



Review Report

Environment, Health & Safety (EHS) Management Systems

Unit: PRAN Corporate & Natore Facility, Bangladesh



For
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Audited organisations/units

PRAN AGRO LTD (PRAN – RFL Group)	HO: PRAN-RFL Center 105 Middle Badda, Dhaka-1212, Bangladesh.
PRAN AGRO LTD (PAL)	Ekdala, Natore
NATORE AGRO LTD (NAL)	Ekdala, Natore

Introduction

‘PRAN’ started its operation in 1981 as a processor of fruits & vegetables in Bangladesh. Over the years, the company has not only grown in stature but also contributed significantly to the overall socio-economic development of the country.

“PRAN” is currently one of the most admired food & beverages brand among the millions of people of Bangladesh and other 94 countries of the world where PRAN products are regularly being exported. All the PRAN products are produced as per international standards maintaining highest level of quality at every stages of its production process.

PRAN is currently producing more than 200 food products under 10 different categories i.e. Juices, Drinks, Mineral Water, Bakery, Carbonated beverages, Snacks, Culinary, Confectionery, Biscuits & Dairy. The company has adopted ISO 9001 as a guiding principle of its management system. The company is compliant to HACCP & certified with HALAL which ensures only the best quality products reach the consumers table across the globe.

An EHS Management system assessment was conducted by a third party consultant in September 2014 at PRAN’s facilities and a corrective action plan was prepared. Since then, PRAN has implemented a number of improvements. PRAN also has prepared a draft corporate Environmental and Social (E&S) management systems framework (“corporate framework”). International Finance Corporation (IFC) has entrusted Consultivo Business Solutions Pvt. Ltd. (Consultivo) to review the effectiveness of implementation of the Environment and Health & Safety (EHS) Management System.

Assessment Scope and Criteria

As per the ‘Terms of Reference’ of the contract between IFC and Consultivo Business Solutions Pvt. Ltd. (Consultivo), the review covers the entire range of operations of the PRAN Natore facilities (mentioned above) including related corporate activities against the criteria stipulated in

- IFC Performance Standards
- IFC EHS Guidelines
- IFC EHS Guidelines (Food and Beverage Processing)
- ISO 14001:2015
- OHSAS 18001:2007
- Relevant Bangladesh Legal requirements

Objective of the Project

- To undertake a review of implementation of EHS management systems improvements - both at the corporate level and at PRAN’s facility in Natore







Assessment Methodology





Consultivo has developed an ESMS assessment protocol based on the IFC performance standard 1, 2, 4 and 6, IFC EHS guidelines general, IFC EHS guidelines for food and beverage processing, OHSAS 18001:2007, ISO 140001:2015 and applicable national regulations in force. The assessment has been conducted based on this ESMS assessment protocol covering all areas of operation and all aspects of the assessment criteria. Assessment findings have been arrived by examination of the physical condition of the plant, interview with appropriate personnel and review of relevant records.

The assessment has been conducted under the following parameters:

1. EHS policy
2. Identification of risks and impacts
3. Objectives and management programmes
4. Organisational capacity and competency
5. Emergency preparedness and response
6. Monitoring and review
7. Stakeholder engagement
8. External communication and grievance mechanism
9. Ongoing reporting to affected communities
10. Documentation
11. Supply chain
12. Resource efficiency and pollution prevention


Picture Gallery

		
<p>Exposed bus bar of PDB at engineering section</p>	<p>Door open of electrical panel & exposed bus at substation 4</p>	<p>Confined space not access controlled in front of ETP 1</p>
		

Inadequate access control of machine at Ghani (oil Press) Area of mastered oil	No provision of bund at diesel storage area	Additional discharge points to river
		
DG set storage tank	ETP sludge stored in open area	Mango waste pond
		
Solid waste storage yard	Treatment effluent discharged into the Narad river	More discharge points into river
		
No telescopic guard at drill machine at engineering section	Contractors are working with normal shoes instead of safety shoes at project area dal	Improper housekeeping at DG room
		
Open JB at wash room of engineering section	Anti-skid shoes are not being used in canteen	No spring return gate – may lead to fall from height hazard

Finding Classification

Risk level prioritisation

	High Risk	Occupational Health & Safety and environment issues which leads to a <u>severe</u> impact on the organisation. E.g. <ul style="list-style-type: none"> • Gross legal violation • Occupational Health & Safety, environment issues which may lead to business interruption • Occupational Health & Safety, environment issues which may lead to impact on brand/reputation of the organisation • Willful negligence/unethical practices related to safety, environment issues
	Medium Risk	Occupational Health & Safety, environment issues which leads to <u>considerable</u> impact on the organisation. E.g. <ul style="list-style-type: none"> • Isolated/trivial inconsequential legal deviations • Safety, environment issues which may lead to operational interruption/considerable impacts on the organisation
	Low Risk	Occupational Health & Safety, environment issues which may lead to <u>insignificant</u> impact on the organisation. If not addressed, it may lead to medium/high risk

Executive Summary

The review of Environment, Health & Safety (EHS) Management Systems implementation at PRAN Natore facility and associated corporate activities demonstrate strong management commitment for the development & implementation of an effective EHS system. The management has taken quite a number of initiatives in the domain of ESMS. Here, we summarise a dashboard which will reflect the remaining risk level, the positive areas as well as the areas of concern.

IFC Performance Standard Focus Areas	Risk Level
EHS policy	●
Identification of risks and impacts	●
Objectives and management programmes	●
Organisational capacity and competency	●
Emergency preparedness and response	●
Monitoring and review	●
Stakeholder engagement	●
External communication and grievance mechanism	●
Ongoing reporting to affected communities	●
Documentation	●
Supply chain	●
Resource efficiency and pollution prevention	●

Noteworthy efforts

- The organisation has developed a well-structured corporate management system framework - EHS and associated procedures which will help the organisation effective management of ESMS.
- It is observed that good efforts have been made to work on the 2014 recommendations. This has resulted in a much better documentation of the EHS system and a transparent system for data capturing and reporting.
- The organisation has established a detailed Environment, Health & Safety (EHS) policy defining EHS objectives that guide the organisation to achieve sound environmental and social performance. The policy is in line with the IFC performance standard and provides framework for the EHS management system.
- The organisation has developed an emergency preparedness plan which includes identification of potential emergency situations/accidents & mitigation plan in case of any harm to people or environment. The emergency preparedness plan includes potential emergency situations that have

occurred or could have been occurred, response procedure, provision of equipment & resources, designated responsibilities and communication of the same.

