Summary of Environmental Impacts and Mitigating Measures

All the impacts that are likely to be generated by the proposed Project is summarized in **Table N**. Mitigating measures specifically proposed for each of the impacts are also presented in a systematic manner in accordance to pre-construction, construction and operational phase. Hence, such data enable convenient identification of impacts along with their respective temporal (i.e., acute or residual) and spatial (i.e., magnitude) considerations.

Table N: Summary of Environmental Impacts and Mitigating Measures for the Proposed Project

PHASE OF DEVELOPMENT	ACTIVITIES	POTENTIAL IMPACTS	MITIGATING MEASURES	SIGNIFICANCE	REMARKS	REFERENCE PAGE
A. <u>Pre-</u> <u>Construction</u> <u>Phase</u>						
Reconnaissance study of the Project Site.		The activity is rather localized and not expected to generate any disturbances to the existing environment.	None.	Short-term.	The pre- construction stage basically involves documentation, legal approval from the relevant	7-1 & 8-1
Detail study of the existing condition.	Field survey and site investigation by engineering and environmental consultants.	impacts such as job			authorities, building construction design and development planning, field survey as well as site investigation.	

PHASE OF DEVELOPMENT	ACTIVITIES	POTENTIAL IMPACTS	MITIGATING MEASURES	SIGNIFICANCE	REMARKS	REFERENCE PAGE
B. <u>Construction</u> <u>Phase</u>						
Construction of the access road	Provision for proper transportation routes is given foremost consideration in any developmental project. This is to ensure convenience to the workers as well as enabling smooth transportation of construction materials and heavy machinery.	terms of noise and dust disturbances. Increment of traffic risks especially by heavy vehicles plying FR4 Jalan Kulim –	fallen debris from construction vehicles (i.e. sand, aggregates, etc.) removed by workers to	Short-term within the duration of the proposed Project.	The contractor should ensure that the transportation of heavy machineries, equipments and construction material adhere to specific guidelines from relevant authorities.	7-2 & 8-2
Main Access route to Project Site	Transportation of machineries, equipment and construction material to the site is via FR4 Jalan Kulim – Gerik and BKE Highway before entering the Project Site		at the access road junctions to control and direct traffic. Vehicles will have to observe speed limits and any damage done to the transportation routes should be repaired. Proper warning signs, signals or warning light and barricade are recommended to ensure safety and smooth flow of traffic.			

PHASE OF DEVELOPMENT	ACTIVITIES	POTENTIAL IMPACTS	MITIGATING MEASURES	SIGNIFICANCE	REMARKS	REFERENCE PAGE
B. Construction Phase Access Route within project site	Existing earthen routes within the project site.	As the access route has been established within the Project area, the magnitude of disturbance unto the physical environment may be considered as nominal.	constructed to avoid dirtying the public road. • Establishment of tarred road or compacted crusher run roads	Short-term within the duration of the proposed Project.	The contractor should ensure that the transportation of heavy machineries, equipments and construction material adhere to specific guidelines from relevant authorities.	7-3 & 8-2
Site Clearing and Biomass Disposal.	 Site clearing involve the removal of mainly of oil palms. Biomass generation is approximately: →~14,797,44 tons (total 3 phases, 300 acres) 	Loss of current vegetation and related habitats. May lead to soil erosion and increase in surface runoff. If not disposed off properly, can lead to water quality deterioration and attract unwanted pests Open burning of biomass or solid waste shall generate soot and dust.	conducted in three (3) phases to allow faunal migration. • Implementation of best management practices (BMPs) on-site (i.e., turfing, temporary earth drains and sediment basin). • Mulching of undergrowth / small woody plants on the slope / bare area to reduce soil erosion.	Short-term within the duration of the proposed Project.		7-3 to 7-5 & 8-3 to 8-5

PHASE OF DEVELOPMENT	ACTIVITIES	POTENTIAL IMPACTS	MITIGATING MEASURES	SIGNIFICANCE	REMARKS	REFERENCE PAGE
Mobilization on site	• Construction of workers camp. • Sewage to be generated during the construction stage is at 67,500 l/day¹ (~estimated 300 workers; which is equivalent to 300 PE).	 300 workers shall be needed during construction stage. Direct discharge of untreated sewage can 	 Stockpiled biomass must be covered so as to not leach TOC into the waterways. Contractor should place heavy emphasis in soil conservation by adopting environmentally integrated measures to counter against soil erosion. Sediment basin design must be based on "Urban Stormwater Manual for Malaysia, 2nd Edition or MASMA 2 (2012). Workers quarters and the site office should be kept clean at all time. Temporary toilets with septic tanks or SSTS (if PE>150) specified by SPAN (Suruhanjaya Perkhidmatan Air Negara) and should be desludged regularly. Small Sewage Treatment System (SSTS) is required to contain the sewage discharge of 300PE at the site to the compliance limits. No open-burning is allowed Water logged areas at the base camps should be drained properly 			7-3 to 7-5 & 8-3 to 8-5

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¹ Assumption during construction stage based on per worker with per capita discharge rate of 225I/day. Adapted from MS1228 Sewage Guidelines

