

Environmental and Social Due Diligence Report

Project Number: 47083-004
December 2019

INDIA: Accelerating Infrastructure Investment Facility in India – Tranche 3 Mytrah Vayu (Pennar) Private Limited (Part 8 of 9)

Prepared by India Infrastructure Finance Company Limited for the India Infrastructure Finance Company Limited and the Asian Development Bank.

This environmental and social due diligence report is a document of the borrower. The views expressed herein do not necessarily represent those of ADB's Board of Directors, Management, or staff, and may be preliminary in nature.

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	the project to achieve sound environmental and social performance. MEIPL will communicate the policy to all levels of its organization.		effectiveness and communication of the policy will be ensured.		
1.3	MEIPL will establish and maintain a process for identifying the environmental and social risks and impacts of the project. The type, scale and location of the project guide the scope and level of effort devoted to the risks and impacts identification process.	<p>Use a screening process for each proposed project, as early as possible, to determine the appropriate extent and type of environmental assessment so that appropriate studies are undertaken commensurate with the significance of potential impacts and risks.</p> <p>Conduct an environmental assessment for each proposed project to identify potential direct, indirect, cumulative and induced impacts and risks to physical, biological, socioeconomic (including impacts on livelihood through environmental media, health and safety, vulnerable groups and gender issues) and physical cultural resources in the context of the project's area of influence. Assess potential trans-boundary and global impacts, including climate change. Use strategic environmental assessment where appropriate.</p>	ESIA in line with the ESMS would be conducted for category A and B projects.		
1.4	The project (or business activities, as appropriate) will comply with the applicable laws and regulations of the jurisdictions in which it is being undertaken, including those laws implementing host country obligations under international law.	The project will comply with the host country's social and environmental laws and regulations, including those laws implementing host country obligations under international law.			

Sl. No	IFC Requirements in context of MEIPL	ADB Requirements	Remarks (where required)	Observation/Gap	Recommendation
1.5	<u>Management Programs</u> Management of a programme (with defined desired outcomes as measurable events) to mitigate and implement improvement measures and actions that address identified social and environmental risks and impacts.	Prepare an Environmental Management Plan, Resettlement Plan and/or Indigenous Peoples Plan to address (as per the applicability) environmental and social risks and impacts.			
1.6	MEIPL will establish, maintain and strengthen as necessary an organizational structure that defines roles, responsibilities and authority to implement the SEMS. Key environmental and social responsibilities should be well defined and communicated to the relevant personnel and to the rest of MEIPL's organization.	This requirement is subsumed within the ESMS or EMP, RP or IPP.			
1.7	<u>Trainings</u> to employees and contractors with direct responsibilities for activities related principles that guide the project to achieve sound environmental and social performance.	This requirement is subsumed within the ESMS or EMP, RP or IPP.			

1.8	MEIPL will establish and maintain an emergency preparedness and response system so that the MEIPL will be prepared to respond to accidental and emergency situations associated with the project in a manner appropriate to prevent and mitigate any harm to people and/or the environment.	Please refer to Occupational and Community Health and Safety.			
1.9	MEIPL will establish procedures to monitor and measure the effectiveness of the management program, as well as compliance with any related legal and/or contractual obligations and regulatory requirements participate in monitoring activities.	<u>EMP Implementation:</u> Implement the EMP and monitor its effectiveness. Document monitoring results, including the development and implementation of corrective actions and disclose monitoring reports.	1.9	MEIPL will establish procedures to monitor and measure the effectiveness of the management program, as well as compliance with any related legal and/or contractual obligations and regulatory requirements participate in monitoring activities.	<u>EMP Implementation:</u> Implement the EMP and monitor its effectiveness. Document monitoring results, including the development and implementation of corrective actions and disclose monitoring reports.
1.10	MEIPL should engage in stakeholder engagements for building strong, constructive and responsive relationships that are essential for the successful management of a project's environmental and social impacts.	Consultation: Carry out meaningful consultation with affected people within its capacity or through Turnkey/ other contractors and facilitate their informed participation. Ensure women's participation in consultation, considering applicability and cultural environment. Involve stakeholders, including affected people and concerned non-government organizations (as per the applicability), early in the project preparation process and ensure that their views and concerns are made known to and understood by			

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		decision makers. Establish a grievance redressal mechanism to receive and facilitate resolution of the affected people's concerns and grievances regarding the project's environmental performance within its capacity or through turnkey/other contractor.			
1.11	<u>External Communications</u> MEIPL will implement and maintain a procedure for external communications that includes methods to: <ul style="list-style-type: none"> i. receive and register external communications from the public; ii. screen and assess the issues raised and determine how to address them; 	Disclose an environmental & social assessment (including the EMP) in a suitable place for stakeholders.			
2	PS 2: Labour and Working Conditions	ADB Environmental Safeguards			
2.1	The MEIPL will adopt and implement human resource policies appropriate to its size and workforce that sets out an approach to managing workers consistent with the requirements of this				

	performance standard and the national law.				
2.2	MEIPL will insist its turnkey contractors/ other contractors to provide workers general awareness regarding their rights under national labour and employment law and any applicable agreements.				
2.3	Working conditions and terms of employment –MEIPL will insist its turnkey /other contractors to provide reasonable working conditions and terms of employment.				
2.4	MEIPL will insist turnkey/other contractors to identify migrant workers and ensure that they are engaged on substantially equivalent terms and conditions to non-migrant workers carrying out similar work.	In order to strengthen non-discrimination in a project, ADB requires that migrant workers are / should be protected on an equal basis by national legislation and that they have the same human rights as national workers.			
2.5	Where accommodation services are provided to workers covered by the scope of this performance standard,				

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	MEIPL will insist its turnkey/other contractors to put in place and implement policies on the quality and management of the accommodation and provision of the basic services. This also includes the applicable requirements of the IFC guidelines on worker accommodation.				
2.6	<p><u>Non-discrimination and equal opportunity</u></p> <p>MEIPL will not make employment decisions based on personal characteristics unrelated to inherent job requirements. MEIPL will base the employment relationship on the principle of equal opportunity and fair treatment and will not discriminate. Same will be monitored by MEIPL to its turnkey, OEM contractors.</p>	<p>Elimination of discrimination in employment and occupation</p> <p>The key six anti discrimination suggestions for ethnic discrimination identified by ADB as part of their Core Labour Standards (CLS) handbook applicable are:</p> <ul style="list-style-type: none"> • Complaints committee for resolution of complaints of discrimination, harassment, or other working condition concerns. • Challenging stereotypes of minorities to ensure equal opportunity and treatment. • Occupational health and safety for all including minorities, • Health insurance and social security for all. • Encouraging minority groups/organizations to form and join groups/ organizations representing their interests. • Protecting migrant workers especially if they are members of ethnic minorities. 			

2.7	<u>Grievance mechanism</u> for workers where they can raise reasonable workplace concerns.	<u>Complaints committee</u> There should be a mechanism within projects for the resolution of complaints of discrimination, harassment, or other working condition concerns.			
2.8	Protecting the Work force – MEIPL will not employ directly/indirectly children in any manner. Forced Labour – MEIPL will not allow to employ forced labour by its contractor, which consists of any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty.	<u>Effective abolition of child labour</u> The ILO Minimum Age Convention, 1973 (No. 138) and its accompanying Recommendation (No. 146) set the goal of elimination of child labour and the basic minimum age for employment or work (in developing countries at 14 years of age or the end of compulsory schooling, whichever is higher; and 15 or the end of compulsory schooling for developed countries). The convention sets a minimum age of 2 years younger for "light work," i.e., 12 and 13 years, respectively; and a higher minimum age for dangerous or hazardous work (basically 18 years of age, but 16 in certain circumstances). <u>Elimination of all forms of forced or compulsory labour</u> According the Forced Labour Convention, 1930 (No. 29), the ILO defines forced labour for the purposes of international law as "all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily". The other fundamental ILO instrument, the Abolition of Forced Labour Convention, 1957 (No. 105), specifies that forced labour can never be used for economic development or as a means of political education, discrimination, labour discipline, or punishment for having participated in strikes.			

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2.9	<p><u>Occupational Health & Safety</u></p> <p>MEIPL will provide a safe and healthy work environment within its capacity or through turnkey/ other contractors, considering inherent risks in its particular sector and specific classes of hazards in MEIPL's work areas, including physical, chemical, biological and radiological hazards and specific threats to women.</p>	<p>Special care needs to be taken in projects to ensure the health and safety of all workers, including members of minorities. In many cases, minority workers are unable to read safety instructions or to understand safety and health training given to other workers.</p> <p>Provide workers with safe and healthy working conditions including easily comprehensible safety information on-site training, provisions of Personal Protective Equipment etc.</p>			
2.10	<p>Workers engaged by third parties</p> <p>With respect to contracted workers MEIPL will take commercially reasonable efforts to ascertain that the third parties (working at site more than 6 months) who engage these workers are reputable and legitimate enterprises and have an appropriate ESMS. Impacts associated with supply chains will be</p>	<ul style="list-style-type: none"> Compliance with national requirements with respect to minimum wage and other social benefits (e.g. payment of ESI, provident fund, etc) MEIPL to ensure that provisions to meet ILO core labor standards are stipulated in contractors and sub-contractors contracts and that these 			

	considered where low labour cost is a factor in competitiveness of the item supplied.				
3	PS 3: Resource Efficiency and Pollution Prevention	ADB Environmental Safeguards			
3.1	During the design, construction, operations and decommissioning of the project (project life cycle), MEIPL is to consider ambient conditions and apply pollution prevention and control technologies and techniques.	Examine alternatives to the project's location, design, technology and components and their potential environmental and social impacts and document the rationale for selecting the particular alternative proposed. Also consider the no project alternative.			
3.2	MEIPL will refer to the EHS Guidelines, when evaluating and selecting resource efficiency and pollution prevention and control techniques for the project.	Apply pollution prevention and control technologies and practices consistent with national /international good practices.			
3.3	<u>Resource efficiency</u> MEIPL will implement technically and financially feasible and cost effective measures for improving efficiency in its consumption of energy, water, as well as other resources and material inputs.	minimize or control the intensity or load of pollutant emissions and discharges, including direct and indirect greenhouse gases emissions, waste generation and release of hazardous materials from their production, transportation, handling and storage.			

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3.4	<u>GHG Emissions</u> MEIPL will consider alternatives and implement technically and financially feasible and cost-effective options to reduce project-related GHG emissions during the design and operation of the project. These options may include, but are not limited to, alternative project locations, adoption of renewable or low carbon energy sources.	MEIPL will promote the reduction of project-related anthropogenic greenhouse gas emissions in a manner appropriate to the nature and scale of project operations and impacts.	Please note that for current operations, it would not be applicable.		
3.5	<u>Pollution Prevention</u> MEIPL will avoid the release of pollutants to air, water and land due to routine, non-routine and accidental circumstances with the potential for local, regional and transboundary impacts or, minimize and/or control the intensity and mass flow of their release. To address potential adverse project impacts on existing ambient	Avoid and where avoidance is not possible, minimize, mitigate and /or offset adverse impacts and enhance positive impacts by means of environmental planning and management. Prepare an environmental management plan (EMP) that includes the proposed mitigation measures, environmental monitoring and reporting requirements, related institutional or organizational arrangements, capacity development and training measures, implementation schedule, cost estimates and performance indicators. Key considerations for EMP preparation include mitigation of potential adverse impacts to the level of no significant harm to third parties and the polluter pays principle.			

	<ul style="list-style-type: none"> existing ambient conditions; the finite assimilative capacity of the environment; existing and future land use; project's proximity to areas of importance to biodiversity; and the potential for cumulative impacts with uncertain and/or irreversible consequences. 				
3.6	<p><u>Wastes:</u></p> <p>To avoid and minimize generation of hazardous and non-hazardous waste materials as far as practicable. Where waste generation cannot be avoided, but has been minimized, MEIPL will recover and reuse wastes, where wastes cannot be recovered or reused, MEIPL will treat, destroy and dispose of in an environmentally sound manner.</p>	<p>MEIPL will avoid, or where avoidance is not possible, will minimize or control the generation of hazardous and nonhazardous wastes and the release of hazardous materials resulting from project activities. Where waste cannot be recovered or reused, it will be treated, destroyed and disposed off in an environmentally sound manner. If the generated waste is considered hazardous, MEIPL will explore reasonable alternatives for its environmentally sound disposal considering the limitations applicable to its transboundary movement in its scope. When waste disposal is conducted by third parties through its turnkey contractor/other contractors, MEIPL will insist to do the same through Reputable and legitimate enterprises licensed by the relevant regulatory agencies.</p>			

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	If the generated waste is considered hazardous, MEIPL will explore commercially reasonable alternatives for its environmentally sound disposal, considering the limitations applicable to its trans-boundary movement.				
3.7	<u>Hazardous Materials Management:</u> MEIPL will avoid or, when avoidance is not possible, minimize and control the release of hazardous materials. In this context, the production, transportation, handling, storage and use of hazardous materials for project activities should be assessed. MEIPL will consider less hazardous substitutes where hazardous materials are intended to be used in manufacturing processes or other operations.	MEIPL will avoid the manufacture, trade and use of hazardous substances and materials subject to international bans or phase outs because of their high toxicity to living organisms, environmental persistence, potential for bioaccumulation, or potential for depletion of the ozone layer and will consider the use of less hazardous substitutes for such chemicals and materials.			

3.8	<p><u>Wastes:</u></p> <p>To avoid and minimize generation of hazardous and non-hazardous waste materials as far as practicable. Where waste generation cannot be avoided, but has been minimized, MEIPL will recover and reuse wastes, where wastes cannot be recovered or reused, MEIPL will treat, destroy and dispose off in an environmentally sound manner.</p>	<p>The environmental assessment will ascertain that any pest and/or vector management activities related to the project are based on integrated pest management approaches and aim to reduce reliance on synthetic chemical pesticides in agricultural and public health projects.</p> <p>MEIPL's integrated pest/vector management program will entail coordinated use of pest and environmental information along with available pest/vector control methods, including cultural practices, biological, genetic and, as a last resort, chemical means to prevent unacceptable levels of pest damage. The health and environmental risks associated with pest management should be minimized with support, as needed, to institutional capacity development, to help regulate and monitor the distribution and use of pesticides and enhance the application of integrated pest management.</p>	Not applicable in wind/solar project life cycle		
4	IFC PS 4: Community Health & Safety & Security:				
4.1	MEIPL will evaluate the risks and impacts to the health and safety of the Affected Communities during the project life-cycle and will establish preventive and control measures as per the applicability.	MEIPL will identify and assess the risks to and potential impacts on, the safety of affected communities during the design, construction, operation and decommissioning of the project and will establish preventive measures and plans to address them in a manner commensurate with the identified risks and impacts. These measures will favour the prevention or avoidance of risks and impacts over their minimization and reduction. Consideration will be given to potential exposure to both accidental and natural hazards, especially where the structural elements of the project are accessible to members of the affected community or where their failure could result in injury to the community. MEIPL will avoid or			

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		minimize the exacerbation of impacts caused by natural hazards, such as landslides or floods that could result from land use changes due to project activities.			
4.2	<u>Hazardous material management and safety</u> MEIPL will avoid or minimize the potential for community exposure to hazardous materials and substances that may be released by the project.	Avoid the use of hazardous materials subject to international bans or phase outs.			
4.3	<u>Emergency Preparedness and Response</u> MEIPL will document its emergency preparedness and response activities, resources and responsibilities and will disclose appropriate information to Affected Communities, relevant government agencies, or other relevant parties.	Establish preventive and emergency preparedness and response measures to avoid and where avoidance is not possible, to minimize, adverse impacts and risks to the health and safety of local communities.			
4.4	MEIPL will avoid or minimize the potential for community exposure to				

	water-borne, water-based, water-related and vector-borne diseases and communicable diseases that could result from project activities, taking into consideration differentiated exposure to and higher sensitivity of vulnerable groups.				
4.5	Where MEIPL retains direct or contracted workers to provide security to safeguard its personnel and property, it will assess risks posed by its security arrangements to those within and outside the project site.	MEIPL will identify and assess the risks to and potential impacts on, the safety of affected communities during the design, construction, operation and decommissioning of the project and will establish preventive measures and plans to address them in a manner commensurate with the identified risks and impacts. These measures will favour the prevention or avoidance of risks and impacts over their minimization and reduction. Consideration will be given to potential exposure to both accidental and natural hazards, especially where the structural elements of the project are accessible to members of the affected community or where their failure could result in injury to the community. MEIPL will avoid or			
5	IFC PS 5: Land Acquisition and Involuntary Resettlement	Involuntary Resettlement Safeguards			
5.1	The project will consider feasible alternative project designs to avoid or at least minimize physical	Screen the project early on to identify past, present and future involuntary resettlement impacts and risks. Determine the scope of resettlement planning (as per the scope and applicability) through a survey and/or census of displaced persons, including a gender analysis,			

Sl. No	IFC Requirements in context of MEIPL	ADB Requirements	Remarks (where required)	Observation/Gap	Recommendation
	displacement, while balancing environmental, social and financial costs and benefits, paying attention to impacts on the poor and vulnerable as per host country norms.	specifically related to resettlement impacts and risks.			
5.2	<p><u>Compensation and benefits for Displaced persons:</u></p> <p>MEIPL take appropriate action under the statute of requisite host country act/law</p> <ul style="list-style-type: none"> • MEIPL to provide unavoidable displaced PAPs with compensation for loss of assets at full replacement cost to help them restore their standards of living or livelihoods; • Where livelihood is land-based or collectively owned, MEIPL will offer land-based compensation where feasible; 	Pay compensation and provide other resettlement entitlements before physical or economic displacement. Implement the resettlement plan under close supervision throughout project implementation			

	<ul style="list-style-type: none"> MEIPL will provide opportunities to PAPs to derive appropriate development benefits from the project. 				
5.3	Facilitate informed participation of all PAFs in decision and entitlement making resettlement processes. Consultation to continue through the implementation, monitoring and evaluation of payment and resettlement.	<p>Considering host country statute, carry out meaningful consultations with affected persons, host communities and concerned nongovernment organizations. Inform all displaced persons of their entitlements and resettlement options.</p> <p>Disclose a draft resettlement plan, including documentation of the consultation process in a timely manner, before project appraisal, in an accessible place and a form and language(s) understandable to affected persons and other stakeholders.</p> <p>The resettlement should elaborate upon displaced persons' entitlements, the income and livelihood restoration strategy, institutional arrangements, monitoring and reporting framework, budget and time-bound implementation schedule.</p> <p>Improve, or at least restore, the livelihoods of all displaced persons</p> <p>Ensure that displaced persons without titles to land or any recognizable legal rights to land are eligible for resettlement assistance and compensation for loss of non-land assets</p>			
5.4	<p><u>Grievance Mechanism:</u></p> <p>MEIPL to establish grievance mechanism consistent with PS 1 to address concerns raised by PAPs</p>	Establish a grievance redressal mechanism to receive and facilitate resolution of the affected persons' concerns.			