- Solid waste handling being an important issue for any food industry, the organisation has set up good infrastructure and systems for collection, storage and safe disposal of solid waste.
- The organisation has initiated significant steps in terms of supply chain assurance programme for managing issues like significant EHS risks & hazards, child & forced labour and conversion of forest land. A risk assessment has been carried out and actions initiated for contract farmed commodities which comprises of a significant part of their supply chain.
- Lots of initiatives have been made in the areas of stakeholder engagement

Areas of improvement

- There is an attempt to internalise the EHS corporate framework but so far, it is only partially implemented and complete integration with the internal EHS is yet to be achieved.
- Hazard Identification and Risk Assessment (HIRA) process appears to be weak. The process does not include complete coverage of hazard identification in all the sections. The basis of Hazard Identification & Risk Assessment (HIRA) as well as communication of the hazards needs to be more structured.
- The organisation has set their objectives on several relevant issues like water, energy, accident reduction and training. However, a detailed action plan to achieve the objectives (accident reduction) in a systematic manner within the desired timeframe is yet to be developed. Review of action plans are generic (e.g. reduce energy consumption) as evidenced in the last MRM minutes dated 8th February.
- Though the organisation has specified roles & responsibilities in different documents like Job Description (JD), it needs to be structured (may be in the form of responsibility matrix) within the framework to facilitate proper implementation & communication. Furthermore, the EHS roles & responsibilities related to emergency preparedness and response, approval of work permit system, energy management, water management, etc has not been specifically addressed under job description. Competence requirement (knowledge, skill, experience) for the people with direct responsibility for the organisation's EHS performance is yet to be defined.
- Though the organisation has developed a procedure on monitoring and review of the management programmes, however, there are monitoring gaps observed at different areas of operations which have been detailed under the monitoring section.
- Improvement is needed to categorise the waste into hazardous & non-hazardous and in proper display of the likely risks & possible precautions
- Resource conservation is another area for improvement. Both water consumption for process water and coal consumption for the Boiler Plant have large potential for improvement. The present management programme for water conservation needs to be detailed and specific to measure and improve accordingly. Coal consumption trend analysis has been done for the year 2017 but specific target against the baseline & further activities to achieve the same has not been developed.
- An engagement plan for the identified stakeholders has been made which is adequate. However, its implementation is still awaited.

Assessment Observations

Element 1: Policy

Sl. No.	Identified gap against reference audit criteria	Risk level Prioritisation High/Medium/Low	Rapid root cause analysis	Recommendation/Proposed corrective action	Categorisation of action (infrastructure, capital investment, procedures/ processes, training)	Prioritisation of the action to be taken High/Medium/Low	Estimated cost involvement
1	<p>The organisation engages significant number of contractor workforce. Though the organisation has designed and implemented EHS policy, however, it has been found that the contractor employees are not aware of the EHS policy.</p> <p>Ref:</p> <ul style="list-style-type: none"> a. [IFC PS 1 – 6] b. Policy & Objectives of Corporate management system of PRAN food group point no.2. 	Low	Due to lack of structured focus on contractor safety management which requires specific procedures and action plans	The organisation needs to develop a structured contractor safety management which includes the selection of contractors, formulation of contracts, induction training for new workers, policy and hazard communication, etc. As of now, some isolated initiatives (preparation of policy cards) are in place.	Process	Medium	Not Significant

Element 2: Identification of risks and impacts

Sl.	Identified gap against reference audit criteria	Risk Level Prioritisation High/Medium /Low	Rapid root cause analysis	Recommendation/ Proposed Corrective action	Categorisation of action (infrastructure, capital investment, procedures/ processes, training)	Prioritisation of the action to be taken High/ Medium/ Low	Estimated cost involvement
2	<p>The organisation has conducted a risk assessment; The risk assessment document found to be inadequate because all the activities were not considered during risk assessment especially non routine jobs.</p> <p>Risk assessment related to management of change (MOC) has not been considered.</p>	High	Structured implementation of the HIRA risk assessment procedure	<p>-Same as Above-</p> <p>A cross functional team needs to be trained effectively which will help them to carry out HIRA considering all activities and associated operations across the organization.</p>	Training of people	High	Not Significant
3	<p>Present hazard identification seems to be incomplete as many of the activities have not been considered during the process. As a result, the following deviations (from different requirements) were observed during the plant visit:</p> <p>a. Missing/inadequate guarding system in different areas like pulley guard of lathe &</p>	High	Lack of control on the procedural requirement, people capability development and detailed hazard identification on	<p>a. Management system needs to be properly integrated & implemented</p> <p>b. The robust procedure for hazard identification and evaluation of risks</p>	Process/ procedure	High	May be Significant

Sl.	Identified gap against reference audit criteria	Risk Level Prioritisation High/Medium /Low	Rapid root cause analysis	Recommendation/ Proposed Corrective action	Categorisation of action (infrastructure, capital investment, procedures/ processes, training)	Prioritisation of the action to be taken High/ Medium/ Low	Estimated cost involvement
	<p>grinding machine at engineering section, open drain pits near ETP 1, chimney hoop ladder, expeller pulley drive, drill machine and bench grinder at engineering section, mustard oil plant filter machine platform railing, machine guarding at mustard oil 'Ghani' (press) area which are neither access controlled nor interlocked.</p> <p>b. Hazards associated to lightning was not duly identified and addressed. Old buildings & chimneys were not covered under lightning protection; failure observed in continuity of the lightning arrester down comers of the diesel storage terminal. This hazard may lead to emergency situations and part of the requirement of rule 51, 72, Bangladesh Electricity Rules 1937.</p> <p>c. Hazards associated to non-availability of proper electrical earthing where not identified. All metal bodies (which may become conductor of electricity at extreme case) includes pipelines such as hydrants, gas/fuel lines metallic staircases except cable trays were found not</p>		field	<p>which is appropriate for the organisations risk level to be established.</p> <p>c. A detailed HIRA to be conducted which will cover all routine, non-routine, emergency situations for the entire facility.</p> <p>d. Involvement of the user in the risk assessment and control design process</p> <p>e. A structured procedure needs to be established for new equipment installation.</p> <p>f. The identification of hazards and design of associated controls based on the risk</p>			

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	<p>connected with earth. Ref: Rule 57, Bangladesh Electricity Rules 1937.</p> <p>d. Unidentified electrical shock hazards where man machine interaction may lead to electrocution.</p> <p>e. Hazard communication elements were not identified during the risk assessment. Example, 'Danger notice with skull & bone' was absent at different Electrical panels like sub section 4 to make people aware regarding the danger of the equipment.</p> <p>f. The organisation is yet to establish a system for new equipment inspection for EHS compliance. There is no system of defining safety parameters before procurement, checking of the new equipment before commissioning. This is even applicable for contractor own equipment entering within the facility for work. This may lead to generation of new risk as hazards are not addressed at source.</p> <p>g. Noise level is 110db in few places which is more than stipulated noise level of 85 db as per the requirement.</p>			significance to be done in certain high hazard processes like 'vehicular movement', electrical safety etc.			

