

Comments on Final RESA Report

Date: 24/08/2025

Project Name: Regional Environmental and Social Assessment for National Special Economic Zone

LIST OF COMMENTS FROM WB HQ (Received on 12/05/2025)

Comments on the Regional Environment and Social Assessment (RESA) Report: *The RESA consists of three volumes- main report (Volume 1), cumulative impact assessment (Volume 2) and Appendix (Volume 3). These documents provide a good foundation for identifying the risks and impacts associated with the overall NSEZ Development Project. However, we recognize the limitations, uncertainties, and lack of comprehensive information in conducting the assessment. We have a few suggestions to consider before finalizing the RESA.*

SL#	Comments	Responses from the Consultant	Page No. (track change version)
1.	<p>(a) Purpose and implementation of RESA Recommendations: We understand the preparation of RESA was agreed during the project appraisal to adopt a holistic approach in the assessment and management of environmental and social risks linked to the full-scale operation of the industrial city. The key findings and recommendations of the RESA were planned to be intended to be considered in conducting sub-project level ESIAs/ESAs and ESMPs.</p> <p>What are the current plans of the task team and the Bangladesh Economic Zones Authority (BEZA) for implementation the RESA recommendations in the NSEZ development?</p> <p>One recommendation to the team: Based on the RESA, the BEZA can develop environmental and social guidelines and clauses to be incorporated into its agreement with the private sectors that will invest in industries and other infrastructures in this special economic zone.</p>	<p>Well noted, the recommendations made in the comments have been considered and incorporated in the executive summary section (Conclusion and Recommendations) and the recommendation section chapter 11 (section 11.2).</p>	XXXIII and 384
2.	<p>(b) Different scenarios of NSEZ and Impacts: RESA considered three scenarios: (i) Low growth (The total land requirement is approximately 16,900 acres); (ii) Medium Growth (The total land requirement is approximately 25,350 acres); and (iii) High growth (The total land requirement is approximately 33,800 acres.). NSEZ plans to develop a total land area of 33,805 acres or 136.86 square kilometers (km²), mostly reclaimed land, with a 25 km coastline along the Sandwip Channel in the Bay of Bengal.</p> <p>According to RESA (Section 6.1.1 of Volume 1), BEZA has received approximately 11,002 acres of land in the Mirsharai area. In addition, approximately 5,768 acres are in process in Sonagazi area. However, the rest of the required land in Sitakunda area is uncertain.</p>	<p>Following the comment, risk rating has been revised and incorporated in Table 6-3.</p> <p>This is to be noted that Chapter 5: Potential ES Risks and Impacts has been developed considering the full-fledged development/implementation of the master plan in the region. As per the instructions from BEZA and WB, at first, all the impacts have been divided into positive and negative categories. Then the negative impacts are again divided into two phases, i.e., the development phase and the</p>	277-278 115-231 232-278

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	<p>If NSEZ is developed according to the high growth scenarios outlined in Table 6.2 of Volume 1, the risks and impacts will be significant, particularly on land use patterns and natural resources. Key risks identified in these high growth scenarios include:</p> <p>(i) Natural habitats, including areas with mangrove vegetation, will be permanently converted into urban and industrial landscapes, leading to a notable reduction in mangrove tree density in the region.</p> <p>(ii) The construction of a 12.5 km super dyke with a two-lane road will necessitate substantial land clearing, resulting in the removal of trees and vegetation in the Sitakunda and Mirsharai sites.</p> <p>(iii) Dredging activities in Sitakunda and associated landfill development will disrupt aquatic and riparian vegetation, potentially affecting downstream plant ecosystems.</p> <p>(iv) Drainage, waterlogging, and flooding issues may arise if khals are not excavated and periodic maintenance is not performed on the super dike and flood control structures, including sluice gates.</p> <p>(v) Extensive deforestation will occur across 33,800 acres of land, leading to an almost complete loss of forest resources.</p> <p>(vi) Severe disruption of aquatic habitats will significantly impact fish and other aquatic resources.</p> <p>(vii) Natural wildlife corridors will be severely fragmented, isolating wildlife populations.</p> <p>(viii) The natural ecosystem balance will be severely disrupted, putting keystone species and ecological functions at high risk.</p> <p>(ix) Building access roads, such as the Barodarogar Hat road, could cause physical and economic displacement in certain areas, affecting 80 residential structures, 500 commercial structures, and 16 other structures.</p> <p>(x) Fishermen in the Mirsharai area (2,557+700), Sonagazi area (1,200+1,000), along with an additional 1,500 registered and 500 unregistered fishermen in the Sitakunda (Saidpur, Muradpur, and Bariardhala) area will be impacted.</p> <p>These high growth scenarios highlight the need for careful consideration and mitigation of the proposed risks and impacts to ensure sustainable development in the region. Chapter 5 (Potential ES Risks and Impacts) considered the full-fledged development</p>	<p>operation phase. The impacts' significance has been assessed considering the nature of impacts, geographical extent, duration, intensity/severity, irreplaceable loss, and probability.</p> <p>BEZA informed that there are uncertainties regarding the land availability in the NSEZ. Therefore, Chapter-6 has been developed to examine different development scenarios considering the land availability i.e., scenario 1 (16,900 acres of area development), scenario 2 (25,350 acres), and scenario 13 (33,805 acres). A comparison among different scenarios has been discussed in Table 6-2 and a risk matrix has been provided in Table 6-3.</p> <p>Following the comments provided in the specific section from WB Dhaka office, Chapter 6 has been fully revised. In addition, details of the impacts assessment for scenario 1 and scenario 2 has been incorporated in Appendix K (volume III)</p>	K-I - K-68

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	(Worst case scenario). There are some differences in risk ratings between Chapter 5 and Table 6.2 (Volume1). We request these two chapters be revisited before finalization.		
3.	<p>(c) Impacts on Hilsa Fisheries: The baseline study reveals the presence of hilsa fish, along with its spawning and breeding grounds, in the Sandwip Channel. The hilsa spawning ground boundary point is located within the study region, namely Mayani Point at Mirsharai, Chattogram. Section 5.3.1.19 (Volume 1) considered several factors impacting Hilsha Fishes:</p> <p>(i) The development of the EZ poses several threats to Hilsa fish, particularly in the vicinity of the identified spawning ground near Mayani Point. Activities such as land reclamation, infrastructure development, and dredging can lead to the loss and alteration of aquatic habitats, including the hilsa's spawning and breeding grounds in the Sandwip Channel. This loss of habitat may disrupt hilsa migration routes and access to critical spawning areas.</p> <p>(ii) Increased sedimentation from construction-related activities can adversely affect water quality in the Sandwip Channel, potentially impacting the survival of hilsa eggs and larvae. Sedimentation can also smother aquatic vegetation, which serves as an important spawning and nursery habitat for hilsa.</p> <p>(iii) Discharge of untreated or inadequately treated construction-related pollutants such as heavy metals, organic compounds, and toxins into the water bodies can harm hilsa health and reproduction. Additionally, spills of oil, lubricants, and other materials during construction activities can contaminate the water and adversely affect hilsa populations. Activities such as dredging, pile driving, and vessel traffic can create underwater noise and disturbances that may disrupt hilsa spawning behavior and communication, particularly during their peak spawning period around the full moon.</p> <p>(iv) The establishment of infrastructure, ports, and industrial areas may encroach upon or disrupt hilsa spawning and breeding grounds, including critical areas like the Mayani Point in Mirsharai, Chattogram. This loss of spawning grounds could have significant implications for hilsa reproduction and population dynamics. The development of ports and improved access to waterways within EZ may attract more fishing vessels, leading to increased fishing pressure on hilsa populations.</p>	<p>Hilsa is also classified as a species of Least Concern (LC) on the IUCN Red List in terms of its conservation significance. There is one Hilsa breeding and spawning ground in the study area but no Hilsa sanctuary. According to the national regulations, activities are restricted in the designated sanctuary area but there are no such regulations for the breeding and spawning ground.</p> <p>Impacts significance in Sections 5.3.1.19 and management of Hilsha fisheries in section 8.3.16 has been updated accordingly.</p>	142-143 and 340-341