Sl. No	IFC Requirements in context of MEIPL	ADB Requirements	Remarks (where required)	Observation/Gap	Recommendation
6	IPS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources				
6.1	Assess significance of project impacts on all levels of biodiversity as an integral part of social and environmental assessment process.	MEIPL will assess the significance of project impacts and risks on biodiversity and natural resources as an integral part of the environmental assessment process. The assessment will focus on the major threats to biodiversity, which include destruction of habitat and introduction of invasive alien species and on the use of natural resources in an unsustainable manner. MEIPL will need to identify measures to avoid, minimize, or mitigate potentially adverse impacts and risks and, as a last resort, propose compensatory measures, such as biodiversity offsets, to achieve no net loss or a net gain of the affected biodiversity.			
6.2	Modified Habitat: MEIPL should minimize impacts on modified habitat (areas managed for agriculture, forest plantations, reclaimed coastal zones and reclaimed wetlands) and implement mitigation measures as appropriate.	(Please refer to Biodiversity Conservation and Sustainable Natural Resource Management)			
6.3	Natural Habitat: MEIPL will not significantly convert or degrade natural habitats, unless	See above.			

	(i) no other viable alternatives within the region exist for development of the project on modified habitat; (ii) consultation has established the views of stakeholders, including affected communities, with respect to the extent of conversion and degradation; and, (iii) any conversion or degradation is mitigated.				
	Critical Habitat	See above			
7	IFC PS 7: Indigenous Peoples (Scheduled Tribes in Indian Context)	Indigenous People (Scheduled tribe)'s Safeguards			
7.1	Avoidance of Adverse Impacts: Assessment needs to be done for identification of indigenous groups (Scheduled tribes) and the expected social, cultural and environmental impacts on them.	Screen early on to determine (i) whether Indigenous Peoples (Scheduled tribes) are present in, or have collective attachment to, the project area; and (ii) whether project impacts on Indigenous Peoples (Scheduled Tribes) are likely.			
7.2	The impacts on affected communities of Indigenous Peoples (scheduled tribes) should be avoided	Undertake a culturally appropriate and gender-sensitive social impact assessment or use similar methods to assess potential project impacts, both positive and adverse, on Indigenous Peoples. Give full consideration to options the affected			

Sl. No	IFC Requirements in context of MEIPL	ADB Requirements	Remarks (where required)	Observation/Gap	Recommendation
	here possible. Where alternatives have been explored and adverse impacts are unavoidable, MEIPL will minimize, restore and/or compensate for these impacts, proposed actions will be developed with the Informed Consultations and Participation ICP of the Affected Communities of Indigenous Peoples and contained in a time-bound plan, such as an Indigenous Peoples Plan as per host country statute.	Indigenous Peoples prefer in relation to the provision of project benefits and the design of mitigation measures as per the host country statute.			
7.3	MEIPL will undertake an engagement process with the affected communities of Indigenous Peoples, considering host country statute as required in Performance Standard 1. Ensure that the grievance mechanism established for the project, as described in Performance Standard 1, is culturally appropriate and accessible.	<p>Identify social and economic benefits for affected Indigenous Peoples that are culturally appropriate and gender and intergeneration ally inclusive and develop measures to avoid, minimize and /or mitigate adverse impacts on Indigenous Peoples.</p> <p>Undertake meaningful consultations with affected Indigenous Peoples communities and concerned Indigenous Peoples organizations to solicit their participation (i) in designing, implementing and monitoring measures to avoid adverse impacts or, when avoidance is not possible, to minimize, mitigate, or compensate for such effects; and (ii) in tailoring project benefits for affected Indigenous Peoples communities in a culturally appropriate manner.</p>			

7.4	<p><u>Private Sector Responsibilities where Government is Responsible for Managing Indigenous Peoples Issues:</u></p> <p>MEIPL will prepare a plan that, may need to include where relevant;</p> <ul style="list-style-type: none"> • a description of the government-provided entitlements of affected Indigenous Peoples; • the measures proposed to bridge any gaps between such entitlements and the requirements of this Performance Standard; and • the financial and implementation responsibilities of the government agency and/or MEIPL. 	<p>Avoid, to the maximum extent possible, any restricted access to and physical displacement from protected areas and natural resources. Where avoidance is not possible, ensure that the affected Indigenous Peoples communities participate in the design, implementation and monitoring and evaluation of management arrangements for such areas and natural resources and that their benefits are equitably shared.</p>			
8	IFC PS 8: Cultural Heritage				
8.1	MEIPL will identify and protect cultural heritage by ensuring that	MEIPL is responsible for siting and designing the project to avoid significant damage to physical cultural resources. Such resources likely to be			

Sl. No	IFC Requirements in context of MEIPL	ADB Requirements	Remarks (where required)	Observation/Gap	Recommendation
	internationally recognized practices for the protection, field-based study and documentation of cultural heritage are implemented.	affected by the project will be identified and qualified and experienced experts will assess the project's potential impacts on these resources using field-based surveys as an integral part of the environmental assessment process.			
8.2	Chance Find Procedures : As part of MEIPL's ESMS, MEIPL will develop provisions for managing chance finds through a chance find procedure which will be applied in the event that cultural heritage is subsequently discovered.				
8.3	<u>Consultation:</u> MEIPL will consult with the Affected Communities to identify cultural heritage of importance and to incorporate into MEIPL's decision-making process the views of the Affected Communities on such cultural heritage.				
8.4	Community Access: Where MEIPL's project site contains cultural				

	heritage, MEIPL will, allow continued access to the cultural site or will provide an alternative access route, subject to overriding health, safety and security considerations.				
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J.3 Environmental and Social Action Plan

The key recommendation from the gap assessment would be captured in the Environmental and Social Action Plan. It will capture the key risks, impacts and non-compliance issues.

Table J.3.0.3 Environmental and Social Action Plan

Sl. No	Reference to relevant sections of Gap assessment table (due diligence) above	Measures and/or Corrective Actions	Responsibility and Resources	Deliverable (Report/ Measurement)	Timelines

Annexure K

E&S Criteria to be considered for Contractor Evaluation and Assessment Checklist





Contractor Details					
Name of Contractor					
Type of service provided					
Total Workforce planned to be deployed					
Site and Duration of Engagement					
EHS Evaluation of the Contractor					
Sl. No	Elements be checked	Yes	No	N/A	Reason/Remarks
1	Does the contractor have all requisite Labour licenses and permits applicable for the job.				If no, please mention licenses pending or yet to be obtained
2	Does the contractor have any form of penalty, case, litigation or compensation claims pending against the same (Contractor should be asked to provide declaration)				If yes, please provide details.
3	Does the contractor have policy or guideline or any effective systems in place to eliminate unethical labour practices such as child labour, bonded labour or forced labour.				
4	Does the contractor pay minimum wages to the workers in line with the Minimum Wages Act, 1948. Contractor to submit evidence of rates paid and MEIPL will compare this with the prevailing national and state-level minimum wage for skilled, semi-skilled, unskilled workers (among other categories).				
5	Does the contractor abide by The Contract Labour (Regulation and Abolition) Act, 1970				

6	Does the contractor pay PF to its workforce				
7	Does the contractor have overtime policy and is it followed				
8	Is the contractor registered under Inter-State Migrant Workmen (Regulation of employment and Conditions of Service) Act, 1978, if required				
9	Is the contractor registered under ESIC/ follows Workmen's Compensation Act, 1923				
10	Does the contractor have health and safety policy or guidelines to regulate working conditions at Site				
11	Are the workers trained on job related and general health and safety aspects				
12	Does the contractor provide requisite PPEs to the workforce to carry out work safely				
13	Does the contractor has designated person (or from workers) responsible for Environment Health and Safety (EHS)				
14	Do the contractor and workers have previous experience of working on similar site				
15	Does the contractor have a formal Grievance Redressal Mechanism				
16	Does the contractor engage local workers and/or have a mechanism to engage and train local workers for employment in project related jobs				
17	Does the contractor provide first aid facility to workers				
18	Does the contractor provide minimum one day leave in the week to the labourers in accordance with the law				
19	Does the contractor have established monitoring mechanisms in place (For e.g. does the contractor carry				

Sl. No	Elements be checked	Yes	No	N/A	Reason/Remarks
	out regular inspections for EHS related parameters like usage of correct PPE, housekeeping, work permits, waste disposal etc. with the help of established checklists and the issues noted are successfully closed. Checks should be filled checklists for any previous project, filled work permit formats, closure of issues.)				
20	Does the contractor have established accident-incident reporting mechanisms in place				
21	Has the contractor established mechanisms to manage any sub-contractors expected to be engaged under them				
22	Does the contractor has any workforce under any existing union or are affiliated to any association? Contractor to provide information on affiliations with existing unions or workers association.				
23	Does it meet MEIPL's minimum EHS requirements				
24	If answer to the above question is no; is the contractor willing to follow MEIPL's contractor EHS requirement.				
25	Records				
	<p>Does the contractor at the minimum maintain the following records:</p> <ol style="list-style-type: none"> 1. Accident incident register 2. Muster rolls/ Attendance register 3. Payment Register 4. Overtime Register 5. Details of Age proof of the workers 				

Summary of Key Remarks (if any):

Key Risks Identified (if any):

Decision on Contractor Selection: _____

Signed by Designated Officer: _____

Title: _____

Date: _____

The key risks identified for the shortlisted contractors shall be included in the contract agreement signed with MEIPL and MEIPL will closely monitor the contractor's on site performance using other tools like EHS Audit checklist for construction phase.

Annexure L

Generic ESMP for Solar & Wind power projects





L Environmental & Social Management Plan For Solar And Wind Power Projects

IFC Performance Standard (PS)-1 underscores the importance of managing environmental and social performance throughout the lifecycle of a project (any business activity that is subject to assessment and management). An Effective Environmental and Social Management System is a dynamic, continuous process initiated by management and involving communication between the client, its workers and the local communities directly affected by the project (the affected communities). Drawing on the elements of the established business management process of “Plan Do Check Act” the system entails the thorough assessment of potential environmental and social impacts and risks from the early stages of project development and provides order and consistency for mitigating and managing these on an on-going basis.

MEIPL is committed to execute all construction and operation related activities for proposed and existing solar and wind power projects as per the best established environmental, health and safety (EHS) standards which meets best industry standard/ practices and are consistent with local regulations and statutory norms.

This generic ESMP entails the minimum requirements and mitigation measures expected for a typical solar and wind power project and should be modified to include project specific impacts. These measures will be adopted by the project proponents and imposed as condition of contract of the sub-contractor employees for respective phases of the project. The mitigation measures suggested during operation will be made as part of the regular maintenance and monitoring schedule after incorporating site specific details and requirements.

- Mitigation measures suggested for adverse environmental and social impacts and associated risks
- Institutional arrangement - management tools and techniques for the implementation

of environmental impacts and risk mitigations

- Monitoring and reporting (primarily internal) of requirements and mechanisms for the effective implementation of the suggested mitigations
- External reporting requirement to the regulatory agencies and funding institutions.

L.1 Framework for Environmental, Occupational Health and Safety & Social Management System (ESMS)

The elements which would be discussed for any proposed ESMP will be:

- Applicable reference framework
- Organization roles and responsibilities
- Training of MEIPL personnel and contractors
- Community Engagement and Grievance Redressal
- ESMP Review and Amendment
- Inspection, Monitoring & Audit
- Reporting and Review
- Documentation and Recordkeeping.

These elements have already discussed as part of the main ESMS document and will be referred to and added in each project specific ESMP.

Table L.0.1 Typical Environment and Social Management Plan for Pre Construction/Construction Phase for Solar & Wind Plant

Sl. No	Issue	Suggested Mitigation	Monitoring / Training	Management Responsibility
Soil				
1	Impact: <ul style="list-style-type: none"> Erosion and compaction Contamination 	<ul style="list-style-type: none"> Use of existing track wherever feasible for transport of man and material to the extent possible Loose soil to be protected from wind and runoff All construction material to be kept within the footprint of the area procured by MEIPL for the project. Loose construction material to be covered to avoid being carried into adjoining areas by wind. Painting of panels, switchyard structures to be undertaken after covering the land beneath with a sheet of impervious material. 	<ul style="list-style-type: none"> Turnkey Contractor/ MEIPL representative to make daily visual observations on storage and handling of soil and construction material. Workers handling painting activity to be briefed about handling to prevent contamination. Drivers to be instructed about use of dedicated tracks within the site 	<ul style="list-style-type: none"> Site incharge To be mentioned in the contract with the construction contractor Site supervisor to make observations and convey it to the contractors
Waste Disposal				
2	Impact: <ul style="list-style-type: none"> Accumulation of construction waste Runoff into rain water channels Unhygienic condition for labours Land Contamination 	<ul style="list-style-type: none"> Construction waste to be properly stored and disposed off to local municipal waste disposal site. Domestic waste generated by workers to be collected and composted at site/ handed over to vendors on daily basis to prevent putrefaction of biodegradable fraction of waste. 	<ul style="list-style-type: none"> Workers to be instructed to use dustbins and toilets at the Site Contractors will be briefed about the need for proper storage and disposal of construction waste. 	<ul style="list-style-type: none"> Site In Charge To be mentioned in the contract with the construction contractor Site supervisor to make observations and convey it to the contractors.

Sl. No	Issue	Suggested Mitigation	Monitoring / Training	Management Responsibility
		<ul style="list-style-type: none"> Other wastes like wood packaging material, metal, jute etc. will be sold to scrap dealers. Adequate number of toilets with septic tank and soak pit arrangement to be provided for workers Documents pertaining to quantity & quality of waste generated and disposed should be maintained at site. Storage of hazardous waste (e.g. empty oil and paint containers, used and soiled PPE's etc.) should have secondary containment and hazardous waste generated to be disposed off to authorized vendors only. 		
Aesthetics and Visual Impact				
3	Impact: Visual intrusion	<ul style="list-style-type: none"> The construction activities at the site to be undertaken in an organised manner. Random stocking of raw material, storage of debris, piling of loose soil etc. to be strictly controlled. Construction waste should be kept at a secured location with proper fencing to avoid trip hazard. 	<ul style="list-style-type: none"> Contractors will be briefed about the need for an organised approach and good housekeeping. 	<ul style="list-style-type: none"> Site Incharge Site supervisor to make observations and convey it to the contractors Construction contractors

Water Resource and Quality				
4	Impact: <ul style="list-style-type: none"> Ground water/surface water extraction Runoff into rain water channels Wastage of water 	<ul style="list-style-type: none"> Water for construction to be arranged by the construction contractors through authorised tanker water suppliers Optimal utilization of water to be ensured throughout the construction phase. Adequate arrangements for storm water management during construction period to be made to avoid sediment runoff from the site and to avoid water logging. Storm water flow would be directed to the existing channels (if present) with silt traps to avoid sedimentation of the channels or the receiving water body. Leaks and losses to be checked frequently to enhance utilisation. Proper storage and internal supply facilities to be arranged before undertaking construction activities. 	<ul style="list-style-type: none"> Daily consumption of water to be recorded Workers to be instructed about optimal use of water. Storm water arrangements to be monitored for clogging on weekly basis. 	<ul style="list-style-type: none"> Site In charge To be mentioned in the contract with the construction contractor Site supervisor to make observations and convey it to the contractors
Fauna and Flora				
5	Impact: <ul style="list-style-type: none"> Clearing of vegetation Cutting of trees Disturbance to avifauna 	<ul style="list-style-type: none"> Tree cutting will be limited to those directly affecting the solar panels/ wind turbines. auxiliary facilities Workforce to be instructed to avoid any other activity likely to affect the local flora & fauna. 	<ul style="list-style-type: none"> Construction contractor to instruct and inform workers about need to refrain from activities that may adversely affect the ecology 	<ul style="list-style-type: none"> Site supervisor To be mentioned in the contract with the construction contractor

Sl. No	Issue	Suggested Mitigation	Monitoring / Training	Management Responsibility
Traffic and Transport				
6	Impact: <ul style="list-style-type: none"> Arbitrary movement of vehicles leading to congestion and accidents Improper parking of vehicles used by workers and for movement of material can lead to discomfort to other users. 	<ul style="list-style-type: none"> Vehicle movement and parking within the Project premises shall be manned properly to avoid accidents Routes for use by construction traffic to be planned to minimize impact on adjoining activities. Dedicated path within the site for exclusive entry and exit of the construction vehicles to be provided. Regular maintenance of vehicles to be taken up. 	<ul style="list-style-type: none"> Necessary training (through regular tool box talks) to the driver of construction vehicles for speed restrictions and to crewmembers on do's and don'ts during construction vehicles movements. Drivers to be assessed for their knowledge on traffic rules before engagement and maintain records of driving license. 	<ul style="list-style-type: none"> Site supervisor To be mentioned in the contract with the construction contractor
Atmospheric Emissions				
7	Impact: <ul style="list-style-type: none"> Fugitive dust Emissions from diesel engines 	<ul style="list-style-type: none"> It is to be ensured that construction equipment's are properly maintained to minimise smoke in the exhaust emissions. Machinery to be turned off when not in use. The impact of emissions from vehicles bringing construction material to be minimised by proper upkeep of maintenance of vehicles, sprinkling of water on unpaved roads at the construction site and planned movement of such vehicles. Vehicle speed to be 	<ul style="list-style-type: none"> Dust deposition in adjoining areas to be physically monitored on weekly basis and any increase in dust levels or any related grievances from community to be noted and adequate mitigation measures are to be adopted. Water should be sprinkled to control fugitive emission. 	<ul style="list-style-type: none"> Site supervisor To be incorporated in the contract with contractor

		<p>restricted to 20-25 km/h at the site to minimize potential for dust generation in the surroundings.</p> <ul style="list-style-type: none"> Trucks /dumpers to be covered by tarpaulin sheets during off site transportation of friable construction materials and spoil. All the vehicles entering the site to be asked to have updated and valid PUC (Pollution under control) certificate. 		
Noise and Vibration				
8	Impact: <ul style="list-style-type: none"> Disturbance to habitations Disturbance to fauna Occupational Hazard 	<ul style="list-style-type: none"> Use of inherently quiet plant and equipment as far as reasonably practicable and regular maintenance to ensure noise emissions are maintained at design levels. Integral noise shielding to be used where practicable and fixed noise sources to be acoustically treated, for example with silencers, acoustic louvres and enclosures. Construction vehicles to be well maintained and not idling equipment or vehicles when not in use. Noise prone activities will be restricted to the extent possible during night time 2200 to 0600 hours to reduce the noise impact. 	<ul style="list-style-type: none"> Arrangements for noise reduction to be monitored Schedule of activities to be discussed and finalised between site manager and the contractor 	<ul style="list-style-type: none"> Site In charge Construction Contractor

Sl. No	Issue	Suggested Mitigation	Monitoring / Training	Management Responsibility
Traffic and Transport				
		<ul style="list-style-type: none"> Site workers working near high noise equipment use personal protective devices to minimise their exposure to high noise levels 		
Archaeological, Historic and Cultural				
9	Impact: <ul style="list-style-type: none"> Cultural differences amongst workers 	<ul style="list-style-type: none"> The construction workers to be instructed about their behaviour and interaction with the local community or other workers. To the extent possible sourcing of construction labour from local region 	<ul style="list-style-type: none"> Workers to be briefed about need for cooperation and harmony with the local community. 	<ul style="list-style-type: none"> Construction Contractor
Health and Safety				
10	Impact: <ul style="list-style-type: none"> Accidents leading to injuries fatalities Occupational health hazards 	<ul style="list-style-type: none"> All the required safety measures based on individual job profile to be provided (as per working guidelines, use of personal protective equipment like gloves, helmets, ear muffs, safety belts etc.) for construction worker through the contractors. Ensure effective work permit system for critical risk activities like work at height, electrical work, hot work etc. Ensure personal protective equipment for all personnel 	<ul style="list-style-type: none"> Proper training of the workers regarding health and safety procedures Workers to be trained through sub-contractors regarding use of Personal protection equipment and its importance. 	<ul style="list-style-type: none"> Site Incharge EHS Officer To form part of the contractor's contract.