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	<p>h. To prevent unintended movement of stationary truck, wheel chocks are not being used. This may lead to physical injury during loading and unloading activity on the stationary truck. Some tractor trailer carrying material found without bonnet hence unsafe due to movable part. From admin building to Central Store is L pattern traffic movement and on main road there are two four-way road crossing some additional traffic guard post shall be added advantage to control four way roads.</p> <p>i. The non-availability of convex mirror in certain areas of central stores may lead to vehicular collision.</p>						

Element 3: Objectives and management program

Sl.	Identified gap against reference audit criteria	Risk Level Prioritisation High/Medium/ Low	Rapid root cause analysis	Recommendation/ Proposed Corrective action	Categorisation of action (infrastructure, capital investment, procedures/ processes, training)	Prioritisation of the action to be taken High/ Medium/ Low	Estimated cost involvement
4	<p>The organisation has set their objectives on several relevant issues like water, energy, accident reduction and training. However, detailed action plan to achieve the objectives (accident reduction) in a systematic manner within the desired timeframe is yet to be developed. Review of action plans are generic (e.g. reduce energy consumption) as evidenced in the last MRM minutes dated 8th February.</p> <p>Ref: IFC PS 1 (13, 14), ISO 14001: 2015, OHSAS 18001:2007</p>	Medium	Objectives have not been set methodically	Quantifiable objective and targets need to be defined in alignment with business risk	Process	High	Not Significant
5	Though procedure of Lock Out Tag Out (LOTO) has been prepared but found inadequate. It does not include the steps to be followed to ensure effective energy isolation like dos and don'ts (specific points) and this should be included in SOPs / WI, beside it	Medium	The organisation has not used any established national/	The procedure to be developed based on certain established national/international standard and to be used	Procedures	Medium	Not Significant

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	needs display at work site. LOTO is also not a part of the respective SOPs / WI of electrical, Pneumatic, Hydraulic energy isolation. Ref: Clause 2.3 Physical Hazard, IFC EHS Guidelines.		international standard	for all kinds of energy isolation activities. These activities are to be identified in HIRA			
6	Electrical panel doors found open with exposed bus bar at sub section 4, open junction box at wash room of engineering section may cause electrocution due to unintended access. Electrical panel rooms are not access controlled to prevent unintended entry. Artificial Respiration chart was not available to give treatment to person suffered Electric shock. PPE like hand gloves for working with electrical system & discharging rod to ensure proper disconnection of Electrical system not found at S/S 4. Ref: Rule 56, 60 (e), Rule 38, Rule 41, Rule 42, Rule 46 & 47, Rule 55, Bangladesh Electricity Rules 1937.	Medium	Lack of awareness on electrical rules and specific safety requirements.	Electrical safety issues are to be identified in HIRA with help of a competent person in electrical safety and horizontal deployment to be planned for entire plant.	Infrastructure	Medium	Not Significant
7	The organisation is yet to identify the list of hazardous activities and related procedures have not	Medium	High hazard activities are	The organisation should have separate control	System	Medium	Not

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	<p>been developed. Further, though the organization issues work permit for hazardous job, there is a gap in the systematic procedure of issuance and closure of work permit. Example: Work permit not closed at working at height and hot work area evidenced at engineering section. Besides, the site is not regularly inspected for safety by competent persons (supervisor) before issuing a work permit and regular monitoring of the work is done. The list of competent persons who can issue the work permit not available.</p> <p>Again, rescue plan is not available to cover emergencies during hazardous work activities. Ref: IFC EHS Guidelines General, Physical Hazard clause 2.3</p>		not treated with focus.	measures for fatality prevention elements (high hazard activities).			Significant

Element 4: Organisational capacity and competency

Sl.	Identified gap against reference audit criteria	Risk Level Prioritisation High/Medium/ Low	Rapid root cause analysis	Recommendation/ Proposed Corrective action	Categorisation of action (infrastructure, capital investment, procedures/ processes, training)	Prioritisation of the action to be taken High/ Medium/ Low	Estimated cost involvement
8	<p>Though the organisation has specified roles & responsibilities in different documents like Job Description (JD), it needs to be structured (may be in the form of responsibility matrix) within the framework to facilitate proper implementation & communication.</p> <p>Furthermore, the EHS roles & responsibilities related to emergency preparedness and response, approval of work permit system, energy management, water management, etc has not been specifically addressed under job description.</p> <p>Ref: IFC PS 1 – [17]</p>	Low	Lack of adequate knowledge in terms of competence management and capacity building	A detailed EHS responsibility, authority, accountability requirements (generally known as communication matrix) to be prepared and ownership needs to be assigned to each relevant individual. The same to be effectively communicated to the people by suitable means.	System/ Documentation	Low	Not Significant
9	Competence requirement (knowledge, skill, experience) for the people with direct responsibility for the organization's EHS performance is yet to be defined. This includes the relevant knowledge on regulatory requirement and IFC performance	Low	Lack of adequate knowledge in terms of competence management	A competence matrix (knowledge, skill experience) required for each EHS responsibility is to be developed.	System/ Documentation	Low	Not Significant

	<p>standard related requirements. The competence building programme and subsequent evaluation in line with the above is found inadequate.</p> <p>The organisation may consider reviewing the adequacy of the EHS resource and expertise available within the organisation to ensure better control, monitoring and effectiveness of the EHS system.</p> <p>Ref: IFC PS 1 [18]</p>			<p>Adequate capacity building programmes like trainings, toolbox talk, on job handholding programmes, mock drills to be in place.</p> <p>A system of evaluation of the gap in competence level is also to be planned.</p>			
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Element 5: Emergency Preparedness and Response

Sl.	Identified gap against reference audit criteria	Risk Level Prioritisation High/Medium/ Low	Rapid root cause analysis	Recommendation/ Proposed Corrective action	Categorisation of action (infrastructure, capital investment, procedures/ processes, training)	Prioritisation of the action to be taken High/ Medium/ Low	Estimated cost involvement
10	<p>Emergency plans are identified for various situations like Fire, Bomb Threat, Earth Quake, Chemical leak, etc. The mock drills have not covered all situations except fire. The mock drill register is not countersigned by the representative of Bangladesh Fire Service who witnessed the mock drill. This is a requirement as per Bangladesh Fire Service Act.</p> <p>Moreover, some deficiencies found during</p>	Medium	Lack of awareness	Mock drills are to be conducted for different situations and new entrants are to be trained with focus. Mock drill registered to be countersigned by the representative of	Procedure	Medium	Not Significant

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	evacuation of new employees.			Bangladesh Fire Service who will witness the mock drill in future.			
11	The diesel underground storage area consists of 22.5 KL and 12 KL tanks possessing maximum fire load (22, 66,681 Kcal/Sq M as per standard high fire load >1100 Thousand Kcal as per NFPA guideline). The existing protection system is found inadequate as only some first aid fire fighting equipment (portable fire extinguishers) is provided. Though foam trolley (500 litre) is kept beside diesel storage, however it is not sufficient considering existing water network. The electrical fittings and wiring system are not in line with rule 41 (4), The Bangladesh Factory Rules 1979 zone classification which may lead to fire and explosion possibility. The explosion may lead to impact beyond boundary which may cause offsite disaster situation.	High	The organisation did not conduct a fire load calculation/ fire risk assessment	<p>The existing water network may be extended with sufficient quantity of foam solution and foam making equipment</p> <p>Provision of either smoke/heat detector or Infrared beam detector for detection of early stage fire.</p> <p>As an alternative, modular type dry chemical powder or suitable type of extinguishing media to cover the total area.</p>	Infrastructure	High	May be Significant

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				Suitable Hazardous Area Classification (Zone 0 – 2 as per IEC) of the diesel storage are to be done and as per the zone classification area, the flameproof electrical fittings to be provided.			
12	<p>Detection system to prevent fire emergencies does not consider the following:</p> <p>a. The Central store is having flammable materials like packaging materials, pallets and other free burning materials. The estimated fire load is 45, 88, 920 Kcal/sq M which leads to Very High fire load as per IEC / NFPA standard. The materials are also stacked at greater height on steel racks up to a height of around 10 metres. Existing smoke detectors provided on beam at a height of around seven meters which leave the top part unprotected from auto detection point of view.</p>	High	While considering/ designing storage capacity & height, fire protection/ detection facility was not considered.	<p>Height of storage should be at a lower level from the smoke detector</p> <p>Either water sprinkler to be provided or as an alternate modular type fire extinguishing media to be provided</p> <p>Provision of suitable smoke detector inside void interconnected</p>	Infrastructure	High	Not Significant