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	<p>Considering the above points, the impact of the development of the EZ on hilsa fisheries is evaluated to be Low.</p> <p>We believe the above risk rating is not correct. The team should evaluate the risk again.</p>		
4.	<p>(d) Involvement of other stakeholders: RESA includes recommendations for other stakeholders to implement certain actions. For example, RESA suggests that a regional-level drainage study be conducted by the Bangladesh Water Development Board (BWDB) to understand the impact of drainage and prepare a regional drainage plan. Is there any timeline for conducting the study? How will it ensure timely completion with adequate technical details? Are there any plans to support the study?</p> <p>Similarly, it mentions that the Forest Department (FD) (Coastal Afforestation Division, Chattogram) under the Ministry of Environment, Forest, and Climate Change (MOEFCC) will be responsible for floral and faunal monitoring work in the region. Additionally, the Department of Fisheries (respective Upazila Fisheries Office) under the Ministry of Fisheries and Livestock will be responsible for fish resource monitoring. A copy of the monitoring report will be shared with the NSEZ management. Is there any regular monitoring program by the Forest Department and Department of Fisheries? Do they have adequate expertise and resources to carry out such regular monitoring?</p>	<p>The regional drainage management plan issue has been revised by incorporating the timeline for conducting the study, issues that need to be considered in the study, and experts required and incorporated in section 8.3.9.</p> <p>Based on comments from WB Dhaka office, whole chapter 8 has been fully restructured and revised the writeup.</p>	<p>328-330</p> <p>298-359</p>
5.	<p>(e) Organogram: Figure 10-1 depicts the proposed HES team structure. Has this been discussed and agreed upon with BEZA? We recommend revisiting the organogram. For instance, the Department of Environment (DoE), as a regulatory body, should be appropriately positioned within the organogram. The Steering Committee should be placed above the BEZA, considering it is a ministry-level body. Additionally, we also suggest reviewing the numbers and expertise of the Environmental Specialists – there should be professional such as marine biologist, hydrologist, waste and wastewater expert based on the nature of the environmental risks.</p>	<p>The organogram has been developed as per the discussion with the BEZA and recommendations/comments received in the national stakeholder workshop at Dhaka on 20 November 2024.</p> <p>The organogram has been revised as per the comment and incorporates the provision for marine biologist, hydrologist, waste and wastewater expert (Figure 10-1).</p>	372-374
6.	<p>(f) Current Environmental and Social Practices: It will be beneficial if RESA includes a review/an assessment of the current environmental and social practices of the existing and under construction industries, such as collection, treatment and discharge of wastewater, solid waste management, occupational health and safety, community health and safety etc.</p>	<p>As per discussion with BEZA, a description of the current environmental and social practices in NSEZ has been incorporated in section 10.5.</p>	366-367

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7.	While the document provides an assessment of positive and negative impacts of this large development, it underestimates the broad implications it will have on land value, labor needs and infrastructure development needs.	Incorporated in sections 5.3.1.25, 5.3.1.28, 5.3.2.27, and 5.3.2.28	147-148, 151-155, 220-222, 223-224

Social Comments

While the document provides an assessment of positive and negative impacts of this large development, it underestimates the broad implications it will have on land value, labor needs and infrastructure development needs.

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1.	Land speculation. The document admits that there is already some indication of land cost inflation, but this could be further explored.	Incorporated in section 5.3.1.25	147-148
2.	Labor influx. The document admits the large volume of labor needs. 1.4 million of workers is expected to move in the area by 2040. Such a significant population in-flow in a rather limited timeframe will create significant burden and put demands on social infrastructure – housing, schooling, hospitals, store/shopping areas. The analysis of these aspects comes short in the report. The assessment does not present the gravity of the situation and lay down the time pressures to create necessary infrastructure. Without that, there is a potential danger of creating a large volume of undocumented workers, housing, which in turn is fraught with significant social-ills.	Incorporated in section 5.3.1.28 and 5.3.2.23	151-155 and 217-218
3.	Large labor influx increases the risks of social tensions, violence, including GBV and SEA-SH. The risk of child and bonded labor should also be further detailed.	Incorporated in section 5.3.1.28, 5.3.1.29, 5.3.1.30, and 5.3.2.23	151-155, 155-156, 156-157, 217-218
4.	Fisherfolk and farming communities stand to lose the most. The report doesn't do justice to the need for reskilling and livelihood restoration.	Incorporated in section 5.3.2.28	217-218
5.	Universal access in the design of all the infrastructure is not considered.	Incorporated in section 5.3.2.27 and 8.3.20	220-222 and 346-347

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Comments from WB Bangladesh (Received on 21/06/2025)

SL#	Section	Comments	Responses from the Consultant	Page No. (track change version)
1.	Executive Summary	Mention wastewater and solid waste management separately	Waste water and solid waste management have been separated	XVIII
2.	Executive Summary	Mention in numerical term with boundary what area did we consider as are of influence. The reader does not get any idea about the extent and location of such direct and indirect area of influence from this description.	Numerical terms have been incorporated.	XVIII
3.	Executive Summary	What is meant by this? Please state clearly.	Revise the statement	XVIII
4.	Executive Summary	Please mention that this is Bangladesh standard set by DoE.	Bangladesh Standards set by DOE has been incorporated	XIX
5.	Executive Summary	Checklist or List?	Replace as "List"	XIX
6.	Executive Summary	NSEZ is not critical habitat but whether the activities undertaken would impact these species? Need to mention this clearly and reflect this in the main report.	Revised accordingly in this section and also in main report	XIX
7.	Executive Summary	Need to include impacts of dredging? How much dredging might be required, what impact that might have on marine ecosystem, hisha breeding, etc.	Impact of dredging has been incorporated including the dredging requirements and impact on marine ecosystem, Hilsha breeding, etc.	XXI
8.	Executive Summary	Presence of mangrove has not been mentioned earlier. If mangrove is found, clearly mention whether these are nature forest or planted, area coverage and how much might have been impacted?	In the baseline section it is mentioned that 3 mangrove species are found in the EZ site. The nature of forest (planted mangrove) and area to be cleared has been incorporated in this section.	XXII
9.	Executive Summary	What about the dolphin population, Hilsha breeding? These are important issues and nothing is mentioned here.	Dolphin and Hilsha have been incorporated accordingly.	XXII