		<p>present at site are made available.</p> <ul style="list-style-type: none"> • Arrangement for fire control measures • Display of phone numbers of the city/local fire services, etc. at site. • Ensure good housekeeping at the construction site to avoid slips and trip hazards. • Dropping/lowering of construction material or tool to be restricted and undertaken only under strict supervision, if required. • Provision of proper sanitation at the labour camp. 		
Social				
11	Access to Common Property Resources <ul style="list-style-type: none"> • Access to grazing lands; • Common village approach road to the site; • Access to fuelwood sourcing areas. 	<ul style="list-style-type: none"> • The project shall avoid using community /village roads for project activities at the time of routine movement of villagers. Alternative access roads will be constructed and used unless community agrees to it; • In case the option is not available and the community so prefers, the project will upgrade the existing roads before use and restore roads to better than project levels after use. These roads will be handed back to the community as an improved/better quality infrastructure. 	<ul style="list-style-type: none"> • The site personnel is to ensure that that during the construction phase there are no additional encumbrances to block access to alternative areas due to material storage etc. 	<ul style="list-style-type: none"> • On-site personnel and contractors

Sl. No	Issue	Suggested Mitigation	Monitoring / Training	Management Responsibility
12	Increased Community Expectations <ul style="list-style-type: none"> Heightened community expectations for employment and other local benefits 	<ul style="list-style-type: none"> The project will initiate an early dialogue with the local community to understand their concerns as well as expectations from the project; The project will communicate and discuss with the community in a transparent manner about employment/contract and other opportunities on a regular basis and demonstrate the efforts being made to accommodate as many people as possible. The projects will ensure that there is a transparent process of giving jobs/contracts and other benefits. 	<ul style="list-style-type: none"> Given the limited scale of the project and its footprint area, MEIPL has to ensure that at least one person from among the on-site personnel hold regular consultations with the local panchayat and regulatory authorities. All concerns must be addressed through a formal grievance redressal process as outlined in section above. 	<ul style="list-style-type: none"> MEIPL and contractors
13	Impact on adjacent lands <ul style="list-style-type: none"> Crop loss during construction; Encroachment. 	<ul style="list-style-type: none"> Ensure that all the project activities are restricted within the existing site boundary. The use of land outside the boundary for purposes like parking of vehicles, storage of material during construction etc. warrants prior consent of the owner of that land as well as adequate compensation for such a use; The project should proactively discourage any encroachment around the project area and involve the local panchayat authorities in the same; Any structures which are constructed outside the boundary should be dismantled after use. 	<ul style="list-style-type: none"> MEIPL will need to monitor the compliance of the contractor to these measures and ensure that any non-compliance is adequately addressed. 	<ul style="list-style-type: none"> MEIPL / Contractor

14	Influx of Migrant Workers <ul style="list-style-type: none"> • Social Impacts; • Health Impact; • Economic Impacts. 	<ul style="list-style-type: none"> • Local labour to be hired as much as possible and each contractor should follow this.; • Ensure labour related regulations are met; • In case of outside labour, ensure that their working conditions as well as camps meet local regulations and best practice; • To the extent possible, labour to be housed in camps, with good living conditions and access to amenities. Outside labour living in the local community should be discouraged; • Health and safety training of the labour, raising awareness about STDs and HIV and maintaining behaviour standards while moving in the community should be a priority; • Community should be consulted at regular intervals. Any complaints or concerns with respect to labour should be addressed without delay; and • Procurement of goods and services required for project activities, including labour camps etc. to be done, to the extent possible, from the local markets. This will ensure that the project catalyses the local economy. 	<ul style="list-style-type: none"> • MEIPL will need to ensure that the onsite administration team to look after contractors will monitor all compliances to the terms and conditions. In addition, personnel will need to be aware of the applicable regulatory requirements for ensuring compliance to good working and labour law compliance. 	<ul style="list-style-type: none"> • MEIPL, the local procurement team and the labour contractors.
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Sl. No	Issue	Suggested Mitigation	Monitoring / Training	Management Responsibility
15	Labor standards	<p>Ensure contractors and subcontractors</p> <ul style="list-style-type: none"> Carry out its activities consistent with the intent of ensuring legally permissible equal opportunity, fair treatment and non-discrimination in relation to recruitment and hiring, compensation, working conditions and terms of employment for its workers (including prohibiting any form of discrimination against women during hiring and providing equal work for equal pay for men and women engaged by the Borrower); Not restrict its workers from developing a legally permissible means of expressing their grievances and protecting their rights regarding working conditions and terms of employment; Civil works contracts contain provisions regarding compliance with core labor standards consistent with national labor laws Ensure that the rights of daily wage labors who are employed either by contractors or their subcontractors are protected, they are paid the minimum wage and their working conditions and living standards 	<ul style="list-style-type: none"> Train MEIPL, the local procurement team and the labor contractors on core labor standards. 	<ul style="list-style-type: none"> MEIPL/Contractor

		comply with standards set in the MEIPL ESMS		
16	Local Employment	<ul style="list-style-type: none"> Assess the exact number of workers to be required at each stage in the construction period Ensure priority is given to local people for short term/ long term employment opportunities as per their skill level. Explore possibilities of training and capacity building to enable the community to be able to secure the available jobs and contracts; 		MEIPL/Contractor
17	Demands for materials, services and inputs	<ul style="list-style-type: none"> Ensure local contracting and vendor opportunities as far as possible in case of regular items; Avoid using any community infrastructure facilities like water bodies, electricity etc. without proper approval 		MEIPL/Contractor
18	Community Health Safety and Security <ul style="list-style-type: none"> Common approach road to the site; Nuisance from air emissions and noise due to transportation; Traffic impacts like accidents. 	<ul style="list-style-type: none"> Evaluate possible community health risks and ensure that these are addressed and minimised; Use simple diagrams and pamphlets in local language for this purpose; Demonstrate that MEIPL and its contractors are very concerned about health and safety of the community; Capacity enhancement of contractors etc.; 	<ul style="list-style-type: none"> ESIA study will look after number of vehicles as well as any incidents and accidents and their outcomes monitored. 	MEIPL/Contractor

Sl. No	Issue	Suggested Mitigation	Monitoring / Training	Management Responsibility
		<ul style="list-style-type: none"> Traffic safety plan should be devised and contractors should be made aware of it; Ensure pollution norms compliant vehicles are used for transportation; Support the local traffic department's traffic awareness programs, if any; and Place adequate signage and warning signs near and around the facility. 		

Table L.0.2 Typical Environment and Social Management Plan for Operation Phase- For Solar Projects

Sl. No	Issue	Suggested Mitigation	Monitoring / Training	Management Responsibility
Waste Disposal				
1	Impact: <ul style="list-style-type: none"> Transformer oil Solar panel 	<ul style="list-style-type: none"> Transformer oil to be replaced and retained by the supplier of transformers; MSDS of hazardous substances should be available at the site; The broken solar panels will be stored in a dedicated container which will be sent back to the supplier. 	<ul style="list-style-type: none"> Staffs to be briefed about the need for proper storage and disposal of transformer oils and broken solar panels 	<ul style="list-style-type: none"> Project Manager/ Site In charge Transformer Suppliers
2	Aesthetics and Visual Impact	<ul style="list-style-type: none"> Suitable Green Belt plantation should be carried out. 		<ul style="list-style-type: none"> Site In-charge
3	Impact: <ul style="list-style-type: none"> Visual intrusion Glare 	<ul style="list-style-type: none"> Panels to have a low profile; Glare from panels to be of low intensity; 		<ul style="list-style-type: none"> Site In-charge

		<ul style="list-style-type: none"> The above mitigation measures will be taken care of during sourcing itself. 		
Water Resource Quantity and Quality				
4	Impact: <ul style="list-style-type: none"> Ground water extraction and/or surface water (if applicable) Water logging 	<ul style="list-style-type: none"> Permission for extraction of groundwater/ municipal supply to be obtained prior to commencing operations; Alternate arrangement of water through authorised tanker water suppliers to be made in case permission for regular source of water is not available; Drain and soak pit to be cleaned and kept unclogged; 	<ul style="list-style-type: none"> Daily consumption of water to be recorded Workers to be instructed about optimal use of water Drains and Soak pits to be monitored for clogging on weekly basis 	<ul style="list-style-type: none"> Site In-charge
Fauna and Flora				
5	Impact: <ul style="list-style-type: none"> Distraction to avifauna Routine clearance 	<ul style="list-style-type: none"> Solar panels to have an anti-reflective coating to minimize the light reflecting off of the panels. Clearing of vegetation to be limited to removal of undergrowth or shrubs at the plant site 	<ul style="list-style-type: none"> Daily consumption of water to be recorded Workers to be instructed about optimal use of water Drains and Soak pits to be monitored for clogging on weekly basis 	<ul style="list-style-type: none"> Site InCharge
Atmospheric Emissions				
6	Impacts: <ul style="list-style-type: none"> Emissions from vehicular engines 	<ul style="list-style-type: none"> All the vehicles entering the site to be asked to have updated PUC (Pollution under control) certificate. 		<ul style="list-style-type: none"> Site InCharge
Health and Safety				

Sl. No	Issue	Suggested Mitigation	Monitoring / Training	Management Responsibility
7	Impacts <ul style="list-style-type: none"> Electromagnetic field Accidents leading to injury/fatality 	<ul style="list-style-type: none"> EMF generated to be of weak in intensity Personal protective equipment to be provided for all personnel at road construction and transmission line. 	<ul style="list-style-type: none"> Proper training of the workers regarding health and safety procedures Workers to be trained for use of Personal protection equipment and its importance during regular tool box talks. 	<ul style="list-style-type: none"> Site Incharge Regional EHS officer
Social				
8	<ul style="list-style-type: none"> Land acquisition and involuntary resettlement impacts 	<ul style="list-style-type: none"> Compensation at replacement cost and livelihood restoration measures presented in a separate resettlement plan, if required as per the host country statute 	<ul style="list-style-type: none"> Designated team to be trained about the resettlement plan and international best practices 	<ul style="list-style-type: none"> Designated Team
9	<ul style="list-style-type: none"> Impacts on scheduled tribes 	<ul style="list-style-type: none"> Measures to mitigate impacts on scheduled tribes dignity, human rights, livelihoods, cultural systems as well as beneficial measures presented in an indigenous peoples plan, if required, as per the host country statute 	<ul style="list-style-type: none"> Designated team to be trained about the resettlement plan and international best practices 	<ul style="list-style-type: none"> Designated Team
10	<ul style="list-style-type: none"> Impacts on Local Economy 	<ul style="list-style-type: none"> In case of development of local enterprise in the vicinity of the project, these should be encouraged through sourcing opportunities. 		<ul style="list-style-type: none"> Procurement team
11	<ul style="list-style-type: none"> Upgrades to Local Infrastructure 	<ul style="list-style-type: none"> Collaborate with local govt. and industry for any community development programs to share the resources and cut cost; 	<ul style="list-style-type: none"> Any community development activity will be guided and implemented through Turnkey/ other contractors 	<ul style="list-style-type: none"> Site Incharge
12	Labor standards	Ensure contractors and subcontractors	<ul style="list-style-type: none"> Train Turnkey /Other contractors and the labour contractors on core 	MEIPL/Contractor

		<ul style="list-style-type: none"> • Carry out its activities consistent with the intent of ensuring legally permissible equal opportunity, fair treatment and non-discrimination in relation to recruitment and hiring, compensation, working conditions and terms of employment for its workers (including prohibiting any form of discrimination against women during hiring and providing equal work for equal pay for men and women engaged by the Borrower); • Not restrict its workers from developing a legally permissible means of expressing their grievances and protecting their rights regarding working conditions and terms of employment; • Service contracts during operations phase contain provisions regarding compliance with core labor standards consistent with national labor laws • Ensure that the rights of daily wage labors who are employed either by contractors or their subcontractors are protected, they are paid the minimum wage and their working conditions and living standards comply with standards set in the MEIPL ESMS 	contractors on core labor standards.	
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Table L.0.3 Environment and Social Management Plan for Operation Phase - For Wind Projects

Sl. No	Issue	Suggested Mitigation	Monitoring / Training	Management Responsibility
Noise				
1	Impact: <ul style="list-style-type: none"> Disturbance to community 	<ul style="list-style-type: none"> Proper engineering controls have been considered while sourcing the infrastructure Regular maintenance of WTG's should be carried out. 	<ul style="list-style-type: none"> MEIPL representative ensure the proper observations on noise of WTG at regular interval 	<ul style="list-style-type: none"> Site Incharge
Waste Disposal				
2	Impact: <ul style="list-style-type: none"> Transformer oil Sludge from domestic wastewater treatment (in case Sewage Treatment Plant) 	<ul style="list-style-type: none"> Transformer oil (limited quantity) to be replaced and retained by the supplier of transformer. Domestic Sludge to be disposed as per requirements. Kitchen wastes and domestic wastes at site should be disposed through proper agencies. Documents pertaining to waste generated and disposed should be maintained at site. 	<ul style="list-style-type: none"> MEIPL site staff to be briefed about the need for proper storage and disposal of transformer oil. 	<ul style="list-style-type: none"> Site Incharge Transformer Suppliers
Aesthetics and Visual Impact				
3	Impact: <ul style="list-style-type: none"> Visual intrusion 	<ul style="list-style-type: none"> Shadow flickers and its impact on the community (if present) needs to be assessed 	<ul style="list-style-type: none"> Shadow Flicker study should be conducted in case community is present or expected to be affected as a part of ESIA study 	<ul style="list-style-type: none"> Site In Charge EHS Manager
Aesthetics and Visual Impact				

4	Impact: <ul style="list-style-type: none"> Visual intrusion 	<ul style="list-style-type: none"> Shadow flickers and its impact on the community (if present) needs to be assessed 	<ul style="list-style-type: none"> Shadow Flicker study should be conducted in case community is present or expected to be affected as a part of ESIA study 	<ul style="list-style-type: none"> Site In Charge EHS Manager
Water Resource Quantity and Quality				
5	Impact: <ul style="list-style-type: none"> Water Conservation 	<ul style="list-style-type: none"> Water conservation measures to be followed to minimise waste water generation at the site. 	<ul style="list-style-type: none"> Workers to be instructed about optimal use of water. Drains and Soak pits to be monitored for clogging on weekly basis 	<ul style="list-style-type: none"> Site In-charge
Fauna and Flora				
6	Impact: <ul style="list-style-type: none"> Distraction to avifauna Routine clearance 	<ul style="list-style-type: none"> Clearing of vegetation to be limited to removal of undergrowth or shrubs at the plant site Plantation activity should be carried out at the pooling substation. 	<ul style="list-style-type: none"> Birds and Bat monitoring studies should be undertaken, if applicable. Proper records should be kept and reviewed periodically. 	<ul style="list-style-type: none"> Site In Charge EHS Manager
Atmospheric Emissions				
7	Impacts: <ul style="list-style-type: none"> Vehicular Emissions 	<ul style="list-style-type: none"> All the vehicles entering the site to be asked to have updated PUC (Pollution under control) certificate. 		<ul style="list-style-type: none"> Site In Charge
Health and Safety				
8	Impacts: <ul style="list-style-type: none"> Accidents leading to injury/fatality 	<ul style="list-style-type: none"> Personal protective equipment to be provided for all personnel. Materials should be kept at a certain location with proper fencing and labelling 	<ul style="list-style-type: none"> Proper training of the workers regarding health and safety procedures Workers to be trained for use of Personal protection equipment and its importance. 	<ul style="list-style-type: none"> Site Incharge/EHS Manager

Sl. No	Issue	Suggested Mitigation	Monitoring / Training	Management Responsibility
Social				
9	<ul style="list-style-type: none"> Impacts on Local Economy 	<ul style="list-style-type: none"> In case of development of local enterprise in the vicinity of the project, these should be encouraging through sourcing opportunities 		
10	<ul style="list-style-type: none"> Upgrades to Local Infrastructure 	<ul style="list-style-type: none"> Collaborate with local govt. and industry for any community development programs to share the resources and cut cost; 	<ul style="list-style-type: none"> Any community development activity will be guided and implemented through Turnkey /other contractors 	<ul style="list-style-type: none"> Site In Charge / Contractor
11	Labor standards	<p>Ensure contractors and sub contractors</p> <ul style="list-style-type: none"> Carry out its activities consistent with the intent of ensuring legally permissible equal opportunity, fair treatment and non-discrimination in relation to recruitment and hiring, compensation, working conditions and terms of employment for its workers (including prohibiting any form of discrimination against women during hiring and providing equal work for equal pay for men and women engaged by the Borrower); Not restrict its workers from developing a legally permissible means of expressing their grievances and protecting their rights regarding working conditions 	<ul style="list-style-type: none"> Train Turnkey /Other contractors and the labour contractors on core labour standards. 	<ul style="list-style-type: none"> MEIPL/Contractor

		<p>and terms of employment;</p> <ul style="list-style-type: none">• Service contracts during operations phase contain provisions regarding compliance with core labour standards consistent with national labour laws• Ensure that the rights of daily wage labourers who are employed either by contractors or their subcontractors are protected, they are paid the minimum wage and their working conditions and living standards comply with standards set in the MEIPL ESMS		
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Table L.0.4 Template of Environment and Social Management/ Monitoring Plan for Solar & Wind Plants of MEIPL

Sl. No	Environment Resource	Impact/ Issues	Mitigation Measures	Timing/ frequency of monitoring	Implementation Responsibility	Reporting Requirements	Status
1	Soil						
2	Waste Disposal						
3	Water Resource and Quality						
4	Ecology						
5	Traffic and Transport						
6	Atmospheric Emissions						
7	Noise and Vibration						
8	Archaeological, Historic and Cultural						
9	Health & Safety						
10	Social						
11	Aesthetics and Visual Impact						
12	Others						

Annexure M

Temporary Workers Accommodation Monitoring Checklist



M Temporary Workers Accommodation Monitoring Checklist

Project	
Location	
Date of inspection	
Name of Contractor	
Expected duration of work of Contractor	
Approximate number of Labourers residing in the Labour Camp	
Last Date of Inspection (14)	
Name and Designation of Assessor	

Checklist Questions

Sl. No	Standards for Workers Accommodation	Satisfaction Levels			Remarks/ Gaps Observed	Expected Date of Completion of identified gaps
		High	Medium	Low		
Labour Camp – General Requirements						
1	Is the location of the labour camp designed to avoid flooding or other natural hazards					
2	Is the project site adequately drained					
3	Are the living facilities located within a reasonable distance from the worksite					
Water, Wastewater and Waste Requirements						

4	Has adequate supply of potable drinking water been made available for the labours			
5	Are tanks used for the storage of drinking water constructed and covered to prevent water stored therein from becoming polluted or contaminated			
6	Is adequate quantity of water supplied for meeting domestic needs like bathing, washing and sanitation purpose			
7	Is adequate storage capacity available to store water for domestic purposes (storage of 48 hours' reserve supply is adequate)			
8	Are their separate arrangements for sanitation and bathing facilities for men and women			
9	Is adequate number of sanitation facilities available and are they maintained in good condition			
10	Are all streams of wastewater generated from the camps leading to treatment and disposal facility (septic tanks and soak pits etc.)			
11	Are adequate facilities available to treat all types of wastewater to avoid unhygienic conditions at Site and to prevent water logging problems (eg. regular emptying of septic tanks in case not connected to soak pits.			
12	Have adequate number of dustbins been provided at the camps for waste collection and disposal			
13	Are wastewater, sewage, food and any other waste material adequately discharged and disposed in compliance with local standards and without causing any significant impacts on camp residents, the environment or surrounding communities			
Living Conditions				
14	Do the worker camps have adequate spacing inside to accommodate allotted number of individuals			
15	Are the labor camps properly illuminated			

16	Are their provision for electrical supply inside the camp			
17	Have separate area for cooking being constructed/ allocated for workers and proper hygienic conditions being maintained			
18	Have the workers been provided or allocated with proper cots, mattresses, pillows and blankets			
Health and Safety				
19	Is the cooking facility separate from the living quarters to avoid any fire hazards and is the LPG cylinders (if used) stored in well-ventilated area			
20	Is the fire extinguisher been provided at the camps			
21	Are the camps properly fumigated and sanitized for removal of pests, insects and germs, as & when required			
22	Is adequate first aid facilities present at the camp and is it readily accessible at all times.			
23	Are emergency contact numbers displayed prominently at the labour camp			
24	Is housekeeping register being maintained for the labour camps			
25	Are the workers sensitized on communicable diseases			
26	Have the workers been provided with relevant health and safety training in order to manage health and safety issues a workers camps (with respect to sanitation, hygiene, fire risk, safety risks to women, infighting, alcoholism etc.)			
Workers' rights rules and regulations on workers accommodations				
27	Are workers religious, cultural and social backgrounds respected			
28	Are workers made aware of the rights and obligations and provided with a copy of the accommodation's internal rules, procedures and sanction mechanisms			

	in a language or through a media they understand			
29	Are house regulations non-discriminatory, fair and reasonable			
30	Are regulations on alcohol, tobacco and third parties' access to the camp clear and communicated to the workers			
Management of Community relations				
31	Have the workers been provided any briefing on community interactions and standard do's and don'ts that are required to be made aware of while interacting with the community			
32	Has there been any reported grievances or complaints from the community on the construction of the workers camps or any behavioral aspects of the workers			
Note: The checklist is applicable for the Wind/Solar power projects, where Turnkey / EPC /OEM / other contractors are arranged workers accommodations temporarily at /nearby project sites for staying more than 3 months. MEIPL will share this checklist with the Turnkey/ EPC contractor to specify minimum requirements and ensure that is being followed wisely. In case of local workers are engaged in the project/ OEM, this checklist is not applicable for Contractor/ MEIPL. Viewing the nature and scope of works, some workers stay temporarily/permanently at nearby villages in rented houses with consent of land owner/s. In that case Turnkey/EPC/other contractors will responsible for providing awareness for general hygiene, housekeeping, cleanliness to those workers.				

