions as Yes or No or Not Applicable (NA), and determine the EnvRR.

Legal classification

As per ECR 1997, this is Red category.

Key issues and proposed technologies / approaches

Particulars	Yes / No / NA
1. Wastewater / ETP: <i>* Has an ETP of a size appropriate to the requirements been included in the design? Is there a justification for the chosen size?</i>	
<i>* Does the ETP design ensure that there is no bypass arrangement?</i>	
2. Air emissions: Does the proposed business activity have appropriate air pollution control equipment at the emissions points, particularly the pulp processing and utilities?	
3. Solid waste: <i>* Are there responsible methods to dispose the solid waste / sludge from the ETP been included in the design?</i> <i>* Are there measures to manage the large quantities of solid waste (though non-hazardous)?</i>	
4. Odour: <i>Are measures for preventing and controlling odour been planned?</i>	
5. Noise: Are measures to control noise from the large mechanical equipment and physical activities?	
6. Monitoring: Is environmental monitoring, particularly of the effluent's characteristics, proposed on a periodic / regular basis?	

Determining overall EnvRR

The italicized questions are the more important / critical ones.

The EnvRR is determined as follows:

Criteria	EnvRR
If answers to any one of the italicized questions is "No"	"High"
If answers to all italicized questions is "yes" but 50% or more of the non italicized questions is "No"	"High"
If answers to all italicized questions is "yes" and if answers to more than 25% and less than 50% of the remaining questions is "No"	"Moderate"
If answers to all italicized questions is "yes" and if answers to less than 25% of the remaining questions is "No"	"Low"

Sector Environmental Due-Diligence Checklist: Sugar & distilleries

This checklist should be used for all proposals for financing in the sugar and distilleries sector.

Please complete a response to each of these questions as Yes or No or Not Applicable (NA), and determine the EnvRR.

Legal classification

As per ECR 1997, this is Red category.

Key issues and proposed technologies / approaches

Particulars	Yes / No / NA
1. Wastewater / ETP: <i>* Has an ETP of a size appropriate to the requirements been included in the design? Is there a justification for the chosen size of the ETP?</i>	
<i>* Does the ETP design ensure that there is no bypass arrangement?</i>	
2. Solid wastes: <i>* Are there responsible methods to dispose the solid waste / sludge from the ETP been included in the design?</i>	
<i>* Have methods to store and dispose solid wastes (generated from the treatment of raw material) been planned in the design?</i>	
3. Water: <i>Are water consumption reduction approaches been adopted to reduce the overall water intake?</i>	
4. Air emissions: Does the proposed business activity have appropriate air pollution control equipment at the emissions points, particularly the steam boilers?	
5. Odour: Are measures for preventing and controlling odour been planned?	
6. Monitoring: Is environmental monitoring, particularly of the effluent's characteristics, proposed on a periodic / regular basis?	

Determining overall EnvRR

The italicized questions are the more important / critical ones.

The EnvRR is determined as follows:

Criteria	EnvRR
If answers to any one of the italicized questions is "No"	"High"
If answers to all italicized questions is "yes" but 50% or more of the non italicized questions is "No"	"High"
If answers to all italicized questions is "yes" and if answers to more than 25% and less than 50% of the remaining questions is "No"	"Moderate"
If answers to all italicized questions is "yes" and if answers to less than 25% of the remaining questions is "No"	"Low"

4.8 Sector Environmental Due-Diligence Checklist: Tannery

This checklist should be used for all proposals for financing in the tannery sector.

Please complete a response to each of these questions as Yes or No or Not Applicable (NA), and determine the EnvRR.

Legal classification

As per ECR 1997, this is Red category.

Key issues and proposed technologies / approaches

Particulars	Yes / No / NA
1. Hazardous chemicals: <i>Does the business activity include appropriate hazardous chemicals management methods in pretreatment, dyeing and other processes?</i>	
2. Wastewater / ETP: <i>* Does the proposed business activity have its own ETP?</i>	
<i>* Does the ETP design ensure that there is no bypass arrangement?</i>	
<i>* If it is to a Common ETP, is this in working order?</i>	
<i>* Does the proposed business activity include a chrome recovery unit in its design?</i>	
<i>* Is the post-ETP treated wastewater discharged into a water body from where water is drawn for other applications?</i>	
3. Solid Wastes: <i>* Are there responsible methods to dispose the solid waste / sludge from the ETP been included in the design?</i> <i>* Is the management of solid wastes properly planned and methods of disposal identified?</i>	
4. Odour: Are there methods to control the odour from leather tanning as these constitute a nuisance to the surrounding community?	
5. Monitoring: Is environmental monitoring, particularly Chromium VI, proposed on a periodic / regular basis?	

Determining overall EnvRR

The italicized questions are the more important / critical ones.

The EnvRR is determined as follows:

Criteria	EnvRR
If answers to any one of the italicized questions is “No”	“High”
If answers to all italicized questions is “yes” but 50% or more of the non italicized questions is “No”	“High”
If answers to all italicized questions is “yes” and if answers to more than 25% and less than 50% of the remaining questions is “No”	“Moderate”
If answers to all italicized questions is “yes” and if answers to less than 25% of the remaining questions is “No”	“Low”

4.9 Sector Environmental Due-Diligence Checklist: Textile and apparels

This checklist should be used for all proposals for financing in the textile sector.