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SL#	Section	Comments	Responses from the Consultant	Page No. (track change version)
10.	Executive Summary	This is the current situation. What about the future?	The future situation has been incorporated	XXIII
11.	Executive Summary	Need to include clear picture about the future water quality issues of different water bodies, particularly the khals, marine water along the cost line etc. What the models tells us about this. Form the current description, the readers do not get any such information.	A clear picture about the future water quality issues of different water bodies, particularly in khals and marine water has been included.	XXIII
12.	Executive Summary	This need to be more informative.	This section has been revised	XXIV
13.	Executive Summary	What about industrial wastewater?	Industrial wastewater volume has been incorporated	XXIV
14.	Executive Summary	What is the impact?	Impacts on traffic have been incorporated	XXIV
15.	Executive Summary	Please specifically mention with reference to the baseline observation i.e., how the vulnerable, near threatened species might be impacted.	This section is updated as per comment	XXV
16.	Executive Summary	These are very generic kind of impact. Please specifically mention the impacts of various roads, railway lines etc. Give an idea how far the location of the community people and mention with reference of air quality modelling how they can be impacted. We need to be specific.	Revised this section following the comment	XXV
17.	Executive Summary	Please mention what other present and future projects have been considered in CIA study.	Other present and future projects have been included.	XXVI
18.	Executive Summary	Please review the main CIA study to check whether this follows the IFC guidelines as suggested before.	Yes, IFC Guidelines (Good Practice Handbook for Cumulative Impact Assessment and Management) are followed.	XXVI
19.	Executive Summary	Please what are VECs considered for CIA.	Included following the comment	XXVI

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20.	Executive Summary	Why? Is it a VEC of the study area that might be impacted by other projects?	Selection of VEC has been explained in the main CIA report justification of high has been clarified.	XXVI
21.	Executive Summary	How? Is it a VEC within the study area?	Included	XXVII
22.	Executive Summary	Briefly mention why?	Included	XXVII
23.	Executive Summary	Please mention whether the other projects also might withdraw water as those are water intensive entities etc. You need to mention why this is high.	Modified	XXVII
24.	Executive Summary	Briefly mention why?	Modified	XXVII
25.	Executive Summary	You need to mention why? See the comments on mangrove above?	Included	XXVII
26.	Executive Summary	In all such cases, mention why the impact is assessed either medium or high etc.	Included	XXVIII
27.	Executive Summary	Please rewrite the section mentioning what is the current proposal and what is the outcome/recommendation from the alternative analysis?	This section has been revised by incorporating current proposal and outcome from the alternative analysis.	XXVII
28.	Executive Summary	What is the current proposal and what is the outcome from the alternative analysis?	This section has been revised by incorporating current proposal and outcome from the alternative analysis.	XXIX
29.	Executive Summary	This section and the section above needs to be revised. See our comments shared separately on this.	Both sections have been revised based on comments made in Chapter 8 and Chapter 10 of the report.	XXXI
30.	Executive Summary	What is meant by 'Under this RESA'?	The statement has been revised	XXXII
31.	Executive Summary	Please check whether this is in line with the assessed impacts.	This section has been revised based on the impact assessment.	XXXII

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32.	Executive Summary	Should it be BWDB? Please check as per the rules of business.	Revised accordingly	XXXIII
33.	Chapter 1/1.2	<p>Please replace this by the following two mentioned in the ToR and revise the report accordingly.</p> <ul style="list-style-type: none"> • Analyse the existing procedures of BEZA for assessment and management of ES risk and impacts and recommend procedures (including the implementation of a formalised ESMS) to be followed to ensure ES compliance with national laws and ESF. This would include a) screening criteria for the selection of investment in BSMSN (b) setting up of environmental, health and safety standards for the industrial city in line with GoB and the World Bank requirements (c) general guidelines for long-term ES monitoring and evaluation (d) recommendations to strengthen social inclusion aspects for the future investments. • Assess the present ES management capacity of BEZA and recommend necessary measures/institutional structure for the implementation of the master plan. 	Replace accordingly and the relevant part of the report has been updated.	2
34.	Chapter 1/1.3	Measures for assessing and managing those risks in line with the national and international rules, regulations and standards.	Incorporated as per comment	2
35.	Chapter 1/1.3	This report is not supposed to prepare environmental and social impacts for all the utilities as this is not an ESIA report. Please review and revise.	Revise the sentence as per comment.	3
36.	Chapter 1/1.5.7	Should be 'System'	Updated by incorporating "System" following the comment	7

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37.	Chapter 2/2.4	Please include the provision of the large Lake (Sharobar) inside the EZ which would help not only in drainage of the rainwater but would also be used as rainwater storage system, recreational center and also for floating solar panels. Mention about the provision of use of solar energy in the EZ.	Provision of the large Lake (Sharobar), use of solar energy in the EZ has been incorporated in this table. In addition, the function of the Sharobar has been incorporated in impact assessment section (5.3.1.10 Impact on Drainage).	12-13
38.	Chapter 2/2.4	Separately mention wastewater and solid waste management.	Waste Water and Solid waste management have been mentioned separately.	13
39.	Chapter 2/2.4.1.1.1	Please check the name. Is it called emergency road?	According to the discussion with BEZA, it is called emergency road.	13
40.	Chapter 2/2.4.1.3	???	Typing error and deleted	17
41.	Chapter 2/2.4.1.3	Please show the proposed location of the jetty in the map	A location map of the proposed jetty has been incorporated.	17
42.	Chapter 2/2.4.2.1	Also show the power demand at different phases.	Phase wise power demand has been incorporated, considering the information received from BEZA on 20/08/2025.	18
43.	Chapter 2/2.4.2.1	Show by phases.	Phase wise generation has been incorporated	18
44.	Chapter 2/2.4.2.2	Include a column showing the demand of the phase.	As per discussion with BEZA, the demand of the phase has been incorporated	21
45.	Chapter 2/2.4.2.4	Why this is separately mentioned? Should have been covered in the description above on the same issue.	Merge in section 2.4.2.1	19
46.	Chapter 2/2.4.3.1	Mention demand by phase.	Phase wise gas demand has been incorporated	26
47.	Chapter 2/2.4.3.2	Mention it by phase.	According to BEZA, KGDCL/ GTCL will supply gas for all phases of NSEZ, and it is incorporated in the text.	27
48.	Chapter 2/2.4.4.1	Show it by phase.	Phase-wise water demand has been incorporated, considering the information received from BEZA on 20/08/2025.	28

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49.	Chapter 2/2.4.4.2	What about the third phase?	Third-phase water sources have been incorporated, considering the information received from BEZA on 20/08/2025.	29
50.	Chapter 2/2.4.4.2	Please check whether water from Mohra TP is at all a source of water here? Also, indicate the different phases in the diagram for better understanding.	Water sources have been checked, and phase-wise water sources have been incorporated, considering the information received from BEZA on 20/08/2025.	30
51.	Chapter 2/2.4.4.3	Please link this with the description above i.e., in which phase it can support, why it is needed, why it is not included in the above graph showing different sources.	Water from Meghna River will be supported in third phase of EZ, mentioned in the text. In addition, the graph has been revised by showing different water sources.	31
52.	Chapter 2/2.4.4.3	It should be local government division, not department, please check.	Revised as "division"	31
53.	Chapter 2/2.4.5.1	Mention the expected quantity by phases.	Phase wise expected quantity has been incorporated, considering the information received from BEZA.	32
54.	Chapter 2/2.4.5.2	Mention the expected quantity by phases.	Phase wise expected quantity has been incorporated, considering the information received from BEZA.	34
55.	Chapter 2/2.4.5.2	Should be Solid Waste Management Facilities.	Replaced by "Solid Waste Management Facilities"	37
56.	Chapter 2/2.4.5.3	This should be shifted to ES risk management chapter.	Shifted to ES Risk Management Chapter (section 8.3.9 Managing Drainage)	328-329
57.	Chapter 2/2.4.5.3	Is it a plan or existing drainage pattern? Please clarify/revise.	It is planned drainage network pattern in NSEZ	40
58.	Chapter 3/3.1	No need to mention this separately. The firm is supposed to consider the whole area of influence. This can be mentioned as strategy in the methodology section. This should be reflected throughout the report	Well noted and this has been removed here and incorporated in methodology section (section 1.5.2)	4-5
59.	Chapter 3/3.1.2	This section should clearly mention what is the extent of the AOI by mentioning the boundaries for all the parameters.	The extent of the AOI by mentioning the boundaries has been mentioned. For individual environmental attributes considering	44-45