Annexure N

Training Matrix


on about the training program





Mytrak

Environmental & Social management System: A sustainable approach for Mytrak's Business



Mytrak's commitment to the environment

Mytrak is committed to the environment and to the sustainable development of its business. This commitment is reflected in the Environmental & Social management System, which is a key part of Mytrak's business strategy. The system is designed to ensure that Mytrak's operations are sustainable and that it meets the needs of its stakeholders.

Mytrak's commitment to society

Mytrak is committed to society and to the sustainable development of its business. This commitment is reflected in the Environmental & Social management System, which is a key part of Mytrak's business strategy. The system is designed to ensure that Mytrak's operations are sustainable and that it meets the needs of its stakeholders.

N Training on Environmental And Social Management Systems

1 Introduction:

The Company has determined the necessary competence for personnel performing work affecting conformity to solar/ wind power generation and allied services by using internationally accepted tools like Integrated ISO management system and Environmental & Social Management System. The management is keen to make the personnel aware about the relevance and importance of these two systems under the umbrella of Operations Management System.

MEIPL identifies training needs associated with its environmental aspects, OH&S risks, which will be further value added by incorporating social risks and opportunities followed by a systematic, sustainable approach of ESMS. MEIPL will provide appropriate training or take suitable action to meet these needs followed by existing Training plan and will retain records for the same.

2 Objective:

MEIPL is intended to establish, implement & maintain the procedure for capacity Building to make persons working for it or on its behalf aware of the following:

- A. the importance of conformance with the QSHE policy, integrated HR Policy, Land policy, CSR policy with relevant procedures and requirements of the Integrated ISO system and ESMS under the umbrella of Operations Management system,
- B. the significant environmental and social aspects & related actual or potential impacts, Health, safety and social risks and opportunities associated with their work and surrounding project areas,
- C. their role and responsibilities in achieving conformity with the requirements of the Environmental Health Safety

Management System & Environmental & Social Management System for continual improvement

- D. Regulatory frame works associated with their activities for wise implementation
- E. Adaptation of standard operating procedures, work instructions, obligations for trouble free, safe, optimum operation in line with Environmental & Social Management system as well as integrated ISO management system
- F. Capacity development of Turnkey/ EPC/ OEM contractors aligning with MEIPL's own management system on Quality, Environment, Health, Safety and social domain.

N.1 Training at Corporate/Site Level/Train the Trainers Program

One-day training would be scheduled at the corporate level for the newly developed Environmental and Social Management Systems (ESMS) to facilitate ESMS implementation. The training would be conducted for relevant staff at corporate level and for Site In charges at Asset level that would be responsible for driving and implementing the ESMS at corporate / Project / Asset level.

Refresher training will be held at a regular frequency (preferably once annually) to reinforce the effectiveness of the training and to cover any new employees or promoted employees with new job responsibilities which were not part of the previous training sessions.

The training at this level will briefly discuss the main aspects of significant elements of ESMS as discussed in the table below.

Table N.1 Training Plan of ESMS for MEIPL at Corporate/Site Level

Sl. No	Topic	Description
1	Introduction	<ul style="list-style-type: none"> • Agenda of the Training • Objective and Scope of ESMS document • Brief on MEIPL's current business arrangement for Solar and Wind Projects
2	Applicable Reference Framework	<ul style="list-style-type: none"> • Brief overview of the IFC PS requirements and ADB SPS requirements, local laws and regulations • Other enlisted in applicable reference framework • Briefly discussing the key permits for Solara and Wind Power Projects
3	Corporate Policies of MEIPL	<ul style="list-style-type: none"> • Briefly discussing the commitments made as part of the following MEIPL policies: <ul style="list-style-type: none"> • Corporate level EHS&S Policy • HRGA Policy • CSR Policy • Key aspects covered and Department of Implementation. • The training would include discussion on resource required for implementation of policy and listing out the key standard operating procedures required for the MEIPL operations during construction and operation stage.
4	Organizational Overview & Corporate Structure	<ul style="list-style-type: none"> • Discussion on implementation roles and responsibilities for managing the E&S aspects. • Role of the subcontractors and developers. • Institutional set up for Project Management and Development. • Institutional set up for Environmental and Social Management. • Role and responsibilities of ESMS committee • Role and responsibilities of ESMS Manager and onsite EHS representative
5	Project Screening, Categorization and Scoping of the Project	<p>Training would include following elements:</p> <ul style="list-style-type: none"> • Screening Criteria for Site Selection. • Risk Based Categorization of Projects based on associated E&S impacts. • Aspects to be considered for finalizing the Project Categorization • Scoping of the ESDD, IEE and ESIA reports based on Project Categorization. • Adoption of different approach for Greenfield projects, Acquisition Projects and Existing and Expansion Projects.

Sl. No	Topic	Description
6	E&S Risks	<ul style="list-style-type: none"> • Brief overview on typical Environmental and Social Risks for Wind and Solar Power Projects across the project lifecycle with special emphasis on land related issues, stakeholder identification and management, specialized studies required for wind and solar power projects and information disclosure • Mitigation Measures to handle the risks • Associated Responsibility to manage risks and monitoring required for follow up
7	Monitoring and Reporting	<ul style="list-style-type: none"> • Reporting requirements for implementation of the ESMS system both internal and external reporting. • Monitoring and audit requirements for ensuring smooth roll out of the ESMS system. • Management Review
8	Discussion on few Tools	<ul style="list-style-type: none"> • Land Procurement Procedure • Resettlement Action Framework • Stakeholder Engagement Framework • Grievance Redressal Framework • E&S criteria for Vendor and Contractor evaluation

N.2 Training Plan of ESMS For MEIPL At Project/Asset Level

The trained employees at the corporate/Site level will deliver training for ESMS implementation at the project / Asset level (for both construction phase and operation phase). The ESMS training can be aligned with the training on work related environment, health and safety risks as well as social risk and opportunities.

Trained contractors would eventually hold training session for their workforce which would be supervised and assisted by MEIPL Site In-charge/ Regional Safety Officer. For the Solar, Wind power projects with the current business arrangement MEIPLs expectation from the EPC contractors would be discussed as part of the ESMS training. The following topics will be considered for capacity building at Project / Asset level.

- Policies of MEIPL
- Brief outline of ESMS
- Roles and responsibilities of site staff for ESMS implementation
- Applicable reference framework requirements
- Construction/ operation stage ESMP requirements
- Associated monitoring and reporting requirements
- Audit and regular inspections
- Grievance handling procedure and

management

- Management of Stakeholders
- EHS audit checklist
- Worker Accommodation checklist
- Minimum EHS requirements of MEIPL for contractors
- EHS obligations at Asset level
- High level construction specific E&S risks and mitigation
- Minimum EHS requirements of MEIPL for contractors
- Accident incident reporting and management
- Public consultation -guidelines
- Site health and safety related topics
- Training on worker accommodation standards
- Management of stakeholders

Both in self-development as well as turnkey project, site incharge will be played key role for ensuring effective training of MEIPL employees as well as site in charge, engineers, supervisors, workers of turnkey / EPC/OEM/other contractors with active support of functional heads at corporate office. Site incharge of MEIPL is responsible to maintain all the records including attendance sheet of individual training followed by site specific training plan and will submit to Head office at regular interval.



Annexure O

Environment & Social Performance Reporting



O Proposed Environmental And Social Performance Report Format For Investors

This document provides an indicative set of monitoring indicators for investors to track the environmental and social performance of MEIPL wind and solar energy projects to assess compliance with ADB/IFC requirements and to assess implementation of agreed Environmental and Social Management Systems (ESMS).

The reporting would be applicable and followed by MEIPL for:

- Construction and commissioning phase of the solar and wind power plants and associated facilities like transmission line for power evacuation;
- Existing as well planned expansion operations including associated facilities during O&M stage of the solar & wind power plants; and
- Acquisition projects and projects where MEIPL has entered into partnership agreement with turnkey contractors (solar/ wind energy projects).

However, reporting of site specific wind and solar projects/ O&M plants will be solely dependent on the mutual agreement, discussion in between investors /lenders /funding agencies and MEIPL.

O.1 Introduction and Background:

This section would cover the details of the company; sponsors of the projects and brief project description followed by introduction of the scope and purpose of the Environmental and Social Performance Report (ESPR) for the specified reporting period (here it is considered as financial year). The scope presented below will be applicable for all mutually agreed solar and wind power projects irrespective of the stage of the project depending on E&S risks involved.

The scope and components of the typical ESPR report will cover, for example:

- Summary of information related to location of the project/ business, nature, scale of the project a date of construction/operation commencement;
- Status of permits or other approvals, compliance to key permit conditions, Issuance dates and duration of validity; Permit conditions and renewal requirements etc.;
- Provision of additional information about activities (eg. on-going public consultation, sustainable development initiatives, etc.);
- A detailed description of significant health & safety, environmental, social and community development activities and events that occurred during the reporting period;
- Details of capacity or management systems in place to manage operations (e.g degree of awareness of environmental management, health and safety, laws and regulations, training programs carried out etc.);
- Quantitative performance monitoring data summaries in comparison to appropriate national requirements aligned with ADB SPS and IFC guidelines. Format for reporting of monitoring data has been summarized in Section 2 of this document;
- An explanation of any cases of non-compliance with national requirements and suitable international guidelines or applicable regulatory limits that have occurred, identifying the cause and the corresponding corrective measures planned or underway to prevent future occurrences;
- A status of implementation of the Environmental and Social Action Plan or other Corrective Action Plans of internal or external audits;
- Summary of construction progress, regular operation (annual hours, hours reduced

production etc.), incidents, accidents, release of contaminants, significant social grievance or protest; any envisaged changes of expansion plan/components, any new land requirements/acquisitions (details);

- Details of consultations, if any, with local communities, non-governmental organizations, civil society groups and other stakeholders, including affected people.

O.1.1 Background:

O.1.2 MEIPL Corporate Overview:

Update of Environmental and Social Management Systems

- Organizational structure and accountability for Environmental and Social Management
- Existing Project Management Systems and any changes proposed
- Integration of EHS teams across other functions

- Any new Environmental and Social Risk Assessment/Impact Evaluation or Screening Procedures etc.

O.1.3 MEIPL Portfolio of Projects:

Environmental and Social Management Systems

- Details of project level EHS organizational capabilities
- Site level EHS Procedures to manage activities at Site
- Environmental/Social Risk Identification
- Details of Internal/ audits and inspections
- Employee/ Contractor/ Sub contractor Training and Awareness
- Stakeholder Engagement/Consultation

Table O.0.1 MEIPL – Project Portfolio (Executed)

SL No.	Project Name & Location	Project Capacity (in DC MW)	Commissioning Period
Wind:			
1			
2			
Solar:			
1			
2			

MEIPL – Project Portfolio (Under Execution/Development)

The ESMS at project level will include details of the above mentioned aspects and MEIPL will summarize the information in the form of enlisting key procedures, sample inspection and audit reports, training records, training schedule, matrix, attendance sheet etc. Overall Business Development

- New Projects and planned expansions

Table O.O.2 Summary of Project Status- Wind Project

Sl. No	Project Name	Project Code & Capacity	Stage of the Project (Design/ Construction/ Expansion/ Operation/ Closure/ Others)	Any change in status/ developments for the project over the reporting period	Category of Project as per MEIPL's ESMS		
					ENV (Environmental Impact)	IR (Involuntary Resettlement)	IP (Indigenous Peoples)
1							
2							

Table O.O.3 Summary of Project Status – Solar Project

Sl. No	Project Name	Project Code & Capacity	Stage of the Project (Design/ Construction/ Expansion/ Operation/ Closure/ Others)	Any change in status/ developments for the project over the reporting period	Category of Project as per WREPL's ESMS		
					ENV (Environmental Impact)	IR (Involuntary Resettlement)	IP (Indigenous Peoples)
1							
2							

O.1.4 List Any Changes To Management Procedures Due To Changes Completion

Describe any changes to management procedures instigated as a result of project changes or completion.

O.2.0 Social And Environmental Performance Monitoring

O.2.1 Environmental Parameters

O.2.1.1 Legal Compliance

Summary of All Legal Compliances

A table showing all legal compliances of the projects mentioning the validity of relevant environmental and social consents obtained by MEIPL will be included.

Summary of all legal compliances:

Table O.O.4 Summary of All Legal Compliances

S. No	Project Name/ Location	Project Code & Capacity	Compliance Description	Issue Date	Validity	Reference/ status

Note: The reporting can be exception based where MEIPL needs to mention, the regulations, applicable to key projects. Alternatively, MEIPL can have a table highlighting what environmental compliances are required and how many of the projects have this approval either through turnkey EPC contractors or themselves. In case of turnkey contractors are involved for legal compliance of Mytrah projects/O&M plants, it will be indicated

The details would include observations of inspections conducted by government officials, fines, operation suspensions, environmental or social claims and corrective actions; it will indicate if violations of standards were caused by company staff or contractors; material changes in legislation or permit conditions that would affect plant operation.

Summary of any PILs/litigations

A table showing the project-wise list of litigations or ongoing cases (along with their status) linked to EHS and Social issues (e.g. worker compensation, land disputes etc.)

O.2.1.2 Implementation And Compliance Status of Key Permits/Management Plans/Safe Guard Requirements

It will include implementation and compliance status of requirements mentioned under the:

- Permit conditions
- Environment and Social Management Plans
- Status of compliance to conditions specified in the covenants on environmental and social action plan of the lenders
- Status of compliance with relevant ADB environmental and social policies and guidelines.

Table O.O.5 Sample format for ESMP Monitoring

ESMP of Construction/ Operation Phase							
S.NO.	E & S Resource	Impact/ Issues	Mitigation Measures	Timing/ frequency of monitoring	Implementation Responsibility	Reporting Requirements	Status

O.2.1.3 Environmental Progress For Active Investments

Summary of implementation progress of sub-projects will include details of:

S. No	Description	Progress/Status
1	Any design changes to the sub-project(s)/activities adopted during the reporting period and reasons for those changes;	
2	Environmental issues and complaints arising during the reporting period;	
3	Information on any unanticipated environmental impacts and remedial actions that have been taken;	
4	Details of any unresolved environmental issues or grievances,	



O.2.1.4 Environmental Monitoring, Management And Findings

Summary of monitoring requirements

Summary of monitoring results undertaken by MEIPL to comply with regulatory requirements and non-regulatory requirements (identified by MEIPL on its own) to meet ADB and IFC standards.

S.NO.	Project Name	Project Code & Capacity	Air		Water and Wastewater		Noise		Soil		Attachment (Annexure # A)
			No. Of Location	No. Of Sample	No. Of Location	No. Of Sample	No. Of Location	No. Of Sample	No. Of Location	No. Of Sample	
1											

O.2.1.5 Summary of monitoring results during Construction Phase

As the construction phase of the project typically falls between 3-6 months, one time monitoring of the identified parameters is sufficient to assess the impacts during construction phase.

S.NO.	Project Name	Project Code & Capacity	Air		Water and Wastewater		Noise		Soil		Attachment (Annexure # A)
			No. Of Location	No. Of Sample	No. Of Location	No. Of Sample	No. Of Location	No. Of Sample	No. Of Location	No. Of Sample	
1											

Note: this is just for understanding of monitoring requirements; individual table needs to be prepared for every parameter monitored with the regulatory and international guideline value comparisons

0.2.1.6 Summary of monitoring results during Operation Phase

Solar and wind energy projects generate minimal quantities of emissions and effluents during project operation. Monitoring plan will be formulated based on the ESMP of the specific project. In general the monitoring during the operation phase would be limited to-

- Monitoring of bird and bat injury and mortality (if identified in ESMP of ESIA report) in Wind project
- Noise monitoring in Wind project
- Shadow flicker monitoring (if identified in ESIA / ESMP);

0.2.1.7 Data Interpretation and Corrective Measures

Brief discussion on the monitoring results within or exceeding the applicable regulatory limits/IFC guideline values and steps in implementing mitigation measures where values are exceeding the regulatory limits. Information will be provided in the table for parameters exceeded.

Instructions	Information
1. Monitoring parameters that exceed WBG/IFC guidelines and Indian regulatory limits.	<u>Monitoring Parameters Exceeded</u>
2. Describe cause(s) of exceedance(s)	<u>Cause(s) for Monitoring Parameter(s) Exceeded</u>
3. Describe corrective action(s) required to bring monitoring parameter into compliance and provide a schedule for completion of needed improvements	<u>Corrective Action(s) and Implementation Schedule</u>

0.2.1.8 Summary of Waste Management By MEIPL

Summary quantities of both hazardous and non-hazardous waste generation, recovery and reuse, treatment / destruction /disposal and summary of how MEIPL is working towards waste reduction/ recycling/ reuse etc.