PHASE OF DEVELOPMENT	ACTIVITIES	POTENTIAL IMPACTS	MITIGATING MEASURES	SIGNIFICANCE	REMARKS	REFERENCE PAGE
	Provision of maintenance yard/workshop.	 Heavy machinery and equipment can generate oily waste. Oil/ grease and hydraulic spill onto soil causing the soil and groundwater contamination. 	 Maintenance yard located away from waterways / drainage system, must self-contained and well-bunded. Proper skid tank storage to curtail the possibility of oil and grease contamination. Generated spent oil and grease from the maintenance works have to be stored and handled as per the Environmental Quality (Scheduled Wastes) Regulations 2005. 			7-6 & 8-8 to 8-11
Impact of earthworks.	 Cut and fill quantities for Phase 1 are approximated to cut 474,035 m³ and total fill 474,035 m³ respectively. The earthworks quantities for Phase 2 and Phase 3 to be detailed in the EMP Phase 2 and EMP Phase 3 before the development. 	generated from earthworks activities is probably in the form of soil washout into the river especially during heavy rain.	 Three (3) earthwork phases for entire development Erosion control proposed is by work scheduling, turfing & hydroseeding. Sediment Control proposed is sediment basin, sediment forebay and sediment fence/sand bag. One (1) sediment basin with forebay is proposed. Earth bund with sediment fence to be placed along the access road next to FR4 Jalan Kulim-Gerik. Runoff Management controls are Temporary Earth Drain, Earth bund, Drainage Outlet Protection and Temporary Waterway Crossing (TWC). 	Short term		7-7 to 7-11 & 8-11 to 8-24

PHASE OF DEVELOPMENT	ACTIVITIES	POTENTIAL IMPACTS	MITIGATING MEASURES	SIGNIFICANCE	REMARKS	REFERENCE PAGE
Impact of earthworks.	 Excavation of higher grounds to form platforms, roads and other areas as shown in design drawings. Filling to lower area to form embankments and platform to design levels. 	 Leveling of ground and the use of heavy machinery for the compaction of the fill material during land development and construction activities will give rise to dust and noise pollution. Internal access road within the site will be used as main access for earth transport. 	the use of hoarding, stabilized construction access, construction Road stabilization, entrance / outlet wash trough, and wetting of ground. Two (2) wash troughs are proposed. Any sediment generated from the site shall be retained in			7-7 to 7-11 & 8-11 to 8-24
Hydrology	Site clearing and earthwork activities will have a significant impact on the hydrological regime.	Clearing of the existing vegetation will increase in discharge into existing earth drain which drain into Sg. Karangan and eventually flow into Sg. Muda.	development, one (1) sediment basin proposed for the overall development area. • Surface drainage needs to be constructed in order to reduce the infiltration and erosion	Short term	Temporary drainage system will be designed to comply with the procedures as outlined in the MASMA manual.	7-9 to 7-10 & 8-25 to 8-27

PHASE OF DEVELOPMENT	ACTIVITIES	POTENTIAL IMPACTS	MITIGATING MEASURES	SIGNIFICANCE	REMARKS	REFERENCE PAGE
Soil Erosion	Site clearing and earthworks in the form of cut and fill activities. This activity will be only carried out at proposed built up area.	Under worst case scenario Soil Erosion rate for the overall earthworks Areas of the Project Site – 203.4 tons/ha/year. Total sediment yield for the overall Earthworks Areas of the Project Site – 16,579 tons per storm event (approximately 12 times higher than the existing condition of 1,395 tons per storm event) With these erosion control mitigation measures The average soil loss rate for the overall Earthworks Areas of the Project Site will be reduced to 3.0 tons/ha/year and the total sediment yield is 193 tons/year which is lower than the existing condition of 1,395 tons/year.	be carried out in three (3) earthworks stage. • Provision of a sediment basin at appropriate location for sediment control purposes for overall Project Site. • Maintenance of the drainage network and	Short term		7-34 to 7-41 & 8-11 to 8-27

PHASE OF DEVELOPMENT	ACTIVITIES	POTENTIAL IMPACTS	MITIGATING MEASURES	SIGNIFICANCE	REMARKS	REFERENCE PAGE
Air Pollution	Improper storage of raw construction materials such as cement, sand, gravels.	 Increased level of TSP/PM10 due to spillage or windblown dust from uncovered material which may have some effects on aesthetic value and health aspects. Leveling of ground and the use of heavy machinery for the compaction of the fill material during earthwork and construction activities will give rise to dust pollution. Traffic movement on dirt road will churn up the surface and may incite hazy condition especially during dry and windy periods. Based on on-site examination, prevailing shall be from the east direction. Anticipated immediate receptors are Kg. Padang Meha, INOKOM, road users of FR4 Jalan Kulim - Gerik at the eastern, western and northern region of the Project Site. 	external public roads. Proposed road network within the site to be constructed and tarred Proper covering of raw materials and topsoil stockpiles. Traffic management trough speed limits and regular maintenance of vehicles / machinery To erect hoarding along the eastern, northern and western boundary of the	Short-term within the duration of the proposed Project.	The air pollution problem is considered to be short-term problem and localised within the working areas.	7-129 to 7- 133 & 8-28 to 8-31

PHASE OF DEVELOPMENT	ACTIVITIES	POTENTIAL IMPACTS	MITIGATING MEASURES	SIGNIFICANCE	REMARKS	REFERENCE PAGE
Noise Pollution	Earthworks	Nearest residential receptor shall experience minimal noise level emitted from tractors, scrappers, trucks and, jackhammer/rock drills.	Noisy construction activities should be done only during day-time to preserve tranquility of night-time and reduce level of nuisance to surrounding population.	Similarly, with air pollution, noise pollution is also localized and short term.		7-60 to 7- 163 & 8-32
Paper Plant and Infrastructural Works	 Piling Activities Solid Waste Traffic and Transportation Impact 	 High noise level will create nuisance and pose psychological effect to the receptors, and to some extend may cause physiological effect. Based on the simulation shown that by using jack in pile for STP/SSTS at the distance 59m from the receptors, the noise emission at 90 percentiles of the time is below than the limit of L₉₀=60. Bored piling can be considered to be used for water treatment plant, pulping workshop, paper making workshop and IETS Improper disposal of construction debris (cement, pebbles, tiles) can clog drain and could impact project site's safety. During construction phase, lorries and trucks delivering building materials, aggregate, etc will increase traffic flow of the area especially at BKE and FR4 Jln Kulim-Gerik. 	 Jack in pile is recommended to use at the area next to the receptors as it offer advantages in terms of low noise and vibration during pile installation. Bored piling can also be considered to be used at the proposed water treatment plant, pulping workshop, paper making workshop and IETS, i.e., 120m, 237m away from the project boundary as based on the simulation shows that the noise emission at 90 percentiles of the time is below than the limit of L90=60. All domestic and building waste will be disposed off site to an approved dumpsite. Traffic management is necessary to control traffic movements especially during peak 	Short-term within the duration of the proposed Project.		7-10 to 7-11, 7-160 to 7- 163, 7-165 to 7-166 & 8-32 to 8-34, 8-39 to 8-40