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			environmental, social, and ecological parameters have been incorporated.	
60.	Chapter 3/3.1.3	Please see comments above on the Study Area. Include this in the methodology section of the corresponding chapter.	Following the comment, this section has been shifted to the methodology section (section 1.5.2)	4-5
61.	Chapter 3/3.2.1	Bangladesh usually has six seasons. That should be mentioned first and then if you want to narrow it down to four distinct patten, mention it after that.	The six seasons have been mentioned following the comment.	47
62.	Chapter 3/3.2.6	Please check the map for mangrove coverage. As per the color coding of the Legend, the light green is the mangrove which appears to be substantial in area whereas the table above mentions only 3.30% of mangrove. This is sensitive and we have to be careful about this.	Land cover in the total study area (NSEZ area + AOI) includes 3.03% mangrove. In contrast, mangrove covers 31.65% of the NSEZ area exclusively as per Master Plan of NSEZ. The overall study area is significantly larger than the NSEZ area.	55
63.	Chapter 3/3.2.13.3	Please add acceptable limit set by DoE/GIIP. Follow the same in all the parameters.	The acceptable limit set by DOE in Air Pollution (Control) Rules 2022 and GIIP (WBG/WHO Guidelines) has been incorporated.	64
64.	Chapter 3/3.2.16	Please split the description into inland and marine water body.	Well noted, this section has been split into inland surface water quality (3.2.16) and marine water quality (3.2.18)	67-72
65.	Chapter 3/3.2.17	should be split into two sections: Rivers/canals and Marine water.	Well noted, this section has been split into inland surface water quality (3.2.16) and marine water quality (3.2.18)	67-72
66.	Chapter 3/3.2.17	???	It is inland surface water	67
67.	Chapter 3/3.2.18	These values appear to be very low. Any reason for that? Please describe.	We have rechecked the sample locations and found that it has been taken from Muhuri Reservoir which is an inland water source. However, during splitting into inland and marine water we have made a mistake. Now this sample has been considered under inland water and update the analysis section for both inland and marine water quality.	72

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68.	Chapter 3/3.2.19	This indicates more than allowable limit of drinking water.	According to the review of secondary data, it's indicating more than the allowable limit.	73
69.	Chapter 3/3.2.19	What is the reason for such wide variation. Need to discuss.	According to the review of secondary data, Chloride concentration is higher than the permissible limit of ECR 2023. Chloride concentration may be caused by the intrusion of saltwater from the sea due to factors like storm surges, tidal flooding, etc.	73
70.	Chapter 3/3.2.20	Please explain what might be the cause of this result which is consistently showing same result while the secondary data shows presence of arsenic above the acceptable limit.	<p>MUDP report stated that <i>“Field kit data suggest that the shallow aquifer is heavily contaminated with elevated arsenic concentration throughout the Upazila except in the extreme northern corner. However, the deep aquifer is largely low in arsenic concentration except one or two locations.”</i></p> <p>Groundwater Investigation in Mirsharai Economic Zone carried out by DPHE reported that <i>shallow aquifer is contaminated with arsenic, iron and sometimes with salinity. On the other hand, Deep aquifer is expected to be safe from arsenic and salinity.</i></p> <p>“Status of arsenic in groundwater of some selected areas of Chittagong district” carried out by Rahman, M.M., Majid, M.A., Nazimuddin, M., and Sumsul, A.S.M.S. (2003), stated that <i>“Arsenic has been estimated in the groundwater samples extracted from shallow tubewells of the Mirsharai Thana, Sitakundu Thana and Chittagong Metropolitan Area of the Chittagong District.”</i></p> <p>From the literature it could be said that the arsenic concentration in the EZ area depends on the depth of the aquifer.</p>	75
71.	Chapter 3/3.2.20.1	Please see the comments above and check?	Well noted and checked	76

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72.	Chapter 3/3.3.4	Could not find description of Irrawaddi dolphin as mentioned in the executive summary. Please check for consistencies.	Information on Irrawaddy dolphins has been mentioned in section 3.3.3.1 Mammals	84
73.	Chapter 3/3.3.7	Please show the location in map.	A map of the Hilsha Sanctuary and Spawning Ground in the Study Area has been incorporated.	87-88
74.	Chapter 3/3.7	Please enlarge this map. It can be placed covering the full page for better visibility of various service centers.	Map has been enlarged covering full page for better visibility	92
75.	Chapter 3/3.8	Can you identify what could be percentage who are using canals as the fishing ground?	No, the canals were used for fishing activities and boat communication to access the Sandwip channel before starting the EZ activities.	93
76.	Chapter 3/3.17.1	We are not only concerned about the world heritage sites but also the national heritage sites. Please revise the description accordingly	National heritage sites have been incorporated.	98
77.	Chapter 5/5	Please delete this. Please follow the comments made on the scenario chapter.	Deleted as per comment	115
78.	Chapter 5/5.1	If this table is to evaluate significance and what is Table 5.2 below? You have to be consistent throughout the report.	Revise this section	115
79.	Chapter 5/5.1	Description above mentions this table as evaluation of significance but the title mentions Ranking criteria, very confusing.	Revise this section	115-116
80.	Chapter 5/5.3.1.1	Please include result for PM _{2.5}	Result for PM _{2.5} has been included in Figure 5-1	122-123
81.	Chapter 5/5.3.1.3	This is not impact but mitigation/risk management.	Well noted and shifted to the ES Risk Management Chapter (section 8.3.3)	313-314
82.	Chapter 5/5.3.1.4	This is good. But organize the discussion in phases and bring the requirement of water of the EZ in the picture to show the level of stress on groundwater at	This section has been revised following the comment. The presence of Arsenic in groundwater has been incorporated.	132

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		<p>various phases. Please consider that during development of phase-2, phase-1 is already in operation and calculate the water demand based on that combined requirements. Same is applicable in case of phase-3.</p> <p>Also, check carefully whether arsenic is an issue. We found contradictory results in secondary and primary water quality results.</p>		
83.	Chapter 5/5.3.1.6	On or 'Of'? Also, the impact related to dredging should be shifted/merged with the section on Impact of Dredging.	<p>Revised by 'Of'.</p> <p>Impact related to dredging has been shifted/merged with the section on Impact of Dredging on Marine Ecosystem (section 5.3.1.21).</p>	134 and 144-145
84.	Chapter 5/5.3.1.10	Describe the role of the proposed Lake in the EZ.	The role of the proposed Lake in NSEZ has been incorporated.	136
85.	Chapter 5/5.3.1.12	Please elaborate the discussion on Fishing and Grazing. In case of fishing, mention what percentage of the population are dependent on fishing and in which areas/khals and how the access restriction (if contemplated) might affect them and later on in the risk management chapter, discuss about the recommended measures.	<p>This section has been revised following the comments.</p> <p>In addition, detailed discussion on Fishing and Grazing are given in social impact section.</p>	137
86.	Chapter 5/5.3.1.12	Do we have lots of medicinal plant in the area? Please check with the baseline data and revise accordingly.	This section has been revised by incorporating available medicinal plant species based on the baseline data.	137
87.	Chapter 5/5.3.1.13	Please mention clearly how much of this 31.65% is mangrove and are we expecting complete clearance of this mangroves? Then in the risk management chapter, mention is there any way to avoid such clearance by modifying the master plan or what else	This section has been revised following the comments and measures incorporated in the risk management chapter (Section 8.3.11).	137-138 and 333-334

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		can be done. How the impact on this parameter can be assessed as Low considering all these?		
88.	Chapter 5/5.3.1.13	This determination again contradicts with the above discussion on impact. Please check.	Based on the discussion on impact, the impact significance on Terrestrial and Mangrove Flora has been revised.	138
89.	Chapter 5/5.3.1.15	Please include a map here showing the location of these two locations, their distances from the proposed EZ.	A map of the IBAs showing the two locations (Ganges-Brahmaputra-Meghna delta and Muhuri Dam) and their distance from the proposed EZ has been incorporated.	139
90.	Chapter 5/5.3.1.15	Please check the distance of the two important biodiversity sites mentioned above to confirm whether noise and vibration can really affect those.	A map showing the distance between two IBAs (Ganges-Brahmaputra-Meghna delta and Muhuri Dam) from the proposed EZ has been incorporated in Figure 5-5.	140
91.	Chapter 5/5.3.1.15	After this kind of assessment, should not be the conclusion on impact level be Medium, rather than Medium Low?	Based on the discussion on impact, the impact significance on Birds/Avifauna has been revised.	140
92.	Chapter 5/5.3.1.16	Please check with the assessment.	Based on the discussion on impact, the impact significance on Herpetofauna has been revised.	141
93.	Chapter 5/5.3.1.17	The area would be developed in phases and dredging requirement would be different in different phases. The impact should be assessed considering that phased development. Please revise this section accordingly. The same should be reflected in the Executive Summary.	This section has been revised considering the dredging activities required for land and Jetty development in different phases. The executive summary also revised by incorporating the impacts on mammals.	141
94.	Chapter 5/5.3.1.17	This does not consistent with the above discussion on impact on dolphins specifically on Irrawaddy dolphin. How, based on the above discussion, can someone come to the conclusion that the impact is Low?	Based on the discussion on impact, the impact significance on Aquatic Mammals has been revised.	141
95.	Chapter 5/5.3.1.18	Why jetties would fragment the existing aquatic habitat?	Jetties can fragment aquatic habitats by acting as physical barriers that disrupt the natural flow of water, sediment, and the movement of aquatic organisms. Fish species, especially migratory ones, rely on unobstructed pathways to access	142

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			different habitats for feeding, breeding, and spawning. Jetties can block the migration/movement routes, preventing fish from reaching their traditional spawning grounds or nursery areas.	
96.	Chapter 5/5.3.1.18	This kind of inconsistent assessment on the impact level has reduced the quality of the report. These would make the readers highly confused. Please take care of this throughout the report. If you really want to say Low, this should be described in clear terms above, for example, you may mention that there would negative impact but considering these and these facts, the impact is determined as Low.	Based on the discussion on impact, the impact significance on Ichthyofauna (Fish) has been revised.	142
97.	Chapter 5/5.3.1.19	We need to clearly evaluate the impact on Hilsha even if that is not in the IUCN red list considering the fact this is nationally recognized as an important species.	Considering the economic value and its importance nationally, the impact on Hilsa Fisheries has been reevaluated.	142
98.	Chapter 5/5.3.1.19	Need to include detail impact evaluation on these points.	Detail impact evaluation on Hilsa breeding and spawning ground has been incorporated.	142
99.	Chapter 5/5.3.1.19	Project activities likely to disrupt hilsa spawning area during the spawning period.	Yes, already incorporated in the section	143
100.	Chapter 5/5.3.1.19	All these are explaining the negative impact on Hilsha and surprisingly the conclusion at then end evaluates the impact as Low referring the above description which is a clear contradiction. Let us be consistent. If impact is found, we need to talk about how to avoid or reduce such impacts, what should be role of BEZA and other entities, any coordination required with the ministry of fishery or local administration etc. Please revise accordingly.	Based on the discussion on impact, the impact significance on Hilsa Fisheries has been revised.	143
101.	Chapter 5/5.3.1.20	Please describe whether these are reversible or irreversible? If reversible, how much time may it require to regrow such benthos and other	Planktonic and benthic communities are generally resilient and recoverable due to their short life cycles and high reproductive rates. Plankton can begin to recover within weeks to a few	143

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		organisms. Also consider the sediment load of the water, turbidity level etc. After considering all these, determine the impact level.	months after the cessation of disturbance, assuming favorable conditions and water quality. In contrast, benthic recovery may take 1 to 3 years under natural conditions. After carefully considering all issues the impact is determined as Low.	
102.	Chapter 5/5.3.1.21	Please clearly mention phase wise quantity of dredging required, possible location for those dredging operation. Show this in a table. Include the discussion of sediment load of existing water, turbidity level and then describe impact of such dredging on marine eco-system and coast morphology. Mention the probable duration of the dredging operations at each phase and how that might or might not impact much the marine eco-system. Also talk about the quality dredged material and any impact on soil and ground water due presence of filling/leaching etc.	Revised this section following the comment	143-145
103.	Chapter 5/5.3.1.21	Check and revise.	Check and revise accordingly	146
104.	Chapter 5/5.3.1.24	Offset has a very specific meaning in WB ESF. Please look into that and revise it accordingly.	The word offset is replaced by "mitigation"	146
105.	Chapter 5/Table 5-16	Please revise based on the revised assessment above. What is the result of all of these. Add columns on Impact and significance so that one can understand clearly. Modify all such tables below in the same way.	Table has been revised based on revised assessment. Two columns, namely Probability and Significance, have been added which were unfortunately deleted during editing of last version.	172-174
106.	Chapter 5/5.3.2.1	Are there provisions of incinerators in the plan? Please check. Even in case of the modern incinerators, no dioxin emission is expected. Please check and revise this text.	According to the discussion with BEZA, there are provisions of incinerators in the plan. According to the literature review, it was revealed that the installed dioxin/furan emission control equipment in modern incinerators is capable of lowering the emissions well below the international standards.	175