Waste Management Report

S. No	Project Name	Project Code & Capacity	Waste (hazardous/ Non-hazardous)		
			Quantities Generated	Method of Storage	Disposal Method

O.2.1.9 Hazardous Material Management

The storage and consumption of hazardous materials in the wind and solar power projects is minimal and is limited to small quantities of diesel storage, use of paints and oils during construction stage and Used oil, oil mixed cotton at OEM stage. Certain checks/ monitoring parameters for hazardous materials storage areas are:

S.No.	Checks to manage hazardous materials	Project/ O&M Plant
1	Quantity of Material stored (annual basis)	
2	Quantity of Material disposed (annual basis)	
3	Presence of secondary containment	
4	Incidents of spillage	
5	Corrective measures taken	
6	Disposal of contaminated soil	
7	Training provided to handle hazardous materials	

O.2.1.10 Other Initiatives/Measures Taken By MEIPL Which Contributes Towards Sustainable Development

- Greenbelt Development – (For example; MEIPL is considering initiative of greenbelt at Nazeerabad Site)
- Water conservation measures e.g. rainwater harvesting
- Any programmes/initiatives adopted by MEIPL towards energy conservation.
- Natural resource use efficiency (e.g. recycling etc.)

O.3 Health & Safety Parameters

O.3.1 Legal Compliances

Discussion on any reports submitted to regulatory authorities, e.g. on OHS, safety inspections, Compliance monitoring, mock drill exercises, as well as comments received and corrective actions taken. Monitoring and inspections by regulatory authorities with subsequent corrective actions taken will be summarized and reported.

Table O.0.13 Legal Compliances

S.NO.	Project Name	Project Code & Capacity	Legal Compliances						
			EHS Audit/Inspection	Reference	Mock drill Exercises	Reference	Medical camp	Reference	Others
1									

0.3.2 Occupational Health And Safety Monitoring Data**Table O.0.13 Accidents & Injuries**

S.NO.	Project Name	Project Code & Capacity	No. of Accident Incident occurred	Details of Accident Incident format	Reference
1					

Table O.0.14 Fire Safety Monitoring

S.NO.	Project Name	Project Code & Capacity	Fire Drill	Reference	Inspection/reporting /Refilling	Reference	Frequency (Minimum per year)
1							

0.3.3 Occupational Health And Safety Monitoring Data

MEIPL can include employee workplace monitoring and fire safety monitoring details if required for any project.

S.NO.	Project Name	Project Code & Capacity	Induction training	Reference	Tool Box talk training	Reference	Heath check up of employees	Reference
1								

O.4 Social Parameters From Running Projects

Summary of progress report shall include:

- Social issues and complaints arising during the project lifecycle
- Information on any accidents/unanticipated impacts and the remedial actions that were taken
- Details of any unresolved social issues or grievances from the community.

O.4.1 Report On Significant Events And Issues

This section would summarize exception-based events that have taken place for MEIPL's Portfolio projects (Solar and Wind).

O.4.1.1 Significant Events And Issues

O.4.1.1.1 Events to be Covered

It will include reporting all environmental and special events, for example;

- caused damage like fire, unplanned releases (e.g. transformer oil leakage), ecological damage/ destruction;
- brought about injuries or fatalities or other health problems either at the site or during transportation of materials and equipment's primarily during construction period;
- attracted the attention of outside parties;
- local population disruption;
- affected project labor or adjacent populations;
- affected cultural property;
- legal notice of violation/ penalty/ fines;
- labour unrest or disputes;
- chance cultural finds;
- worker compensation claims;
- land access/encumbrances; and
- disruption of emissions or effluent treatment;

- any other event which created liabilities for MEIPL
- Any significant event coverage report will include the following details at the minimum:
- date and description of event
- description of affected people or environment
- corrective action adopted
- any report submitted to regulatory agencies describing the event
- description and cost of repairs clean up or other remedial measures
- lessons learnt, employee training and preventive measures or process change instituted to prevent recurrence
- any other relevant additional information.

O.4.2. Awards/Recognition For MEIPL

It will include description of any relevant awards received by MEIPL for its sustained efforts either in the field of environment or social development

O.5 Liaison With External Parties

The details of liaisoning with external parties (if required) will include:

- Description of any reporting/monitoring requirements imposed by local regulatory authorities
- Description of any on-going public consultation and disclosure, liaison with non-governmental organizations (NGOs), civil society or public relations efforts
- Description of any on-going social or community development initiatives, programs, or dialogue.

O.5.1 Employee And Labour Welfare

- ATTRITION RATE AND TRENDS
- REGION-WISE EMPLOYEE AND LABOUR DISPUTES
- LABOUR COMPLIANCE

Table O.0.16

S. No	Project Name	Project Code & Capacity	Applicable Regulations	Number of Non-compliances	Related Labour Grievances	Total Monetary Impact	Grievances forwarded for Legal Redressal
1							

Table O.0.17 Gender Ratio At Corporate Office

YEAR	EMPLOYEES				
	MALE	FEMALE	TOTAL	MALE %	FEMALE %

- SUB-CONTRACTOR WORK ORDERS
- LABOUR CAMP INSPECTION PARAMETERS
- WORKER COMPENSATION CLAIMS
- RESULTS OF ANY EMPLOYEE SATISFACTION SURVEY

O.5.2 Stakeholder Engagement

- PUBLIC CONSULTATION/DISCLOSURE ON ENVIRONMENTAL AND SOCIAL RISKS AROUND SITES
- GRIEVANCE REDRESSAL

Table O.0.18 Gender Ratio At Corporate Office

Project Name	Project Code & Capacity	Type of Grievance	Number of Cases	% of Grievances Closed	Grievances forwarded for Legal Redressal

- INTERACTIONS WITH NGOS/LOCAL MEDIA
- COMMUNITY HEALTH & SAFETY AWARENESS CAMPAIGNS
- LOCAL EMPLOYMENT AND PROCUREMENT EFFORTS

0.5.3 Community Development

- FOCUS AREAS OF MEIPL'S COMMUNITY DEVELOPMENT
- SUMMARY OF DEVELOPMENT ACTIVITIES ACROSS ZONES/REGIONS
- COMMUNITY DEVELOPMENT ACTIVITY REPORT
- BUDGET ALLOCATION

Add Annexures as Relevant:

- Monitoring Reports for each Category A or B project following the outlines in the Attachments;
- Accident/Investigation Reports for Significant Events;
- Stakeholder engagement/consultation checklist and minutes;
- Records/photographs/articles as supporting (if applicable);
- Media articles etc. (if applicable)
- ESAP compliance report

Attachment 1

Suggested Outline of an Environmental Monitoring Report for Projects

A. Project name and summary information

- Project location
- Natural conditions
- Project size
- Construction/operational date
- Key developments and any major changes in location and design, if any

B. Relevant environmental permit, clearance or certificate

- Issuing body

- Date of issue and term of validity
- Terms of permit and renewal requirements
- Other standards and/or certificates (eg ISO 14000 Environmental Management Systems and Standards)

C. Matters of breach or non-compliance

- Nature of non-compliance
- Environmental standard or specification not complied with
- Record date and body
- Community or media reaction (if any)

D. Relevant environmental, health and safety incidents

- Training programs carried out
- Date of recording of incident
- Damage and injury information (if any)
- Compete investigation/recording body
- Community or media reaction (if any)

E. Environment Management Capacity

- Number of staff, environmental management personnel's work abilities (qualification and experience)
- Awareness level:
 - (i) environmental management
 - (ii) health and safety
 - (iii) environmental laws and regulations
- Executed training
- Necessity of environmental management ability assessment

F. Consultation with stakeholders

- Details regarding consultation, including, where applicable, local community, NGO, cultural and social groups and other stakeholders, including affected groups.
- Details of approach/methodology on addressing the concerns and issues raised at consultations

Table O.0.19 Gender Ratio At Corporate Office

Company/ SPV Name:			Location:			Grievance Officer /s with Mobile/s :			
Month :			Year :			Note: Employee Grievance as per Company policy			
Sl No.	Grievance Date & time	Name & Address or person with Mobile no.	Gender (M/F)	Details of Issue / Problem	Mode of Sharing of Problems/ Issues	Person who attended	Action taken	Remark (Open/ Close/ Pending)	Remark/s of Grievance officer/s with Signature

G Grievance redressal Mechanism:

This Grievance Redressal Framework (GRM) has been addressed in Annexure I with four (4) guiding principles, which include:

Transparency, Fairness, Respect, Accountability. The Grievance will be monitored in the following format at Project / Asset level.

Project specific cumulative status will be addressed in the Annual monitoring report.

H Environmental quality and standards (national/local and international)

- Implementation of Environmental Management Plan (EMP) (citing changes in the EMP, where warranted) at construction or operation phase, focusing on mitigation measures and monitoring program on the following:
 - Air Quality
 - Water (surface and groundwater)
 - Waste generation and management
 - Noise and vibration
 - Others

I Other Information and feedback

Please list any information that the Project should be aware of. This may relate to broader environmental matters, community initiatives within your company, positive media, or NGO attention, training activities, management system initiatives or cost savings through process efficiency, environment-friendly processes.

Name and Signature:	
Name:	Date:
Position:	Phone:
Signature:	E-mail:

Attachment 2

Suggested Outline of a Social Monitoring Report for Projects

A. Introduction

- Brief subproject description

B. Physical Progress of Projects with Resettlement and Indigenous Peoples Impacts

- List of subproject components with resettlement and indigenous peoples

impacts and progress updates (including engineering progress and ground clearing, land acquisition and structure demolition progress)

C. Scope of Resettlement Impacts and/or Impacts on Indigenous Peoples

- Actual scope of land acquisition and resettlement (including the methodology to determine the actual scope of land acquisition and resettlement and comparison with the scope of impacts in resettlement plan(s))
- Actual impacts on Indigenous Peoples (including the methodology to determine the actual scope of impacts on Indigenous Peoples and comparison with the scope of impacts in Indigenous Peoples plan(s))

D. Institutional Arrangements

- Key organizations involved in resettlement plan and/or IPP implementation
- Progress of activities implemented by other organizations
- Specific implementation arrangements for Indigenous Peoples

E. Compensation Rates, Payment and Assistance Delivery

- Compensation rates for land, resettlement subsidies, standing crops and trees
- Compensation for buildings and allowances for relocation
- Allocation and utilization of resettlement compensation
- Payment delivery to affected village groups and individuals
- Assistance delivery to affected Indigenous Peoples

F. Status of Land Acquisition, Resettlement and Reconstruction

- Housing relocation and reconstruction
- Provision of replacement agricultural and/or commercial land
- Restoration of affected public

infrastructure and facilities

- Restoration of land used for construction-related activities
- Implementation progress of income restoration activities
- Support to vulnerable groups
- Implementation progress of specific measures for affected Indigenous Peoples

G. Status of Provisions for Indigenous Peoples

- Culturally appropriate beneficial measures for each affected IP groups
- Mitigative measures for each affected IP groups
- Capacity Building measures for IP communities in the subproject area
- Broad community support, where required

H. Consultation and Disclosure Activities and Grievance Procedures

- Consultations on compensation standards and fees, relocation options, etc.
- Specific consultations conducted with Indigenous Peoples on the subproject, its impacts and assistance to Indigenous Peoples
- Any good faith negotiation to resolve major disagreements with Indigenous Peoples
- Grievances received and actions taken to address them

I. Grievance Redressal Mechanism

- Date established and description of organizational arrangements
- Grievances reported and resolution processes (e.g., nature of grievance, recorded dates and organizations involved, actions taken to resolve grievances and media or community reactions (if any))

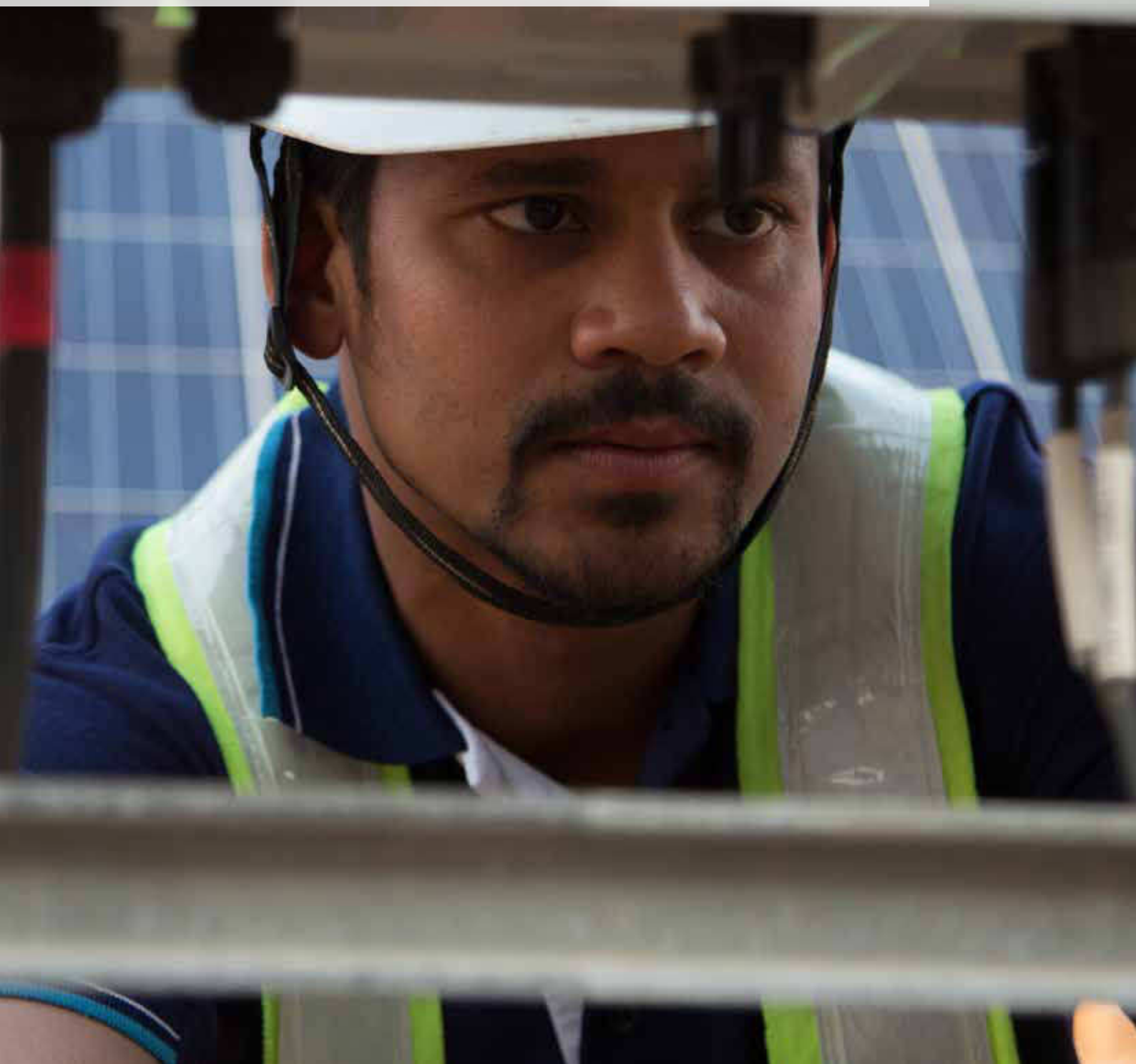
J. Compliance with Applicable Social Safeguard Requirements as Defined in the ESMS**K. Concerns and Work Plan**

- Concerns encountered, solutions provided and good practices established
- Work plan (staffing, training and work schedules)

Name and Signature:	
Name:	Date:
Position:	Phone:
Signature:	E-mail:

Annexure P1

EHS audit Checklist for Wind and Solar Projects- construction Phase



P1.0.1 EHS audit Checklist for Wind and Solar Projects- construction Phase

Date	
Location	
Name of the Project Site	
Name of the Site Manager	
Project EHS Manager	
Name of Auditor	
Brief Description of Project	

Table P1.0.2 Site Audit checklist for Construction Phase of the project

Sl. No	Aspects to check	Yes/No	Remarks
Key compliance checks			
1	Has the Site obtained Consent to Establish (CTE) under Water (Prevention and Control of Pollution) Act, 1974 and Air (Prevention and Control of Pollution), 1981 prior to starting construction, if not give the reason		
2	Is the Site complying with conditions stated under the CTE issued by respective State Pollution Control Board (SPCB), if not give the reason		
3	Has the Site obtained permission from Central Ground Water Board (CGWB) for groundwater extraction in case groundwater is being used during construction phase in line with CGWB Guidelines. If not give the reason		
4	Has the Site obtained Forest Clearance (in case forest land diversion is required) for both main plant and associated facilities like transmission towers.		
5	Is the construction Site registered under Building and Other Construction Worker (Regulation of Employment and Conditions of Service) Act, 1996		

6	Have the involved contractors obtained labour license for involved workforce under Contract Labour (Regulation and Abolition) Act, 1970		
7	Has the contractor obtained license under Inter-State Migrant Workmen (Regulation of Employment and Conditions of Service) Act, 1979 in case more than five or more Inter-State migrant workmen are employed.		
8	Does the contractor pay minimum wages to the workers in line with the Minimum Wages Act, 1948.		
9	Does the contractor provide wages in line with The Contract Labour (Regulation and Abolition Act, 1970)		
10	Does the contractor pay overtime to the deployed labourers in line with the regulatory requirements (The Contract Labour (Regulation and Abolition Act, 1970)).		
11	Is the contractor workforce insured under Workmen's Compensation Act, 1923		
12	Is the contractor confining its activities within the footprint of the project acquired lands?		
13	Is the contractor leasing any land from private individuals or from the community? If yes, provide details of lease.		
14	Are there any outstanding grievances related to contractors, e.g. are they affecting sources of livelihoods of communities around the project site?		
General H&S Provisions			
15	Do the contractor workforce/ other visitors wear ID card/ visitor card to regularize any unauthorized entry		
16	Are access routes in good condition and clearly signposted		
17	Are passageways/work areas clear to avoid tripping hazards		
18	Are potable (drinking) water and adequate toilet facilities available at the Site		
19	Are the employees and workers seen wearing adequate PPEs as per the requirement of the job		
20	Is the site housekeeping properly maintained and is the construction material safely stacked.		
Fall Protection			
21	Are holes/excavations/pits adequately guarded and marked to prevent falls		
22	Are temporary structures stable, adequately braced and not overloaded		

Sl. No	Aspects to check	Yes/No	Remarks
23	Will permanent structures remain stable during any refurbishment or demolition work		
24	Are open sided platforms and floors provided with guard rails and toe board to prevent falls		
25	Have safety harness been provided to workforce working at height (i.e. above 2 m)		
Excavations (limited applicability for excavations which are less than 2.5 m deep)			
26	Is there safe access into the excavation, e.g. a sufficiently long, secured ladder		
27	Are there barriers or other protection to stop people and vehicles from falling in		
28	Are properly secured stop blocks provided to prevent tipping vehicles falling in		
29	Are materials and spoil stored away from the edge of the excavation to reduce the chance of a collapse		
Traffic Safety			
30	Are all workers and other staff seen wearing high visibility vests at all times.		
31	Are vehicles properly maintained e.g. do the steering lights, handbrake and footbrake work properly, reverse horns and light		
32	Have drivers received proper training and are they competent for the vehicles or plant they are operating		
33	Is it made sure that passengers are only carried on vehicles designed to carry them		
34	Has it been made sure that plant and vehicles are not used on dangerous slopes		
Tools and machinery			
35	Are all dangerous and moving parts guarded, e.g. gears, chains, drives, projecting engine shafts		
36	Are guards secured and in good repair		
37	Are tools and machinery maintained in good repair and are all safety devices operating correctly		
38	Are all operators trained and competent		
Powered access equipment			