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	b. In Training Centre and Canteen, some part of the roof is covered by false ceiling void through which service line and electrical lines are passed. In case of any smoke generation in the void, it is very difficult to detect and there will be delayed fire detection.			with response indicator on false ceiling roof for easy & early detection of fire/smoke.			
13	<p>The organisation has laid a fire water network and hydrant system in three phases with three pumps houses. Some part of the water network is on single line with dead end condition. The following inadequacies are identified during the audit:</p> <p>a. There is a possibility of restriction of flow due to non-availability of 'ring main' in some parts of the network.</p> <p>b. The system design is unable to ensure whether it is capable to deliver water with highest load condition</p>	High	The fire water system has been developed in 3 phases. The system has been developed in 3 phases design validation has not been done in totality.	Hydraulic suitability of the fire water network system to be ensured.	Infrastructure	High	May be Significant
14	ETP at PRAN Agro handles 650 – 700 KL of effluent every day. The Decanter Centrifuge is vital equipment	High		This emergency preparedness plan at ETP	System	High	Not

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	and any outage of this equipment presents an emergency situation with respect to Environment. The Emergency Response Plan prepared by the department has not addressed this important area. Ref: Bangladesh Pollution control requirements		Overlooked	needs to be modified accordingly.			significant

Element 6: Monitoring and review

Sl.	Identified gap against reference audit criteria	Risk Level Prioritization High/Medium/ Low	Rapid root cause analysis	Recommendation/ Proposed corrective action	Categorisation of action (infrastructure, capital investment, procedures/ processes, training)	Prioritization of the action to be taken High/ Medium/ Low	Estimated cost involvement
15	Though the organisation has developed a procedure on monitoring and review of the management	Medium	Lack of awareness on	1. Systems of monitoring needs to be	System	Medium	Not Significant

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	<p>programs, however the effective implementation of the procedure has not been evidenced. Example:</p> <ol style="list-style-type: none"> Periodic maintenance of electrical equipment is an important tool to control hazards arising out of equipment like Transformer, Switchgears, MCC, PCC, portable equipment etc. to ensure the condition of health for safe operation. The plan and checking record for safe operations was not evident at the time of audit. Periodic checking of PPE has not been evidenced during the audit. The organization does not maintain any record on the issuance, periodic inspection, replacement of PPE to both permanent and contractor workers to satisfy the requirement of usage of PPE. During the audit, it has been evidenced that safety shoes have not been used by the contractor workman at old 'dal (spice)' mill and chipping of core winding of electrical motor 		objective setting and alignment process and inadequate monitoring system	<p>strengthen and effectively implemented.</p> <ol style="list-style-type: none"> Nearmiss and safety observations (unsafe conditions and unsafe acts) should be reported by each individual at work. This requires creation of awareness, involvement of people and easy incident capturing methodology. 			

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	<p>was being done without safety goggles.</p> <p>c. Near miss reporting system which supports proactive accident prevention needs to be percolated upto the workman level to ensure more effective capturing and reporting. Involvement of the entire workforce who is actually exposed to different hazardous situations and near misses is absent.</p> <p>d. The system of regular supply and replenishment of medicines is found inadequate as the list of medicine and its stock position is not maintained and displayed at all the locations. The first aid card was not available in first aid boxes in substation 4 & DG Room containing number of items as well as date of last first aid administered and it is evident that regular replenishment is ineffective. This is in violation with Rule 55 of Bangladesh Factory Rules, 1979.</p> <p>e. Hygiene survey is not being regularly monitored to ensure proper cleaning and</p>						

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	<p>maintenance neither the hygiene survey data sheet is being updated regularly. This is against Bangladesh Factory Rule No 33.</p> <p>Ref: IFC – PS 1[22]</p>						
16	<p>Effluent temperature at discharge point is not monitored.</p> <p>Ref: IFC – EHS Guideline (Food & Beverage) sectoral guideline, Performance Indicators and Monitoring 2.1 (TABLE1)</p>	Low	IFC EHS Guideline reference has not been considered	Temperature measurements should be done periodically. The methods, frequency and point of measurement should be included in the relevant procedure;	System	Low	Not significant
17	<p>There are total 18 discharge points of water from the two Factories (PAL and NAL). At present, the process water & the factory wash water are discharged through ETP but WTP back wash water, Hand and foot wash water and Prayer hall water (Collectively called domestic water) are directly discharged to outside (river). This water, generally meets the quality parameters. However, for WTP wash water TSS appears has not been measured and reported at the moment. Ref: Pollution control requirements of</p>	Medium	Lack of awareness	<ul style="list-style-type: none"> The organisation may try to reduce the discharge points by rationalising the points of discharge. The monitoring parameters, frequency and sample collection 	System	Medium	Not significant

Sl.	Identified gap against reference audit criteria	Risk Level Prioritization High/Medium/ Low	Rapid root cause analysis	Recommendation/ Proposed corrective action	Categorisation of action (infrastructure, capital investment, procedures/ processes, training)	Prioritization of the action to be taken High/ Medium/ Low	Estimated cost involvement
	IFC as well as Bangladesh law.			<p>points should be clearly defined for all discharge points and the same should be included in the relevant procedure.</p> <ul style="list-style-type: none"> For WTP wash water TSS may be monitored and if found within norm this water may be reused. 			
18	<p>The post-monitoring action plans are not implemented completely. This has resulted in the following situation:</p> <p>Analysis or investigation has not been done on the reported diseases. Reported sickness has not been analysed further to establish the linkage between disease and work.</p> <p>Ref: IFC – PS 1[23]</p>	Medium	Lack of analysis and investigation	Organisation to strengthen the post monitoring analysis process through involvement of top management, allocation of resource, structured follow up and effectiveness	System	Medium	Maybe Significant

Sl.	Identified gap against reference audit criteria	Risk Level Prioritization High/Medium/ Low	Rapid root cause analysis	Recommendation/ Proposed corrective action	Categorisation of action (infrastructure, capital investment, procedures/ processes, training)	Prioritization of the action to be taken High/ Medium/ Low	Estimated cost involvement
				evaluation.			