Please complete a response to each of these questions as Yes or No or Not Applicable (NA), and determine the EnvRR.

Legal classification

As per ECR 1997, this is Orange B category.

Key issues and proposed technologies / approaches

Particulars	Yes / No / NA
1. Hazardous Chemicals: <i>Does the business activity include appropriate hazardous chemicals management methods in pretreatment, dyeing and other processes?</i>	
2. Wastewater / ETP: <i>* Does the proposed business activity have an ETP?</i>	
<i>* If business activity uses specific dyes (e.g. chrome dyes, sulphur dyes or phenolic compounds) in dyeing process, is there a method to check the limits of particular compounds in the effluent discharged?</i>	
<i>* Has the ETP design ensured that there is no bypass arrangement?</i>	
3. Solid Wastes: Is the management of solid wastes properly planned and methods of disposal identified? The wastes include trials, trimmings, cuttings of fabrics, spent dyes, pigments, and printing pastes; and ETP sludge containing mainly fibres and grease.	
4. Air emissions: Are air pollution control devices planned in the finishing processes such as coating and dyeing to manage air emissions that may contain toxic compounds?	
5. Fire and explosions: <i>Have proper design provisions been made to prevent fire and explosion hazards that may arise from operations?</i>	
6. Monitoring: Is environmental monitoring, particularly effluent characteristics, proposed on a periodic basis?	
7. Export requirements: If it is an export-oriented business or part of the supply chain, have all the buyer environmental requirements been met ?	

Determining overall EnvRR

The italicized questions are the more important / critical ones.

The EnvRR is determined as follows:

Criteria	EnvRR
If answers to any one of the italicized questions is “No”	“High”
If answers to all italicized questions is “yes” but 50% or more of the non italicized questions is “No”	“High”
If answers to all italicized questions is “yes” and if answers to more than 25% and less than 50% of the remaining questions is “No”	“Moderate”
If answers to all italicized questions is “yes” and if answers to less than 25% of the remaining questions is “No”	“Low”

4.10 Sector Environmental Due-Diligence Checklist: Ship breaking

This checklist should be used for all proposals for financing in the ship breaking sector.

Please complete a response to each of these questions as Yes or No or Not Applicable (NA), and determine the EnvRR.

Legal classification

As per ECR 1997, this is Orange B category.

Key issues and proposed technologies / approaches

Particulars	Yes / No / NA
1. Certificate: <i>Do the management methods include obtaining a certificate from the exporting country?</i>	
2. Hazardous Chemicals: <i>Does the business activity include appropriate hazardous chemicals management methods during sorting, storage and reuse?</i>	
3. Wastewater / ETP: * Does the proposed business activity have an ETP in its design?	
* Has the ETP design ensured that there is no bypass arrangement?	
4. Solid Wastes: Is the management of solid wastes properly planned and methods of disposal identified?	
5. Monitoring: Is environmental monitoring, particularly effluent characteristics, proposed on a periodic / regular basis?	

Determining overall EnvRR

The italicized questions are the more important / critical ones.

The EnvRR is determined as follows:

Criteria	EnvRR
If answers to any one of the italicized questions is "No"	"High"
If answers to all italicized questions is "yes" but 50% or more of the non italicized questions is "No"	"High"
If answers to all italicized questions is "yes" and if answers to more than 25% and less than 50% of the remaining questions is "No"	"Moderate"
If answers to all italicized questions is "yes" and if answers to less than 25% of the remaining questions is "No"	"Low"

Matrix for quick guidance on potential Environmental risks

A. Overall Risk based on Project Location

Sl. No.	Description	Env. Clear	Land / Site	Clim Chge	Remarks, if any
A1	On the coast	Yes	Yes	Yes	
A2	Inland – Flood plain	Yes	Yes	Yes	
A3	Inland – outside flood plain	Yes	No	No	

B. Sector Specific Risk

Sl. No.	Description	Env. Clear	Effl	Haz. Chem	Wste	Air Em.	Others	Remarks, if any
B1	Agri-Poultry	Yes	Yes	Yes	Yes		Yes	Avian Flu
B2	Agri-Dairy	Yes	Yes	No	Yes	Yes	No	
B3	Cement	Yes	Yes	No	Yes	Yes	Yes	Noise
B4	Chemicals-Fertilizers	Yes	Yes	Yes	Yes	Yes	Yes	Noise
B5	Chemicals-Pesticides	Yes	Yes	Yes	Yes	Yes	Yes	WHO Guidelines, Fire / Explosions
B6	Chemicals-Pharmaceuticals	Yes	Yes	Yes	Yes	Yes	Yes	Genetics, Bioethics, Labour
B7	Engg. and basic metal	Yes	Yes	No	Yes	Yes	Yes	Noise, Fire/ explosions
B8	Housing	Yes	Yes	No		Yes	Yes	Noise, debris
B9	Pulp & paper	Yes	Yes	No	Yes	Yes	Yes	Noise, odour
B10	Sugar & distilleries	Yes	Yes	No	Yes	Yes	Yes	Water avail., odour
B11	Tannery	Yes	Yes	Yes	Yes		Yes	Odour
B12	Textile and apparels	Yes	Yes	Yes	Yes	Yes	Yes	Labour, Fire / Expl & Export Reqts.
B13	Ship breaking	Yes	Yes	Yes	Yes	No	Yes	Labour

Yes: Source of Risk must be considered.

No: Source of Risk not applicable.