39	Is the site housekeeping properly maintained and is the construction material safely stacked.		
40	Are the operators trained and competent		
41	Is the safe working load clearly marked on the equipment and machinery		
Cranes			
42	Is the crane on a firm level base; are the riggers properly set		
43	Are the crane driver and signaler trained and competent		
44	Has the signaler/slinger been trained to give signals and to attach loads correctly		
45	Have you made arrangements to make sure the driver can see the load or has a signaler been provided to help		
46	Are people stopped from walking or working beneath a raised load		
47	Does the crane have a current report of thorough examination and record of inspection		
Fires and emergencies and First aid			
48	Are there emergency procedures e.g. for evacuating the site in case of fire		
49	Are the people aware of the On-site Emergency Plan and assembly points		
50	Is there a means of raising the alarm and does it work		
51	Is there a way to contact the emergency services from site		
52	Are there adequate escape routes and are these kept clear		
53	Is there adequate first-aid provision		
54	Is the quantity of flammable materials, liquids and gases on site kept to a minimum		
55	Are they properly stored		
56	Are suitable containers used for flammable liquids		
57	Are smoking and other ignition sources banned in areas where gases or flammable liquids are stored or used		

Sl. No	Aspects to check	Yes/No	Remarks
58	Is flammable and combustible waste removed regularly and stored in suitable bins or skips		
59	Are suitable fire extinguishers provided		
Hazardous substances			
60	Have you identified all harmful substances and materials, such as, paints, cement and dust		
61	Have you identified and put into place precautions to prevent or control exposure to hazardous substances		
62	Have workers had information and training so they know what the risks are from the hazardous substances used and produced on site and what they need to do to avoid the risks		
Noise (if applicable)			
63	Have you identified and assessed workers' exposure to noise.		
64	Can the noise be reduced by using different working methods or selecting quieter plant e.g. by fitting breakers and other plant or machinery with silencers.		
Welfare			
65	Are toilets readily available and are they kept clean and properly lit.		
66	Are drinking water and cups provided.		
67	Is there a place where workers can sit, make hot drinks and prepare food		
68	Can everyone who needs to use them get to the welfare facilities easily and safely.		
Electricity and other services			
69	Have all necessary services been provided on site before work begins and have you also identified existing services present on site (e.g. electric cables or gas mains) and taken effective steps, if necessary, to prevent danger from them.		
70	Where mains voltage has to be used, are trip devices, e.g. residual current devices (RCDs), provided and maintained for all equipment.		
71	Are cables and leads protected from damage		

72	Are all connections to the system properly made and are suitable plugs used		
73	Are tools and equipment checked by users, visually examined on site and regularly inspected and tested by a competent person		
74	Where there are overhead lines, has the electricity supply been turned off, or have other precautions been taken, such as providing 'goal posts' or taped markers		
75	Have hidden electricity cables and other services been located (e.g. with a locator and plans) and marked and have you taken precautions for safe working		
Protecting the public			
76	Is the work fenced off from the public using physical barriers		
77	Is the boundary of the Project Site secure and undamaged		
78	Are all portable ladders removed or their rungs boarded so that they cannot be used		
79	Are excavations and openings securely covered or fenced off		
80	Are flammable or dangerous substances locked away in secure storage places		

Signature of the auditor: _____

Assessment by EHS team

All requirements met: _____

If No, what are the additional requirements?

1. _____
2. _____
3. _____

Signature of team members

1. _____
2. _____
3. _____
4. _____

Annexure P2

EHS audit Checklist for Wind and Solar Projects- Operation Phase



P2.0.1 EHS audit Checklist for Wind and Solar Projects- Operation Phase

Date	
Location	
Name of the Project Site	
Name of the Site Manager	
Project EHS Manager	
Name of Auditor	
Brief Description of Project	

Table P1.0.2 Site Audit Checklist for Operation Phase of the Project

Sl. No	Aspects to check	Yes/No	Remarks
1	Has the Site obtained Consent to Operate (CTO) under Water (Prevention and Control of Pollution) Act, 1974 and Air (Prevention and Control of Pollution), 1981 prior to starting operations. If not give the reason		
2	Is the Site complying with conditions stated under the CTO issued by respective State Pollution Control Board (SPCB), if not give the reason		
3	Has the Site obtained permission from Central Ground Water Board (CGWB) for groundwater extraction in case groundwater is being used during operation phase in line with CGWB Guidelines, if not justify the reason		
4	Has the Site obtained Forest Clearance (in case forest land diversion is required) for both main plant and associated facilities like transmission towers.		
5	Has the Site obtained/renewed Factories License and fills all relevant returns to the Chief Inspector of factories on regular basis.if not give the reason		
6	Has the Site obtained power evacuation approval from the Power Transmission Company.		

Sl. No	Aspects to check	Yes/No	Remarks
7	Is the Site following the Electricity Act, 2003 and rules e.g. providing insulation mats in front of the electrical panels, fencing of transformer yards, presence of authorized safety personnel, display of danger signage and notice, adequacy of provisions of safety and protection of equipment's, periodical testing of installations etc.		
8	Have the involved contractors obtained labour license for involved workforce under The Contract Labour (Regulation and Abolition) Act, 1970.		
9	Has the contractor obtained license under The Inter-State Migrant Workmen (Regulation of Employment and Conditions of Service) Act, 1979 in case more than five or more Inter-State migrant workmen are employed.		
10	Does the contractor pay minimum wages to the workers in line with the Minimum Wages Act, 1948.		
11	Does the contractor provide wage slips to its workforce in line with Section 78(b) () of The Contract Labour (Regulation and Abolition Act, 1970)		
12	Does the contractor pay overtime to the deployed labourers in line with the regulatory requirements (The Contract Labour (Regulation and Abolition Act, 1970)).		
13	Is the contractor workforce insured under Workmen's Compensation Act, 1923		
14	Are commitments under Environment and Social Management Plan implemented		
15	Is ambient noise levels monitored and are wind turbines sited near to any sensitive receptors (relevant only to Wind Power projects)		
16	Is waste water quality being tested regularly before disposal, if not justify		
17	Is there a waste disposal plan and is it practiced at Site		
18	Are all temporary structures for construction phase removed and land restored		
19	Are plantation activities and green belts maintained		
20	Is there an accident incident reporting system		
21	Are records of Health and Safety incidents and mock fire drills maintained		

22	Are facilities for first aid available at site and does it meet the requirements prescribed under the Factories Rules of the applicable state		
23	Is Health and Safety training being imparted as per requirements		
24	Does the Site have operational On site emergency Plan and are employees aware of it.		
25	Does the site conduct mock drills on regular basis		
26	Does the switch yard, transformer area and inverter rooms are in compliance with the rules stated under Indian Electricity Act and relevant Rules.		
27	Is the transformer oil free of Poly chlorinated Biphenyls (PCB's) which has been banned by the Indian government.		
28	Is the stakeholder engagement plan followed during the operations		
29	Does the site follow the MEIPL's grievance redressal procedure		

Signature of the auditor: _____

Assessment by EHS team

All requirements met: _____

If No, what are the additional requirements?

1. _____
2. _____
3. _____

Signature of team members

1. _____
2. _____
3. _____
4. _____



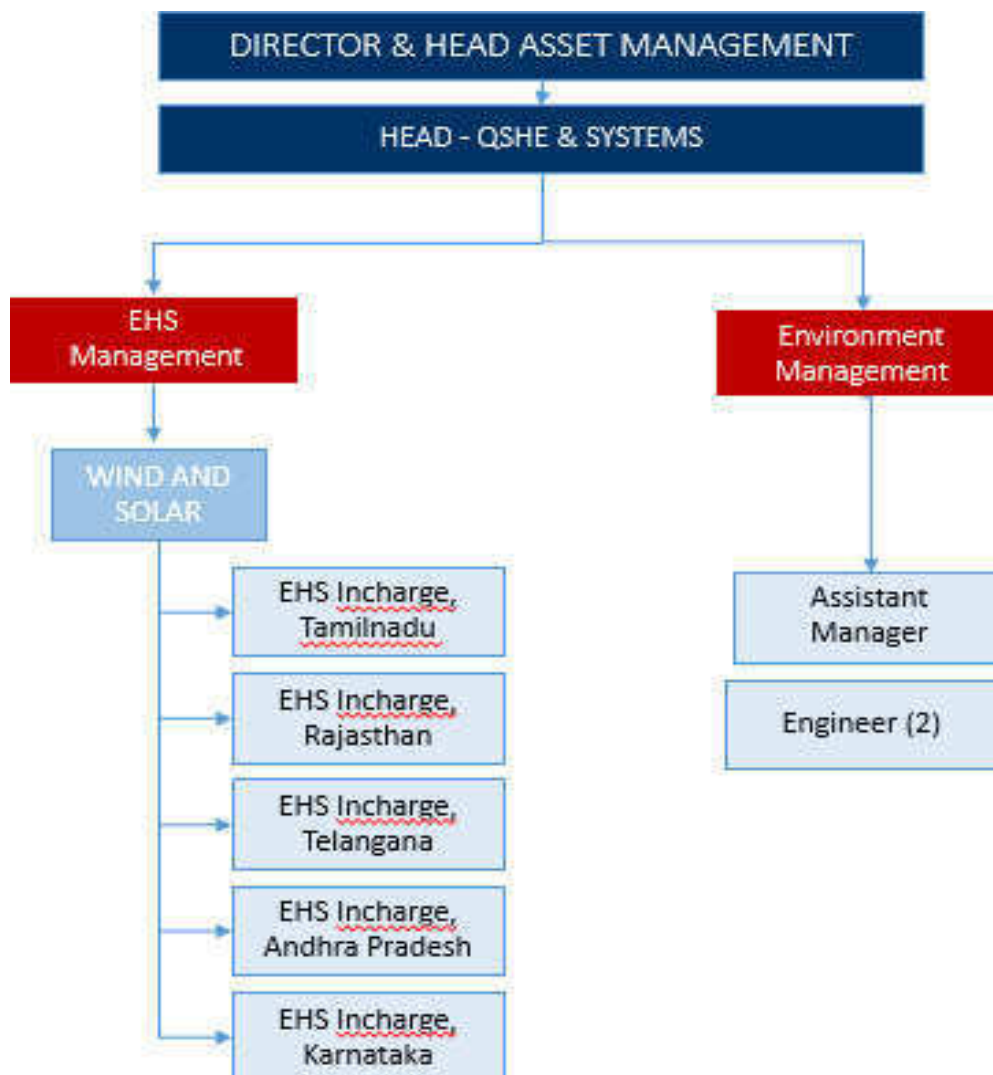
Mytrah Energy India Private Ltd.

Contact person - Suranjan Sarkar, Head QSHE & Systems

8001, 8th Floor, Q-City, Nanakramguda, Gachibowli, Hyderabad 500032, Telangana, India

Tel: +91 40 3376 0100 | Email: mail@mytrah.com | Web: www.mytrah.com

Organogram





Grievance Redressal Framework

Mytrah Vayu Pennar Pvt Limited

ESMS

INTRODUCTION

This Grievance Redressal Framework (GRM) has been developed by M/s Mytrah Energy (India) Pvt. Limited (MEIPL) for all its own Special Purpose Vehicles (SPVs) for addressing and managing grievances related to environmental and social performance arising from its operations in Wind Projects. This GRM shall serve as one of the component of MEIPL's Environmental and Social Management for managing overall performance of its projects as well as providing more accountability to its stakeholders. The GRM is based on four (4) guiding principles of the company which include:

Transparency

Fairness

Respect

Accountability

Types of Grievances

If any internal or external stakeholder believes that the company's business practices or activities are having an adverse impact on their quality of life, livelihood or environment, which they want the appropriate management to address, such a concern can be classified as a complaint or grievances. From the purpose of classifying the various kinds of grievances that can arise, they are mostly categorized under four (4) headings:

1.1 Internal Grievances

Employee Grievance (Separate procedure in place as part of the Human Resources (HR) of MEIPL. These include the employees hired specifically for the site.

1.2 External Grievances

Contractor and labour related grievances (Directly /indirectly controlled by MEIPL)

Community grievances including those on land and resettlement issues, project activities, CSR intervention, employee/worker-community conflicts, and other project related issues (Directly/Indirectly controlled by MEIPL)

Internal Grievances- Employees Grievance

The likely grievances of direct employees of MEIPL may include but not limited to:

- Complaints pertaining to amount of wage, salary, other remuneration or benefits, as per company's centralized HR Policy
- Timely disbursement of remuneration;



Grievance Redressal Framework

Mytrah Vayu Pennar Pvt Limited

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- Working condition, health and safety of the employees;
- Unethical behaviour between senior and subordinate employees;
- Discrimination on the basis of caste, creed, language, religion etc.;
- Gender discrimination; and
- Workplace harassment

External Grievances

External grievances are those grievances received from the external stakeholders such as labour and workforce, contractors, communities, local administrative setup, community groups/NGOs, and media groups.

Contractors and Labour Related Grievance

The workers include the local and interstate migrant workers are likely to have the grievance related to the following issues:

- Risk to health and safety of the labourers or workers hired by the Contractors;
- Working condition of the labour;
- Wage discrimination among the labour;
- Timing of the payments;
- Adequate facilities in the labour camps (during construction stages) including water supply and sanitation;
- PF, ESIC, Workmen's compensation, adequate health facility related issues;
- Unjustified deduction from the wages;
- Minimum wage rates for the labour;
- Extended working hours;
- Prevention and protection of child labour from hazardous work condition;
- Issue of forced labour;
- Gender discrimination.

Note: MEIPL has limited control on labour & workforce deputed through contractor/subcontractor as per business model. However, as a principle employee, MEIPL shall monitor the overall process as & when required as a part of its own Environmental & Social Management system. Should the contractors have their own GRM, MEIPL will ensure that it is functioning effectively and even review the grievance records. However, if the contractors lack GRM in the first place, MEIPL will ensure that the workers are linked to their GRM process.



Grievance Redressal Framework

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Community Grievance

The surrounding community of the project is considered as important stakeholder by the Project. The possible grievances of the community could be:

- Land and compensation related issues
- Damage to, crops, infrastructure;
- Eligibility issues and payment of compensation;
- Improper/ inadequate valuation of the compensation;
- Compensation and employment entitlement against losses;
- Delay in the payment of the compensation;
- Livelihood restoration issues and associated benefits;
- Adverse impacts on community, common property resources (CPR);
- Community development, employment and other issues
- Risks to community, health & safety (e.g. traffic);
- Accidents (e.g. involving livestock);
- Unethical Behaviour by MEIPL personnel or its sub-contractors;
- Noise/dust/air emissions or any other impact on environment caused by project or sub-contractors;
- Demand for development interventions in the community;
- Issues owing to behaviour of the security personnel and general attitude of the local community;
- Issues related to cultural conflicts or opportunity conflict owing to presence of migrant workers in the community or in the nearby areas;
- Any attempts to conceal the above



Note: MEIPL has limited control in case of Trunkey contract for the project /OEM. However, as a principle employee, MEIPL shall monitor the overall process as & when required as a part of its own Environmental & Social Management system

1.2 Redressal Process

Redressal Process for Internal/Employee Grievances

MEIPL as part of its Human Resources system has developed grievance addressing policy with detailed scope and coverage considering registration and addressal of internal grievances raised by the employees, which display Grievance procedures transparently in its SAP Net Weaver Portal with following objectives:

- Grievances of the employees in the shortest possible time
- At the lowest possible management level
- With appellate stages so that it is fair, transparent and reasonable

	<h1 style="text-align: center;">Grievance Redressal Framework</h1> <h2 style="text-align: center;">Mytrah Vayu Pennar Pvt Limited</h2>	
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The grievance policy is intended as the tool by which a member of staff may formally have a grievance, regarding any condition of their employment, which he/ she wants to be heard by the management of the Company.

The following stages outline the existing grievance redressal process established by MEIPL with stipulated time period to resolve the issues for its employees:

Stage 1: First level of grievance addressal

The aggrieved employee may take up the grievance in writing with his/her reporting officer. If the matter itself concerns the employee's line manager or program manager, then the grievance should be escalated to the Head of the Department.

Stage 2: Second level of grievance addressal

In case employee is not satisfied with the decision communicated to him/her at Stage-I, or if she/he fails to receive the reply within stipulated period, he/she may submit the grievance in the prescribed form to Head-HR

Stage 3: Third level of grievance addressal



If the employee remains aggrieved and not satisfied with the decision of the Head-HR, will have an option to appeal to the President

Redressal Process for External Grievances

MEIPL has limited on External Grievances due to its Business model. Mainly deputed Pretty contractor will be responsible for grievances redressal system as they are responsible from land purchasing to Plant erection and OEM. In those cases, as a principle employee, MEIPL shall monitor the overall process as & when required as a part of its own Environmental & Social Management system. However, in case of self-developed project and OEM, MEIPL will implement a robust Grievance Redressal & Management system with a defined process.

Step 1: Publicizing Grievance Management Procedures

For any project, MEIPL /deputed Contractor is required to ensure suitable public disclosure of its grievance handling and redressal process to its external stakeholders such as the community or the local administration. The company will establish a grievance body at the plant site comprising of designated personnel and disclosure of such a body to be displayed at suitable location in the plant premises so that any member of the community can easily access such information.

	Grievance Redressal Framework Mytrah Vayu Pennar Pvt Limited	
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Looking at the scale of the project and the duration of the construction stage wherein maximum numbers of contract workers, migrant workers or workers from the local community are supposed to be working at the site for a duration ranging from six months to nine months tentatively, the Grievance Redressal Mechanism for the community can simultaneously be used for the workers. The process of disclosure of information and the GRM process itself will be disclosed to the workers considering the duration i. e six months to nine Months. Should the contractors have their own GRM, MEIPL will ensure that it is functioning effectively and even review the grievance records as and when required.

For the grievance mechanism to be in line with the cultural and socio- economic characteristics, based on its understanding of the ground situation in the project area, the company / deputed contractor will strive to provide the following information to the stakeholders (primarily community) from time to time with suitable communication media, at least some of the following:

Project-level mechanisms capable of delivering outputs against grievances and benefits complainants can receive from using the company grievance mechanism, as opposed to other resolution mechanisms;

Information on who can raise complaints (affected communities);

Where, when, and how community members can file complaints;

Company personnel responsible for receiving and responding to complaints, and

Type of response complainants can expect from the company/contractor, including proposed timing of response, based on the gravity;

Designated personnel shall be responsible for publicizing the procedure through appropriate methods.

Step 2: Receiving and Keeping Track of Grievances

This receipt and tracking of grievances primarily involves the following stages:

Collecting and recording grievances;

Registering them in a suitable manner; and



Tracking them to reflect their status

Grievance Receipt and Recording

Designated personnel from the grievance body with collection of grievances writes down complaints at group or individual meetings, during field visits, or at designated locations. These grievances are to include:

Complaints received through third parties such as Sarpanch, community persons, contractors, contract workers, etc.;

Complaints received by project staff directly/indirectly involved in handling grievances;

	Grievance Redressal Framework Mytrah Vayu Pennar Pvt Limited	
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Tracking of grievances can be undertaken with keeping of records in the registrar.

Designated grievance personnel of respective sites will be responsible to intimate the Grievance status at regular interval to appropriate authority eg. Project Head, OEM Head, HR&FMS-Head and EHS Head so that it will be reflected in appropriate forum like ESMS committee. The designated Grievance personnel may also do a case to case grievance status reporting to the Top management in case of critical grievances or grievances that may require immediate attention of the Top management or ESMS committee.