PHASE OF DEVELOPMENT	ACTIVITIES	POTENTIAL IMPACTS	MITIGATING MEASURES	SIGNIFICANCE	REMARKS	REFERENCE PAGE
C. <u>Operational</u> <u>Phase</u>						
Transportation of raw materials and chemicals	Transportation of raw materials and chemicals by vehicles.	 The risk of spillage / leakage due to leaking / damaged containers that causes contamination to the nearby water bodies. Incompatible raw materials and chemicals transported in the same vehicle will cause reaction to take place creating fumes or fire. Increased probability of road accident by using undedicated road networks. 	vehicle shall be equipped with the	Long-term.		7-18 & 8-41

PHASE OF OPERATION	ACTIVITIES	POTENTIAL IMPACTS	MITIGATING MEASURES	SIGNIFICANCE	REMARKS	REFERENCE PAGE
Handling of raw materials and chemicals	Incoming chemicals. Residue wastes or sludge generated from the operation process.	 Mislabeling or no labeling of residue waste or hazardous chemicals poses danger to the safety of the workers. Direct impact towards worker's health when handling the hazardous chemicals. 	 Recordkeeping should be maintained. All drums and other storage containers must be properly and prominently labeled and tightly sealed. Containers should be compatible with the stored material and free of leaks. Suitable personal protective equipments (i.e., goggles, gloves and mask) have to be equipped all the time. 	Long-term.		7-18 & 8-42

PHASE OF OPERATION	ACTIVITIES	POTENTIAL IMPACTS	MITIGATING MEASURES	SIGNIFICANCE	REMARKS	REFERENCE PAGE
Storage of raw materials and chemicals	Incoming of raw materials and chemicals.	Leaking / damaged containers, accidental spills could cause adverse effects to the workers and contaminate the air while liquid chemicals contaminate the water bodies. Leaching caused by inadequate protection against rain and the leachate may run off into surface waters or seep into groundwater.	place and avoid any	Long-term.		7-19 & 8-42

PHASE OF OPERATION	ACTIVITIES	POTENTIAL IMPACTS	MITIGATING MEASURES	SIGNIFICANCE	REMARKS	REFERENCE PAGE
Workers' Safety and Chemical Hazard	 Operation of machineries. Maintenance of plant machineries. Chemical hazard of the raw material. 	Accidents are prone to happen if without proper maintenance of the machinery and know- how skill of the workers for chemical hazards.	 Trainings cover emergency procedures should be provided to the workers. The maintenance of plant machineries should also be conducted on a regular basis. Material safety data sheet should be placed at the noticeable area when handling materials. 	Long-term.		7-19 & 8-43

PHASE OF OPERATION	ACTIVITIES	POTENTIAL IMPACTS	MITIGATING MEASURES	SIGNIFICANCE	REMARKS	REFERENCE PAGE
C. <u>Operational</u> <u>Phase</u>						
Stormwater Management		Without a proper drainage planning and stormwater management, water quality and surface runoff will be disturbed as the landuse constituent of the Project Site will have gone through a major alteration.	one (1) major catchment area (Sg. Karangan catchment, one of the tributaries of the	that there will be no localized flooding upon		7-19 to 7-20 & 8-44

PHASE OF OPERATION	ACTIVITIES	POTENTIAL IMPACTS	MITIGATING MEASURES	SIGNIFICANCE	REMARKS	REFERENCE PAGE
Hydrology	 During the operational phase, 22 MLD per phase of water will be abstracted from Sg Karangan for the plant processing purposes. As the development is divided into 3 phases, the total abstraction will amount to 66 MLD with 95 % of the water will be used, treated and discharged back to Sg Karangan as treated effluent discharge. Therefore, the nett river abstraction will amount to 3.3 MLD (5% consumptive use) when the 3 phases of the development are in operation. 	assess the impact on the river availability to the downstream water user. The assessment is focussed towards the Titi Karangan scheme (3.2 km downstream of the Project intake). • Currently, Titi Karangan diverts 27.6 MLD (0.32 m³/s) of water by gravity from Sg Karangan to the irrigation scheme according to planting schedule. • From the water availability analysis, without the abstraction from the Project site, the water availability at Titi Karangan exceeds 27.6 m³/s at 98% of the time in a year. With the	To comply with approval condition and requirement by JPS Kedah and MPKK.	Long-term.		7-20, 7-42 to 7-44