Element 7: Stakeholder engagement

Sl.	Identified gap against reference audit criteria	Risk Level (prioritisation) (High/medium/ low)	Rapid Root cause analysis	Recommendation/ Proposed corrective action	Categorization of action (infrastructure, capital investment, procedures/processes, training of people)	Prioritization of the action to be taken (High/ medium/ low)	Estimated cost involvement
19	<p>The organisation has developed an engagement plan with the members of the local community. Only factory has a plan of biannual meeting with stakeholder. The procedure is yet to be implemented in totality.</p> <p>Ref IFC requirement PS 1 [25]</p>	Medium	Lack of awareness	<p>The first engagement event should be planned as early as possible.</p> <p>The organization will plan a meeting soon in this month.</p>	System	Medium	Not significant

Element 8: External communication and grievance mechanism

Sl.	Identified gap against reference audit criteria	Risk Level (prioritisation) (High/medium / low)	Rapid Root cause analysis	Recommendation/ Proposed Corrective action	Categorisation of action (infrastructure, capital investment, procedures/processes, training of people)	Prioritisation of the action to be taken (High/medium/low)	Estimated cost involvement
20	<p>There is a grievance redressal system which is clearly established with the provision of boxes where the members of the local communities can submit their grievances. The follow-up actions against to prevent similar grievances in future is weak. The grievance is closed after providing compensation only. In Dec 2017, a complaint was received from Ashin Bagan Tagore pond (Mango waste dumping area) where three small Mehagoni trees of the adjoining areas died due to overflow of contaminated water into the neighbouring fields. The organization has compensated the owners and the banks of the pond were raised to arrest any overflow in future. However similar action is yet to be taken for other ponds. During audit it was observed that at “Motaleb Hazir Pukur” and the adjoining seed drying area display the same hazards.</p> <p>Ref: [IFC PS1]</p>	Medium	Lack of awareness	<p>For all grievance cases not only corrective but preventive actions also should also be taken.</p> <p>Considering this specific issue, they plan to build an interconnecting drain so that water of drying area can go to adjoining pond.</p> <p>Based on the information provided by PRAN dated 10th April 2018, they have already purchased Mango seed and skin separators and have initiated work on</p>	System	Medium	Not significant

Sl.	Identified gap against reference audit criteria	Risk Level (prioritisation) (High/medium / low)	Rapid Root cause analysis	Recommendation/ Proposed Corrective action	Categorisation of action (infrastructure, capital investment, procedures/processes, training of people)	Prioritisation of the action to be taken (High/ medium/ low)	Estimated cost involvement
				construction of compost sheds and seed drying yard. By the start of next Mango season (i.e. May 2018), the solution will be in place which would involve seed and skin separation and composting of skins. PRAN has already ordered dual fuel boilers which can use the seeds as fuel and are expected to be installed in next 3-4 months.			

Element 9: Ongoing reporting to affected communities

Sl.	Identified gap against reference audit criteria	Risk level (prioritisation) (High/medium/ low)	Rapid root cause analysis	Recommendation/ Proposed Corrective action	Categorisation of action (infrastructure, capital investment, procedures/processes, training of people)	Prioritisation of the action to be taken (High/ medium/ low)	Estimated cost involvement
21	<p>The system of communication to the affected communities is not clearly established. It has been planned but yet to be implemented. Ground water analysis has been carried out at Hatsighardaha village. The quality of water was found satisfactory. This information has not been shared with the villagers.</p> <p>Re: IFC requirement PS 1 – [36]</p>	Medium	Lack of Awareness	<p>The method and frequency of communication to the affected communities should be clearly established and implemented. The records for the same should be maintained.</p> <p>Factory has planned to have biannual meeting with stakeholders.</p>	System	Medium	Not Significant

Element 10: Documentation

Sl.	Identified gap against reference audit criteria	Risk level (prioritisation) (High/medium/ low)	Rapid root cause analysis	Recommendation/ Proposed corrective action	Categorisation of action (infrastructure, capital investment, procedures/processes, training of people)	Prioritisation of the action to be taken (High/ medium/ low)	Estimated cost involvement
22	<p>The organisation has identified and defined several procedures related to EHS. However, the following gaps are identified for further improvement:</p> <ul style="list-style-type: none"> Certain systems/practices related to EHS are in a place like EHS toolbox talks which require to be formalised through procedures. Certain systems are to be introduced like new equipment purchase/hiring which requires documentation. 	Medium	Lack of focus and inadequate HIRA	A structured system of development of procedures to be introduced.	System	Medium	Not Significant
23	<p>The corporate EHS framework needs to incorporate certain more areas of relevant to IFC Performance Standards – Like Stakeholder engagement, Bio Diversity, Supply Change, Ongoing Reporting to Affected Communities, External Communication and Grievance Mechanism.</p> <p>The overall document management system needs improvement in terms of document control, approval methodology by respective authority, procedural adequacy, record control</p>	Low	Lack of resources for document control	A well-established document control system	System	Low	Not Significant

Sl.	Identified gap against reference audit criteria	Risk level (prioritisation) (High/medium/ low)	Rapid root cause analysis	Recommendation/ Proposed corrective action	Categorisation of action (infrastructure, capital investment, procedures/processes, training of people)	Prioritisation of the action to be taken (High/ medium/ low)	Estimated cost involvement
	etc.						

Element 11: Supply chain

Sl.	Identified gap against reference audit criteria	Risk level (prioritization) (High/medium/ low)	Rapid root cause analysis	Recommendation/ Proposed corrective action	Categorisation of action (infrastructure, capital investment, procedures/processes, training of people)	Prioritisation of the action to be taken (High/ medium/ low)	Estimated cost involvement
24	Commodities (raw materials) procured through contract farming, which forms a majority part of the supply chain is covered under supply chain assurance programme. Other supply items like commodities procured through trading activities may be considered for supply chain risk assessment and subsequent actions.	Medium	Contract farming commodities cover majority of the supply chain. Hence the organization has focused on this.	The organization need to include all other major supply items in the supply chain assurance programme.	System	Medium	Not Significant

Element 12: Resource efficiency and pollution prevention

Sl.	Identified gap against reference audit criteria	Risk level (prioritisation) (High/medium/ low)	Rapid root cause analysis	Recommendation/ Proposed corrective action	Categorisation of action (infrastructure, capital investment, procedures/processes, training of people)	Prioritisation of the action to be taken (High/medium/ low)	Estimated cost involvement
25	ETP sludge generation at PAL is around 100-120 Kg/day. The sludge storage area near ETP is surrounded by short brick wall that has neither a door nor a roof and therefore presents a risk of escaping of contaminants in rainy season. Ref: IFC requirements, GIIP	Medium	Lack of awareness	The height of wall around the storage place should be increased and a door and a roof should be constructed.	Investment	High	Not significant
26	Most of the test parameters of treated effluent meet the requirements. TSS values are in the range of (80-110) mg/l which meets the Bangladesh standard (150 mg/l) but falls short of meeting the EHS sectoral guideline (50 mg/l) Ref: IFC EHS Sectoral Guideline for Food	Medium	Parameters need to be checked against IFC guideline as well.	ETP should be run and controlled to achieve the desired standard.	System	Medium	Not significant
27	All Solid waste collected from factory are taken to a large waste storage yard developed in PAL 2. A 12000 square feet Yard is made for	Medium	Lack of awareness	Display boards should be made available for	System	Low	Not significant

Sl.	Identified gap against reference audit criteria	Risk level (prioritisation) (High/medium/ low)	Rapid root cause analysis	Recommendation/ Proposed corrective action	Categorisation of action (infrastructure, capital investment, procedures/processes, training of people)	Prioritisation of the action to be taken (High/medium/ low)	Estimated cost involvement
	<p>this purpose.</p> <p>However, items are not identified separately for hazardous and non-hazardous categories. Used Batteries from DG and ETP sludge for example are not separately identified with necessary caution boards.</p> <p>Ref: IFC requirements</p>			hazardous items along with their probable impacts and necessary precaution to be taken during its handling. Procedures for disposal of hazardous wastes should include the precautions to be taken during disposal.			
28	Stock, receipt and dispatch records of solid wastes are not maintained properly. Postings of daily receipt from the factory are not done regularly. This creates a problem for monitoring the arising, dispatch and stock of solid wastes on a continual basis as well as the applicable controls over the same.	Medium	Lack of awareness	Regular posting of arrival and dispatch along with a stock position at any point of time should be done and monthly reports should be taken out for management	System	Medium	Not significant

Sl.	Identified gap against reference audit criteria	Risk level (prioritisation) (High/medium/ low)	Rapid root cause analysis	Recommendation/ Proposed corrective action	Categorisation of action (infrastructure, capital investment, procedures/processes, training of people)	Prioritisation of the action to be taken (High/medium/ low)	Estimated cost involvement
	Ref: IFC requirements			information.			
29	<p>The organisation has a practice of dumping mango wastes into nearby ponds in the local villages which after drying is disposed off. However, these ponds are potential hazards for the adjoining fields. Particularly due to overflow of these ponds during rains. The organisation has taken up a project where the dumping of Mango waste into ponds will be totally eliminated. The mango seed and the skin will be separated using machines. The mango skin will be used for making compost fertilizer and the dried mango seeds will be used in the Boiler as fuel. However, till the new project is complete and fully stabilized, controls on the mango waste ponds need to be continued and further strengthened.</p> <p>Ref: IFC requirements</p>	Medium	Lack of awareness	<p>Action to increase the heights of all similar ponds and seed drying areas should be initiated. Based on the information provided by PRAN dated 10th April 2018, they have already purchased Mango seed and skin separators and have initiated work on construction of compost sheds and seed drying yard. By the start of next Mango season (i.e. May 2018), the solution will be in place which would involve seed and skin</p>	Investment	Medium	May be significant

Sl.	Identified gap against reference audit criteria	Risk level (prioritisation) (High/medium/ low)	Rapid root cause analysis	Recommendation/ Proposed corrective action	Categorisation of action (infrastructure, capital investment, procedures/processes, training of people)	Prioritisation of the action to be taken (High/medium/ low)	Estimated cost involvement
				separation and composting of skins. PRAN has already ordered dual fuel boilers which can use the seeds as fuel and are expected to be installed in next 3-4 months.			
30	<p>Resource Efficiency: Coal for Boiler Plant: The Boiler Plant has two Boilers one of 10 t/h capacity and the other is of 20 t/h capacity producing steam at 8 Kg/cm². The Boiler runs on Coal. Consumption of coal depends on the control over combustion process. At present, there is no measurement of coal consumption/ton of Steam and no target for the same. On visual observation, it was seen that over size coal (1-3 inch size) is being fed into the Boiler against the requirement of 0.25-1 inch. This is resulting in incomplete combustion and wastage in the form of un-burnt carbon in the cinder.</p> <p>Flue gas analysis reveals 12.6% Oxygen against</p>	Medium	Lack of awareness	<p>To overcome the situation and reduce specific coal consumption the unit may do the following:</p> <ul style="list-style-type: none"> Set a target for reduction of coal consumption Measure the crushing index (CI) of the crushed coal and adjust 	System	Medium	Not significant

Sl.	Identified gap against reference audit criteria	Risk level (prioritisation) (High/medium/ low)	Rapid root cause analysis	Recommendation/ Proposed corrective action	Categorisation of action (infrastructure, capital investment, procedures/processes, training of people)	Prioritisation of the action to be taken (High/medium/ low)	Estimated cost involvement
	<p>a requirement of 4-6 % which means huge amount of excess air is being used for combustion which reduces the thermal efficiency of the Boiler.</p> <p>Ref: Good International Industry Practice</p>			<p>hammer position in the crusher to get proper size output.</p> <ul style="list-style-type: none"> Control dumper position according to the Oxygen content of the flue gas to avoid excess air or insufficient air. Occasional test of cinder for un-burnt carbon to cross-check for un-burnt carbon lost through cinder. 			
31	<p>Resource Efficiency: Reduction in Consumption of Water</p> <p>Water drawn from deep tube well at WTP at PRAN Agro is about 2600 KL every day. There</p>	Medium	Lack of awareness	Prepare a scheme for recycling of water with technical details of how much	System	High	May be significant

Sl.	Identified gap against reference audit criteria	Risk level (prioritisation) (High/medium/ low)	Rapid root cause analysis	Recommendation/ Proposed corrective action	Categorisation of action (infrastructure, capital investment, procedures/processes, training of people)	Prioritisation of the action to be taken (High/medium/ low)	Estimated cost involvement
	<p>is a big opportunity to recycle and reuse a large portion of the same which is still lacking. Objective and management programme has been made for this area but the detailed plan for water reduction (how to reduce) is yet to be made. .</p> <p>Ref: IFC requirements, Good International Industry Practice</p>			<p>water can be recycled and how the same will be achieved. This should be backed by feasibility studies, technical specifications, budgetary requirements and management approvals.</p>			
32	<p>For regeneration of WTP which is done at an interval of 8 hrs about 250 KL of water is used every day. There is no means to salvage this water. This water is totally lost as discharge to the river.</p> <p>Ref: IFC requirements, Good International Industry Practice</p>	High	Lack of awareness	<p>This water might be having a problem of higher TSS and may therefore be reused after settling of the suspended solid in the water.</p> <p>The unit may think of a setting up a new settling tank where this backwash water can be stored and</p>	Investment	High	May be significant

Sl.	Identified gap against reference audit criteria	Risk level (prioritisation) (High/medium/ low)	Rapid root cause analysis	Recommendation/ Proposed corrective action	Categorisation of action (infrastructure, capital investment, procedures/processes, training of people)	Prioritisation of the action to be taken (High/medium/ low)	Estimated cost involvement
				later used as raw water in the factory instead of throwing it into the river.			

Status of previous assessment recommendations

Sl. No.	2014 Recommendations reference	Previous (2014) assessment recommendations	Status as on Feb 2018	Compliance status (Complaint/ Non-complaint /Partially compliant)
1	1.4	The policy to declare guideline for reviewing OHS performance including a commitment to other stakeholders	Policy adequately addresses the OHS performance review framework. Policy review dated 08.06.2017	Compliant
2	1.5	The policy may be included in the awareness training programme	The policy has been communicated to own employees effectively. The contractor employees are not much aware of the policy requirements.	Partially complaint
3	2.2	The team members responsible for preparation of HIRA to undergo a comprehensive training on HIRA by the competent agency. The present HIRA matrix needs review as it is confusing and may lead to inaccuracies in calculation of risk. For example, activity is considered not within two years as frequency. Such activities are normally non-routine in nature and may be taken care of separately by other hazard identification tools (JSA).	A structured risk assessment procedure has been used to conduct the risk assessment	Compliant
4	2.4	Risk assessment needs to be done for all work including changes in the production process, addition/alteration of machinery & construction site	Risk assessment does not include non-routine activities, emergency situations and management of change (MOC)	Partially complaint
5	2.5	The risk matrix and the risk rating need to be re-examined for identifying and mitigating significant risks	The organisation has developed a structured procedure for risk assessment	Compliant
6	2.6	Existing HIRA to be reviewed at least annually. Special reviews may be carried out in case of additional alterations of machines, changes in production procedures & new jobs.	HIRA is reviewed annually & the procedure is in place to review it if some incident occurs & change in process methodology. HIRA has been also reviewed after incident happened. However, Management of Change (MOC) has not been addressed.	Partially Compliant
7	3.1	A documented system of identifying the legal requirements to be established and persons at the plant level to be made responsible	The documented system of legal requirement is established. In-charge of EHS in the plant is the owner of the system.	Compliant
8	3.2	A formal legal register (EHS) containing the	A formal legal register CS-AD-REG-	Partially

Sl. No.	2014 Recommendations reference	Previous (2014) assessment recommendations	Status as on Feb 2018	Compliance status (Complaint/ Non-complaint /Partially compliant)
		legal and other regulatory requirements relating to EHS to be prepared. Complete with the identification of the persons responsible for compliance	008-E-01 with all relevant requirements is in place but identified persons for compliance is not evident from the register.	Compliant
9	3.3	Pressure vessels, lifts, lifting machines to be tested as per the requirements of 'Bangladesh Shram Aain' and Bangladesh Factories Rules 1979	As per Bangladesh Factories rules 1979, pressure vessels & lifting tools are checked by competent persons as records of those checking are available. This test is being conducted internally, however, an external assessment by competent body is required to ensure effective compliance and verification.	Partial Compliant
10	3.4	Objectives set in the organisation should be aligned with the company's policy, significant EHS hazards identified by the company & the applicable legal requirements	The setting of objectives considered the legal requirements as depicted in EHS Policy	Compliant
11	3.5	Legal register to be made available to departmental heads and other concerned parties	Legal register is not available to departmental heads and other concerned persons	
12	4.3	A documented management programme covering the measures to be taken to mitigate significant risk is to be formulated and pursued	In documented management programme, action plan has been prepared to mitigate significant risk	Compliant
13	4.4	Management programme is to be undertaken by spelling out the objectives, provisions for necessary resources and clear time frame	Present management programmes include objectives, resource & timelines. However, many of the objectives do not have adequate action plan.	Partially compliant
14	4.5	Programmes relating to EHS to be reviewed periodically to ensure timely completion	Programs related to EHS have been reviewed periodically but timely completion has not been evidenced during the audit.	Partially Compliant
15	5.1	The organisation structure has to be revised and expanded further to show the EHS responsibilities of persons placed under the departmental heads.	EHS organisation structure was not revised in such a manner that the roles & responsibilities of persons have been understood who are under departmental heads	Partially Compliant
16	5.2	EHS responsibilities of the individual to be clearly indicated in their respective job description	EHS roles and responsibilities are not clearly defined and specific for individuals	Partially Compliant
17	5.3	Requirements of resources required for operation of ESMS be made an integral	The requirement of resources is an integral part of the organisation	Compliant

Sl. No.	2014 Recommendations reference	Previous (2014) assessment recommendations	Status as on Feb 2018	Compliance status (Complaint/ Non-complaint /Partially compliant)
		part of the organisation's budgeting process	budget. 15% of the total budget has been allocated for the EHS budget.	
18	6.1	Training needs to be assessed annually for identifying the specific training required in the field of EHS for improving the performance of the employees. The assessment shall be made on the basis of specific requirements projected by the departmental HODs.	Training needs identification is done in collaboration with HR department & departmental heads	Compliant
19	6.2	Specific hours of training are to be imparted according to the assessed need	Specific hours of training are addressed in the training calendar	Compliant
20	6.3	The specific safety training programmes for working in confined space, working at height, isolation lock out tag out, hot work and use of PPE to be included in the training calendar	Specific safety training programmes have been included in the training calendar, however, those programmes like manual handling, working at height have not been imparted in the current calendar year.	Partially Compliant
21	6.5	SOPs should be revised to include critical parameters where deviation will lead to adverse EHS impact	SOPs have been revised considering the relevant critical EHS parameters including the usage of appropriate PPE at the hazardous work area	Compliant
22	7.1	A documented procedure for communication of EHS Hazard is to be established and promulgated. A dedicated EHS portal for EHS management could be useful for tracking all EHS activities.	A procedure for EHS hazard communication and reporting has been developed, however, the EHS portal has not been developed so far.	Partially Compliant
23	7.4	Documented procedure is to be established for reporting of near miss, incident and unsafe conditions by employees. The procedure is to be widely published amongst the employees.	Documented procedures on EHS reporting like near miss, incident, unsafe act, and unsafe condition is there, but the same has not been implemented specially at the workers level.	Partially Compliant
24	7.5	A safety committee consisting of equal numbers of representation from worker and management to be constituted to obtain worker's participation in safety management. The committee should keep meetings at regular intervals and may formulate preventive measures, training/ awareness programme on EHS. Deliberations in the meetings of the safety committee to be recorded.	Equal representation in safety committee from management & workers is established	Compliant
25	7.6	Records of meeting with contractors regarding EHS issues before the award of a contract to be maintained.	Records of meeting with contractors regarding EHS issues before awarding a contract is not	Non-compliant

Sl. No.	2014 Recommendations reference	Previous (2014) assessment recommendations	Status as on Feb 2018	Compliance status (Complaint/ Non-complaint /Partially compliant)
			available	
26	8.1	Register of accidents and dangerous occurrences is to be maintained in the format as prescribed in Form No. 28 prescribed under the rule - 100 of Bangladesh Factories Rule 1979.	Register of accidents & dangerous occurrences are available at the first aid centre. Detailed investigations of the accidents are also being done.	Compliant
27	8.2	SOPs to be made should be numbered and controlled centrally by MR	SOPs are numbered & centrally controlled by MR	Compliant
28	9.5	<p>1. A list of significant risks both with respect to health, safety and environment may be prepared</p> <p>2. All employees working in areas connected with significant risks may be given training and awareness in the SOPs, engineering controls and the management programmes in the respective areas</p> <p>3. One important control is the use of PPE. The employees including the contractor's men should be given training and instructions to use PPE without fail.</p> <p>4. The PPE should be tested for their appropriateness and quality. The specification should be carefully developed and controlled.</p> <p>5. Work permits for all hazardous activities may be developed and implemented. Adequate training for the purpose may be given to all the concerned.</p> <p>6. SOPs and WIs connected with significant risks should contain the critical operating parameters and the impact of their deviation from the desired range</p> <p>7. ETP and the related equipment should be brought under regular inspection and preventive maintenance.</p> <p>8. Considering the number of employees working in this unit installation of STP may be considered.</p> <p>9. Noise generating machines may be identified and control at source by suitable acoustic cover may be considered</p> <p>10. A system of contractor safety management may be considered</p>	<p>1. List of significant risks is not available</p> <p>2. Training is imparted to employees regarding significant risk in the respective areas</p> <p>3. Records of training given on PPE are available</p> <p>4. No records are available regarding testing/checking of PPE for the purpose of their availability of their usage</p> <p>5. Work permit for all hazardous work are developed</p> <p>6. SOP/WIs connected with significant risk contains critical operating parameters with a mention of usage of PPE to avoid the impact of deviations</p> <p>7. ETP has been covered under regular inspection and preventive maintenance</p> <p>8. STP has not been made so far. Only soak pits are available.</p> <p>9. Noise generating machine, generator identified through noise survey but suitable acoustic enclosure not considered</p> <p>10. System/procedure of contractor safety management needs further improvement</p> <p>11. The procedure for managing hazardous waste has been developed (Doc No: CS-HY-SOP-002-E-01) but the handling of biomedical waste has not been</p>	Partially Compliant

Sl. No.	2014 Recommendations reference	Previous (2014) assessment recommendations	Status as on Feb 2018	Compliance status (Complaint/ Non-complaint /Partially compliant)
		<p>11. A procedure for storage, handling and disposal of hazardous waste including biomedical waste may be developed and implemented</p> <p>12. Contents of first aid box is to be maintained as mentioned in Rule 55 of Bangladesh factories rules. Consumption of contents shall be recorded.</p> <p>13. QAP format duly vetted for safety standards to be introduced while inspection</p> <p>14. Vehicles duly registered with governmental authority are to be permitted to ply inside the plant. Flame arrestors are to be fitted on both cylinder end and torch end of LPG cylinders.</p> <p>15. Damaged members are to be replaced. Forklift movement inside store is to be properly marked.</p>	<p>included</p> <p>12. Contents of first aid boxes as found in DG room & Substation are not as per rule 55 of Bangladesh Factory Rules 1979</p> <p>13. No such QAP format for safety standard is introduced</p> <p>14. Most of the vehicles are owned by the company & dully registered</p> <p>15. Forklift movement inside store has been streamlined with proper marking system</p>	
29	10.1	<p>1. The emergency response plan should also include rescue plan and may be made more elaborate with necessary commands structure and communication channel</p> <p>2. The emergency alarms and sirens should be distinct and people should be made aware of the same</p> <p>3. A control room concept should be developed and control room should be available as the nerve centre in case of any emergency</p> <p>4. Emergency Response Team and the Rescue Team should undergo proper training</p> <p>5. The fire hydrant pumping system may be modified by installation of electrically operated fire pumps (at least two) backed by a diesel operated pump of the same capacity as electrically operated pump. For maintaining pressure in the hydrant line, a jockey pump (auto start) may be included in the system.</p> <p>6. Necessary and adequate infrastructural facilities for dealing with emergency situations may be listed and made available</p>	<p>1. Emergency preparedness plan is complying with the requirements of command structure and communication channel</p> <p>2. The emergency alarms and siren is adequate</p> <p>3. Training has been imparted</p> <p>4. The firewater pumping system is adequate</p> <p>5. Necessary resources are provided</p> <p>6. Mock drill for other than fire situation to be taken care</p>	Partially Compliant

Sl. No.	2014 Recommendations reference	Previous (2014) assessment recommendations	Status as on Feb 2018	Compliance status (Complaint/ Non-complaint /Partially compliant)
		7. Mock drills may be regularly conducted not only for fire but also for other potential emergency situations. Rescue and evacuation should also be a part of the mock drill.		
30	11.2	An annual plan for EHS monitoring may be developed in a standard format.	Annual plan for EHS monitoring has been developed in a format.	Compliant
31	11.3	The actual value of the EHS parameters should be measured as per the monitoring plan and a trend chart needs to be developed and communicated to the concerned employees.	Trending chart has been developed since 2017 on training, accident, water consumption, electricity and coal & diesel consumption.	Compliant
32	11.5	Management programmes may be linked to the EHS objectives and prepared in a standard format. Responsibility for reviewing the progress of management programme and its frequency may be defined. The record of such reviews may be maintained for necessary follow-up.	The management program is linked with objective targets whose progress is reviewed in a periodic interval. The record of review is maintained but necessary follow-up as well procedure developed for follow-up is not evident.	Partially Compliant
33	11.6	Constitution of accident investigation committee shall be documented	The committee is in place	Compliant
34	11.7	Presently audiometry test is conducted in a room exposed to ambient noise. A soundproof room is to be constructed for carrying out audiometry test. Contractor's workers exposed to hazardous activities are to be brought under the purview of periodical medical examination like company's employees.	Record of audiometry test of employees is not available with the unit	Non-Compliant
35	11.8	Structured legal register indicating the applicable legal provisions, the person responsible for compliance, monitoring and frequency of compliance is to be prepared and maintained	The structured legal register is available but the name of persons responsible for compliance not mentioned	Partially Compliant
36	12.1	The record registers as per Form 28 format of Bangladesh factories act is to be maintained	This is in place.	Compliant
37	12.3	Near miss reporting must be promoted through all departmental heads. All workers are awarded to participate in reporting near miss. Near miss targets might be given department-wise.	Nearmiss reporting methodology and awareness need to be peculated across all the levels of the organization specially the workers who are exposed to.	Partial
38	13.1	The people from surrounding community, media, police, statutory authority, affected communities and other stakeholders are to	The organisation has listed stakeholders and has developed an engagement Plan. But this is yet to	Partially compliant

Sl. No.	2014 Recommendations reference	Previous (2014) assessment recommendations	Status as on Feb 2018	Compliance status (Complaint/ Non-complaint /Partially compliant)
		be included in stakeholders list.	be brought into practice.	
39	13.2	Stakeholders need to be identified and an engagement plan drawn in a standard format. A procedure needs to be developed for the same.	Stakeholders including the affected communities have been identified and the impacts of business operations on the affected communities as well as the risks involved have been assessed.	Compliant
40	14.1	Management review procedure needs to incorporate a review of the trend of EHS parameters, objectives realisation, evaluation of legal compliance etc.	Review of EHS parameters, trend analysis is part of agenda in the management review meeting.	compliant
41	14.3	The output should be given in a format indicating the decisions taken, responsibility and time frame.	The management review meeting is recorded in a prescribed format where the action plans are drawn against agenda, with allocation of proper responsibility and completion timeline.	Compliant

Conclusion

An in-depth independent assessment of Environment, Health & Safety (EHS) management system in PRAN Agro Ltd. (PAL) & Natore Agro Ltd. (NAL), Natore facility at Bangladesh was carried out by Consultivo Business Solutions Pvt. Ltd. (Consultivo) during February 2018. The assessment results for the selected facility as a whole have been depicted in this report.

Apart from the current assessment, we have reviewed the level of implementation & effectiveness of the previous assessment findings which was conducted in August 2014. The level of implementation and the compliance status are also listed out in this report.

By and large, the management systems are in place and a significant improvement has been noticed since the last assessment in 2014. There are certain gaps identified in the management system which has been brought out clearly in this report.

Acknowledgement

Consultivo management expresses their sincere gratitude to the Management of IFC.

We wish to record our appreciation for the co-operation and assistance provided by the Management of PRAN Group generally; and in particular to the GM – EHS and the team members who have interacted & extended their support to the assessment team during onsite assessment carried out at Natore site & Head Office at Dhaka, Bangladesh, February 2018.

Disclaimer

This report is prepared and submitted to the management of International Finance Corporation (IFC) for an assessment of PRAN Agro Ltd. (PAL) & Natore Agro Ltd. (NAL) Natore facility at Bangladesh in accordance with the agreed scope & criteria. Consultivo Business Solutions Pvt. Ltd. (Consultivo) does not accept responsibility for any other person or organisation. Any reliance that any third party may place on this report is entirely at their own risk.

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The study team has been drawn from qualified personnel with wide industry experience. It is ensured that no member of the assessment team has a business relationship with IFC, PAL & NAL beyond that required of this assignment.

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