Step 3: Reviewing and Investigating Grievances

The designated personal from the grievance body responsible for grievance handling will organize the process to validate the complaint's legitimacy and arrange for investigation of details as per the applicability. All grievances shall undergo some degree of review and investigation, depending on the type of grievance and clarity of circumstances.

MEIPL will communicate clearly to all concerns about the role, responsibilities, and limitations of a company grievance mechanism and the limitations of the same in handling grievances, if any to ensure transparent dealing of any grievance.

Step 4: Developing Resolution Options and Preparing a Response

Rationale for Grievance Closure

The requirements/need specified in the form of grievance by the aggrieved have been effectively addressed to the satisfaction of the complainant;

Applicable Grievance to be duly addressed and closed by MEIPL in stipulated time based on the merit.

Process of the Grievance Redressal

The person having grievance will come on the scheduled time and lodge the complaint in person or through other recognised person/forum identified by the company

The grievance will be processed and concerned person will be informed through a suitable communication by person or through company recognized person/forum within mutually agreed stipulated period

On hearing from the designated grievance personnel they have to come for further processing to the grievance redressal, if required.

Step 5: Monitoring, Reporting, and Evaluating a Grievance Mechanism

Monitoring and reporting can be tools for measuring the effectiveness of the grievance mechanism and the efficient use of resources, and for determining broad trends and recurring problems so they can be resolved proactively before they become points of contention. Monitoring helps identify common or recurrent claims



Grievance Redressal Framework

Mytrah Vayu Pennar Pvt Limited

ESMS

that may require structural solutions or a policy change, and it enables the company to capture any lessons learned in addressing grievances. Periodic review of internal and external grievances has to be carried out at the appropriate forum of MEIPL like ESMS committee meetings.

Monitoring Indicators

Grievance records will provide the background information for regular monitoring, both informal and formal.

Step 6: Reporting and Recording

Based on all grievances received, registered, documented and tracked through database reports shall be prepared for reporting to the appropriate Forum. This shall assist in tracking overall trends and patterns in concerns allowing emerging issues to be flagged and understood at an early stage. Monitoring and reporting also create a base level of information that can be used by the company to report back to communities as per the applicability and requirement.

I 3. Disclosure of this GRM

The disclosure for GRM will be done with the appropriate community, employees and stakeholders to fulfil the specific purpose based on the requirement through suitable communication.

Manpower: Roles and Responsibilities

Corporate Level

At the corporate level, handling of grievances is required to be directly handled by the HR&FMS department under the responsibility of the designated officer, declared in the SAP Net Weaver Portal for resolution of internal grievances.

Project & O&M Level

A grievance Body, led by designated Grievance officer is proposed for effective implementation of GRM and coordinating day to day functions. The grievance Body would be reporting back to the appropriate authority including functional areas such as HR, Project, O&M, BD/Land, CSR, EHS etc. as per requirement. The mandate of this cell would be managed as part of the ESMS forum.

Financial

MEIPL will ensure appropriate budget allocation to deal with grievance tracking and handling with consent of appropriate authority.

Training

Awareness shall be provided in the company's policy and practices for both employee and appropriate stakeholder grievance mechanisms, relevant to their exposure and responsibilities.

ESMS

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EHS audit Checklist for Wind and Solar Projects-

Operation Phase

EHS audit Checklist for Wind and Solar Projects- Operation Phase

Date	9 th September 2017
Location	Vajrakarur
Name of the Project Site	Vajrakarur
Name of the Site Manager	Mr. Surya Mohan Perumalla
Project EHS Manager	Mr. Suranjan Sarkar
Name of Auditor	Mr. Ramesh Babu R
Brief Description of Project	Vajrakarur Site, having 30 WTGs with 63MW of total capacity

Table Error! No text of specified style in document..1 Site Audit Checklist for Operation Phase of the Project

S. No.	Aspects to check	Yes/No/NA	Remarks
1	Has the Site obtained Consent to Operate (CTO) under Water (Prevention and Control of Pollution) Act, 1974 and Air (Prevention and Control of Pollution), 1981 prior to starting operations. If not give the reason	NA	No Pollution of Air and Vehicles having PUC certificate
2	Is the Site complying with conditions stated under the CTO issued by respective State Pollution Control Board (SPCB), if not give the reason	NA	Not required since Wind industry is under White category

3	Has the Site obtained permission from Central Ground Water Board (CGWB) for groundwater extraction in case groundwater is being used during operation phase in line with CGWB Guide Lines, If not justify the reason	Yes	Available
4	Has the Site obtained Forest Clearance (in case forest land diversion is required) for both main plant and associated facilities like transmission towers.	NA	Site is not under Forest area
5	Has the Site obtained/renewed Factories license and fills all relevant returns to the Chief Inspector of factories on regular basis, if not give the reason	Yes	
6	Has the Site obtained power evacuation approval from the Power Transmission Company.	Yes	
7	Is the Site following the Electricity Act, 2003 and rules e.g. providing insulation mats in front of the electrical panels, fencing of transformer yards, presence of authorized safety personnel, display of danger signage and notice, adequacy of provisions of safety and protection of equipment's, periodical testing of installations etc.	Yes	Available
8	Have the involved contractors obtained labour license for involved workforce under The Contract Labour (Regulation and Abolition) Act, 1970.	Yes	Available
9	Has the contractor obtained license under The Inter-State Migrant Workmen (Regulation of Employment and Conditions of Service) Act, 1979 in case more than five or more Inter-State migrant workmen are employed.		
10	Does the contractor pay minimum wages to the workers in line with the Minimum Wages Act, 1948.	Yes	Available
11	Does the contractor provide wage slips to its workforce in line with Section 7B(b) (i) of The Contract Labour (Regulation and Abolition Act, 1970)	Yes	Available

31 Every contractor shall, where the wage period is one week or more, issue wage slips in Form XIX, to the workmen at least a day prior to the disbursement of wages. : Yes

12	Does the contractor pay overtime to the deployed labourers in line with the regulatory requirements (The Contract Labour (Regulation and Abolition Act, 1970)).	NA	Contractors workforce is for 8 hours
13	Is the contractor workforce insured under Workmen's Compensation Act, 1923	Yes	Available
14	Are commitments under Environment and Social Management Plan implemented	Yes	Implemented
15	Is ambient noise levels monitored and are wind turbines sited near to any sensitive receptors (relevant only to Wind Power projects)	Yes	Every 6 months once Noise level monitoring is done inside and outside of WTG
16	Is waste water quality being tested regularly before disposal, if not justify	NA	No disposal of water
17	Is there a waste disposal plan and is it practiced at Site	Yes	As per Suzlon guidelines
18	Are all temporary structures for construction phase removed and land restored	NA	
19	Are plantation activities and green belts maintained	Yes	
20	Is there an accident incident reporting system	Yes	
21	Are records of Health and Safety incidents and mock fire drills maintained	Yes	
22	Are facilities for first aid available at site and does it meet the requirements prescribed under the Factories Rules of the applicable state	Yes	
23	Is Health and Safety training being imparted as per requirements	Yes	
24	Does the Site have operational On site emergency Plan and are employees aware of it.	Yes	
25	Does the site conduct mock drills on regular basis	Yes	
26	Does the switch yard, transformer area and inverter rooms are in compliance with the rules stated under Indian Electricity Act and relevant Rules.	Yes	

27	Is the transformer oil free of Poly chlorinated Biphenyls (PCB's) which has been banned by the Indian government.	Yes	
28	Is the stakeholder engagement plan followed during the operations	Yes	Conducting CSR activities
29	Does the site follow the MEIPL's grievance redressal procedure	No	Suzlon has own GRP

Rajesh Sam

Signature of the auditor

• Assessment by EHS team

All requirements met: _____

If No, what are the additional requirements?

1. _____

2. _____

3. _____

Signature of team members

1. _____

2. _____

3. _____

4. _____

By _____

1. Name of the team leader/Chairperson	2. Date	3. Signature of the team leader/Chairperson
4. Name of the team member/Member	5. Date	6. Signature of the team member/Member
7. Name of the team member/Member	8. Date	9. Signature of the team member/Member
10. Name of the team member/Member	11. Date	12. Signature of the team member/Member



VISION LABS

Environmental Consultants & Analytical Services

Recognised by ISO/IEC 17025:2005 (NABL), MoEF & CC,
FSSAI, NARFT-QCI, ISO 9001:2015 & OHSAS 18001:2007.

AMBIENT NOISE QUALITY MONITORING LEVELS

Issued to: Myrsh Vayu (Punam) Private Limited, #2091, Q City S.No.109, Nizampet, Hyderabad-500 092, India. Site: Myrsh Vayu (Punam) Private Limited, Goddabatur Village, Vengal Rao Mandal, Uppurkonda Taluk, Anantapur District, Andhra Pradesh.	Issued Date	07.08.2018
	Our Ref No	VL - 180703442092
	Work Order No	9300006234
	Your Ref Date	19.07.2018
Monitoring conducted by VISON LABS		

Total Average Results: Units: dB (A)

S.NO	Monitoring Time	Saxlon Sub Station Near Entrance Gate Date: 28.07.2018 to 29.07.2018	Goddabatur Village Date: 28.07.2018 to 29.07.2018	Chinna Hothur Village Date: 28.07.2018 to 29.07.2018
1	06.00 - 07.00	43.1	42.6	43.1
2	07.00 - 08.00	46.4	44.6	48.3
3	08.00 - 09.00	48.2	49.1	49.7
4	09.00 - 10.00	50.1	48.3	51.4
5	10.00 - 11.00	51.7	51.2	52.6
6	11.00 - 12.00	53.6	52.6	54.3
7	12.00 - 13.00	52.3	50.1	55.5
8	13.00 - 14.00	53.1	52.8	52.6
9	14.00 - 15.00	50.3	50.2	54.3
10	15.00 - 16.00	51.4	53.7	56.2
11	16.00 - 17.00	52.0	51.4	52.9
12	17.00 - 18.00	53.1	49.6	51.8
13	18.00 - 19.00	54.3	52.4	54.2
14	19.00 - 20.00	51.2	51.7	55.0
15	20.00 - 21.00	48.5	49.2	52.4
16	21.00 - 22.00	46.1	47.0	50.1
17	22.00 - 23.00	44.4	44.6	47.3
18	23.00 - 24.00	41.7	42.1	45.6
19	24.00 - 01.00	39.6	40.3	42.4
20	01.00 - 02.00	36.2	38.4	39.8
21	02.00 - 03.00	34.9	36.1	37.3
22	03.00 - 04.00	35.8	34.4	35.4
23	04.00 - 05.00	35.4	35.7	38.2
24	05.00 - 06.00	38.6	39.1	41.0
Leq day dB(A)		51.1	50.5	52.9
Leq Night dB(A)		38.5	40.1	42.6

AMBIENT NOISE LEVEL STANDARDS

Area Code	Category of Area	Limits in dB (A) Day Time	Limits in dB (A) Night Time
(A)	Industrial Area	< 75	< 70
(B)	Commercial Area	< 65	< 55
(C)	Residential Area	< 55	< 45
(D)	Silence Zone	< 50	< 40

Note: 1. Day time is reckoned in between 6 a.m. and 9 p.m., Night time is reckoned in between 9 p.m. and 6 a.m.

2. Noise monitoring were done as per standard method prescribed by IS 5876:1981 (Reaffirmed 2001) & IS 4758:1968 (Reaffirmed 2002).

Prepared by	Checked by	Authorized Signatory
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VL/QEHS/5, 10/TR

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 NOTE : This Report is subject to the terms and conditions mentioned overleaf.



VISON LABS

Environmental Consultants & Analytical Services

Recognised by ISO/IEC 17025:2005 (NABL), MoEF & CC,
FSSAI, NABET-QCI, ISO 9001 : 2015 & OHSAS 18001 : 2007.

AMBIENT NOISE QUALITY MONITORING LEVELS

Issued to:	Issued Date
Mytrah Vayu (Punna) Private Limited, # 8001, Q- City, S.No-109, Nanakramguda, Gachibowli, Hyderabad- 500 032, India.	07.08.2018
Site: Mytrah Vayu (Punna) Private Limited, Guddechar Village, Vajrakurur Mandal, Urvakonda Taluk, Ananthapur District, Andhra Pradesh.	Our Ref No VL - 180703442092-01
	Work Order No 9300006254
	Your Ref Date 19.07.2018

Monitoring conducted by VISON LABS

Total Average Results. Units: dB (A)

S.NO	Monitoring Time	Near Urvakonda Village Date: 28.07.2018 to 29.07.2018	Ragulapada Village Date: 28.07.2018 to 29.07.2018	Vajrakurur Village Date: 28.07.2018 to 29.07.2018
1.	06.00 - 07.00	39.1	39.6	37.0
2.	07.00 - 08.00	41.4	41.5	38.2
3.	08.00 - 09.00	41.3	43.9	41.4
4.	09.00 - 10.00	45.0	45.5	43.2
5.	10.00 - 11.00	47.1	47.0	45.6
6.	11.00 - 12.00	46.4	44.9	46.5
7.	12.00 - 13.00	45.3	45.6	44.4
8.	13.00 - 14.00	48.1	48.1	47.2
9.	14.00 - 15.00	46.3	49.5	45.5
10.	15.00 - 16.00	49.7	48.4	44.0
11.	16.00 - 17.00	46.2	47.0	46.2
12.	17.00 - 18.00	47.4	49.6	48.5
13.	18.00 - 19.00	49.0	51.0	45.1
14.	19.00 - 20.00	47.4	48.5	47.6
15.	20.00 - 21.00	45.2	48.1	44.4
16.	21.00 - 22.00	43.5	45.8	42.3
17.	22.00 - 23.00	41.1	42.7	39.7
18.	23.00 - 24.00	38.8	40.9	36.9
19.	24.00 - 01.00	36.4	39.1	38.4
20.	01.00 - 02.00	34.1	36.2	31.7
21.	02.00 - 03.00	31.7	33.7	29.3
22.	03.00 - 04.00	29.6	31.6	28.6
23.	04.00 - 05.00	31.4	33.8	31.9
24.	05.00 - 06.00	34.9	36.7	33.3
Leq day dB(A)		46.2	47.1	45.0
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AMBIENT NOISE LEVEL STANDARDS

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(B)	Commercial Area	< 65	< 55
(C)	Residential Area	< 55	< 45
(D)	Silence Zone	< 50	< 40

Note: 1. Day time is reckoned as between 6 a.m. and 9 p.m. Night time is reckoned as between 9 p.m. and 6 a.m.

2. Noise monitoring was done as per standard method prescribed by IS 9876:1981 (Reaffirmed 2001) & IS 4759:2001 (Reaffirmed 2007).

Prepared by	Checked by	Authorized Signatory

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NOTE : This Report is subject to the terms and conditions mentioned overleaf.



Community Health and Safety Management Plan

		Signature	Date
Prepared By	Kishore Kumar Naveen Kumar Upasi	<i>Kishore Kumar</i> <i>Naveen Kumar</i>	25/10/2018
Approved By	Suranjan Sarkar	<i>Suranjan Sarkar</i>	29/10/2018
Controlled By	Suranjan Sarkar	<i>Suranjan Sarkar</i>	29/10/2018



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1.0 INTRODUCTION

Mytrah Energy (India) Private Limited ("MEIPL") is one of the largest renewable Independent Power Producers in India. The Company has a 2 GW portfolio of wind and solar power assets, consisting of 40 projects, spread across 9 India states. All projects are under long-term Power Purchase Agreements thereby providing significant revenue and profit visibility over the next two decades. With a mid-term target of growing its portfolio to 5 GW, MEIPL continues to actively pursue new project opportunities across the country.

The management of MEIPL is committed to building the Company into a sustainable, socially responsible institution that creates positive impact for all its stakeholders. While MEIPL's core business of renewable power generation is inherently eco-friendly, its ethos is reflected in all business activities. Whether it is in its robust project management practices, development of proprietary technology to monitor operational projects, or the use of CSR as a tool for large-scale social impact, this impact-oriented approach is integral to all key business initiatives of MEIPL.

As part of the process for the Project a suite of environmental and social management plan is required to address the issues identified in the Environmental and Social Impact Assessment (ESIA). Several activities associated with the projects may impact upon the health and safety of the local community.

This Community Health and Safety Management Plan (CHSMP) has been compiled to address the specific impacts that are anticipated to occur as a result of project's construction, operation and maintenance developments as identified in the ESIA. This plan sets out a formal system by which Mytrah shall manage and implement mitigation measures that will avoid or reduce the significance of impacts related to community health and safety.

1.1 SCOPE

The purpose of the CHSMP is to provide a clear set of actions and responsibilities for the control of impacts affecting the health and safety of the communities within the Project's area of influence.

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The scope of this Community Health and Safety Management Plan (CHSMP) covers construction, operational and maintenance phases of the Project. The CHSMP is relevant to Mytrah and all contractors.

The CHSMP includes measures to respond to the following potential impacts identified in the ESIA:

- Changes to community safety profile related to traffic, emergency responses, unplanned events and conflict.
- Changes to livelihoods and income generating opportunities and subsequent effects on community access to social and physical infrastructure.

2.0 CONTEXT OF ORGANIZATION

Mytrah reaffirms continual improvement for its Quality, Safety, Health & Environment (QSHE) performance with full satisfaction of customer in Power generation and committed to meeting the International Finance Corporation's Performance Standards on Environmental and Social Sustainability (IFC PSs).

Specifically in relation to the CHSMP, Mytrah and its contractors will take the responsibility to avoid or minimize the risks and impacts to community health and safety that may arise from proposed activities, paying particular attention to vulnerable groups. Focused attention and discretionary effort should be made in conflict or post-conflict areas where a project could exacerbate an already sensitive local situation and stress scarce local resources potentially leading to further conflict.

2.1 POLICY STATEMENT AND OBJECTIVES

The development of this CHSMP has been guided by Mytrah Environment and Occupational Health and Safety Policy, as set out in **2.2 ENVIRONMENTAL POLICY** and **2.3 OCCUPATIONAL HEALTH AND SAFETY POLICY**. This Policy is a high-level corporate statement of intent and establishes the principles to be followed in the management of environmental and Occupational health & safety issues.