PHASE OF OPERATION	ACTIVITIES	POTENTIAL IMPACTS	MITIGATING MEASURES	SIGNIFICANCE	REMARKS	REFERENCE PAGE
Water Pollution	Wastewater from the human population at the dormitory. Industrial effluent from paper plant IETS.	Low Flow Scenario - Upon operation of the plant, effluent discharge will be released after the treatment from the IETS to Sg. karangan. Under the 7Q10 low flow condition, the summary of the simulated results for each parameter is shown in Table N1 below. BOD will deteriorate from baseline Class III to Class IV under Phase 1 operation and further deteriorates to Class V under Phase 1 & 2 operation. COD will deteriorate from baseline Class II to Class III under Phase 1 and further deteriorate to Class IV under Phase 1 and 2 operation. AN will deteriorate from baseline Class II to Class IV under Phase 1 and 12 operation. AN will deteriorate from baseline Class II to Class IV under Phase 1 and further deteriorate to Class V under Phase 1 and 2 operation.	 Proper maintenance of STP/SSTS is necessary to ensure its good operational Effluent from the plant will be treated in the IETS to comply with Standard A limits under the Environmental Quality (Industrial Effluent) Regulations 2009. In the event that the IETS fails, effluent will be contained in a Contingency Tank which has the capacity to retain the effluent up to 6.36 hours or 5,833 m3 capacity. The plant operation will be slow down until the IETS operation is resumed as normal. Usually the recovery should take 2 hours and operation will resume as normal. In the event that the IETS operation is unable to resume within the specified period and the storage of holding tank has reached 90% full, the whole production will be ceased. 	Long-term.	The design of sewage treatment plant or small sewerage treatment system (SSTS) shall comply to "Malaysian Sewerage Industry Guidelines -Volume IV - Sewage Treatment Plants (Third Edition SPAN 2009)". The IETS design needs to comply to the requirements of the Environmental Quality Act, 1974.	7-45 to 7-103 & 8-45 to 8-57

PHASE OF OPERATION	ACTIVITIES	POTENTIAL IMPACTS	MITIGATING MEASURES	SIGNIFICANCE	REMARKS	REFERENCE PAGE
Water Pollution	Wastewater from the human population at the dormitory. Industrial effluent from paper plant IETS.	Overall, WQ condition is		Long-term.	 The design of sewage treatment plant or small sewerage treatment system (SSTS) shall comply to "Malaysian Sewerage Industry Guidelines -Volume IV - Sewage Treatment Plants (Third Edition SPAN 2009)". The IETS design needs to comply to the requirements of the Environmental Quality Act, 1974. 	7-45 to 7-103 & 8-45 to 8-57

Table N1 (a): Summary of Simulated Results of WQ Parameters for Sg. Karangan under the 7Q10 Low Flow Condition

WQ				Ope	ration Phas	е
Parameters	Class/	Baseline	Phase 1	Phase 1	Phase 1	Phase 1 + 2 + 3
Parameters	mg/L		only	+ 2	+ 2 + 3	(worst case)
рH	Class	I	II	II	II	III
DO	Class	II-III	III	III-IV	III-IV	V
BOD	Class	III	IV	V	V	V
COD	Class	II	III	IV	IV	V
AN	Class	II	IV-V	V	V	V
TSS	Class	I	I	I-II	II	V
NO ₃	Class	2.0	3.6 - 3.7	5.4 - 5.6	5.6 - 6.0	5.6 - 6.0
TP	mg/L	8.3	6.7 - 7.0	5.2 - 5.8	4.8 - 5.0	4.8 - 5.0
Chloride	mg/L	7.0	45 - 50	85 - 100	100 - 110	236 - 285
TOC	mg/L	2.2	5.0 - 5.6	8.8 - 9.9	9.0 - 10.0	800 - 1000

Table N1(b): Summary of Simulated Results for each Parameter for Sg. Muda under the Low Flow Condition

WQ	Class /		Operational				
Parameters	Class/ mg/L	Baseline	Phase 1 only	Phase 1 + 2	Phase 1 + 2 + 3	Phase 1 + 2 + 3 (worst case)	
pН	Class	II	II	II	II	II	
DO	Class	II	II	II	II	II - III	
BOD	Class	III	III	III	III	V	
COD	Class	II	II	II	II	III- IV	
AN	Class	III	III	III	III	III	
TSS	Class	I	I	I	I	II	
NO ₃	Class	2.2	2.2	2.2	2.3	2.3	
TP	mg/L	13.2	13.2	13.2	13.2	13.2	
Chloride	mg/L	5.0	6.0	6.8	8.5	10.2	
TOC	mg/L	3.0	3.0	3.0	3.0	19.4	

Table N2(a): Summary of Simulated Results for each Parameter for Sg. Karangan under the Normal Flow Condition

1440				0	perational	
WQ Parameters	Class/ mg/L	Baseline	Phase 1 only	Phase 1 + 2	Phase 1 + 2 + 3	Phase 1 + 2 + 3 (worst case)
pН	Class	I	I	I	I	II
DO	Class	II	II	II	II	V
BOD	Class	III	IV	IV	IV	V
COD	Class	II	II	II	II-III	V
AN	Class	II	III	III	IV	IV
TSS	Class	I	I	I	I	V
NO ₃	Class	2.0	2.3	2.6	2.9	2.9
TP	mg/L	8.3	8.0	7.8	7.4	8.3
Chloride	mg/L	7.0	15.3-16.0	23-25	30-33	70-83
TOC	mg/L	2.0	2.8	3.4	3.9-4.2	220-270

Table N2(b): Summary of Simulated Results for each Parameter for Sg. Muda under the Normal Flow Condition

WO				O	perational	
WQ Parameters	Class/ mg/L	Baseline	Phase 1 only	Phase 1 + 2	Phase 1 + 2 + 3	Phase 1 + 2 + 3 (worst case)
рН	Class	II	II	II	II	II
DO	Class	II	II	II	II	II
BOD	Class	III	III	III	III	IV-V
COD	Class	II	II	II	II	II-III
AN	Class	II	II	II	II	II
TSS	Class	II	II	II	II	II
NO ₃	Class	2.2	2.2	2.2	2.2	2.2
TP	mg/L	13.6	12.9	12.9	12.9	12.9
Chloride	mg/L	5.0	5.4	5.4	5.7	7.3
TOC	mg/L	3.0	3.0	3.0	3.0	10

PHASE OF OPERATION	ACTIVITIES	POTENTIAL IMPACTS	MITIGATING MEASURES	SIGNIFICANCE	REMARKS	REFERENCE PAGE
Water Pollution		 The additional WQ modelling was carried out to find out the threshold of concentration limit that could maintain the WQ class for BOD and AN under the operational phase 1 during 7Q10 low flow condition. In order for BOD and AN to maintain as per baseline condition without affecting the current river class during low flow, the absolute concentration quality for BOD and AN is 7 mg/L and 2 mg/L respectively. To achieve such condition, no water abstraction from Sg. Karangan and water quantity to be sourced from other alternative. 	 Effluent monitoring programme for IETS is recommended to ensure the quality of effluent discharge is within the acceptable quality and quantity limit. It is crucial to conduct regular inspection and maintenance to detect early sign of failure or leakage if any. Preventive maintenance of the WWTP components with regular system checks should be conducted to detect early signs of system failure. The online monitoring analyser is proposed at the final discharge point within the plant compound prior to discharging out to downstream river and the parameters to be monitored are COD, BOD and AN. The in-house laboratory testing will analyse the samples collected from primary clarifier, anaerobic treatment, aeration tank, secondary clarifier and tertiary clarifier for parameters of COD, BOD, AN and pH. 			7-45 to 7-103 & 8-45 to 8-57

PHASE OF OPERATION	ACTIVITIES	POTENTIAL IMPACTS	MITIGATING MEASURES	SIGNIFICANCE	REMARKS	REFERENCE PAGE
Water Pollution			Additional Option for Consideration during Operation Phase under the Low Flow Condition— As the Project will cause impact to river WQ during low flow condition, additional mitigation measures proposed to abate WQ deterioration during low flow condition are: Alternative discharge points; Better treated effluent standard for selected parameters; Monitoring of water level and flow meter at Sg. Karangan intake to monitor river water level and/or flow; and reduce effluent discharge by recycling for internal plant usage.			7-45 to 7-103 & 8-45 to 8-57
Groundwater Quality		Possibilities of groundwater contamination due to spillage or leakage oil/grease and scheduled waste from the paper mill.	scheduled waste at site.	Impacts can be managed.	Long-term groundwater monitoring reveal changes to the groundwater system which differs with those predicted by the recalibrated groundwater model; the model should again be verified and re-calibrated with all available monitoring data.	7-104 to 7- 128 & 8-58 to 8-60

Cont...'

PHASE OF OPERATION	ACTIVITIES	POTENTIAL IMPACTS	MITIGATING MEASURES	SIGNIFICANCE	REMARKS	REFERENCE PAGE
Waste Management -Solid Waste	 Solid waste expected to be generated from the workers from office and dormitory onsite is 2,780 kg/day. Solid wastes such as plastic and metal generated from the stock preparation and pulping workshop. 	Improper disposal of solid waste may affect aesthetic quality, a source of water contamination and proliferation of disease vectors.	 Implementation of a proper and adequate waste collection system by the Local Authority. Solid waste shall only be disposed at an approved dumpsite landfill under the jurisdiction of Majlis Perbandaran Kulim (MPKk). The plastic and metal can be recycled and sell to the recycling contractors. 	Long-term.	Solid waste management is under the responsibility of local authority (Majlis Perbandaran Kulim)	& 8-60 to 8-
-Sullage and Kitchen Waste Management		 All drainage systems and piping will be clogged if the sullage and kitchen wastes are discharged without a proper trap. 	Grease traps must to be prepared for all kitchens in the workers dormitory to trap the Fat, Oil and Grease (FOG).	Long-term.		7-21 & 8-48 to 8-57

PHASE OF OPERATION	ACTIVITIES	POTENTIAL IMPACTS	MITIGATING MEASURES	SIGNIFICANCE	REMARKS	REFERENCE PAGE
Scheduled Wastes	 Sludge generation from the proposed pulping workshop, water treatment plant (WTP) and industrial effluent treatment system (IETS). Fly ash and slag (bottom ash) from boilers and ESP. 	kg/day/phase based on the removal of 26mg/L (baseline TSS at W6) of solids from the raw river water pumping rate of 22MLD. • Scheduled waste (SW204 sludge from IETS) generated during the	apply for special management of scheduled wastes under Section 7, Environmental Quality (Scheduled Wastes) Regulations 2005. • Sludge or WTR from water treatment plant will be disposed of to the landfill. • Sludge of IETS will be		The Project Proponent has to apply for special management of scheduled wastes under Section 7, Environment al Quality (Scheduled Wastes) Regulations 2005.	7-22 to 7-23 & 8-61 to 8- 63

PHASE OF OPERATION	ACTIVITIES	POTENTIAL IMPACTS	MITIGATING MEASURES	SIGNIFICANCE	REMARKS	REFERENCE PAGE
Air and Noise	Operation of process equipment and pollution control system. Traffic flow to and from the Paper Plant for material loading and unloading.	storage area and process area.	precipitator (ESP). Compliance to EQ (Clean Air) Regulations 2014. Continuous emission monitoring system (CEMS) to be provided to monitor and record selected gas parameters to monitor the imminent breach of emission limit and is interlocked with control system to adjust various processes parameters to avoid such exceedance. Regulatory procedures or control of traffic emissions to comply with the legislative limits. Proposed heavy landscape buffer to be established at the	Residual impacts	The air quality modeling showed most of the predicted Maximum Average Incremental Concentration for Identified pollutants (PM2.5, PM10, NOx, SOx) by normal scenario are within the Malaysian Air Quality Standards 2013 (Standard 2020)	7-134 to 7- 164 & 8-64 to 8-67

Table N3(a): Predicted Maximum Average Incremental Concentration for Identified Pollutants (in $\mu g/m^3$) Normal Scenario

Parameter	Averaging	Baseline Level	Phase	Highest				Off-sit	te ASRs				MAAQS
	Time (Figure)	(μg/m³)		MAIC	ASR1: Indu near Ir		Kg. Padan	acent with g Meha on rtheast	ASR 3: Adja Padang I Eastern B	Meha on	ASR4: Tar Cinta S		2013 (Standard [2020])
					Predicted MAIC	GLC	Predicted MAIC	GLC	Predicted MAIC	GLC	Predicted MAIC	GLC	
			Phase 1	4.3	1.4	48.4	3.2	58.2	2.6	55.6	1.0	53.0	
	24-hours		Phase 1+2	6.6	2.5	49.5	5.6	60.6	3.6	56.6	1.5	53.5	100
Particulate matter sized 10 microns or less (PM ₁₀)		Off-site ASRs A1: 47 A2: 55	Phase 1+2+3	7.5	3.0	54.5	6.4	61.4	3.9	56.9	1.8	53.8	
		A3: 53 A4: 52	Phase 1	0.8	0.18	-	0.66	-	0.38	-	0.15	-	
	Annual Average	(24-hours averaging time)	Phase 1+2	1.2	0.27	-	1.14	-	0.63	-	0.25	-	40
	Average		Phase 1+2+3	1.4	0.32	-	1.35	-	0.80	-	0.29	-	1
	A1: 29 A2: 32 A3: 28 A4: 26 Annual Average (24-hours average time)		Phase 1	3.8	1.3	30.3	2.8	34.8	2.3	30.3	0.8	26.8	15
		A2: 32 A3: 28 A4: 26 (24-hours averaging	Phase 1+2	5.8	2.2	31.2	4.9	36.9	3.1	31.1	1.4	27.4	
Particulate matter			Phase 1+2+3	6.6	2.6	31.6	5.7	37.7	3.5	31.5	1.6	27.6	
sized 2.5 microns or less (PM _{2.5})			Phase 1	0.7	0.16	-	0.58	-	0.34	-	0.13	-	
			Phase 1+2	1.1	0.24	-	1.00	-	0.55	-	0.22	-	
	(Plate 7.32)		Phase 1+2+3	1.3	0.28	-	1.19	-	0.71	-	0.26	-	
			Phase 1	362.6	101.9	-	106.4	-	123.4	-	95.4	-	
	1-hour		Phase 1+2	771.5	213.23	-	186.8	-	209.3	-	186.4	-	30 mg/m ³ or 30,000
		Off-site ASRs A1: 4.3	Phase 1+2+3	959.3	308.8	-	241.6	-	247.5	-	273.1	-	μg/m³
Carbon Monoxide	8-hours	A2: 3.6 A3: 4.0	Phase 1	88.7	38.8	43.1	60.6	64.2	51.1	55.1	17.5	21.5	
(CO)		A4: 4.0	Phase 1+2	181.1	82.9	87.2	127.4	131.0	83.7	87.7	33.8	37.8	10 mg/m³
		(8-hours averaging time)	Phase 1+2+3	230.9	121.7	126.0	178.0	181.6	108.1	112.1	48.9	52.9	or 10,000 µg/m³

Parameter	Averaging	Baseline Level	Phase	Highest				Off-sit	e ASRs				MAAQS								
	Time (Figure)	(μg/m³)		MAIC	ASR1: Indu near I	ıstrial Area nokom	ASR 2: Adja Kg. Padang the Nor	g Meha on	ASR 3: Adja Padang I Eastern B	Meha on	ASR4: Tan Cinta S		2013 (Standard [2020])								
					Predicted MAIC	GLC	Predicted MAIC	GLC	Predicted MAIC	GLC	Predicted MAIC	GLC									
			Phase 1	145.2	40.8	-	42.6	-	49.4	-	38.2	-									
Nitrogen Oxides (NO _x) as 100% NO ₂	1-hour	Off-site ASRs	Phase 1+2	0309. (Within Project Site)	85.3	-	74.8	-	83.8	-	74.7	-	280								
		A1: ND A2: ND A3: ND A4: ND	Phase 1+2+3	384.2 (Within Project Site)	123.7	-	96.8	-	99.1	-	109.4	-									
	24-hours	(24-hours averaging time)	Phase 1	15.6	5.2	5.2	11.5	11.5	9.3 9.3 3.5	3.5											
			Phase 1+2	27.9	11.1	11.1	24.3	24.3	15.1	15.1	6.6	6.6	70								
			Phase 1+2+3	37.8	16.3	16.3	33.8	33.8	19.6	19.6	9.6	9.6									
			Phase 1	145.2	40.8	-	42.6	-	49.4	-	38.2	-									
	1-hour	our Off-site ASRs A1: ND A2: ND A3: ND A4: ND									Phase 1+2	309.0 (Within Project Site)	85.3	-	74.8	-	83.8	-	74.7	-	250
Sulphur Dioxide (SO ₂)			Phase 1+2+3	384.2 (Within Project Site)	123.7	-	96.8	-	99.1	-	109.4	-									
		(24-hours averaging time)	Phase 1	15.6	5.2	5.2	11.5	11.5	9.3	9.3	3.5	3.5	80								
	24-hours		Phase 1+2	27.9	11.1	11.1	24.3	24.3	15.1	15.1	6.6	6.6									
			Phase 1+2+3	37.8	16.3	16.3	33.8	33.8	19.6	19.6	9.6	9.6									

Notes: MAAQS, 2013 (2020) = Malaysian Ambient Air Quality Standard, 2013 at 2020

ND – Not detected, ASRs – Air Sensitive Receptors

Ground Level Concentration = Baseline Level + Predicted MAIC

Baseline Ambient Air Quality Monitoring carried out from 11 to 15 March 2019

 $m{BOLD} = Exceedance$

Table N3(b): Predicted Maximum Average Incremental Concentration for Identified Pollutants (in μg/m³) during Normal Scenario in Compliance of 25% Threshold

No.	Scenario	Identified Air Sensitive Receptor	Air Sensi	tive Receptor In (μg/m³)	cremental	Compliance with 25%
			Phase 1	Phase 1+2	Phase 1+2+3	Threshold
	Pollutant: PM ₁₀	ASR1: Industrial Area near Inokom	1.4	2.5	3.0	YES
	24-hours Average	ASR2: Adjacent with Kg. Padang Meha on the Northeast	3.2	5.6	6.4	YES
1	Limit: 100 mg/m³ (MAAQS 2013 [Standard 2020])	ASR3: Adjacent to Kg. Padang Meha on Eastern Boundary	2.6	3.6	3.9	YES
	25% Threshold: 25 μg/m³	ASR4: Taman Desa Cinta Sayang	1.0	1.5	1.8	YES
	Pollutant: PM ₁₀	ASR1: Industrial Area near Inokom	0.18	0.3	0.3	YES
2	Annual Average	ASR2: Adjacent with Kg. Padang Meha on the Northeast	0.66	1.1	1.4	YES
2	Limit: 40 mg/m³ (MAAQS 2013 [Standard 2020])	ASR3: Adjacent to Kg. Padang Meha on Eastern Boundary	0.38	0.6	0.8	YES
	25% Threshold: 10 μg/m³	ASR4: Taman Desa Cinta Sayang	0.15	0.3	0.3	YES
	Pollutant: PM _{2.5}	ASR1: Industrial Area near Inokom	1.3	2.2	2.6	YES
2	24-hours Average	ASR2: Adjacent with Kg. Padang Meha on the Northeast	2.8	4.9	5.7	YES
3	Limit: 35 mg/m³ (MAAQS 2013 [Standard 2020])	ASR3: Adjacent to Kg. Padang Meha on Eastern Boundary	2.3	3.1	3.5	YES
	25% Threshold: 8.75 μg/m³	ASR4: Taman Desa Cinta Sayang	0.8	1.4	1.6	YES
	Pollutant: PM _{2.5}	ASR1: Industrial Area near Inokom	0.16	0.2	0.3	YES
_	Annual Average	ASR2: Adjacent with Kg. Padang Meha on the Northeast	0.58	1.0	1.2	YES
4	Limit: 15 mg/m³ (MAAQS 2013 [Standard 2020])	ASR3: Adjacent to Kg. Padang Meha on Eastern Boundary	0.34	0.6	0.7	YES
	25% Threshold: 3.75 μg/m ³	ASR4: Taman Desa Cinta Sayang	0.13	0.2	0.3	YES
	Pollutant: CO	ASR1: Industrial Area near Inokom	101.9	213.2	308.8	YES
	1-hour Average	ASR2: Adjacent with Kg. Padang Meha on the Northeast	106.4	186.8	241.6	YES
5	Limit: 30,000 mg/m³ (MAAQS 2013 [Standard 2020])	ASR3: Adjacent to Kg. Padang Meha on Eastern Boundary	123.4	209.3	247.5	YES
	25% Threshold: 7,500 μg/m³	ASR4: Taman Desa Cinta Sayang	95.4	186.4	273.1	YES
	Pollutant: CO	ASR1: Industrial Area near Inokom	38.8	82.9	121.7	YES
6	8-hours Average	ASR2: Adjacent with Kg. Padang Meha on the Northeast	60.6	127.4	178.0	YES
6	Limit: 10,000 mg/m³ (MAAQS 2013 [Standard 2020])	ASR3: Adjacent to Kg. Padang Meha on Eastern Boundary	51.1	83.7	108.1	YES
	25% Threshold: 2,500 μg/m³	ASR4: Taman Desa Cinta Sayang	17.5	33.8	48.9	YES
	Pollutant: SO ₂	ASR1: Industrial Area near Inokom	40.8	85.3	123.7	YES
7	1-hour Average	ASR2: Adjacent with Kg. Padang Meha on the Northeast	42.6	74.8	96.8	YES
'	Limit: 250 mg/m³ (MAAQS 2013 [Standard 2020])	ASR3: Adjacent to Kg. Padang Meha on Eastern Boundary	49.4	83.8	99.1	YES
	25% Threshold: 62.5 μg/m³	ASR4: Taman Desa Cinta Sayang	38.2	74.7	109.4	YES
		ASR1: Industrial Area near Inokom	5.2	11.1	16.3	YES
	Pollutant: SO ₂	ASR2: Adjacent with Kg. Padang Meha on the Northeast	11.5	24.3	33.8	YES
8	24-hours Average	ASR3: Adjacent to Kg. Padang Meha on Eastern Boundary	9.3	15.1	19.6	YES
	Limit: 80 mg/m³ (MAAQS 2013 [Standard 2020]) 25% Threshold: 20 μg/m³	ASR4: Taman Desa Cinta Sayang	3.5	6.6	9.6	YES

Table N3(c): Predicted Maximum Average Incremental Concentration for NO₂ (in μg/m³) during Normal Scenario in Compliance of 25% Threshold

No.	Scenario	Identified Air Sensitive Receptor	Air Sensitive Receptor Incremental (μg/m³)- NOx as 100% NO ₂		Air Sensitive Receptor Incremental (µg/m³)- NOx as 10% NO ₂		Compliance with 25%	Incre	nsitive Re mental (µ x as 35%	g/m³)-	Compliance with 25%		
			Phase 1	Phase 1+2	Phase 1+2+3	Phase 1	Phase 1+2	Phase 1+2+3	Threshold	Phase 1	Phase 1+2	Phase 1+2+3	Threshold
		ASR1: Industrial Area near Inokom	40.8	85.3	123.7	4.08	8.53	12.37	YES				
1	1-hour Average Limit: 280 µg/m³ (MAAQS 2013 [Standard 2020]) 25% Threshold: 70 µg/m³	ASR2: Adjacent with Kg. Padang Meha on the Northeast	42.6	74.8	96.8	4.26	7.48	9.68	YES				
l I		ASR3: Adjacent to Kg. Padang Meha on Eastern Boundary	49.4	83.8	99.1	4.94	8.38	9.91	YES				
		ASR4: Taman Desa Cinta Sayang	38.2	74.7	109.4	3.82	7.47	10.94	YES				
		ASR1: Industrial Area near Inokom	5.2	11.1	16.3					1.8	3.9	5.7	YES
	24-hours Average Limit: 70 μg/m³ (MAAQS 2013 [Standard 2020]) 25% Threshold: 17.5 μg/m³	ASR2: Adjacent with Kg. Padang Meha on the Northeast	11.5	24.3	33.8					4.0	8.5	11.8	YES
2		ASR3: Adjacent to Kg. Padang Meha on Eastern Boundary	9.3	15.1	19.6					3.3	5.3	6.9	YES
		ASR4: Taman Desa Cinta Sayang	3.5	6.6	9.6					1.2	2.3	3.36	YES

Table N3(d): Predicted Maximum Average Incremental Concentration for Identified Pollutants during Abnormal Situation (in μg/m³)

Parameter	Averaging	Baseline Level	Highest				Off-sit	e ASRs				MAAQS
	Time	(μg/m³)	(µg/m³) MAIC		ASR1: Industrial Area near Inokom		ASR 2: Adjacent with Kg. Padang Meha on the Northeast		cent to Kg. 1eha on oundary	ASR4: Taman Desa Cinta Sayang		2013 (Standard [2020])
				Predicted MAIC	GLC	Predicted MAIC	GLC	Predicted MAIC	GLC	Predicted MAIC	GLC	
Particulate matter sized 10 microns or less (PM ₁₀)	1-hour	Off-site ASRs A1: 47 A2: 55 A3: 53 A4: 52 (24-hours averaging time)	2,727.5	751.2	798.2	637.5	692.5	872.8	925.8	602.5	654.5	-
Particulate matter sized 2.5 microns or less (PM _{2.5})	1-hour	Off-site ASRs A1: 29 A2: 32 A3: 28 A4: 26 (24-hours averaging time)	2,304.1	634.6	663.6	538.6	570.6	737.3	765.3	509.4	535.4	-

Notes: MAAQS, 2013 (2020) = Malaysian Ambient Air Quality Standard, 2013 at 2020

ASRs - Air Sensitive Receptors

Ground Level Concentration = Baseline Level + Predicted MAIC

Baseline Ambient Air Quality Monitoring carried out from 11 to 15 March 2019

PHASE OF OPERATION	ACTIVITIES	POTENTIAL IMPACTS	MITIGATING MEASURES	SIGNIFICANCE	REMARKS	REFERENCE PAGE
Traffic	Increase in traffic activities would be a source of impact on both the air and noise quality.	FR4 Jalan Kulim-Gerik, BKE are expected to receive the increased traffic volume from the proposed development.	 Designing the facilities on the trucks/vehicles to minimize the likelihood of spillage occurring; Scheduling of the transportation trucks to ensure the truck turnaround time is not delayed and to prevent truck-waiting within the site, which will lead to a line-up of truck along the internal road near INOKOM and along the FR 4 Jalan Kulim-Gerik. Strict adherence to the relevant regulations pertaining to road transport. 	Long-term.		7-165 to 7- 172 & 8-75
Biological Environment	Enhance the aesthetic value of the Project Site with landscape programme.	 Biological impacts are basically upon re-planting of greeneries by landscaping. This activity could further attract some fauna species to the Project Site. Loss of the existing terrestrial biological environment during the establishment of a built development. There will be reduction in both fish and prawn catches by recreational fishermen from the river due to water quality in Sg. Karangan will be marginally impacted. 	diversify the flora and fauna species, albeit nominal in the Site. Implementation of heavy landscape along the	Long-term.		7-23 to 7-25 & 8-68 to 8- 71

PHASE OF OPERATION	ACTIVITIES	POTENTIAL IMPACTS	MITIGATING MEASURES	SIGNIFICANCE	REMARKS	REFERENCE PAGE
Socio-economic Environment	 Potential positive impacts on the socio-economic environment are evident with the implementation of the proposed Project. Occupational hazard and residual impacts such as noise, air emission, industrial effluent discharge during the operational phase. 	 employment opportunities. Occupational hazard during operational stage is prevalent. Fear of residual impacts from the operation of the paper plant, i.e., noise, air emission, industrial effluent discharge 	IETS must comply with Standard A level for Environmental Quality (Industrial Effluent) Regulations 2009. • Compliance to EQ (Clean Air) Regulations 2014. • Aspect of safety			7-25 to 7-29 & 8-71 to 8-73

PHASE OF OPERATION	ACTIVITIES	POTENTIAL IMPACTS	MITIGATING MEASURES	SIGNIFICANCE	REMARKS	REFERENCE PAGE
Environmental Management Plan (EMP)	Monitoring, Reporting & Auditing			Long-term.		9-1 to 9-24
Competent Persons	Environmental Officer, Competent person for Industrial Effluent Treatment System (IETS), Air Pollution Control System and CePSWaM.					9-1 to 9-24 5-70 to 5-71, 5-94
Abandonment						7-17