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107.	Chapter 5/5.3.2.1	Please include result and discussion on PM2.5	Results and discussion on PM _{2.5} have been incorporated accordingly.	176
108.	Chapter 5/5.3.2.1	What about SO _x and CO ₂ emission?	Sulfur dioxide emissions have been incorporated. AERMOD, as a steady-state Gaussian plume model, is not designed to accurately model the dispersion of carbon dioxide (CO ₂). AERMOD is specifically designed to simulate the dispersion of criteria pollutants and toxic air contaminants that affect local air quality and have health-based ambient standards, such as SO ₂ , NO _x , PM, and CO. Since CO ₂ is a globally mixed greenhouse gas and does not exhibit the same localized concentration patterns as these pollutants, AERMOD is not suitable for capturing its dynamic and large-scale atmospheric behavior. This represents a fundamental limitation of the model.	178-179
109.	Chapter 5/5.3.2.3	Please check with CETP report. No pre-treatment would be done and all the treatments would be handled by CETP. Please check and revise accordingly.	As per discussion with BEZA, initial treatment will be done only by individual industries who are highly polluting industry or having hazardous substances. Others will send their effluent to the CETPs.	181
110.	Chapter 5/5.3.2.3	We are talking about the Impact during operation phase. Why then construction, dredging etc. are coming into the picture? Please clarify and revise. There will be some overlap during the interim period of different phases. If that is the consideration, describe it clearly so that no is confused. But at some point of time, there would no more development and you need to consider only operation of the EZ.	This section has been revised by considering only operational activities.	182
111.	Chapter 5/5.3.2.3.1	It would be good to include that discussion here also.	The result of water quality dispersion has been incorporated following the comment	182-183

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112.	Chapter 5/5.3.2.3.1.1	Please mention the name of the canals and rivers in all the figures. Also super impose are actual proposed area of the NSEZ in all the figures.	Name of the khals and rivers has been incorporated and NSEZ boundary has been incorporated in all figures accordingly.	184-199
113.	Chapter 5/5.3.2.3.1.2	These figures are not reader friendly. Can you remove the satellite imagery from the background and highlight the result of the model with an outline of the NSEZ. Please do this in all the other figures. Enlarge the figures for better visibility of the results.	Satellite imagery from the background has been removed and highlights the result of the model with an outline of the NSEZ. Also enlarged all the figures for better visibility.	188
114.	Chapter 5/Table 5-20	Please add the summary of the Normal Operation.	A summary of the normal operation conditions has been included in Table 5-22.	187
115.	Chapter 5/5.3.2.4	Please check and confirm.	As per discussion with BEZA, initial screening and treatment will be done only by individual industries who are highly polluting industry or having hazardous substances. Others will send their effluent to the CETPs.	201
116.	Chapter 5/5.3.2.9	???	Revised	205
117.	Chapter 5/5.3.2.9	As this chapter is talking about liquid waste, focus on that.	Yes, all are related to the generation of liquid waste from different industrial processes.	205
118.	Chapter 5/5.3.2.9	Please check the formation of the sentence.	Sentence has been revised	205
119.	Chapter 5/5.3.2.9	Please discuss about the suitability of these locations? Also assess whether you think these adequate comparing to the generation of the liquid waste?	This section has been revised by incorporating the suitability of CETP locations, adequacy/generated volume of wastewater and proposed CETPs capacity, etc.	205-206
120.	Chapter 5/5.3.2.9	Are not we talking about liquid waste here?	It is a typing mistake, corrected as "Liquid waste"	206
121.	Chapter 5/ 5.3.2.10	Who are building these roads? Please check with BEZA and confirm.	The road is being built by the local community outside of EZ. Revise this section accordingly.	206-207

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122.	Chapter 5/5.3.2.10	Is not any measures included in the master plan to avoid this? Please check with BEZA and confirm.	As per discussion with BEZA and review of the Master Plan, this section has been revised.	207
123.	Chapter 5/5.3.2.12	Please clarify what is meant by ecosystem services, what kind of ecosystem services are currently available and how these might be impacted. The assessment below needs to be revised.	The section has been revised by incorporating information like meant by ecosystem services, kind of ecosystem services are currently available and how these might be impacted.	208-209
124.	Chapter 5/5.3.2.12	Why this statement is included here? This seems to be the impact of air pollution on human health. Please check.	The statement has been revised	209
125.	Chapter 5/5.3.2.12	This is impact of noise and light on wildlife. Please link how this is related to ecosystem services.	The section has been revised by incorporating an explanation	209
126.	Chapter 5/5.3.2.13	What is the assessment on impact on mangrove during operation phase? I have not seen anything in the discussion below. Please mention whether there would be mangrove in the area and how those might have been impacted during the operation phase.	The section has been revised as per the comment	209-210
127.	Chapter 5/5.3.2.13	We are now talking about the impact of operational phase. Need to clearly mention which habitat are you talking about. The conversion of land has already been done during the development phase. If any habitat which is within the area of influence might have been impacted during operation phase. But in that case, you have clearly mention which are those, what kind of wild life is expected to be affected etc. Do not mix up the impact of development phase and operation phase. Please revise this section accordingly.	The assessment has been revised	209
128.	Chapter 5/5.3.2.15	This section should give a clear idea about the bird habitat within or close to the AOI and then describe	Bird habitat has been defined, and existing section has been revised accordingly.	211

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		how those can be impacted by the activities of the EZ. Please revise the description below accordingly.		
129.	Chapter 5/5.3.2.15	This statement should be included in the development phase, not here. This kind of mixing should be avoided. Concentrate on what you have in the region after development is completed and how those can be impacted by the EZ.	The statement has been included in the development phase.	211
130.	Chapter 5/5.3.2.15	Please comments above and check.	This section has been revised as per previous comment	212
131.	Chapter 5/5.3.2.17	If the EZ operation have potential adverse impact on these species, then why the impact has been assessed as LOW ? Please include detail risk management strategy and measures in the concerned chapter to avoid/reduce such impact.	Based on the discussion on impact, the impact significance on Aquatic Mammals has been revised. A detail risk management strategy and measures have been incorporated in risk management chapter (section 8.3.14) to avoid/reduce such impact.	212 and 338-339
132.	Chapter 5/5.3.2.17	This is not consistent with the above assessment. Please review and revise.	Based on the discussion on impact, the impact significance on Aquatic Mammals has been revised.	213
133.	Chapter 5/5.3.2.18	In the Risk Management Chapter, include strategies and measures to be taken to avoid/reduce such risk.	A strategy and measures have been incorporated in the risk management chapter (section 8.3.15) to avoid/reduce such impact.	339-340
134.	Chapter 5/5.3.2.18	Is not consistent with the above assessment. Please review and revise.	Based on the discussion on impact, the impact significance on Ichthyofauna (fish) has been revised.	214
135.	Chapter 5/5.3.2.19	Include strategies and measures to be taken in the Risk Management Chapter to avoid/reduce these impacts.	A strategy and measures have been incorporated in the risk management chapter (section 8.3.16) to avoid/reduce such impact.	340-341
136.	Chapter 5/5.3.2.19	No port, jetty.	The port is replaced by Jetty	214
137.	Chapter 5/5.3.2.19	Again not consistent. Review and revise.	Based on the discussion on impact, the impact significance on Hilsa Fish has been revised.	214

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138.	Chapter 5/5.3.2.22	Please add discussion on the type of industries expected and the OHS risk of those types with some examples.	The type of industries expected and the OHS risk of those types with some examples has been incorporated accordingly.	215-217
139.	Chapter 5/Table 5-24	Please revise based on the comment made earlier on the table of the development phase. Also revise based on the revised assessment.	Table has been revised based on revised assessment and comment made earlier on the table of the development phase.	229-231
140.	Chapter 6/6	Rename this as 'Impact Assessment Considering Uncertainties'	Chapter name has been renamed as "Impact Assessment Considering Uncertainties".	232
141.	Chapter 6/6	Delete these as this has not been considered in the analysis.	Deleted	
142.	Chapter 6/Table 6-1	Please add Map for each scenario. Please assess the impact relating to dredging based on assessed requirement of dredging for each scenario. We do not expect a linear relationship in such case because of the fact that due to the location of the available land, dredging requirement should vary. Also assess the impact on other parameters accordingly. Assess how many CETPs and STPs might be required in each case how the impact might have been changed etc.	Map for each scenario has been incorporated in Figure 6.1 Impact assessment has been carried out considering all physical, biological and socioeconomic components. Details of the impact assessment for scenario 1 and scenario 2 have been provided in appendix K (volume III).	232
143.	Chapter 6/Table 6-1	Rename it as 'Scenario-3'	Renamed as "Scenario-1" following the Master Plan Phasing	232
144.	Chapter 6/Table 6-1	Rename it as 'Scenario-2'	Renamed as "Scenario-2"	232
145.	Chapter 6/Table 6-1	Rename it as 'Scenario-1'. No need to further assess it here as this has already been assessment in the Impact assessment chapter. Only pick the results and mention it in the table below. But for the other two scenarios, include salient features of impact and then add those to the table.	Renamed as "Scenario-3" following the Master Plan Phasing Details of the impact assessment for scenario 1 and scenario 2 have been provided in appendix K (volume III). Salient features of the impact are given in Table 6-2.	233

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146.	Chapter 6/ Table 6-2	This table should be renamed as 'Summary of Impact in different scenario'. Please add section above on impact assessment on scenario 2 and 3 which come into this table. The impact of scenario-1 should come directly from Impact assessment chapter.	Table has been renamed as "Summary of Impact in different scenario". Two sections on impact assessment on scenario 1 and 2 have been added in section 6.2.1 and 6.2.2. Details of the impact assessment for scenario 1 and scenario 2 have been provided in appendix K (volume III). Salient features of the impact are given in Table 6-2.	239
147.	Chapter 6/6.3	Please rename this as 'Impact Matrix'.	Renamed as "Impact Matrix"	277
148.	Chapter 6/6.3	Did you consider any scoring system in developing Table 6.3? Please elaborate/refer.	Yes, the same scoring system used in Potential ES Risks and Impacts assessment chapter (table 5.1 and table 5.2). As per instructions from WB and BEZA on 20/08/2025 the writeup also revised accordingly.	277 and 115-118
149.	Chapter 6/6.3	Change Column headings.	Column heading has been changed.	277
150.	Chapter 7/7	This chapter has to be revised. This is not actually an alternative analysis. Many of these are simply recommended measures to manage the ES risk better. Prepare a table of alternative options and then assess impact of each of the alternatives. Prepare a table of impact for each of the alternative and then come to the conclusion.	This chapter has been revised following the comments.	279-297
151.	Chapter 7/7.1	Prepare a impact matrix for each of the parameters like summary of impact tables. No go alternative might be good from surface water pollution perspective, no dredging perspective, no restriction of access to fishing and many more. Include a sussict description of such positive and negative impacts and compare these two sets of impacts to find out the combined impact, compare that impact with the impact of the proposed master plan and	This section has been revised following the comments.	279-297

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		then come to the conclusion that No Go Alternative is bad or good.		
152.	Chapter 7/7.2	Based on the description below, mention that Location Alternative was not considered in Alternative Analysis.	Following the comment, it is mentioned that 'Location alternative was not considered in alternative analysis'.	280
153.	Chapter 7/7.3	These are recommendations for improvement and should not be part of the Alternative Analysis.	This has been removed from this section and is kept in ES Risk management chapter (section 8.3.10.2)	331-332
154.	Chapter 7/7.4-7.14	This is not alternative analysis. As mentioned above, prepare a matrix of various alternatives, assess impact of each alternative, compare the result and then come to the conclusion.	This section has been revised following the comments.	282-283
155.	Chapter 8/8	Rename it as 'ES Risk Management'. Procedure should a part of that system along with many other things. Please see the comments provided separately	Chapter name has been renamed as "ES risk Management"	298
156.	Chapter 8/8.2.2	Include a flow chart starting from the leasing out land for any industry. There should be a screening at this stage to help BEZA leasing the land to appropriate industry.	A flow chart has been incorporated (Figure 8-1) following the comment.	299
157.	Chapter 8/8.2.2.1	Rather than generically mentioning the names, give a rationale for each category. For example, while you include Low Water consuming industry, refer to the assessment chapter where water scarcity was found as one of the issues and that is why this recommendation is justified. Each of these should be backed by assessment result.	A rationale for each category has been incorporated.	299-300
158.	Chapter 8/8.2.2.4	ECR 2023.	ECR 2023 has been incorporated	302

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159.	Chapter 8/8.2.2.5	No need for project categorization as per WB. Please exclude this. Following the national system should be OK.	Project categorization as per WB has been excluded from the report.	302-303
160.	Chapter 8/8.2.2.6	Not required. Stick to a single procedure and ideally that should be the national rules and regulations.	World Bank requirements have been removed from the report	304
161.	Chapter 8/8.3	This is not an ESIA report and no management plan as such is required. Rename it as 'Managing ES Risk'. Follow the same in case of other parameters.	Well noted and section renamed as "Managing ES Risk"	307-356
162.	Chapter 8/8.3.1	Rename it as 'Managing Air Quality'. Follow the same in case of other parameters. Under this, include the following sub-head: Development phase and Operational Phase. Under each of this phase, include the following: 1.Key issues: Briefly mention the key issues from impact assessment chapter. 2. Measures to be considered (mention role of each entities) 3. Monitoring mechanism (mention role of each entity) Follow the same pattern for all the parameters.	Rename as "Managing Air Quality" and the same structure has been followed for all other parameters. The same pattern has been followed for all parameters, including adding sub-heads: Development phase and Operational Phase, and incorporating key issues, measures to be considered, and monitoring mechanism (mentioning role of each entity).	307-310
163.	Chapter 8/8.3.1	Rename it as 'Measure for managing air quality'. This should split into Development phase and Operation phase. Follow the same in case of other parameters. The Measures should be divided into development and operation phase and clearly identify the roles of and responsibilities of various entities i.e., BEZA HQ, NSEZ team, DoE and others.	Rename as "Measure for managing air quality". Split into the Development phase and Operation phase, the roles and responsibilities of various entities have been incorporated.	307-310
164.	Chapter 8/8.3.1	Is it confirmed or a proposal	It was a commitment of the DOE during the national workshop. However, this section has been restructured following the previous comments.	308

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165.	Chapter 8/8.3.4	Delete the word 'Plan' in all the cases.	The word "Plan" has been deleted in all cases	316
166.	Chapter 8/8.3.11	Where?	Approximately 1,778.75 acres have been preserved as forested areas in the master plan. However, this section has been restructured following the previous comments.	333-335
167.	Chapter 9/Table 9-1	ECR 2023 should be included here.	ECR 2023 has been incorporated accordingly.	360
168.	Chapter 10/10.6.4.1	What about the counsellors.	The provisions of environment and social counselors have been incorporated.	371-374, 376
169.	Chapter 11/11	Please revise based on the revised assessment and management.	This chapter has been revised based on the revised assessment and management.	382-385
170.	Chapter 11/11.2	Should include few plans/options for implementing RESA recommendations.	Few plans for implementing RESA recommendations has been incorporated.	384

General Comments on the Main Report - Email

SL#	Comments	Responses from the Consultant	Page No. (track change version)
1.	The Executive summary needs to be well organized, should avoid use of too many numbering of sections and sub-sections, should be more informative and more specific. Please see specific comments in the attached report. Also need to reflect the revisions to be made in the executive summary.	Executive summary has been revised following the specific comments given in the report.	XVII-XXXIII
2.	The impact assessment chapter is still very inconsistent. In many cases, the assessment of impact on a certain parameter does not match with the conclusion made at the end. Please review the whole chapter on impact assessment and revise it. Please see specific comments in the attached report.	The impact assessment chapter has been revised following the comments made in the specific sections.	122-231

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3.	See the comments on the chapter on Scenario Analysis. Need to rename the chapter. Follow the comments made in the report and revise it accordingly.	Following the comment and discussion with WB on 20/08/2025 the chapter name has been revised and updated relevant sections.	232-278
4.	The Chapter on Alternative Analysis is not properly done. Please see the comments in the report and revise it thoroughly.	Alternative Analysis chapter has been revised following the comments made in the specific sections.	279-297
5.	The Chapter on ES Risk Management and institutional arrangements also need to be revised as per the comments.	ES Risk Management and institutional arrangements have been revised following the specific comments given in the report.	298-359 and 371-381

General Comments on CIA - Email

SL#	Comments	Responses from the Consultant	Page No. (Editing version)
1.	The selection process of VC should be consistent throughout the document. In the VC screening process (Figure 5-1) it is mentioned that if a VC is not found important to stakeholder it will be screened out. But, in Table 5-1 land use, noise quality etc. have been selected as VC, which are identified as not important by stakeholders, this contradiction should be resolved. Figure 5-1 and Table 5-1 should complement each other.	This has been modified in the report (Table 5-1)	51-59
2.	Impact Significance Definition of Table 2-3 requires further clarification, development of scoring system would be more prudent instead of subjective evaluation.	We have included the threshold limit criteria in definition section (Table 2-3).	18
3.	In page 7 it has been mentioned that, "The following VCs have not been included in the preliminary list": however, no further text is found in this regards. It would be better to list down all VC which were selected initially but finally not included, as merged/covered by other VC or impact not being significant.	This has been now modified in the report	7
4.	The selection of 'Land Use Change' as VC and assessment of its cumulative impacts requires further justification, analysis and should be supported by different indicators. It would be better to analyse	We have included the decadal land use change for Feni and Chattogram district to define the threshold value. And based on these criteria, cumulative impact section has been modified.	51, 81-85, and 125

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	each VC by: Examination of factors affecting VC, Background information, Indicators and level of Impact, how impacted in each scenario, Impact ratings, discussion of mitigation measures etc.		
5.	The study should mention the rational of selecting the Area of Influence.	This has been clarified in the report (Table 2-1).	11-14
6.	The selection of temporal boundary as 16 years for the CIA study requires elucidation. Has the life cycle of the all foreseeable projects been considered or any other criteria have been considered to fix this time period?	Temporal boundary section has been modified (section 2.1.3.4).	14

Comments on Social Issues – Email

Category	Details	Examples	Relevant WB ESS/Guidance	Suggested Improvements	Responses from the Consultant	Page No. (track change version)
GAPS	Inadequate labor influx planning	1.4 million workers expected, but weak analysis of impacts on housing, health, schools, transport, and sanitation	ESS2, ESS4, Labor Influx Management Toolkit	A summary of Labor Influx & Infrastructure Readiness Plan with timelines, spatial planning, and service projections	Incorporated in Section 5.3.1.28 and management plan accordingly (section 8.3.20)	151-154 and 346-347
	Weak livelihood restoration strategy	Fisherfolk, farmers, buffalo herders affected, but no entitlement matrix, budget, or transition plan	ESS5, LRP Good practices	Prepare a Livelihood Restoration Plan with short-, medium-, and long-term actions; include targeting vulnerable groups	Incorporated in the section 5.3.1.33, 5.3.1.34, 5.3.2.28, and 3.2.29 and management section 8.3.24	164-167, 223-225 and 352-354
	SEA/SH, child labor risks insufficiently addressed	Generic mention, lacks risk mapping or detailed mitigation	ESS2, SEA/SH Good Practice Note	A summary SEA/SH Action Plan, community awareness strategy, and confidential GRM	Incorporated in section 5.3.1.30	156-157

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Category	Details	Examples	Relevant WB ESS/Guidance	Suggested Improvements	Responses from the Consultant	Page No. (track change version)
	Social cohesion/conflict risks ignored	No analysis of potential tensions between host and migrant workers	ESS10, ESS4	A summary Social Cohesion Risk Assessment, and design community-building initiatives	Incorporated in sections 5.3.1.26 and 8.3.23 respectively	149-151 and 350-352
	Gender-differentiated risks and access gaps unaddressed	No sex-disaggregated data or gender-sensitive design inputs	ESS1, ESS4, ESS10	A summary Gender Impact Assessment; integrate findings in design and monitoring	Incorporated in section 5.3.1.30	156-157
MISMATCHES	Chapter 5 vs Chapter 6 risk rating inconsistency	Table 6.2 and 6.3 use a different risk framework than Chapter 5	ESS1	Harmonize risk frameworks and use cross-referencing	Revised following the specific comments made in the report	115-118 and 239-278
	Infrastructure risk noted but weak management plans	Risks to health, education, housing mentioned but not reflected in ESMPs	ESS1, ESS10	Integrate Infrastructure Development Plan linked to population projections	Incorporated in sections 5.3.1.32 and 8.3.20 respectively	157-163 and 346-347
WAYS TO IMPROVE	Comprehensive livelihood plan	Fisherfolk, livestock-dependent communities, women, informal workers	ESS5	Develop targeted livelihood support, including reskilling and compensation	Incorporated in section 8.3.24	352-354
	Gender and SEA/SH mainstreaming	High risk due to labor influx and informal housing	ESS2, ESS4, WB SEA/SH Guidance	Implement SEA/SH codes of conduct, awareness programs, and separate GRM	Incorporated in section 5.3.1.30 and 8.3.22 respectively	156-157 and 349-350
	Transparent and justified risk rating	Current ratings misaligned with evidence	ESS1	Create traceable scoring methodology and clarify assumptions	Relevant section has been revise following the specific comments made in the report	115-118 and 239-278

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Category	Details	Examples	Relevant WB ESS/Guidance	Suggested Improvements	Responses from the Consultant	Page No. (track change version)
	Institutional clarity and capacity building	Current structure is aspirational	ESS1, ESS10	Develop phased capacity building, budgeted HSE team recruitment plan, and training	Incorporated in section 10.6.5	379-380
	Community conflict prevention and engagement	Labor-host community tension potential	ESS10	Conduct conflict mapping, host-migrant forums, and grievance redress support	Incorporated in sections 5.3.1.26 and 8.3.23 respectively	149-151 and 350-352
	Urban growth & planning	Urban services under pressure	ESS1, ESS10	Coordinate with LGED/NHA for spatial plans, slum prevention, and township development	Incorporated in sections 5.3.1.32 and 8.3.20 respectively	157-163 and 346-347