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2.2 ENVIRONMENTAL POLICY




ENVIRONMENTAL POLICY

Mytrah is committed to carry out all organizational activities in a sustainable manner by adopting a risk-based approach and promoting environmental good practices that minimize environmental impact and provide effective environmental and ecological stewardship

Objectives

- Operating in compliance with all relevant Environmental legislation
- Managing resources effectively to help conserve nature
- Adopting an integrated and a sustainable approach towards waste management
- Encouraging adoption of green supply chain management by promoting efficient use of materials and resources across relevant business activities
- Providing holistic training to employees, contractors and other stakeholders enabling them to understand the legal requirements and consequences of environmental risks
- Establishing a cohesive approach towards Green House Gas (GHG) emission reduction
- Improving the effectiveness and efficiency of Environment and Social Management Plan and program in a continual manner
- Communicating the policy to all relevant stakeholders and making it available in public domain, as applicable

Date: 18.04.2018


(Vikram Kailas)
Vice Chairman & MD



2.3 OCCUPATIONAL HEALTH AND SAFETY POLICY




OCCUPATIONAL HEALTH AND SAFETY POLICY

Mytrah is committed to the Occupational Health and Safety of every stakeholder involved in its project life cycle by adopting a risk-based approach and providing a clean, safe and healthy environment that promotes best safety practices

Objectives:

- Creating a safe and secure environment for man, machine and materials with a target of zero accident
- Promoting a robust OH & S culture within the organization through effective participation, communication, training and consultation among employees at the workplace
- Complying with all applicable OH & S standards and regulations by practicing a sustainable and integrated OH & S management approach
- Adopting effective administrative processes to minimize OH & S risks to relevant stakeholders throughout the organization
- Improving the effectiveness and efficiency of OH & S Performance through adoption of a holistic Emergency Preparedness Management program
- Communicating the policy to all relevant stakeholders and making it available in public domain, as applicable

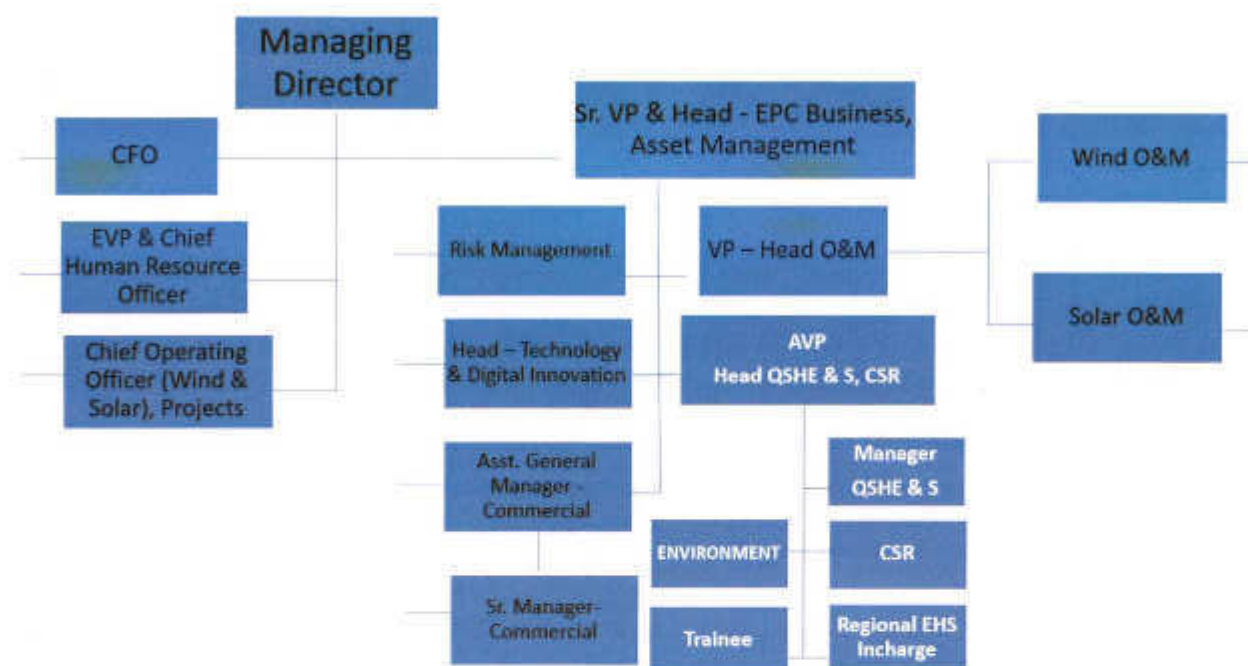
Date: 18.04.2018


(Vikram Kailas)
Vice Chairman & MD



3.0 Organization Chart

Mytrah Group is focused on delivering sustainable energy to the world. The group is privately owned and takes a long-term view of business, guided by strong corporate values and high ethical standards.



4.0 Summary of Community Health and Safety Management Plan

Key measures to be adopted to mitigate the impact on community are given in Table-4.1.

TABLE-4.1
COMMUNITY HEALTH AND SAFETY MANAGEMENT PLAN

Impact	Mitigation Measures	Monitoring Plan/ Training Requirements	Responsibility
Construction Phase			
Increase in ambient air quality levels due to emissions from construction activities	<ul style="list-style-type: none"> Turn off the machineries when not in use. Periodic inspection of equipment. 	Maintenance checklist	Contractor/ Site Incharge/EHS Incharge
Degradation of air quality due to emissions from transportation	<ul style="list-style-type: none"> Vehicles speed to be restricted to 20-30 km/hr on unpaved road Material should be covered with tarpaulin during 	Vehicle inspection checklist	Contractor/ Site Incharge/EHS Incharge

Impact	Mitigation Measures	Monitoring Plan/ Training Requirements	Responsibility
	transportation and in storage area <ul style="list-style-type: none"> All the project vehicles should have valid Pollution under Control (PUC) certificate. Ensure regular maintenance of project vehicles 		
Increase in Noise levels due to construction activities	<ul style="list-style-type: none"> Keep stationary source of noise such as DG sets at farthest point from the settlements Restrict major noise generating activities during night time 10:00 pm to 6:00 am Regular maintenance of project vehicles 	Vehicle inspection checklist	Site Incharge/EHS Incharge
Depletion of water resources	<ul style="list-style-type: none"> Water for construction should only be sourced from tanker facility. 	Water consumption record	Contractor/ Site Incharge
Spread of communicable diseases due to influx of new workers.	Awareness campaigns on health, hygiene and sanitation.	Awareness campaign	EHS incharge
Increase in anti-social behaviours	Providing training and awareness raising events around the dangers and consequences of substance abuse, violence and others.	Awareness campaign	Site Incharge/EHS Incharge
Issue of local level employment opportunities	Local employment should be encouraged and shall be deployed through contractors both during construction and operation	As per the need and competency	Contractor/Site Incharge
Increase in injuries/accidents due to Project associated road traffic	<ul style="list-style-type: none"> Control speed limits; Ensure trucks are not overloaded and are covered where necessary; Investigate reasons and implement more strict or new measures if need it. Community awareness 	Awareness campaign	Contractor/ Site Incharge/EHS Incharge

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Impact	Mitigation Measures	Monitoring Plan/ Training Requirements	Responsibility
	Please refer to Road Safety and Traffic Management Plan		
Effect on culture or sites of archaeological importance	<ul style="list-style-type: none"> Chance find procedure is required to be planned and implemented in case of accidental discovery of artefacts during construction activities 	Awareness campaign	EHS Incharge/Head-EHS
Operation Phase			
Increase in Noise levels due to operation of wind turbines.	<ul style="list-style-type: none"> Periodic monitoring of ambient noise levels Periodic maintenance of WTGs 	SOP for Noise monitoring and Maintenance checklist	Site Incharge/EHS Incharge
Disturbance due to shadow flickering and blade glint caused by wind turbines	<ul style="list-style-type: none"> Formal grievance redressal mechanism shall be in place for the local community so that any issues or concerns associated with shadow flicker are reported to the site staff. Provide curtain and blinds in households with open roof, and windows, doors facing WTGs. Undertake plantation to hide shadow flicker near receptors (households) identified with significant impact. 	Grievance Redressal Mechanism	EHS Incharge/Site Incharge
Injury due to accidental blade throw	<ul style="list-style-type: none"> Ensure that lightning protection systems are properly installed and maintained. Carry out periodic blade inspections and repair any defects that could affect blade integrity 	Blade inspection report	Site Incharge

Impact	Mitigation Measures	Monitoring Plan/ Training Requirements	Responsibility
Impact on community due to improper transportation of waste	Training of staff on matters pertaining to hazardous materials that could be encountered on site and measures to be taken in case of a spill or road accident during waste transportation	Awareness campaign	Site Incharge/EHS Incharge
Decommissioning Phase			
Increase in ambient air quality levels due to emissions from dismantling activities	A plan will be established prior to the decommissioning phase to mitigate the impacts on community.	Decommissioning checklist	Head – EHS
Increase in Noise levels due to dismantling			
Impact on community due to improper transportation of debris			

5.0 Road Safety and Traffic Management Plan

5.1 Scope and Purpose

The plan encompasses the community safety related impacts that may arise from the increased vehicular traffic due to movement of heavy equipment/machineries and vehicles along the site access and approach roads particularly during construction phase. The plan will be regularly updated by the contractor with the project progress and as vehicle movement requirements are identified in detail. Designated site incharge/EHS incharge will be responsible for overall coordination of traffic management.

5.2 During Construction Phase

The following mitigation measures will be implemented during this phase:

- Project vehicular movement will be restricted to defined access routes.
- Only commercial vehicles shall be used for project core activities
- Ensure that Central Motor Vehicle Rules, 2000 shall be honored
- Any road diversions and closures will be informed in advance to the project vehicles accessing the above route. Usage of horns by project vehicles will be restricted near sensitive receptors viz. schools, settlements etc.

- Traffic flows will be timed wherever practicable during period of increased commuter movement in the day.
- Temporary parking facilities should be provided within the work areas and the construction sites to avoid road congestion.
- Vehicular movement to be controlled near sensitive locations viz. schools, colleges, hospitals identified along designated vehicular transportation routes.
- Routine maintenance of project vehicles will be ensured to prevent any abnormal emissions and high noise generation.
- Adequate training on traffic and road safety operations will be imparted to the drivers of project vehicles. Road safety awareness programs will be organized in coordination with local authorities to sensitize target groups viz. school children, commuters on traffic safety rules and signage.
- The contractor(s) should frame and implement a "No Drug No Alcohol" Policy to prevent road accidents/incidents.

5.3 During Operational Phase

Since limited vehicular movement is anticipated during operational phase considering only the daily movement of project personnel any impacts arising from the same can be effectively addressed through implementation of mitigation measures as discussed during the construction phase. In addition, the following measures will be emphasized.

- Ensure that Central Motor Vehicle Rules, 2000 shall be honored
- Use of horns near the villages along the access road to villages, main plant and internal roads should be restricted.
- The vehicular movements along the access roads and highways should be avoided during the night time.
- All the vehicles entering the access roads and plant should have Pollution under Control (PUC) certificates.
- The speed limit in the internal roads should be restricted to 25 km/hr. Proper warning signs and road safety awareness posters should be displayed to create road safety awareness among the personnel accessing the site.
- Periodic Road Safety and Traffic Management campaigns and awareness sessions should be carried out among the villagers and the plant workers/personnel to develop road safety awareness among the people likely to be impacted by the project.
- An emergency road safety plan should be framed by the Proponent to combat any emergency conditions/accidents along the highways, access roads and within plant area.
- The drivers should be given an induction on road safety and traffic management policy.
- A parking lot should be identified near the plant site and its associated facilities.

6.0 Community Complaints

Community complaints and concerns will be captured and addressed through Grievance Mechanism (refer to the Stakeholder Engagement Program of ESIA). The procedure has been designed to provide a simple, fair and transparent process for all internal and external parties to provide feedback and to raise grievances.

7.0 Community Reporting

On the basis of the existing reporting program undertaken during the construction, operational and maintenance phases, a summary report suitable for digestion by a non-technical community audience will be developed and disclosed in annual environment and social performance report.

This report will focus upon graphical representation of information, and in particular outcomes of any community complaints and those actions taken to remedy significant impacts. This will be undertaken in non-technical languages and in suitable local languages in a culturally appropriate manner.



STANDARD OPERATING PROCEDURE ON SITE EMERGENCY PLAN



Doc No	MEIPL/SOP/ONSITE EMERGENCY PLAN /2018
Release Date	15.06.2018
Revision	01

Prepared By	Naveen Upasi Dhananjay Pawar	QSHE & Systems	Signature	Date
				11.06.2018
Approved By	Suranjan Sarkar	Head QSHE & Systems		15.06.2018
Controlled By	Suranjan Sarkar	Head QSHE & Systems		15.06.2018

1. INTRODUCTION

It is an accepted fact that no matter how well a process is controlled and safeguarded by instruments and process safety procedures, it is inevitable that there is a residual risk, which is capable of causing a variety of emergencies.

Such emergencies could be the result of malfunction or non-observance of operating instructions. It could at times, be the consequences of acts outside the control of people. Hence the need to prepare an ON-SITE EMERGENCY PLAN (OEP) for dealing with incidents which may still occur and are likely to affect Health, Safety, Life, Property and Environment both at site and in the immediate



STANDARD OPERATING PROCEDURE ON SITE EMERGENCY PLAN



neighbourhood. An OEP mitigates effects of a major accident / emergency, when these effects are contained within the boundary of the site.

An emergency is a situation, which may cause serious injury, loss of life, damage to property, environmental pollution etc., due to major accident, fire / explosion or any other calamity.










This plan is guideline for employees, contractors, visitors etc., also informs about prompt rescue operations, medical treatment, co-ordination and communication among various internal & external members. For an OEP, speed is the essence. The plan should be such that it would avoid any confusion, panic during emergency at site.

Mytrah Management will plan into practice during an emergency .Mock drills and rehearsal will be conducted periodically (once in 6 months) to ensure of all those connected with implementation of the plan. The Mytrah management will also upgrade the plan continuously consistent with the changes in facilities and the manpower structure within the site.

Any change of the guideline shall be approved by the Director and Head Asset Management.

The management shall have the overriding right to withdraw and / or amend the guideline at its own discretion as it deems fit from time to time. The decision of the management shall be final and binding.

2. General Emergency Situations:

Fire at Work Places		Crane /Structure Toppled	
Falling from Height		Snake Bite	
Electric Shock		Earth Quake	
Lightning/ Thunderstorm		Road Accident	
Bomb Threat		Oil Spillage	

3. OBJECTIVES

The overall objectives of an Emergency preparedness are:

- To control the emergency, localize it and if possible, terminate it
- To avoid confusion / panic and to handle the emergency with clear instructions
- To minimize the effects of the incidence on people and property and also to minimize the damage to the environment in and around our premises.
- To preserve records and take appropriate steps to prevent recurrence
- To restore normalcy.

4. SCOPE

All site function including Project and O&M.

5. DEFINITIONS

- **Emergency:** Undesired and imposed hazardous situation, which can cause LOSS in the form of injuries and property damage.
- **On-Site Emergency:** Emergency inside the site boundaries which demands the stoppage of all activities and total or partial evacuation.
- **Off-Site Emergency:** Emergency which spills outside the site boundaries and affects neighbouring areas and general public. Information to regulatory bodies and seeking help from them.
- **Assembly Point:** Safe area for the assembly of persons requiring evacuation after accounting for the missing persons. This is done through a **Head count**.
- **Emergency Exits:** Passages and walkways leading to Assemble point.



STANDARD OPERATING PROCEDURE ON SITE EMERGENCY PLAN



6. IDENTIFICATION OF EMERGENCIES

Sr. No.	NATURE OF EMERGENCIES
1.	H&S Emergencies: <ul style="list-style-type: none">• Fire• Panel blast (Power panel / Capacitor) & flash cover• Medical Emergency• Collapse of structure & Crane• Road incident• Electrocution• Electrical flash over (HT line)• Crane / Vehicle topple (Plain Road, Turn, Hill)• Insect & Snake Bite• Bomb Threat
2.	Environmental Emergencies: <ul style="list-style-type: none">• Flood• Thunder storm• Lightning• Cyclone• Earth quake• Oil Spillage

7. IDENTIFICATION OF HAZARDOUS AREAS

Sr. NO.	ACTIVITY	HAZARDOUS ASPECTS
1.	Working at height	Any emergency during height work activity
2.	D.G. operation/ Hot work & Power tools application	Electrical shock, Electrocution/Fire
3.	Crane functions	Any major/minor incident / Electrical shock, Electrocution
4.	Men/Material transportation by Vehicles	Road incident
5.	Civil Construction work/Blasting	Any major / minor accident / Fire Activity
6.	Electrical Construction & Commissioning work	Any major / minor incident / Electrical shock, Electrocution
7.	WEC-Tower installation / Machine Installation / Electrical & Commissioning work / De-installation work	Any major / minor incident / Electrical shock, Electrocution / Fire
8.	Service, Substation, External electrical activities.	Any major / minor incident / Electrical shock, Electrocution
9.	Handling & Storage of Diesel, Petrol, kerosene or other lubricants / Chemicals / Transformer oil.	Fire
10.	Preparation of food	Food poisoning

8. FACILITIES / EQUIPMENTS FOR EMERGENCIES

a. Emergency Control Centre (ECC)

Emergency Control centre is arranged in Container / First aid centre / Site offices/Substation as per the availability of resources at sites.

List of Equipment's shall be provided in ECCs.



STANDARD OPERATING PROCEDURE ON SITE EMERGENCY PLAN



Sr. No.	Items
1	On site Emergency plan
2.	Material Safety Data Sheet (MSDS)
3.	Rescue kit (Applicable for WTG)
4.	Stretcher
5.	Barricade tape
6.	PPE – Electrical gloves (HT), Goggles etc.
7.	First Aid Box
8.	Fire Extinguishers
9.	Earth rod
10.	Emergency Contact numbers display board /Site Layout/Evacuation Plan

b. Fire Fighting Facilities

Different types of fire extinguishers are strategically located at Site locations, Containers, Site offices, Substation, WTGs, etc. Periodical firefighting training shall be provided for Site personnel.

c. Medical facilities

First aid boxes are available at Site Containers, Offices, Substation, WTG locations, 4 wheelers and Guest houses. The stock of First Aid material shall be replenished by a designated person. In case of emergencies, the affected personnel can also be transported to near-by hospital. Periodical First Aid training is provided to all site personnel.

d. Rescue System

Periodical training for rescue is provided for Site personnel (technician & Engineers). Rescue kit shall be available at site office for rescue operation. During emergency, ambulance or available vehicle at site can be used for transport the injured persons to the First aid centre or nearby hospital.

9. INCIDENT REPORTING

Anybody seeing an incident situation shall report to his colleagues / site in charge / team leader / department giving his identity.

10. COMMUNICATION FACILITIES

a. Emergency Contact Display Board

Emergency Contact Display Board shall be provided in the project office area for immediate contact of key personnel. (Internal key personnel, nearby hospital, Fire stations, Ambulance details).

b. Emergency exit plan displayed at respective locations as per the applicability.

b. Emergency Contact Display Board:

Contact Person	Phone No
Site Supervisor/Engineer(Team Leader)	
Site In charge	
Safety Officer	
Ambulance Service	
District Govt. Hospital	
Nearest Hospital	
Fire Station	
Police Station	
HR /FMS Site Contact Person	
Department HOD	

c. External communication

Site is very well connected with External interested parties through Mobile.

d. Internal communication

Site is very well connected with internal stakeholders by way of Mobiles

11. ROLES & RESPONSIBILITY OF PERSONNEL**a. Contractor workmen / wind /Solar sites Technician**

- Anybody seeing an incident / abnormal fire/situation shall report to his colleagues / site in charge / team leader/department and giving his identity.
- Do evacuation if possible by using available emergency equipment's or call colleagues or other personnel for assistance / help / need of rescue device.

b. Team Leader / Engineer / Contract Supervisor

- Provide proper guidance to contract workmen / technician for evacuation.
- Inform to Site in charge / HOD about evacuation.

c. Site In charge / Head Operation

- On receiving information, inform to site key personnel for evacuation.
- Reach emergency sport and arrange required help for evacuation.
- Co-ordinate with admin department for external agency help (Ambulance, Fire brigades etc.)
- Inform to function head / Site FMS / FMS and HR head.

d. Head Operation: On receiving information from Site in charge / Site representative arrange required support.

- Depute technical expert if required.
- Inform to Director and Head Asset Management if required.

e. FMS /HR Head : They shall co-ordinate and arrange the following: