

Environmental and Social Due Diligence Report

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INDIA: Accelerating Infrastructure Investment Facility in India – Tranche 3

Mytrah Vayu (Krishna) Private Limited (Part 6 of 10)

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Annexure D

Register of Regulations





D. Applicable Legislative Framework

D.1 Environmental and Social Legislative Framework

Primary legislation in India is in the form of Acts, which provide a framework for environmental protection and control and are applicable at the National level. The key acts and rules on environmental protection and social aspects are given in Section 1.3 which captures the key applicable regulatory guideline for Wind Power and Solar Power Projects in India. The regulatory guidelines are limited to Environment, Land, Labour and Occupational Health and Safety related regulations and statutory norms within the country. It also has to be noted that the table only encompasses the key legislations and policies in

the aforementioned fields and may not take into account other statutory requirements that also have direct or indirect relevance to wind and solar projects in India.

D.1.1 Institutional Framework - Enforcement Agencies for Wind and Solar Power Projects

A brief description of relevant enforcement agencies and their functions is described in the Tables below:



Table D.1 Enforcement Agencies – Wind and Solar Power Projects

Sl. No	Agency	Functions
Central Level		
1	Ministry of Environment and Forests (MoEF & CC)	<p>The Ministry of Environment and Forests (MoEF), Government of India is responsible for the environment management at Union of India level. The specific functions of MoEF & CC are as follows:</p> <ul style="list-style-type: none"> • Environmental policy planning • Effective implementation of legislation • Issuing guidelines under EP Act for environment protection • Monitoring and control of pollution through Central Pollution Control Board and State Pollution Control Boards • Environmental clearance for industrial and development projects covered under EIA Notification • Monitoring of compliance conditions stipulated in Environmental clearance through its regional offices • Promotion of environmental education, training and awareness • Forest conservation, development and wildlife protection • Protection of Coastal areas <p>MoEF & CC is responsible for the implementation and enforcement of the Environment Protection Act, 1986 and Rules issued under the Act, including the EIA notification. Under sections 3 and 5 of the EP Act, 1986, it retains enormous powers to issue directions in the interests of environment protection</p>
2	The National Green Tribunal (NGT)	<p>The National Green Tribunal (NGT) has been established on 18th October, 2010 under The National Green Tribunal Act, 2010 for effective and expeditious disposal of cases relating to environmental protection and conservation of forests and other natural resources including enforcement of any legal right relating to environment and giving relief and compensation for damages to persons and property and for matters connected therewith or incidental there to.</p>
3	Central Pollution Control Board	<p>The Central Pollution Control Board (CPCB) has been constituted for the control of water, air and noise pollution, land degradation and hazardous material and waste management. The specific functions of CPCB are as follows:</p> <ul style="list-style-type: none"> • Prevent pollution of streams and wells; • Advise the Central Government on matters concerning prevention, control and abatement of water and air pollution; • Co-ordinate the activities of SPCB's and provide them with technical and research assistance;

Sl. No	Agency	Functions
		<ul style="list-style-type: none"> Establish and keep under review quality standards for surface and groundwater and for air quality; Planning and execution of national programme for the prevention, control and abatement of pollution through the Water and Air Acts.
4	Central Ground Water Authority	The Central Ground Water Authority (CGWA) was constituted in 1997 to regulate, control and manage groundwater development in the country, under the EP Act 1986. One of the main functions of CGWA is to regulate indiscriminate boring and withdrawal of groundwater and to issue necessary regulatory directions with a view to preserve and protect the groundwater.
5	Ministry of New and Renewable Energy (MNRE)	<p>The Ministry of New and Renewable Energy (MNRE) is the nodal Ministry of the Government of India for all matters relating to new and renewable energy. The broad aim of the Ministry is to develop and deploy new and renewable energy for supplementing the energy requirements of the country.</p> <p>The Ministry facilitate research, design, development, manufacture and deployment of new and renewable energy systems/ devices for transportation, portable and stationary applications in rural, urban, industrial and commercial sectors.</p>
6	Indian Renewable Energy Development Agency Limited (IREDA)	<p>IREDA was established on 11th March, 1987 as a Public Limited Government Company under the Companies Act, 1956 and it promotes, develops and extends financial assistance for Renewable Energy and Energy Efficiency/Conservation Projects.</p> <p>The main objectives of IREDA is to provide financial support to specific projects and schemes for generating electricity and / or energy through new and renewable sources and conserving energy through energy efficiency.</p>
7	Central Electricity Authority (CEA)	<p>The Central Electricity Authority (CEA) is a statutory organization constituted under Section 3 of the repealed Electricity (Supply) Act, 1948, here in after replaced by the Electricity Act, 2003. Some of the functions performed by CEA include the following:</p> <ul style="list-style-type: none"> Advise the Central Government on the matters relating to the national electricity policy, formulate short-term and perspective plans for development of the electricity system and coordinate activities of the planning agencies for the optimal utilization of resources to sub-serve the interests of the national economy and to provide reliable and affordable electricity to all consumers; Specify the technical standards for construction of electrical plants, electric lines and connectivity to the grid; Specify the safety requirements for construction, operation and maintenance of electrical plants and electric lines; Promote and assist in the timely completion of schemes and projects for improving and augmenting the electricity system; Collect and record the data concerning the generation, transmission, trading, distribution and utilization of electricity and carry out studies relating to cost, efficiency, competitiveness and such like matters;

		<ul style="list-style-type: none"> • Make public from time to time the information secured under this Act and provide for the publication of reports and investigations; • Advise any State Government, licensees or the generating companies on such matters which shall enable them to operate and maintain the electricity system under their ownership or control in an improved manner and where necessary, in coordination with any other Government, licensee or the generating company owning or having the control of another electricity system; etc.
State Level		
1	State Energy Development Agency	Different states have created Energy Development Agency as the designated agency to co-ordinate, regulate and enforce the provisions of the Energy Conservation Act and implement schemes under the said Act within the State. The objective is to undertake development of renewable energy and facilitate energy conservation, as a state nodal agency under the umbrella of the MNRE.
2	State Environment Department	<p>The Environment Department is the apex body in the States for implementation of all the environment related matters including Environment (Protection) Act, 1986, which is an umbrella Act on environment in the country. The main mandate of the Department is to achieve the sustainable development in the State and introducing the sound environmental management practices.</p> <p>Activities like pollution Control & Monitoring of Water, Air, Noise and other related areas, Conservation of Natural resources, Environment Monitoring, Environment Education etc. are co-ordinated by this department.</p>
3	State Pollution Control Board	State Pollution Control Boards are responsible for implementing various environmental legislations in the state, mainly including Water (Prevention and Control of Pollution) Act, 1974, Air (Prevention and Control of Pollution) Act, 1981, Water (Cess) Act, 1977 and some of the provisions under Environmental (Protection) Act, 1986 and the rules framed there under like, Biomedical Waste (M&H) Rules, 1998; Hazardous Waste (M&H) Rules; Municipal Solid Waste Rules, etc. SPCBs functions under the administrative control of Environment Department of the State.
4	State Electricity Transmission Company Limited	In accordance with Electricity Act, 2003, the State Electricity Transmission Company Limited is involved in erection of transmission lines and its commissioning for evacuation of power from generation projects. The major role is to plan, develop, operate and maintain the State Transmission System.
5	State Labour Department	The Department of Labour is responsible for formulation, implementation and enforcement of the labour laws in the Maharashtra state. It also undertakes prevention and settlement of industrial disputes, Industrial safety, Health and promotes welfare of workers in the undertakings falling within the sphere of the State.
6	Directorate Industrial Safety and Health Department (DISH)	The Directorate Industrial Safety and Health Department enforces the provisions of Factories Act 1948 and State Factories Rules and the rules made there under to ensure the safety health and welfare of the workers. It also plays a significant role in regularizing working hours and working conditions and reducing the accident and dangerous occurrences in the factories, redressal of the grievances of the workers in respect of Safety Health and Welfare through a set of policies and programs

Sl. No	Agency	Functions
		<p>developed by both the Central and State Government. Some of the functions of DISH are</p> <ul style="list-style-type: none"> • Eliminating inequality and discrimination in the work place; • Enhancing occupational health and safety awareness and compliance in the workplace; • Workforce and community participation, to employers, employees, workplaces, communities, businesses and unions; and • Providing policy advice and analysis to government on labour and employment related matters.
Other Institutions		
1	Centre for Wind Energy Technology (C-WET)	<p>Centre for Wind Energy Technology (C-WET) has been established in Chennai in the year 1998, as an autonomous R&D institution by the Ministry of New and Renewable Energy (MNRE), Government of India. The Centre provides the services such as</p> <ul style="list-style-type: none"> • Research and development for wind turbine technologies; • Identification of wind resource rich regions in the country; • Testing of complete Wind Turbine Generator Systems (WTGS) according to international standards (IEC) and Type Approval Provisional Scheme (TAPS-2000); and • Provisional Type Certification of Wind Turbines as per the Indian Certification Scheme.

Table D.2 Applicable Environmental and Social Legislative framework for Wind and Solar Power Project

Sl. No	Specific Regulation/ Policy	Key Requirement(s)	Enforcement Agency	Remarks
Environment				
1	National Green Tribunal Act, 2010	<ul style="list-style-type: none"> Instituted for effective and expeditious disposal of cases relating to environmental protection and conservation of forests and other natural resources including enforcement of any legal rights relating to environment and giving relief and compensation for damages to persons and property. The tribunal will have jurisdiction over all civil cases relating to implementation of the following regulations: <ul style="list-style-type: none"> The Water Act, 1974; The Water Cess Act, 1977; The Forest Conservation Act, 1980; The Air Act, 1981; The Environment Protection Act, 1986; The Public Liability Insurance Act, 1991; The Biological Diversity Act, 2002 	National Green Tribunal	
2	The Environment (Protection) Act; 1986 and Environment (Protection) Rules 1986 and amendments	<p>This Act is an umbrella legislation that provides a single focus for protection of the environment. Several sets of Rules and notifications are promulgated under the E(P) Act ranging from approvals required for a new development project to those required for environmental management during their operation phases The salient provisions of the Act include but not limited to the following:</p> <ul style="list-style-type: none"> Restrict or prohibit industries, operations or processes in specified areas; Undertake environmental impact assessment for certain categories of industries to inform the decision making in approval of new or expansion projects; Restrict or prohibit handling of hazardous substances in specified areas; Protect and improve the quality of the environment and prevention, control and abatement of environmental pollution; 	Ministry of Environment and Forests (MoEF & CC)	Environmental statements are usually sent to SPCB as per the consent condition. However, it is not applicable at present as Consent is exempted for Solar/ wind projects as a White Category industry.

Sl. No	Specific Regulation/ Policy	Key Requirement(s)	Enforcement Agency	Remarks
		<ul style="list-style-type: none"> Lay down standards for the quality of the environment, emissions or discharges of environmental pollutants from various sources; Lay down procedures and safeguards for the prevention of accidents, which may cause environmental pollution; Bar on filling of any suit or legal proceedings against the Government or officials empowered by it for action taken in good faith, in pursuance of the Act; Bar of jurisdiction to Civil Court to entertain any suit or proceedings in respect of anything done, action taken or directions issued by the Central Government or any other authority empowered by it, in pursuance of the Act. <p>Environmental Statement Environmental Statement is required to be submitted under Rule 14 to the Environment (Protection) Rules, 1992 as amended in 1993 in a prescribed format i.e. FORM V by 30 September each year for the relevant financial year ending 31 March.</p>		
3	EIA Notification 2006 - Environmental Clearance and Public Consultation	<p>The EIA notification divides all projects into two categories i.e. category A and B, based on spatial extent of potential impacts on human health and natural and manmade resources. All 'category A' projects or activities require environmental clearance from the MoEF & CC, Government of India on recommendations of the Expert Appraisal Committee (EAC) while projects under 'category B1' (Category B is subdivided into B1 and B2) require prior clearance from State /Union territory Environment Impact Assessment Authority (SEIAA), based on recommendations of a State Level Expert Advisory Committee (SEAC).</p> <p>The Environmental Clearance under the EIA notification is granted based on prior EIA study conducted as per Terms of Reference approved by Expert Appraisal Committee of MoEF & CC. Based on EIA study and conduct of Public Consultation, the EAC of MoEF & CC appraises projects requiring Environmental Clearance.</p>	MoEF & CC/SEIAA	Wind and solar power projects are exempted from obtaining environmental clearance.
4	Forests (Conservation) Act, 1980 and Rules 1981 as amended 2004	The Forest Conservation Act (FCA) was adopted in 1980 to protect and conserve forests. The Act restricts the powers of the state in respect of de-reservation of forests and the use of forestlands for non-forest purposes. An advisory committee has been created to oversee the implementation of the statute. The FCA is relevant for the power sector for the siting guidelines for solar power plants and for passage	MoEF & CC/State Forest Department	Applicable to site where forest land has been taken including land for construction of

		<p>of transmission through forest areas, since it would involve use of forestland for "non-forest" purposes.</p> <p>According to Section 2 of the Act "notwithstanding anything contained in any other law for the time being in force in a State, no State Government, or other authority shall, except with the prior approval of the Central Government, make any order directing:</p> <ul style="list-style-type: none"> • De-reservation of a reserved forest • Use any forest land for any non -forest purpose • Assign any forest land to any private person or entity not controlled by the Government • Clear any forest land of naturally grown trees for the purpose of using it for reforestation 		substation and transmission line pathway
5	Hazardous Waste (Management, Handling and Transboundary Movement) Rules, 2008 as amended thereafter under EPA, 1986 (HWM Rules, 2008)	<p>The Hazardous Wastes (Management, Handling and Transboundary Movement) Rules, 2008 are promulgated under Environment (Protection) Act 1986, which was further amended in July 2009, September 2009, March 2010 and August 2010. With the recent amendment, these rules have become quite comprehensive. The rules define responsibility of hazardous wastes generators, require safe handling practices and maintenance of manifest system during transport of hazardous waste and also describe technological aspects to be followed up by re-refiners and recyclers of hazardous wastes. The rules also cover liabilities of occupier, transporter and operator of a facility for any damages caused due to improper handling and disposal of hazardous wastes by reinstating or restoring environmental damages caused.</p>	SPCB	Hazardous Waste Authorisation to be obtained where specific site is handling any hazardous waste.
6	Batteries (Management and Handling) Rules, 2001 and further amendments	<p>The Rules identify specific responsibilities for consumers and bulk consumers, manufacturers, importers, assemblers, re-conditioners, dealers, recyclers and auctioneers involved in the processing, trade and use segments of the lifecycle of a lead-acid battery.</p> <p>Used Lead acid batteries if generated should not be disposed off in any manner other than depositing with the dealer, manufacturer, importer, assembler, registered recycler, re-conditioner, or at the designated collection centres.</p>	SPCB	Applicable if used battery is being generated at the site
7	The Air (Prevention and Control of Pollution) Act, 1981	<p>The Act prohibits the construction and operation of any industrial plant without the consent of SPCBs. The Act assigns powers and functions to the CPCB and the SPCBs for prevention and control of air pollution and all other related matters. For the</p>	SPCB	Wind and solar power projects are exempted from Consent to

Sl. No	Specific Regulation/ Policy	Key Requirement(s)	Enforcement Agency	Remarks
	Including Rules 1982 and 1983	prevention and control of air pollution, the State Government, in consultation with the SPCB has the powers to set standards for emissions from automobiles, impose restrictions on use of certain industrial plants and prohibit emissions of air pollutants in excess of the standards laid down by the SPCB. It can also make an application to the court for restraining persons from causing air pollution. In addition, it also has the power of entry and inspection, power to obtain information and power to take samples of air emissions and conduct the appropriate follow up. The CPCB, as well as the SPCBs are eligible for contributions from the Central as well as the State Government, respectively, to perform their functions appropriately. The Act also allows for appropriate penalties and procedures for non-compliance.		Establish and Consent to Operate as per the latest categorization (White) by GOI.
8	Noise Pollution (Regulation and Control) Rules, 2000 and the Noise Pollution (Regulation and Control) (Amendment) Rules, 2010	As per the Noise Pollution (Regulation and Control) Rules 2000, every operating facility is required to take all possible steps to meet the ambient noise level standards prescribed in the Rules. The rules prescribe maximum permissible values of day and night time noise levels for zones A, B, C and D representing industrial, commercial, residential and silence zone respectively.	SPCB	Noise levels to be maintained within the specified limits
9	The Water (Prevention and Control of Pollution), Act, 1974 including Rules, 1975 (as amended up to 1988)	This Act provides for the prevention and control of water pollution and maintaining or restoring good water quality for any establishment. The Act assigns functions and powers to the CPCB and SPCBs for prevention and control of water pollution and all related matters. Subject to the provisions of the Act, the functions and powers of CPCB as well as the SPCBs have been delineated individually and with respect to each other.	SPCB	Wind and solar power projects are exempted from Consent to Establish and Consent to Operate as per the latest categorization (White) by GOI.
10	The Water (Prevention and Control of Pollution), Cess Act, 1977 including	This Act provides for levy and collection of Cess on water consumed and water pollution caused. It also covers specifications on affixing of meters, furnishing of returns, assessment of Cess, interest payable for delay in payment of Cess and penalties for non-payment of Cess within the specified time. Industries consuming	SPCB	Wind and solar power projects are exempted from Consent to Establish and

	Rules 1978 and 1991	water less than 10m ³ /day have been exempted from levy of cess provided they are not generating hazardous wastes.		Consent to Operate as per the latest categorization (White) by GOI.
11	Electricity Act, 2003	<p>The sections of the Electricity Act, 2003 that are relevant for laying (and repairs) of transmission lines for the supply of energy are described as following:</p> <ul style="list-style-type: none"> • Section 67 details the provisions (a) to open and break up the soil and pavement of any street, railway or tramway; (b) to open and break up any sewer, drain or tunnel in or under any street, railway or tramway; (c) to alter the position of any line or works or pipes, other than a main sewer pipe; (d) to lay down and place electric lines, electrical plant and other works; (e) to repair, alter or remove the same; (f) to do all other acts necessary for transmission or supply of electricity. • Section 159 describes that no person shall be engaged in the generation, transmission, distribution, supply or use of electricity, in any way injure any railway, highway, airports, tramway, canal or water-way or any dock, wharf or pier vested in or controlled by a local authority, or obstruct or interfere with the traffic on any railway, airway, tramway, canal or water-way. • Section, 160(1) describes that every person generating, transmitting, distributing, supplying or using electricity (hereinafter in this section referred to as the "operator") shall take all reasonable precautions in constructing, laying down and placing his electric lines, electrical plant and other works and in working his system, so as not injuriously to affect, whether by induction or otherwise, the working of any wire or line used for the purpose of telegraphic, telephone or electric signalling communication, or the currents in such wire or line. • Section 34 describes that every transmission licensee shall comply with such technical standards, of operation and maintenance of transmission lines, in accordance with the Grid Standards, as may be specified by the Authority. • Section 53 (1) describes that the Authority may in consultation with the State Government, specify suitable measures for –(a) protecting the public (including the persons engaged in the generation, transmission or distribution or trading) from dangers arising from the generation, transmission or 	Electrical Inspector	Applicable during operation phase

Sl. No	Specific Regulation/ Policy	Key Requirement(s)	Enforcement Agency	Remarks
		<p>distribution or trading of electricity, or use of electricity supplied or installation, maintenance or use of any electric line or electrical plant; (b) eliminating or reducing the risks of personal injury to any person, or damage to property of any person or interference with use of such property ; (c) prohibiting the supply or transmission of electricity except by means of a system which conforms to the specification as may be specified; (d) giving notice in the specified form to the Appropriate Commission and the Electrical Inspector, of accidents and failures of supplies or transmissions of electricity; (e) keeping by a generating company or licensee the maps, plans and sections relating to supply or transmission of electricity; (f) inspection of maps, plans and sections by any person authorised by it or by Electrical Inspector or by any person on payment of specified fee; (g) specifying action to be taken in relation to any electric line or electrical plant, or any electrical appliance under the control of a consumer for the purpose of eliminating or reducing a risk of personal injury or damage to property or interference with its use;</p> <ul style="list-style-type: none"> Section 165 (1) In section 40, sub-section (1) of clause (b) and section 41, subsection (5) of the Land Acquisition Act, 1894, the term "work" shall be deemed to include electricity supplied or to be supplied by means of the work to be constructed. (2) The Appropriate Government may, on recommendation of the Appropriate Commission in this behalf, if it thinks fit, on the application of any person, not being a company desirous of obtaining any land for its purposes, direct that he may acquire such land under the provisions of the Land Acquisition Act, 1894 in the same manner and on the same conditions as it might be acquired if the person were a company. 		
12	The Petroleum Act, 1934 and the Petroleum Rules	<p>This Act and Rules provide procedures and safety measures to be taken up for handling, storage and transportation of petroleum products. The Rules define the quantity and class of petroleum for which prior permission from the concerned authorities are required. The storage requiring prior licences are as following:</p> <ul style="list-style-type: none"> Petroleum class A (having flash point less than 23°C) not intended for sale of the total quantity in possession does not exceed 30 litres. Petroleum Act, 1934, Section 8); Petroleum class B (having flash point from 23 to 65°C) if the total quantity in possession at any one place does not exceed 2,500 litres and none of it is contained in a receptacle exceeding 1,000 litres; (Petroleum Act, 1934, Section 7); 	Petroleum Explosives Safety Organization (PESO)	Applicable if storage exceeds the threshold quantity specified in the Act and Rules. In general, it is not applicable in Wind/ solar project

		<ul style="list-style-type: none"> Petroleum class C (having flash point above 65 to 93°C) if the total quantity in possession at any one place does not exceed 45,000 litres (Petroleum Act, 1934, Section 7). 		
Land and Labour				
13	Land Acquisition Act 1894 (Amended in 1984) and The Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act, 2013	<p>The Land Acquisition Act 1894 was passed with the purpose of enabling the procurement of land for the purpose of activities which are in the interests of the country. These include procedures for the acquisition of land, declaration of acquisition intent, hearing of objections and final possession of the land amongst others.</p> <p>In last decade, the LA Act 1894 has been debated over for its archaic characters which do not fit into the current realities. The current reality surrounding the process of land acquisition has changed tremendously and therefore, the need was felt for the passing of a new law. A new Land Acquisition Resettlement and Rehabilitation Bill (LARR) 2011, which was renamed to The Right to Fair Compensation and Transparency in Land Acquisition, Rehabilitation and Resettlement Act (the LARR Act), was passed by both the houses of Parliament and given the President's assent on 26th September 2013. The new law came into force in January 2014 and is applicable to the project.</p> <p>The new law stipulates mandatory consent of at least 70% of affected people for acquiring land for Public Private Partnership (PPP) projects and 80% for acquiring land for private companies. It also requires that payment of compensation for the owners of the acquired land will be four times the market value in rural areas and twice in urban areas. It also stipulates that the land cannot be vacated until the entire compensation is awarded to the affected parties.</p> <p>The law has the provision that the companies can lease the land instead of purchasing it. Besides, the private companies will have to provide for rehabilitation and resettlement if land acquired through private negotiations is more than 50 acres and 100 acres in urban and rural areas, respectively.</p>	Local Administration - District Collector Revenue Officer	Applicable if land acquisition is involved as per GOI norm
14	The Scheduled Tribes and Other Traditional Forest Dwellers (Recognition	The act basically vests the forest rights and occupation in forest land in forest dwellers (ST and other traditional forest dwellers) who have been residing in forests for generations but whose rights could not be recorded. The act provides a framework for recognising the forest rights and the nature of evidence required for such recognition and vesting of forest land.	Ministry of Tribal Affairs	Applicable only if land procured/ to be procured is falling

Sl. No	Specific Regulation/ Policy	Key Requirement(s)	Enforcement Agency	Remarks
	of Forest Rights) Act 2006 & rules 2007	<p>Some of the key rights so vested are as follows-</p> <ul style="list-style-type: none"> • Right to hold and live in the forest land under the individual or common occupation for habitation or for self-cultivation for livelihood by a member or members of a forest dwelling Scheduled Tribe or other traditional forest dwellers; • Community rights such as nistar, by whatever name called, including those used in erstwhile Princely States, Zamindari or such intermediary regimes; • Right of ownership, access to collect, use and dispose off minor forest produce which has been traditionally collected within or outside village boundaries; • Other community rights of uses or entitlements such as fish and other products of water bodies, grazing (both settled or transhumant) and traditional seasonal resource access of nomadic or pastoralist communities; • Rights including community tenures of habitat and habitation for primitive tribal groups and pre-agricultural communities; • Rights in or over disputed lands under any nomenclature in any State where claims are disputed; • Rights for conversion of Pattas or leases or grants issued by any local authority or any State Government on forest lands to titles; • Rights of settlement and conversion of all forest villages, old habitation, un-surveyed villages and other villages in forests, whether recorded, notified or not into revenue villages; • Right to protect, regenerate or conserve or manage any community forest resource which they have been traditionally protecting and conserving for sustainable use; • Rights which are recognised under any State law or laws of any Autonomous District Council or Autonomous Regional Council or which are accepted as rights of tribal under any traditional or customary law of the concerned tribes of any State; 	Tribal Welfare Department	under designated tribal area
15	The Provision of the Panchayats (Extension to the	The Act provides extension of the provisions of Part IX of the Constitution relating to the Panchayats to the Scheduled Areas. Scheduled Areas are defined as per the Clause (1) of Article 244 of the Constitution. The act gives special powers to the	Gram Panchayat	Applicable only if land procured/to be procured

	Scheduled Areas) Act, 1996	<p>Panchayats in case it has been classified as Schedule V area by the constitution. The Panchayats are expected to have special powers given to them through the state Legislatures like:</p> <ul style="list-style-type: none"> • The power to enforce prohibition or to regulate or restrict the sale and consumption of any intoxicant; • The ownership of minor forest produces; • The power to prevent alienation of land in the Scheduled Areas and to take appropriate action to restore any unlawfully alienated land of a Scheduled Tribe; • The power to manage village markets by whatever name called; • The power to exercise control over money lending to the Scheduled Tribes; • The power to exercise control over institutions and functionaries in all social sectors; • The power to control over local plans and resources for such plans including tribal sub-plans; <p>The administration and management of the Panchayat is similar to the non-schedule areas, but the Panchayat has immense powers in case of Scheduled Area.</p>		is falling under designated tribal area within GOI norms
16	The Indian Telegraph Act, 1885	<p>The Indian Telegraph Act, 1885, empowers the Telegraph authorities to use the land / property for telegraph lines without having any ownership or right in the property even for the land occupied by the telegraph line supports or belts covered by overhead wires and the only obligation of the telegraph authority is to compensate for the actual loss / damage to the owner of the property. The relevant section of the Act is as under:</p> <p>"The telegraph authority may, from time to time, place and maintain a telegraph line under, over, along or across and posts in or upon, any immovable property: Provided that:</p> <ul style="list-style-type: none"> • The telegraph authority shall not exercise the powers conferred by this section except for the purpose of a telegraph established or maintained by the Central Government or to be so established or maintained: • The Central Government shall not acquire any right other than that of user only in the property under over along across in or upon which the telegraph authority places any telegraph line, or post; • Except as hereinafter provided, the telegraph authority shall not exercise those powers in respect of any property vested in or under the control or 	State Electricity Transmission Company	Applicable for power evacuation

Sl. No	Specific Regulation/ Policy	Key Requirement(s)	Enforcement Agency	Remarks
		<p>management of any local authority, without the permission of that authority;</p> <ul style="list-style-type: none"> In the exercise of the powers conferred by this section, the telegraph authority shall do as little damage as possible and when it has exercised those powers in respect of any property other than that referred. (e) Shall pay full compensation to all persons interested for any damages sustained by them by reason of the exercise of those powers." 		
17	The Indian Factories Act, 1948 and State Rules	<p>The Indian Factories Act was promulgated in 1948, to ensure general welfare of the industrial workers. The Act is divided into nine chapters with three chapters exclusively on health and safety (H&S) issues. The Act in its preamble states that "it is the general duty of the occupier (defined in the act as person having the ultimate control over the affairs of the factory) to ensure as far as practicable health, safety and welfare of all workers while they are at work in the factory".</p> <p>A general policy with respect to H&S of the workers at work should be in the form of a written statement and brought to the notice of the workers per the provision of the Act.</p> <p>The Act in its Chapter 4 deals with the provisions relating to Safety. The specific areas of safety are those relating to the usage of machinery, handling of hazardous substances and the latest amendments include safety measures for hazardous processes. For the usage of machinery there are Acts related to the fencing, casing of the machinery. Restriction of young persons and the employment of women and children to work on machines that is dangerous in nature. The Act also has regulations for working near machinery in motion; development of adequate safety measures during installation and various types of operation of the machinery.</p> <p>The Act also explains preventive and protective measures in safety including proper consideration of explosive or inflammable substances so that the workers are not exposed to hazards during operation. Some of the sections deal with various precautions that are required for handling pressure plants, fire, inflammable dust, gas or explosive. The factory occupier is responsible to maintain safety of the buildings and machinery per this legislation. The Act also gives power to States to make relevant rules to supplement the need of safety in the facility.</p> <p>The Act also explains preventive and protective measures in safety including proper consideration of explosive or inflammable substances so that the workers are not exposed to hazards during operation. Some of the sections deal with various</p>	Directorate of Industrial Safety and Health (DISH)	Solar/ Wind Power Plant is applicable with a limited scope.

		<p>precautions that are required for handling pressure plants, fire, inflammable dust, gas or explosive. The factory occupier is responsible to maintain safety of the buildings and machinery per this legislation. The Act also gives power to States to make relevant rules to supplement the need of safety in the facility.</p> <p>The Act also covers provisions for hazardous processes for an occupier to take all practicable measures to ensure prevention of any sorts of explosion due to manufacturing process which are hazardous. There are permissible limits for exposure of chemicals and toxic substances in the workplace. Workers have the right to know about imminent danger and their participation in safety management. The Act also requires medical check-ups of workers with access to workers to look for outcome of the medical reports. An occupier is to develop a safety policy and form safety committees and provide power to the Central Government to appoint inquiry committee if some extraordinary situation had occurred in the factory which is engaged in the hazardous process.</p>		
18	The Bonded Labour (Abolition) Act 1976	<ul style="list-style-type: none"> The Bonded Labour (Abolition) Act 1976: States that all forms of bonded labour stand abolished and every bonded labourer stands freed and discharged from any obligations to render any bonded labour (Ch II, Section 4) 	Ministry of Labour Labour Department	Applicable to both wind and solar powered projects
19	Minimum Wages Act, 1948	<ul style="list-style-type: none"> Minimum Wages Act, 1948 requires the Government to fix minimum rates of wages and reviews this at an interval of not more than 5 years. The minimum wage as prescribed for the industry by the government is required to be paid by the employers to the staff. 	Ministry of Labour Labour Department	Applicable to both wind and solar powered projects
20	Workmen's Compensation Act, 1923	<ul style="list-style-type: none"> Workmen's Compensation Act, 1923 requires if personal injury is caused to a workman by accident arising out of and in the course of his employment, his employer shall be liable to pay compensation in accordance with the provisions of this Act. Applicable to employees with less than or equal to a maximum of basic salary of INR 8000 per month 	Ministry of Labour Labour Department	Applicable to both wind and solar powered projects
21	The Contract Labour (Regulation & Abolition) Act, 1970 and Rules	<ul style="list-style-type: none"> As per the contract labour act, every principle employer is required to get the establishment registered before employing any contract labour. The contractors are also required to provide at minimum amenities like canteen, urinals, restrooms or alternate accommodation (if night halting labour), first aid, safe drinking water, etc. in case of contractor's failure to provide these amenities, the principle employer is liable to provide such amenities at its cost. 	Ministry of Labour Labour Department	Applicable to both wind and solar powered projects

Sl. No	Specific Regulation/ Policy	Key Requirement(s)	Enforcement Agency	Remarks
22	The Child Labour (Prohibition and Regulation) Act, 1986	<ul style="list-style-type: none"> A child is defined as a person who has not completed 14 years of age. The Act prohibits employment of children in certain occupation and processes (part II, Section 3). The Act also specifies conditions of work for children, if permitted to work. These include a working day of maximum of 6 hours a day (including rest), no work period exceeding 3 hours at a stretch and no overtime (Section 7). The Act requires maintenance of a register for employed children (Section 11). 	Ministry of Labour Labour Department	Applicable to both wind and solar powered projects
23	ESI Act, 1948 (Employees State Insurance Act, 1948)	<ul style="list-style-type: none"> The ESI Act provides for certain benefits to employees in case of sickness, maternity and employment injury. These includes periodical payments to any insured person in case of his sickness certified by a duly appointed medical practitioner, periodical payments to an insured woman in case of confinement or miscarriage or sickness arising out of pregnancy, confinement, premature birth of child, periodical payments to an insured person suffering from disablement as a result of an employment injury sustained as an employee, or periodical payments to such dependants of an insured person who dies as a result of an employment injury sustained as an employee amongst others. Applicable to employees with less than or equal to a maximum of basic salary of INR 15000 per month 	Ministry of Labour Labour Department	Applicable to both wind and solar powered projects
24	Building and Other Construction Workers Act 1996	<p>The act aims to provide for regulation of employment & conditions of service of the building and other construction workers as also their safety, health and welfare measures in every establishment which employs or employed during the preceding year ten or more workers. The exception made is only in respect of residential houses for own purpose constructed with a cost not exceeding Rs. 10 lakhs (1 million) and such other activities to which the provisions of Factories Act, 1948 and Mines Act, 1952 apply. Some of the other main provisions of the Act are given below:</p> <ul style="list-style-type: none"> Provision for registration of each establishment within a period of sixty days from the commencement of work to ensure that there are no malpractices and to discourage non-compliance of law by circumventing; penalties of fine and imprisonment for violation and contravention of Act. 	Ministry of Labour Labour Department	Applicable to both wind and solar powered projects

		<ul style="list-style-type: none">• Provision for registration of building workers as beneficiaries under this Act.• Provision for immediate assistance in case of accidents, old age pension, loans for construction of house, premium for group insurance, financial assistance for education, to meet medical expenses, maternity benefits etc apart from constitution of safety committees (in case of more than 500 workers and appointment of safety officers)• Provision for health and safety measures for the construction workers in conformity with ILO convention No.167 concerning safety and health in construction revising the Safety Provisions (Building) Convention, 1937. For this purpose, comprehensive Central Rules i.e. Building and other Construction Workers (Regulation of Service and Conditions of Service) Central Rules, 1998 have been notified by the Central Government.• Provision for Penalties of fine and imprisonment for violation and contravention of the Act.		
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D.2 International Finance Corporation's Performance Standards on Environmental & Social Sustainability

International Finance Corporation (IFC) applies the Performance Standards to manage environmental and social risks and impacts and to enhance development opportunities in its private sector financing in its member countries eligible for financing. The Performance Standards may also be applied by other financial institutions choosing to support them in the proposed project.

These performance standards and guidelines provide ways and means to identify impacts and affected stakeholders and lay down processes for management and mitigation of adverse impacts, which in detail are described subsequent Table D.3.



Table D.3 IFC Performance Standards

Performance Standard	Outlines	Details
PS 1: Assessment and Management of Environmental and Social Risks and Impacts	Social and Environmental Assessment and Management Systems for managing social and environmental performance throughout the life cycle of the Project and runs through all subsequent PSs.	<ul style="list-style-type: none"> • A Social and Environmental Assessment to understand the social and environmental impacts and risks; • A Management Program for mitigating the impacts and minimizing the risks identified in the assessment; • Establishing and ensuring organizational capacity and requisite trainings to the staff to implement the Management Programme; • Engagement with the community to ensure free prior informed consultation (FPIC), community grievance redressal constructive relationship all through the project life cycle; and • Adequate monitoring and reporting systems to measure and report the effectiveness of the Management Programs.
PS 2: Labour and Working Conditions	The economic growth through employment creation and income generation is recognised and balanced protecting the basic rights of workers. This PS outlines the minimum requirements of working conditions, protection to the workforce (including issues of child and forced labour) and ensuring occupational health and safety of both its 'employees' as well as 'non-employees' working through contractors.	<p>The PS requires:</p> <ul style="list-style-type: none"> • Establishment of a sound worker-management relationship; • Encouraging equal opportunity and fair treatment of workers; • Promoting compliance with national labour and employment laws; and • Promoting healthy and safe working conditions for workers. <p>PS 2 requires project proponents to conduct its activities in a manner consistent with the four core labour standards (child labour, forced labour, non-discrimination and freedom of association and collective bargaining). In addition, PS 2 also addresses other areas such as working conditions and terms of employment, retrenchment and occupational health and safety issues.</p>
PS 3: Resource Efficiency and Pollution Prevention	PS 3 outlines the approach to pollution prevention and abatement in line with internationally disseminated technologies and practices	<p>The objectives of PS 3 are to:</p> <ul style="list-style-type: none"> • Avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from activities; • Promote more sustainable use of resources including energy and water; and • Promote the reduction of emissions that contribute to climate change.

Performance Standard	Outlines	Details
		PS 3 outlines a project approach to Pollution Prevention and Abatement (PPA) in line with internationally disseminated technologies and practices. It recognises the need to implement technically and financially feasible and cost effective measures in the project for improving efficiency in its consumption of energy, water as well as other resources and material inputs. It also describes the measures to take into account the potential impact of emissions on the ambient conditions (such as ambient air quality) and seek to avoid or minimise these impacts within the context of the nature and significance of pollutants emitted.
PS 4: Community Health, Safety & Security	PS 4 requires a project to evaluate risks and impacts to the health and safety of the affected community during the Project life cycle and establish measures to avoid minimize and reduce risks and impacts from the Project.	<p>PS 4 recognises that project activities, equipment and infrastructure often bring benefits to communities including employment, services and opportunities for economic development. However, projects can also increase the potential for community exposure to risks and impacts arising from equipment accidents, structural failures and releases of hazardous materials.</p> <p>The performance standard details out project proponents responsibility to avoid or minimise the possible risks and impacts to community health, safety and security that may arise from project activities.</p>
PS 5: Land Acquisition and Involuntary Resettlement	<p>This PS applies to physical or economic displacement resulting from the following types of land transactions:</p> <p>Type I: Land rights for a private sector project acquired through expropriation or other compulsory procedures;</p> <p>Type II: Land rights for a private sector project acquired through negotiated settlements with property owners or those with legal rights to land, including customary or traditional rights recognised or recognisable under the laws of the country, if expropriation or other compulsory process would have resulted upon the failure of negotiation; and</p>	<p>The objectives of this PS are to:</p> <ul style="list-style-type: none"> • Avoid or at least minimize the involuntary resettlement wherever feasible by exploring alternative project designs; • Mitigate adverse social and economic impacts from land acquisition or restrictions on affected persons' use of land by: • Providing compensation for loss of assets at replacement cost; and • Ensuring that resettlement activities are implemented with appropriate disclosure of information, consultation and the informed participation of those affected. • Improve or at least restore the livelihoods and standards of living of displaced persons; and • Improve living conditions among displaced persons through provision of adequate housing with security of tenure at resettlement sites. <p>PS 5 require a project to consider various processes and systems to avoid /minimise social and economic impacts related to land acquisition and resettlement.</p>

		This PS does not apply to resettlement resulting from voluntary land transactions (i.e. market transactions in which the seller is not obliged to sell and the buyer cannot resort to expropriation or other compulsory procedures if negotiations fail).
PS 6: Biodiversity Conservation and Sustainable Management of Natural Living Resources	PS 6 aims at protecting and conserving biodiversity, the variety of life in all its forms, including genetic, species and ecosystem diversity and its ability to change and evolve, is fundamental to sustainable development	<p>This PS addresses how clients can avoid or mitigate threats to biodiversity arising from their operations as well as incorporate sustainable management of renewable natural resources.</p> <p>PS 6 recognises that protecting and conserving biodiversity—the variety of life in all its forms, including genetic, species and ecosystem diversity—and its ability to change and evolve, is fundamental to sustainable development. It reflects the objectives of the Convention on Biological Diversity to conserve biological diversity and promote use of renewable natural resources in a sustainable manner.</p>
PS 7: Indigenous Peoples	PS 7 acknowledges the possibility of vulnerability of indigenous people owing to their culture, beliefs, institutions and living standards and that it may further get compromised by one or other project activity throughout the life cycle of the project.	<p>The PS underlines the requirement of avoiding / minimizing adverse impacts on indigenous people in a project area, respecting the local culture and customs, fostering good relationship and ensuring that development benefits are provided to improve their standard of living and livelihoods.</p> <p>PS 7 recognises that Indigenous Peoples, as social groups with identities that are distinct from dominant groups in national societies, are often among the most marginalised and vulnerable segments of the population.</p> <p>Objectives of PS 7 underscore the need to avoid adverse project impacts on Indigenous Peoples' communities living in the project's area of influence, or where avoidance is not feasible, to minimise, mitigate or compensate for such impacts through mechanisms that are tailored to their specific cultural characteristics and expressed needs of the Indigenous Peoples, in a manner commensurate with the scale of project risks and impacts.</p>
PS 8: Cultural Heritage	PS 8 aims to protect the irreplaceable cultural heritage and to guide clients on protecting cultural heritage in the course of their business operations. In addition, the requirements of this PS on a project's use of cultural heritage are based in part on standards set by the Convention on Biological Diversity.	<p>PS 8 recognises the importance of cultural heritage with an objective to:</p> <ul style="list-style-type: none"> • Protect cultural heritage from the adverse impacts of project activities; • Support its preservation; and • Promote the equitable sharing of benefits from the use of cultural heritage in business activities.

Table D.4 Summary of Key Requirements under IFC Performance Standards and Actions for MEIPL Operations

IFC Policy and Performance Standards Requirements	Actions for MEIPL
Screening and Categorization	
As part of review of a project's expected social and environmental impacts, IFC uses a system of social and environmental categorization. These categories are A, B and C.	The ESMS has a screening and categorisation of projects and provides Environmental and Social Screening Checklist in Annexure E
The IFC Exclusion List defines the types of projects that IFC does not finance (Refer http://www.ifc.org/ifcext/sustainability.nsf/Content/IFCExclusionList)	The ESMS includes a process of verifying that MEIPL does not invest in projects/sectors that are in the IFC exclusion list. Refer Annexure D for exclusion list.
PS-1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL AND RISKS	
Social and Environmental Management System	
Establish and maintain a Social and Environmental Management System appropriate to the nature and scale of the project and commensurate with the level of risks and impacts	This ESMS has an QSHE, HR & CSR Policies and Environmental and Social Management System (ESMS) in line with IFC PS 1 requirements.
Social and Environmental Assessment	
Conduct a process of Social and Environmental Assessment that will consider all risks and impacts of the project.	The ESMS includes clear guidelines of conducting ESIA at an appropriate stage of the project and for various categories of the project (Refer Section 7). The document also provides various checklists and tools provided in Annexures J1 and L for this purpose.
Risks and impacts will be analysed in the context of the project's area of influence.	The project area of influence has been defined for the purposes of screening and categorization and subsequently in ESIA Terms of Reference (Annexure J1).
Risks and impacts will also be analysed for the key stages of the project cycle, including preconstruction, construction, operations and decommissioning or closure.	The scope of the ESIA covers the entire life cycle including decommissioning of the project. Other than this Annexure P includes the Audit tool to manage the risks and impacts for both construction and operation phases of the project.

<p>The Assessment will be an adequate, accurate and objective evaluation and presentation of the issues, prepared by qualified and experienced persons. In projects with significant adverse impacts or where technically complex issues are involved, clients may be required to retain external experts to assist in the Assessment process.</p>	<p>The ESMS suggests the use of independent external experts and competent internal EHS team and other appropriate resources to assist in the Assessment process based on the categorisation and complexity of the projects. Refer Section 7 for more details,</p>
<p>Depending on the type of project and the nature and magnitude of its risks and impacts, the Assessment may comprise a full-scale social and environmental impact assessment, a limited or focused environmental or social assessment, or straightforward application of environmental siting, pollution standards, design criteria, or construction standards</p> <p>Narrower scopes of Assessments may be conducted for projects with limited impacts that are few in number, generally site-specific, largely reversible and readily addressed through mitigation measures.</p>	<p>The ESMS has provided appropriate options for the conducting Environmental and Social Assessments commensurate with the internal categorisation of projects and assessment of risks in the internal pre-project review process.</p> <p>The ESMS provided for a verification and approval of the categorisation of the project from the ESMS Committee and the Investors that will determine the scope of the ESIA/other environmental and social studies.</p>
<p>Projects with minimal or no adverse impacts will not be subject to further assessment beyond their identification as such.</p>	<p>For projects with minimal or no adverse impacts, the ESMS provides simpler procedures for implementation and compliance to ensure they meet regulatory requirements and IFC PS and EHS guidelines through their life cycle.</p>
<p style="text-align: center;">Management Program</p>	
<p>Based on the findings of the Social and Environmental Assessment and the result of consultation with affected communities, the client will establish and manage a program of mitigation and performance improvement measures and actions that address the identified social and environmental risks and impacts.</p>	<p>Generic and specific program of mitigation and performance improvement measures have been included commensurate with the level of impacts and risks.</p>
<p>The program will define desired outcomes as measurable events to the extent possible, with elements such as performance indicators, targets, or acceptance criteria that can be tracked over defined time periods.</p>	<p>The ESMS provides a monitoring and reporting framework and indicated performance indicators. It is expected that these will be detailed in project specific management systems.</p>
<p style="text-align: center;">Organizational Capacity</p>	
<p>Establish an organizational structure to implement the management program. Sufficient management sponsorship and human and financial resources will be provided.</p>	<p>ESMS has proposed organizational structure both at Corporate and Project level to implement the management program defining the roles and responsibilities.</p>

IFC Policy and Performance Standards Requirements	Actions for MEIPL
Training	
Train employees and contractors with direct responsibility for activities relevant to the project's social and environmental performance	ESMS includes the training schedule to build capacity of employees and contractors in a sustained manner. Refer Annexure N .
Community Engagement	
Community engagement is an on-going process involving the client's disclosure of information. The nature and frequency of community engagement will reflect the project's risks and adverse impacts on the affected communities.	Stakeholder Engagement Framework (SEF) (Annexure H) has been prepared as part of the ESMS which defines the engagement process, tools and methods to ensure effective consultations.
Disclosure	
Disclosure of relevant project information and SEA documents helps affected communities understand the risks, impacts and opportunities of the project. Provide impacts communities with access to information on the purpose, nature and scale of the project, the duration of proposed project activities and any risks to and potential impacts on such communities.	The SEF also talks about the disclosure mechanism to the affected communities. Additionally, MEIPL's policies reflect commitment of disclosure of information to public. Refer Annexure C and CSR strategy.
Consultation	
Undertake a process of consultation with affected communities. The consultation process will be inclusive and culturally appropriate. For projects with significant adverse impacts on affected communities, the consultation process will ensure their free, prior and informed consultation and facilitate their informed participation.	SEF includes the methodology to ensure free, prior and informed consultations.
Grievance Mechanism	
Establish a grievance mechanism to receive and facilitate resolution of the affected communities' concerns and grievances. The grievance mechanism should be scaled to the risks and adverse impacts of the project.	Grievance Redressal Framework (GRF) has been developed as part of the ESMS for entire lifecycle of the project which meets IFC requirements. The GRF has established procedures to manage both internal and external grievances.

Monitoring	
As an element of its Management System, establish procedures to monitor and measure the effectiveness of the management program. Use dynamic mechanisms, such as inspections and audits. Retain qualified and experienced external experts, if the scale of impact is high. The extent of monitoring should be commensurate with the project's risks and impacts. Implement corrective actions based on monitoring feedback.	The ESMS provides a monitoring framework and has developed tools for the audits and inspection purpose to measure effectiveness of the management systems. It is expected that these will be detailed in project specific management systems.
Reporting	
<p>Internal Reporting - Senior management to receive periodic assessments of the effectiveness of the management program. The scope and frequency of such reporting will depend upon the nature and scope of the activities.</p> <p>External Reporting on Action Plans - Disclose the Action Plan and its periodic monitoring reports that describe progress on issues that involve ongoing risk to or impacts on affected communities and on issues that the consultation process or grievance mechanism has identified as of concern to those communities. The frequency of these reports will be proportionate to the concerns of affected communities but not less than annually.</p>	ESMS provides internal and external reporting and communication mechanism. MEIPL has also developed formats for reporting at asset level, which will be reflected in the Annual Environmental and Social Performance Report which would be submitted to Investors on annual basis. AESPR Report format has been proposed in Annexure O .
PS-2: LABOUR AND WORKING CONDITIONS	
Human Resource Policy	
The project proponent and contractor shall have a Human Resources policy which sets out its approach to manage employees consistent with the requirement of this PS.	HRGA policy prepared as part of the ESMS includes IFC PS 2 requirements. Refer Annexure C2 for the policy document.
Working Relationships	
The client will document and communicate to all employees and workers directly contracted their working conditions and terms of employment, including entitlement to wages and benefits.	The working conditions are enumerated in the Human Resources Management Services (HRMS) manual.

IFC Policy and Performance Standards Requirements	Actions for MEIPL
Working Conditions and Terms of Employment	
<p>The Project proponent shall incorporate provisions for collective bargaining agreement on working conditions and terms of employment (wages, benefits, hours of work, overtime arrangements and compensation etc.) where such agreements are respected. At the minimum comply with the national law. Where law recognizes worker's rights to form and join worker organizations of their choice without interference and collectively bargain, the client will comply with the national law.</p>	<p>The HR policies included in the ESMS meets the PS2 requirements.</p>
Non-discrimination and Equal Opportunity	
<p>Employment decisions will not be made on the basis of personal characteristics unrelated to job requirements. Job opportunities will be provided on the principles of equal opportunity and fair treatment.</p>	<p>Same as above.</p>
Retrenchment	
<p>A plan to mitigate the adverse impacts of retrenchment on employees to be in place, (if required).</p>	<p>No retrenchment plan has been prepared as part of the ESMS.</p>
Grievance Mechanism	
<p>Grievance mechanism for workers where they can raise reasonable workplace concerns.</p>	<p>Grievance Redressal Framework (GRF) is included in the ESMS for entire lifecycle of the project which meets IFC requirements.</p>
Child Labour and Forced Labour	
<p>The client will not employ children in a manner that is economically exploitative or is likely to be hazardous or to interfere with the child's education, or be harmful to the child's development. The client will not employ forced labour, which consists of any work or service not voluntarily performed and that is extracted for an individual under threat of force or penalty.</p>	<p>ESMS as part of the HR policies includes specific commitments which forbid forced labour and child labour. Additionally, it is part of the exclusion list mentioned in Annexure D.</p>

Occupational Health & Safety	
The project proponent should emphasize on Occupational H&S through training, documentation, reporting. The IFC EHS guidelines shall be considered as the guideline for EHS.	ESMS includes audit formats to regulate EHS performance during construction and operation. Additional formats have been developed for accident reporting and training and project specific onsite emergency plan would be prepared. The H&S performance would be also evaluated for shortlisting the contractors. Refer Annexure K .
Non-Employee Workers	
For all non-employee workers directly contracted, i.e. the daily-rated workers, or related to the core functions of production, the requirements of PS 2 with the exception of applicability of the HR policy, the retrenchment policy will be applicable. PS 2 requires the client to ascertain that contractors are legitimate enterprises and comply to PS 2.	ESMS tools include criteria for vendor and contractor evaluation which includes compliance to regulations and PS2
Supply Chain	
Impacts associated with supply chains will be considered where low labour cost is a factor in competitiveness of the item supplied.	MEIPL will demand self-certificates and voluntary disclosures from suppliers about the compliance to child-labor and forced labor issues which are subject to Third party verification and certification.
PS-3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION	
Pollution Prevention and Control Technologies and Techniques	
During the design, construction, operation and decommissioning of the project (project life cycle), the client is to consider ambient conditions and apply pollution prevention and control technologies and techniques. To avoid release of pollutants or when avoidance is not feasible minimize or control the intensity or load of the release.	Solar and wind power projects are essentially green and renewable sources of energy and limited E&S impacts are expected. The anticipated impacts and mitigation measures have been included in Section 7 of this ESMS and Annexure L . Additionally, the sample ToR prepared for the ESIA study includes baseline data collection.
Resource Conservation	
In addition, the client is to examine and incorporate in its operations resource conservation and energy efficiency measures consistent with the principles of cleaner production.	Wind and Solar Power projects are sources of clean energy production and additionally at the project level water conservation measures will be adopted. Refer Annexure L .

IFC Policy and Performance Standards Requirements	Actions for MEIPL
Waste Generation	
Avoid and minimize generation of hazardous and non-hazardous waste materials as far as practicable. Recover and reuse wastes, where feasible or else treat, destroy and dispose off in an environmentally sound manner. Waste disposal by third parties must be through reputable and legitimate enterprises licensed by the relevant regulatory agencies.	Key risks and impacts have been identified in Section 7 which includes waste management too and mitigation measures have been included.
Hazardous Materials	
Not to manufacture, trade or use chemicals and hazardous materials subject to international bans or phase-outs and must consider less hazardous substitutes to such chemicals and materials.	MEIPL exclusion list includes materials which have been banned internationally. ESMS impact assessment and audit tools have verification process to ensure it is not considered.
Emergency Response	
Be prepared to respond to process upset, accidental and emergency situations in a manner appropriate to the operational risks and the need to prevent their potential negative consequences. This preparation will include a plan that addresses the training, resources, responsibilities, communication, procedures and other aspects. Refer to current version of the EHS guidelines when evaluating and selecting pollution prevention and control techniques.	On site emergency plan would be site specific and would be prepared as part of impact assessment process.
Technical Guidance	
Refer to the current version of the EHS Guidelines when evaluating and selecting pollution prevention and control techniques. When host country regulations differ from the levels and measures presented in the EHS Guidelines, clients will achieve whichever is more stringent.	ESMS as part of generic management plan (Annexure L) has included measures to control pollution and which will be followed at the minimum and would be made project specific based on the impact assessment studies.
Ambient Considerations	
Address adverse project impacts on existing ambient conditions such as finite assimilative capacity of the environment, existing and future land use, existing ambient conditions, the project's proximity to ecologically sensitive or protected areas and the potential cumulative impacts, already degraded area. Based on this, evaluate strategies including project location alternatives and emissions offsets.	ESMS has included as part of project screening process and categorization process- proximity to the sensitive areas as one of the key criteria to categorize and select the project.

GHG Emissions	
To promote reduction of project-related GHG emissions in a manner appropriate to the nature and scale of project operations and impacts.	MEIPL is keen for GHS reduction initiative by putting renewable energy plant. Company is considered instituting systems and procedures for earning carbon-credit under Clean Development Mechanism (CDM) or other provisions as per the suitability and market condition
Integrated Pest/ Vector Management (IIPM)	
Formulate and implement an integrated pest management (IIPM) and or integrated vector management (IVM) approach to pest management.	Not being used by MEIPL in its current operations.
PS-4: COMMUNITY HEALTH SAFETY & SECURITY (CHS&S)	
Risk Evaluation and Disclosure	
Avoiding or minimizing risks to and impacts on health and safety of the local community by evaluating risks and potential impact. Action plans to be disclosed to enable affected communities and concerned government agencies to enable them to understand the risks and engage them on an ongoing basis. Safeguarding of personnel and property through adequate safety measures, adopt specific measures to prevent the occurrence of incidents and accidents associated with operation of such machines / equipment. Taking adequate measures for hazardous materials safety.	As part of pre-project review process and ESIA process, ESMS includes EHS&S Assessment and Management too.
Contamination of Natural resources	
Avoiding and minimizing adverse impacts of the project on soil, water and other natural resources in use by the affected community. Avoid exacerbation of impacts caused by natural hazards if any, through project activities.	ESMS includes mitigation measures to avoid contamination of natural resources as part of Section 7 of this document and generic ESMP for solar and wind operations.
Hygiene and Health	
Prevention or minimizing potential for exposure to water borne, water based risks, water related, vector borne diseases and other communicable diseases that could result from the project activities.	Both Solar and Wind operations require minimal quantities of water for meeting domestic needs and small quantity for washing of solar panels. Additionally, audit tools and regular inspections included in the ESMS will regulate prevention of water borne risks.

IFC Policy and Performance Standards Requirements	Actions for MEIPL
Emergency Response	
Informing affected community about potential risks and impacts from the project activities in a culturally appropriate manner, including collaborating with the community and government agencies in their efforts to respond effectively to emergency situation.	ESMS includes community engagement and consultations tools which would include informing affected community (if any) about potential risks and impacts from the project activities.
Security Personnel Requirements	
Client to assess risks to those within and outside the project site from the security arrangements provided. Client shall provide training on rules of conduct, handling of security equipment to all the security personnel. Ensure that any unlawful or abusive acts by the security are investigated appropriately.	Included in the ESMS in EHS Audit tool.
Grievance Redressal Mechanism	
A grievance mechanism should allow the affected community to express concerns about the security arrangements and acts of security personnel. Investigate any credible allegations of unlawful or abusive acts of security personnel, take action and report unlawful and abusive acts to public authorities when appropriate.	Included as part of Grievance Redressal Framework. MEIPL will ensure as per the scope with its turnkey contractor / deputed personnel.
PS-5: LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT	
Project Alternatives	
The project will consider feasible alternative project designs to avoid or at least minimize physical or economic displacement, while balancing environmental, social and financial costs and benefits.	Integrated in the ESMS through screening checklists and through categorization process.
Compensation and benefits for Displaced persons	
Client 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, the client will offer land-based compensation where feasible. The client will provide	MEIPL to the extent feasible shall procure government and revenue land or will procure land on willing buyer-willing seller basis. Land will be procured in line with the land procedure. Refer Annexure F for details.

opportunities to PAPs to derive appropriate development benefits from the project.	
Grievance Mechanism	
Client to establish grievance mechanism consistent with PS 1 to address concerns raised by PAPs.	Included as part of Grievance Redressal Framework. Refer Annexure I
Resettlement Planning and Implementation	
Client shall carry out a census survey for socio-economic baseline data. For Type I and Type II transactions with physical displacement, client to develop an RAP on the basis of a social assessment to mitigate adverse impacts of displacement. Client to document all the land rights transactions and closely monitor the resettlement as well as address issues through corrective actions. A resettlement is complete only when all adverse impacts have been mitigated as per IFC PS. For Type II transactions involving economic displacement, the client will offer PAPs compensation and other assistance to meet PS.	Included in the ESMS as part of Resettlement Action Framework (Annexure G). However, MEIPL is strategically dealt by adopting Willing buyer-willing seller concept.
Compensation and Replacement Value	
For PAPs defined as (i) PAPs with formal and legal rights to land they occupy and (ii) PAPs with no formal rights but a nationally recognizable claim; client to offer resettlement property of equal or higher value and compensation of replacement value. If communities of indigenous people are to be physically displaced, client to meet requirements of PS 7. If the project causes loss of income or livelihood, regardless of whether or not the affected people are physically displaced, the client will need to provide compensation for or entitlements for those with recognizable rights, claims as well as those without legal rights.	Same as above.
PS-6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES	
Assessment of impacts on all levels of biodiversity	
Assess significance of project impacts on all levels of biodiversity as an integral part of social and environmental assessment process. Habitat destruction considers all kinds of habitats- including natural habitat, modified habitat and critical habitats. If located within legally protected areas, to act in a manner consistent with the protected area management plan, consult stakeholder	Included as part of pre-project review, categorization and ESIA process, the assessment of project impacts on all levels of biodiversity and site-specific regulatory implications.

IFC Policy and Performance Standards Requirements	Actions for MEIPL
<p>on the proposed project and implement additional programme to promote and enhance conservation aims. Do not intentionally introduce any new invasive alien species.</p>	<p>Based on the internal categorisation of projects and categorization specialized studies would be conducted.</p>
Sustainable Measures	
PS-7: INDIGENOUS PEOPLES	
Impact and Compensation	
<p>Avoid impacts on indigenous communities, to the extent feasible and where not, mitigate or compensate in a culturally appropriate manner.</p>	<p>Included in the ESMS as part of project screening and ESIA scope the various direct and indirect impacts on indigenous communities and their resources including cultural resources, considering the host country statute.</p>
Engagement Process	
<p>Develop an ongoing relationship with such communities through the life of the project, involving their representatives (e.g. council of elders) and inclusive of women and men and allowing them time for collective decision making.</p>	<p>Project-specific Indigenous Community Engagement Plan following FPIC approach will be prepared for category A projects based on the applicability and host country statute.</p>
Development Benefits	
<p>The client will seek to identify, through the process of free, prior and informed consultation with and the informed participation of the affected communities of Indigenous Peoples, opportunities for culturally appropriate development benefits.</p>	<p>Same as above.</p>
Special Requirements and Protection	
<p>Retain qualified and experienced experts depending upon level of impacts. Address impacts on Traditional or Customary Lands under Use and Relocation of Indigenous Peoples from Traditional or Customary Lands. Protect cultural heritage of indigenous people.</p>	<p>Experts would be engaged based on categorization of projects,</p>
PS-8: CULTURAL HERITAGE	

Protection of Cultural Heritage in Project Design and Execution	
Both tangible forms of cultural heritage as well as intangible forms of culture, such as cultural knowledge, innovations and practices are included. Avoid removing cultural heritage unless there are no alternatives and benefits outweigh costs. Comply with national laws as well as host country obligations under International conventions/laws.	As part of project screening and categorization process, includes analysis of cultural heritage issues and risks associated with it.
Chance Find	
Implement chance find procedures wherever necessary.	Same as above.
Consultation	
Where a project may affect cultural heritage, the client will consult with affected communities within the host country. Consultation will also involve the relevant national or local regulatory agencies that are entrusted with the protection of cultural heritage.	The ESMS includes it as part of stakeholder consultations, includes consultations regarding cultural heritage with affected communities and relevant national or local regulatory agencies responsible for protection of cultural heritage.

D.5 The World Bank Group General EHS Guidelines

The World Bank Group General Environmental, Health and Safety (EHS) Guidelines 2007 are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP). When one or more members of the World Bank Group are involved in a project, these EHS Guidelines are applied as required by their respective policies and standards. These General EHS Guidelines are designed to be used together with the relevant Industry Sector EHS Guidelines which provide guidance to users on EHS issues in specific industry sectors.

The EHS Guidelines contain the performance levels and measures that are generally considered to be achievable in new facilities by existing technology at reasonable costs. Application of the EHS Guidelines to existing facilities may involve the establishment of site-specific targets, with an appropriate timetable for achieving them. The applicability of the EHS Guidelines should be tailored to the hazards and risks established for each project on the basis of the results of an environmental assessment in which site-specific variables, such as host country context, assimilative capacity of the environment and other project factors, are taken into account.

D.5.1 Sector specific EHS Guidelines for Wind Energy Projects, Electric Power Transmission and Distribution;

EHS Guidelines for Wind Energy Projects

The EHS Guidelines for wind energy projects include information relevant to environmental, health and safety aspects of onshore and offshore wind energy facilities. The guidelines have been structured into four sections including:

- **Section 1.0** - Industry-Specific Impacts and Management: this section of the document discusses the EHS issues associated with wind energy facilities, along with recommendations

for their management;

- **Section 2.0:** Performance Indicators and Monitoring;
- **Section 3.0:** References; and
- **Annex A:** General Description of Industry Activities.

D.5.2 Typical issues arising from wind projects include:

- **Environmental issues:** the environmental issues include:
 - Visual impacts;
 - Noise;
 - Species mortality or injury and disturbance;
 - Light and illumination issues;
 - Habitat alteration;
 - Water quality.
- **Occupational health and safety hazards:** the typical occupational health and safety risks associated with wind farm projects include working at height and working over water.
- **Community health and safety hazards:** the community health and safety related risks relevant to wind power industry includes:
 - Aircraft and marine navigation safety;
 - Blade and ice throw;
 - Electromagnetic interference and radiation;
 - Aviation Radar;
 - Telecommunication Systems;
 - Television;
 - Public access.

D.5.3 EHS Guidelines for Electric Power Transmission and Distribution

The EHS Guidelines for Electric Power Transmission and Distribution include information relevant to power transmission between a generation facility and a substation located within an electricity grid, in addition to power distribution from a substation to consumers located in residential, commercial and industrial areas. The guidelines have been structured into four sections including:

- **Section 1.0** - Industry-Specific Impacts and Management: this section of the document discusses the EHS issues associated with wind energy facilities, along with recommendations for their management;
- **Section 2.0:** Performance Indicators and Monitoring;
- **Section 3.0:** References and additional sources; and
- **Annexure A:** General Description of Industry Activities.

Typical issues associated with Electric Power Transmission and Distribution includes:

- **Environmental issues:** the environmental issues include:
 - Terrestrial habitat alteration;
 - Aquatic habitat alteration;
 - Electric and magnetic fields;
 - Hazardous materials; and
 - Visual impacts.
- **Occupational health and safety hazards:** the typical occupational health and safety risks associated with transmission and distribution projects includes:
 - Live power lines;
 - Working at height;
 - Electric and magnetic fields; and
 - Exposure to chemicals.

- **Community health and safety hazards:** the community health and safety related risks relevant to transmission and distribution projects includes:

- Electrocuting;
- Electromagnetic interference;
- Visual amenity;
- Noise and Ozone; and
- Aircraft Navigation Safety Aircraft and marine navigation safety.

D.6 ADB's Safeguard Policy Statement, 2009

In July 2009, ADB's Board of Directors approved the new Safeguard Policy Statement (SPS) governing the environmental and social safeguards of ADB's operations. The SPS builds upon ADB's previous safeguard policies on the Environment, Involuntary Resettlement and Indigenous Peoples and brings them into one consolidated policy framework with enhanced consistency and coherence and more comprehensively addresses environmental and social impacts and risks. The SPS also provides a platform for participation by affected people and other stakeholders in the project design and implementation.

The SPS applies to all ADB-financed and/or ADB-administered projects and their components, regardless of the source of financing, including investment projects funded by a loan; and/or a grant; and/or other means, such as equity and/or guarantees. ADB works with borrowers and clients to put into practice the requirements of SPS.

The SPS supersedes ADB's Involuntary Resettlement Policy (1995), Policy on Indigenous Peoples (1998) and Environment Policy (2002). In accordance with the SPS, these previous policies apply to all projects and tranches of multi-tranche financing facility projects that were reviewed by ADB's management before 20 January 2010.

The objectives of ADB's safeguards are to:

- Avoid adverse impacts of projects on the environment and affected people, where possible

- Minimize, mitigate and/or compensate for adverse project impacts on the environment and affected people when avoidance is not possible
- Assist borrowers and clients to strengthen their safeguard systems and develop the capacity to manage environmental and social risks

ADB's SPS sets out the policy objectives, scope and triggers and principles for three key safeguard areas:

- Environmental safeguards
- Involuntary Resettlement safeguards
- Indigenous Peoples safeguards

To help borrowers and clients and their projects achieve the desired outcomes, ADB adopts a set of specific safeguard requirements that borrowers and clients are required to meet in addressing environmental and social impacts and risks. These safeguard requirements are as follows:

- **Safeguard Requirements 1:** Environment (Appendix 1 of SPS)
- **Safeguard Requirements 2:** Involuntary Resettlement (Appendix 2 of SPS)
- **Safeguard Requirements 3:** Indigenous Peoples (Appendix 3 of SPS)
- **Safeguard Requirements 4:** Special Requirements for Different Finance Modalities (Appendix 4 of SPS)

In addition, ADB does not finance activities on the prohibited investment activities list (Appendix 5 of SPS). Furthermore, ADB does not finance projects that do not comply with its safeguard policy statement, nor does it finance projects that do not comply with the host country's social and environmental laws and regulations, including those laws implementing host country obligations under international law.

For the current assessment, only Safeguard Requirement 1 for Environment is applicable.

D.7 Other ADB Social Policies

D.7.1 Public Communications Policy (2011)

1. ADB's Public Communications Policy (2011) sets out disclosure requirements for various ADB activities, including safeguard requirement. Safeguard Requirements
2. Involuntary Resettlement (Appendix 2 of SPS); and Safeguard Requirements
3. Indigenous Peoples (Appendix 3 of SPS) sets out the need for meaningful consultation and information disclosure during project preparation and operation to the affected population and other key stakeholders. Key requirements include:
 - **Information Disclosure:** The borrower/client will submit the following documents to ADB for disclosure on ADB's website as per the applicability with respect to the Project:
 - Draft EIA including draft EMP
 - Final EIA/IEE
 - Updated EIA/IEE and corrective action plan
 - Environmental Monitoring Reports
 - Resettlement Plan (RP)
 - Indigenous Peoples Plan (IPP).
 - **Information disclosure to affected people or stakeholders:** The borrower/client will provide relevant environmental information in a timely manner, in an accessible place and in a form and language(s) understandable to affected people and other stakeholders. For uneducated people, other suitable communication methods will be used.
 - **Consultation and Participation:** The borrower/client will carry out meaningful consultation with affected people and other concerned stakeholders, including civil society and facilitate their informed participation.

- **Timing and Frequency for consultation and participation:** Meaningful consultation begins early in the project preparation stage and is carried out on an ongoing basis throughout the project cycle.

D.7.2 Social Protection Strategy 2001

- Social protection is a key step in ADB's battle to have Asia and the Pacific region "free of poverty." The Social Protection Strategy (SPS) spells out the scope of social protection and commitment of the ADB to develop priority interventions in five major elements including:
- Labour market policies and programs designed to generate employment, improve working conditions and promote the efficient operations
- Social insurance programs to cushion the risks associated with unemployment, ill health, disability, work-related injury and old age
- Social assistance and welfare service programs for the vulnerable groups with inadequate means of support, including single mothers, the homeless, or physically or mentally challenged people
- Micro and area-based schemes to address vulnerability at the community level, including micro insurance, agricultural insurance, social funds and programs to manage natural disasters
- Child protection to ensure the healthy and productive development of children.

D.7.3 Operations Manual (OM) C3 Sector and Thematic Policies on Incorporation of Social Dimensions 2011

All ADB operations have social dimensions that need to be taken into account from the country strategy formulation, programming and project processing phases onward. The key social dimensions,

supported by specific ADB policies or strategies, include:

- Participation
- Gender and development
- Social safeguards
- Management of social risks, especially among vulnerable groups.

As per the policy, ADB operations incorporate social dimensions to ensure the following social development outcomes, especially for the poor, vulnerable and excluded groups:

- Policies and institutions that recognize and promote greater inclusiveness and equity in access to services, resources and opportunities
- Greater empowerment to participate in social, economic and political life
- Greater sense of security and ability to manage risks.

In pursuing these social development outcomes, ADB:

- Encourages consultation with and participation by stakeholders (including the government, executing and implementing agencies, clients and/or beneficiaries, people affected by ADB-supported projects); provides them with opportunities to engage in key stages of the country strategy formulation, programming and project cycles; and actively seeks, where appropriate, the cooperation of nongovernment organizations and other civil society groups in formulating, designing, implementing, monitoring and evaluating projects;
- Addresses gender considerations in relevant aspects of ADB operations, including macroeconomic, sector strategy, country strategy formulation and programming work and in key stages of the project cycle; and proposes strategies to promote social inclusion and gender equality and to empower women;
- Integrates social analysis in preparing country partnership strategies and regional strategies and programs; identifies potential social issues during project preparation to

ensure that the project design maximizes social benefits and avoids or minimizes social risks, particularly for vulnerable and marginalized groups; and

- Ensures that project design and implementation arrangements include actions to enhance benefits and to monitor and evaluate the distribution of the benefits of the project, with performance targets and indicators for monitoring and evaluating benefits included in the design and monitoring framework of the project performance management system.

- Conventions 29 and 105 ban forced labour and slavery
- Conventions 87 and 98 require countries to allow freedom of association and collective bargaining
- Conventions 100 and 111 ban workplace discrimination
- Conventions 138 and 182 set a minimum working age of 15 and ban the worst forms of child labour (e.g., bonded labour, hazardous labour, military conscription and sex trade).

D.7.4 Gender Mainstreaming Guidelines 2012

The projects of the Asian Development Bank (ADB) have four gender mainstreaming categories:

- Category I: gender equity as a theme (GEN)
- Category II: effective gender mainstreaming (EGM)
- Category III: some gender elements (SGE)
- Category IV: no gender elements (NGE).

The Gender Mainstreaming Guidelines 2012 provides a detailed overview on the definition, requirements and application of the above gender mainstreaming categories.

- Policies and institutions that recognize and promote greater inclusiveness and equity in access to services, resources and opportunities
- Greater empowerment to participate in social, economic and political life
- Greater sense of security and ability to manage risks.

D.8 ILO Core Labour Standards

There are eight International Labour Organisation (ILO) conventions that align with and further strengthen, the covenant requirements. They cover four 'Core Labour Standards':

D.9 Exclusion List

There are eight International Labour Organisation (ILO) conventions that align with and further strengthen, the covenant requirements. They cover four 'Core Labour Standards':

MEIPL will not invest in the following projects:

- Production or activities involving harmful or exploitative forms of forced labor (5) / harmful child labor (6)
- Production or trade in any product or activity deemed illegal under host country laws or regulations.
- Production of or trade in any product or activity that contravenes any international conventions and agreements to which the host country is a party and which have the force of law in the host country
- Production or trade in weapons and munitions including paramilitary materials
- Production or trade in alcoholic beverages (excluding beer and wine) (7).
- Production or trade in tobacco.
- Gambling, casinos and equivalent enterprises.
- Trade in wildlife or wildlife products regulated under CITES (8)
- Production or trade in radioactive materials, including nuclear reactors and components thereof (9).

- Production or trade in or use of unbounded asbestos fibers. This does not apply to purchase and use of bonded asbestos cement sheeting where the asbestos content is less than 20%.
 - Commercial logging operations or the purchase of logging equipment for use in primary tropical moist forest.
 - Production, commercial-scale use, trade, storage, or transport of products containing polychlorinated biphenyls PCBs (10) and hazardous chemicals (11).
 - Production or trade in pharmaceuticals (refer www.who.int), pesticides/herbicides (refer www.pic.int) or ozone depleting substances (12) subject to international phase outs or bans.
 - Marine and coastal fishing practices, such as large-scale pelagic drift net fishing and fine mesh net fishing, harmful to unwanted vulnerable and protected species in large numbers and damaging to the marine biodiversity and habitats; and
 - Production or activities that impinge on the lands owned, or claimed under adjudication, by indigenous peoples, without full documented consent of such peoples.
- (9) This does not apply to the purchase of medical equipment, quality control (measurement) equipment and any equipment where ADB considers the radioactive source to be trivial and/or adequately shielded.
- (10) A group of highly toxic chemicals, polychlorinated biphenyls, are likely to be found in oil-filled electrical transformers, capacitors and switchgear dating from 1950 to 1985.
- (11) A list of hazardous chemicals is available from www.pic.int.
- (12) A list of the chemical compounds that react with and deplete stratospheric ozone, resulting in the widely publicized ozone holes is listed in the Montreal Protocol, together with target reduction and phase out dates. <http://www.unep.org/ozone/montreal/shtml>.

References

(7) Forced labor means all work or service not voluntarily performed, that is extracted from an individual under threat of force or penalty.

(6) Child labor means the employment of children whose age is below the host country's statutory minimum age of employment or employment of children in contravention of International Labor Organization Convention No. 138 "Minimum Age Convention"

(7) This does not apply if the activity concerned is ancillary to a sponsor's/project's (or subproject's) primary operations.

(8) CITES: Convention on International Trade in Endangered Species of Wild Fauna and Flora. A list of CITES listed species is available from the Environment Division.

Annexure E

E&S Screening Checklist





E&S Screening Checklist

I Primary Screening Checklist

Sl. No	Criteria / Things to Check for	Actual Status	Evidence Details	Remarks
1	Is the Project located in ecologically sensitive zones (10 km)			Check the permission required and account for it in the project schedule. (Permission from National Board for Wildlife) unless otherwise State has demarcated its own eco sensitive zone.
2	Is there any Wild life sanctuary, Bio- reserve, National Park or notified Eco Sensitive Zone in the area of influence (i.e. within 10 km) ?			
3	Are there any Reserve forests, Protected forest, or reserved land in the area of influence ?			
4	Coastal Areas - Site falling within High Tide line (HTL) as per CRZ notification			Check the permission required and account for it in the project schedule.
5	Is the site at a sufficient distance from National Highway/ State Highway and Railway line ?			
6	Distance from flood plains or riverine systems			
7	Metropolitan Cities (More than 3,00,000 population) at least 25 km of the projected growth boundary of the settlement			
8	Are there any sites of cultural or archaeological importance at the site ?			
9	Wind Speed/Solar Radiation			
10	Seismic Zone			
11	Availability of Land for plant & township (Area, Orientation & shape of plot, Extent of land available for Plant, Township etc.)			
12	Is the land being used for economic/livelihood purposes			Conduct site visit, consult with local people and provide evidence/proof that land is not being used for residential, economic or livelihood purposes all year round (there may be seasonal or temporary use which cannot be identified in one site visit.)
13	Are there any residences in the land that will need to be removed ?			

14	Is the land categorised as tribal land ?			
15	Is there any settlement within 300 m of the boundary of the land parcel ?			
16	If Forest Land, has the Forest Rights Act (FRA) been implemented and all Forest Rights settled by the law ?			
Note:	Only after majority of Primary Siting Criteria is met for a particular Site, it will be subjected to more rigorous Social and Environmental Screening Checklist for the selected Site at a later stage of the project (i.e. during ESDD stage) to trigger the need for specialized studies.			



II Social Screening Checklist

Social Safeguards Screening Checklist for Land which passed primary screening criteria				
Sl. No	Criteria / Things to Check for	Yes/No*	Remarks/ Checks in place/ Additional information	Likely source of information
Involuntary Resettlement				
1	Is there any National / local policy guidelines and laws on the kind of land available/ to be used for wind/solar power projects and will they affect the project adversely ?		Check, if it is being followed.	
2	Is Private land available for buying or the mandatory land acquisition is necessary ?		Understand the nature of land - Cultivated, Barren and unused, current fallow, long term fallow etc.	
3	Will land acquisition involve displacement of people and resettlement and is enough land available for the resettlement ?		Consider both physical and economic displacement. If yes, prepare resettlement action plan (RAP) as per the outline suggested in relevant Annexure G .	<ol style="list-style-type: none"> Freeze land location required based on information gained from Revenue department and Forest Department. Socio-economic survey of the land parcel to ascertain physical and economic displacement if required.
4	What impact will the displacement have on the people in the short run or long run ? <ul style="list-style-type: none"> Impact on livelihood Cropping pattern Employment opportunity Loss of Business/ Enterprises 		If yes, prepare RAP after conducting SIA. Understand the nature of ownership of land - Private land, revenue land, forest land.	<ol style="list-style-type: none"> Get SIA study done to ascertain impact as per the applicability

5	Will access to common property resources (e.g. community facilities, public grazing lands, forest etc.) be restricted by the project ?		If there is restricted access, such assets may need to be replaced or alternate routes acceptable to communities may be provided. Such measures will be outlined in the RAP.	1. This aspect to be covered in socio-economic survey and SIA
6	Are there any non-titled people who live or earn their livelihood at the site or within the right-of-way ?		If yes, prepare RAP	1. This aspect to be covered in socio-economic survey and SIA
Land Encumbrances				
7	Does the land involve conversion from agricultural to non-agricultural use ?		Ensure appropriate permits	1. Check applicability of NOCs for land use conversion as per Govt. norms
8	Are the land parcels free of any encumbrances or disputes ?		Seek appropriate legal opinion on status of land is No	
9	If government land is involved, are any local clearances from panchayats required ?			
Security				
10	<p>Is security an issue in the nearby project area? Is there any threat from local outfits/terror groups ?</p> <ul style="list-style-type: none"> Does any other project in the nearby area face such challenges ? What could be the possible losses ? How can the issues like vandalism and theft be addressed and what could be the possible cost ? 			1. Discussion with local administration

Social Safeguards Screening Checklist for Land which passed primary screening criteria				
Sl. No	Criteria / Things to Check for	Yes/No*	Remarks/ Checks in place/ Additional information	Likely source of information
Scheduled Tribes (ST) Concerns				
11	Are there any tribal populations occupying / deriving benefit from the site? Is the area a Scheduled Area ?		If specific sites and impacts are not known but STs are present in the area, Scheduled Tribes Development Plan (STDP) is required.	1. Check with List of Scheduled V Area. 2. Discuss with District Administration for more specific detail (If required for identification)
12	Do STs maintain distinctive customs or economic activities that may make them vulnerable to hardship ?		If yes, prepare a STDP.	1. This aspect to be covered in socio-economic survey and SIA
13	Will the project restrict STs' economic and social activity and/or make them particularly vulnerable in the context of project ?		If yes, prepare a STDP.	1. This aspect to be covered in socio-economic survey and SIA
14	Will the project change their socioeconomic and cultural integrity and disrupt their community life ?		If yes, prepare a STDP.	1. This aspect to be covered in socio-economic survey and SIA
15	Will the project negatively affect their health, education, livelihood, or social security status ?		If yes, prepare a STDP.	1. This aspect to be covered in socio-economic survey and SIA
16	In case there is no disruption of indigenous community life as a whole, will there be loss of housing, strips of land, crops, trees and/or other fixed assets owned or controlled by individual indigenous households ?		If relocation is required, prepare an STDP along with RAP	1. This aspect to be covered in socio-economic survey and SIA
Archaeological/Religious Concerns				
17	Is the site considered sacred by any community ?			1. This aspect to be covered in socio-economic survey and SIA

18	<p>If any site of Cultural/Archaeological importance available ?</p> <ul style="list-style-type: none"> • What adverse impacts are perceived on those sites ? • What are the options for mitigating the impacts ? • What do the local or national laws state ? • What will be the cost of such an exercise ? 		<p>If there is restricted access, such assets may need to be replaced or alternate routes acceptable to communities may be provided. Such measures will be outlined in the RAP.</p>	<p>1. This aspect to be covered in socio-economic survey and SIA</p>
Note	* If the answer is not available in yes/no, fill details in remarks column.			
Note	Depending on the expected scale of impacts, adequate management plans will have to be prepared after undertaking ESIA report based on categorization of the project.			

III Environment Screening Checklist

Environmental Screening Checklist for Land which passed primary screening criteria			
Sl. No	Criteria / Things to Check for	Yes/No	Remarks/ Checks in place/ Additional information
Involuntary Resettlement			
1	Will project cause aesthetic degradation and property value loss due to establishment of facilities ?		
2	Will the project alter the pattern of land use or cause land use conflicts ?		
3	Will the project impact the surface water resources ?		
4	Availability of water source.		
5	Visual effects. Impact on the nearby built up areas or community		
6	Will the project cause pollution to surface or ground water bodies from the project's construction or operations, sanitary sewage, sludge, residues and miscellaneous discharges ?		
7	Is the site home to any endemic fauna/floral population ?		Is so, are appropriate mitigation measures adopted for the project in the biodiversity management plan.
8	Will access to site require removal of vegetation ?		
9	Is the site under dense vegetation cover ?		
10	Availability of hydrological data or flood level within the project site within the last 3 to 5 years especially for solar farm.		Climate change effect
11	Will the selection of site result in habitat fragmentation ?		

Other Relevant Information				
12	Other Linear Facility <ul style="list-style-type: none"> Distance to the existing transmission line and other electrical infrastructure Is the site suitable for all associated facilities like evacuation of power etc. ? Existing road and their condition Distance of the road Disturbance to the access road 			
Note	<p>If the answer is not available in yes/no, fill details in remarks column.</p> <p>Depending on the expected scale of impacts, adequate management plans will have to be prepared after undertaking ESIA report based on the category of project.</p>			

Annexure F

MEIPL Land Procurement / Land Lease Procedure





F. Land Procurement: Standard Operating procedure

Mytrah Energy India (Private) Limited (MEIPL) proposes to procure land as per the following Standard Operating Procedure (SOP). The basic component of the project development is "Land". The lands are to be procured for the following purposes:

Lands required for turbine foundations and pathways connecting each turbine;

- Sub-station/pooling station land;
- Wind monitoring stations;
- Stock Yards/ Material yard;
- Batching plants, if planned;
- Transmission Lines Right of Way (RoW).

F.1 Types of Land

Various types of lands where the Wind Power Projects will be developed areas under:

F.1.1 Forest Land

The land owned by the Forest Department (Central Government), which includes any waste land containing trees or shrubs, can be held by MEIPL on lease basis (minimum 10 years, maximum extension up to 30 years). Thereafter, the project will be renewed for a period of 5 years at a time after the lease period subject to fulfilment of conditions stipulated by the Central Government.

Care to be exercised on procurement of Forest Land:

Ministry of Environment and Forests, Government of India (MoEF & CC) permission is required.

F.1.2 Revenue Land

The land owned by the Revenue Department of the State Government can be held by MEIPL on lease basis (minimum 10 years, maximum extension up to 30 years). Thereafter, the project may be renewed for a period of 5 years at a time, subject to fulfilment of certain conditions stipulated by the respective State Government.

Care to be exercised on procurement of Revenue Land:

Due Permission from the respective State Government is to be obtained.

F.1.3 Private Land

The land which is owned by a private person, including the one owned by a company, family, firm, society or association of individuals, private or public trust.

Care to be exercised in procurement of Private Land:

Agricultural land will be held by MEIPL after conversion into non-agricultural land. Right, title and interest in the land needs to be ascertained.

F.1.4 Other Lands

Other lands include lands held by SC/ST, Tribal and others. Procurement of these lands requires prior approvals from the Competent Authorities including respective State Governments. Since the procedures and subsequent process of proposals are laborious and time consuming, such lands are usually not considered for development of projects.

F.2 Identification of Prospective Land

The process followed in identification of windy sites is as follows:

Collection of wind data from Centre of Wind Energy Technologies (CWET), which is based in Chennai;

For physical inspection of proposed land, MEIPL Regional Office (RO) will intimate MEIPL's Wind Resource Department (WRD);

WRD will conduct physical inspection;

Wind Mast is installed, if necessary;

WRD will intimate to RO details of suitable land,

pursuant to physical inspection;

Classification of type of land i.e. Forest, Revenue, Private will be ascertained;

RO will submit an application for Project allotment to respective Nodal Agencies which are intermediaries for Project Allotment from Energy Department;

Micrositing is done on the basis of the topography sheet (map issued by Survey of India, which shows boundaries of the district, taluka, villages and contours) by WRD;

Collection of village maps and Field Measurement Book (which shows each Survey Number, Measurement & Extent - i.e. area in terms of Acres / Hectares);

Detailed micrositing maps are sent to RO; Detailed contour and plane table survey will be conducted in respect of Forest & Revenue lands to identify and mark the Turbine Locations, Approach road alignment, internal roads and transmission line alignment.

The process of procurement of land is initiated, after intimation by WRD. RO will start acquisition of land after receipt of detailed Micrositing map from WRD.

F.3 Acquisition Procedure

RO will follow acquisition procedure according to the type of land i.e. Forest, Revenue & Private, which is described below:

F.3.1 Forest Lands Applicable Legislations:

- State Forest Act, 1963
- Forest (Conservation) Act, 1980
- Forest Conservation Rules, 2003
- Guidelines dated 14.05.2004 for setting up Wind projects in Forest Lands
- Under Section 2 of Forest Conservation Act, 1980, an outright sale of Forest Lands in favour of any persons/user agencies including Companies for non-forest purposes is not permitted. However, MoEF & CC has framed guidelines for diversion of forest lands for the setting up of Wind Projects in forest lands, as per which lands may be diverted for Wind Projects on a leasehold basis for a term of 30 years.

F.3.2 Stage I approval (In Principle Approval)

- RO will submit an initial proposal in the name of MEIPL/Subsidiary, in the format prescribed in Form "A", to the Nodal Officer for diversion of forest lands;
- Nodal Officer will call for report from respective Deputy Conservator of Forests (DCF);
- MEIPL's Business Development team (BD) / RO shall submit the required copies of proposals to the respective DCF's office;
- DCF will call for a report from Assistant Conservator of Forests (ACF) and Range Forest Officer (RFO).
- Forest Guards will make an estimate of the trees that will have to be felled within the forest land sought for diversion;
- RFO will inspect the area and submit report to ACF;
- The User Agency will get an equivalent extent of Non-Forest Land transferred to the Forest Department, thereby complying with Compensatory Afforestation;
- In due compliance of the Forest Rights Act, 2006, the User Agency shall obtain and submit a No Objection Certificate (NOC) as per government regulations wherever applicable;
- ACF will inspect the area and submit his recommendations to DCF;
- DCF will inspect the area and submit recommendation to the Conservator of Forests (CF) along with his inspection report in the prescribed format;
- CF will inspect and forward recommendations to Principal Chief Conservator of Forests (PCCF);
- Nodal Officer will scrutinise the proposal and place it before PCCF;
- PCCF will submit the proposal for approval to the respective State Government;
- Principal Secretary, Forest Department will forward the proposal to the State Forest Minister for endorsement;

- State Forest Minister will forward the proposal to MoEF & CC for approval:
 - If the area requested for diversion is less than 40 hectares then the same will be forwarded to the Regional Office, MoEF & CC, which will then forward it to the Union Minister, MoEF & CC;
 - If the area is more than 40 hectares then the same will be sent to MoEF & CC, New Delhi, which will then forward it to the Union Minister, MoEF & CC;
 - If the area requested for diversion is more than 100 hectares, the area will be inspected by Chief Conservator of Forests, Regional Office, MoEF & CC and he will submit his report to MoEF & CC, New Delhi;
 - Union Minister approves proposal to divert forest land subject to compliance of conditions by MEIPL;
 - In-Principle Approval will be accorded by MoEF & CC, subject to compliance of certain conditions by MEIPL;
 - Based on the In-Principle Approval, the same will be forwarded to the Concerned DCF through the Principal Secretary, PCCF Office.
 - The concerned DCF will raise the demand notice for payment of applicable NPV Charges, CA Charges and One Time Lease Rent along with compliance of other conditions such Demarcation of the Proposed Area to be diverted, etc.
 - RO will pay Net Present Value (determined by Forest Department based on quantity & density of forest) and other charges as per the demand note raised by the Forest Department through DD.
- State Minister for Forests, State Government
- IG MOEF & CC GOI issues final order/Stage II Approval for diversion of forest lands
 - Stage II Approval shall be sent to the State Government.
 - State Government shall issue Government Order for diverting the forest lands and communicated to the PCCF Office.
 - PCCF office will direct the Concerned DCF, to execute the Lease Agreement.
 - Lease Agreement will be executed between the Forest dept (State) and MEIPL / Subsidiary.
 - The Lease agreement is to be registered with respective Sub-Registrar.
 - Compliance to forest lease conditions
 - Demarcate the forest area diverted with 4ft high RCC Pillars duly indicating the Forward and Backward bearings.
 - Soil Moisture Conservation (SMC) works to be carried out as per forest land lease agreement conditions.
 - Yearly lease rentals to be paid during the lease tenure as per applicable rates levied by the Forest Dept.
 - Medicinal plantation to be developed as per lease agreement
 - Dwarf species plants to be planted between intervening areas of two windmills.
 - Rigid fire protective measures in the leased area and the area surrounding it against fire incidents are to be undertaken by MEIPL by carrying out the work or paying to the Dept. as per their yearly demand notes.

F.3.3 Stage II Approval (Final Approval)

- Compliance of conditions by MEIPL
- DCF & CF submit compliance report to PCCF
- PCCF submits compliance report to the State Government and recommendation for final approval
- Principal Secretary FD State Government forwards recommendations for issue of approval to MOEF & CC, Govt. of India thru

F.3.4 Lease Transfer

Execution and commissioning of project by MEIPL

Submission of project completion report and application for lease transfer

DCF & CF submits compliance report to PCCF to the effect that the User Agency has completed the project and the Agreement Conditions have been complied.

PCCF submits compliance report to State

Government and recommends for final approval

Secretary FD, State Government forwards recommendations for issue of approval to MOEF & CC, GOI

IG MOEF & CC, GOI issues permission for transfer of diverted forest lands.

State Government issues order and lease Transfer Deed signed with DCF

Later on, Deed of Transfer of Lease will be executed between Forest Department & Customer.

The Forest (Conservation) Act, 1980 is the principal Act governing the entire process of Diversion of Forest Lands for non-forest purposes.

Since the same being Central Act, the procedure across the Country for diversion of Forest Lands is more or less similar.

MEIPL proposes Wind Power projects in Forest Lands mostly in the states of Maharashtra, Andhra Pradesh and Karnataka.

If the Project is given on Turnkey Development basis to the other Developers, we will be scrutinizing the documents and obtain Legal Opinion from a Third Party Counsel on usage rights on the land.

F.3.5 Revenue Lands

BD / RO will file application on MEIPL's letterhead to concerned District Collector (Revenue Department) in the name of MEIPL / Subsidiary, as applicable, earmarking the extent of Land required on Village Maps and will submit other necessary documents.

The District Collector will call for the report from the Tahsildar.

The Tahsildar, after receiving the reports from the Revenue Inspector, will submit the recommendations to the Sub Divisional Collector.

The Sub Divisional Collector, will submit his report to the District Collector after due inspection of the proposed area.

Based on the reports of the Tahsildar and Sub Divisional Collector, the District Collector will send the report to the Principal Secretary.

The Principal Secretary will, if required, send the recommendations to the Minister, Revenue Department.

Upon the approval of the proposal by the Minister,

Revenue Department, GO will be issued.

Thereafter, the District Collector will issue Official Memorandum, directing the Tahsildar to execute the Lease Deed subject to certain conditions.

The Lease Deed will be executed by the Tahsildar (on behalf of the Revenue Department) and MEIPL / Subsidiary, after payment of advance rent.

In the States of Gujarat, Andhra Pradesh and Rajasthan and in Karnataka, where a major chunk of wind potential areas is generally occupied by Revenue Lands, MEIPL proposes Wind Power projects in Revenue Lands.

In the state of Andhra Pradesh, against payment of Market Value of the lands proposed, Dist. Collector will hand over the advance possession of lands for development of projects. The final orders of land possession transfer will be issued by Revenue Department with due approval of the Minister. This process is referred as Alienation of Land.

In Rajasthan, RREC, State Nodal Agency will issue the land allotment letter after approval from the respective Dist. Collector/ Government.

In the state of Gujarat, Dist. Collector is empowered to grant permission for Revenue lands up to 5.00 Ha. Beyond 5.00 ha. Revenue Secretary will issue the orders.

In respect of Gouchar lands, Dy. Collector has to conduct meeting with respective villagers and with due consent from them, Collector/ Revenue Secretary will issue the orders as the case may be.

If the Project is given on Turnkey basis to Developers, MEIPL will scrutinize the documents and obtain independent Legal Opinion from a Third Party Counsel on title and usage rights on the land, before procuring.

In respect of Gouchar lands, Dy. Collector has to conduct meeting with respective villagers and with due consent from them, Collector/ Revenue Secretary will issue the orders as the case may be.

If the Project is given on Turnkey basis to Developers, MEIPL will scrutinize the documents

and obtain independent Legal Opinion from a Third Party Counsel on title and usage rights on the land, before procuring.

F.3.6 Private Lands

Private lands required for Wind Power projects are, usually, procured through bona fide purchases after due negotiations with land owners and a subsequent sale deed to the Minister, Revenue Department.

- Applicable Legislations
- State Land Reforms Act
- State Land Ceiling Act
- Land Policies of the state.

Purchase of the agricultural land through MEIPL Representative

To the extent possible and depending on the technical feasibility, MEIPL will avoid purchasing private land. However, if there is a need to procure agriculture land, following procedure will be adopted:

1. Ground Marking of Location and Identification of the Land Owners.
2. Land Survey of Location and Approach roads, Ground Marking of Location and Roads
3. Obtain Land Revenue Records, like Index of Lands, RTC/7-12/Adangal - Patta pass book, Encumbrance Certificate for 30 Years, Relevant Mutation Extracts, Village Map, Survey Grant Certificate, Genealogical tree of the family etc.,
4. Obtain CDP Plan Pertaining to the Area. Obtain the Legal opinion with respect to the title of the land and right marketable title for purchase of land
5. Negotiation with Land Owner for Price and Extent, Clearance of Bank Loans and Encumbrances
6. Land Registration in the Name of MEIPL/ MEIPL Representative
7. Obtain transfer of land title in the name of MEIPL / MEIPL's Representative and Sub-divisional sketch of Land.
8. Applying for Land Conversion.
9. Obtain NOCs from various authorities required.
10. Pay necessary Conversion Charges.

11. Conversion order by District Collector
12. It is important to note that non-agricultural activity shall not be taken up in agricultural land as per the provisions of land regulations. Any non-agricultural activity shall be taken up only upon due conversion of Agricultural Land to Non-Agricultural Industrial Purpose.
13. Transfer / Lease of Land in the Name of MEIPL/Subsidiary.
14. Purchase the agricultural land through Facilitator (Agent)
15. Identify the person/Firm/Company who will act as facilitator for procurement and transfer of lands in favour of MEIPL
16. MEIPL will enter into agreement with Facilitator for procurement of lands as per the requirement of MEIPL.
17. MEIPL surveyors will assist the Facilitator in identifying the lands as per the Micro siting Drawing.
18. Facilitator will negotiate and purchase the lands out of his own funds after due verification of title to the satisfaction of MEIPL.
19. Execute the General Power of Attorney in favour of MEIPL representative.
20. MEIPL will release part of the agreed amount as per the terms of the agreement.
21. The Facilitator will get the land converted from agricultural to non-agricultural purpose from his funds.
22. It is important to note that non-agricultural activity shall not be taken up in agricultural land as per the provisions of land regulations. Any non-agricultural activity shall be taken up only upon due conversion of Agricultural Land to Non-Agricultural Industrial Purpose.
23. The Facilitator will register the land in favour of MEIPL/Subsidiary
24. MEIPL will release the agreed balance amount to the Facilitator.
25. MEIPL has proposed Wind Power projects in Private Land in the state of Karnataka, Maharashtra, Tamil Nadu, Andhra Pradesh, Gujarat & Rajasthan.

Table F.3.7 Private Land Purchase Related Requirements in Various States

Sl. No	States	Procedures
1	Tamil Nadu	<p>The major legislation governing the procurement and holding of private lands in the state Tamil Nadu is "The Tamil Nadu Land Reforms (Fixation of Ceiling on Land) Act – 1961 and provisions of which are briefly discussed hereunder</p> <p>As per the section 2 of the Act, it applies to procurement of Agricultural land which is used or capable of being used for agricultural purposes and includes forest lands, pasture lands, plantation and tope but does not include house-site or land used exclusively for Non-agricultural purposes</p> <p>Ceiling area is limit is prescribed in section 5 of the Act.</p> <p>As per the Section 7 of the Act – From the date of the commencement of the Act, no person shall be entitled to hold the land in excess of ceiling area limit prescribed under the act. The ceiling area as prescribed under the act will be 15 standard acres. The standard acre varies from District to district within the state.</p> <p>For instance, in Kanyakumari it ranges from 1 acre of registered wet land irrigated to 4 acres of unirrigated dry land. In Shencottah taluk of Tirunelveli district it ranges from 1.2 acres of wet land irrigated to 4 acres of un irrigated dry land.</p> <p>Considering dry lands are preferred for Projects, in effect a Company/ Individual can hold up to maximum 60 acres (15 * 4 Acres). Ceiling limit specified in the act is not applicable if any person holds the land on the basis of Power of Attorney</p> <p>There is no provision as such for conversion of lands. Companies can hold Agricultural lands subject to Ceiling limit of 60 acres.</p>
2	Andhra Pradesh & Telangana	<p>Companies can purchase agricultural lands directly from the Agriculturist</p> <p>Company has to apply for Conversion of land before the Dist. Collector and obtain such order.</p> <p>There is no bar on extent of lands held by a Company if the lands are converted.</p> <p>The non-agricultural activities should be carried out only upon getting the lands converted for non- agricultural purpose.</p>
3	Karnataka	<p>In Karnataka, the legislation governing private land procurement is the Karnataka Land Reforms Act 1961</p> <p>As per Sec 79A purchase of land by any person having assured annual income of Rs 2,00,000/- or higher is prohibited.</p> <p>As per Sec 79B, no person other than a person cultivating the land is entitled to hold land.</p> <p>As per Sec 79B (2), a company, association or a body of individuals, co- operative society cannot hold land.</p> <p>As per Sec 80, transfer of lands to non-agriculturist is barred.</p> <p>Land ceiling is 54 acres of D class land by an Agriculturist.</p> <p>A company, association or a body of individuals, co- operative society can hold Non Agricultural land and as such there is no Ceiling Limit specified.</p>

Sl. No	States	Procedures
		<p>The non-argil activities should be carried out only upon getting the lands converted for non- agricultural purpose.</p> <p>Any of the following procedures may also be adapted to purchase private lands in Karnataka; however, they are not suitable for development of Wind Power Projects.</p> <p>Acquisition of lands required through KIADB, a nodal agency created to develop industrial lands under Industries Department Permission from Government under Section 109.</p>
4	Rajasthan	<p>The legislation governing private land procurement is the Rajasthan Land Revenue Act and Conversion of Agricultural Land for Non-Agricultural Purposes in Rural Areas) Rules, 1992</p> <p>There is no bar for the company to directly purchase the agricultural lands. However, conversion to non-agricultural land is made mandatory under the Revenue Act.</p> <p>Agricultural land can be directly purchased from the land owners and thereafter we have to apply for conversion of agricultural to non-agricultural industrial purpose.</p>
5	Maharashtra	<p>Agricultural land can be purchased for non-agricultural purposes. However, we have to obtain conversion of agricultural to non-agricultural industrial purpose.</p>
6	Gujarat	<p>Prior permission from Industries Dept. to purchase lands if the extent is more than 10 Ha.</p> <p>Private lands can be purchased from the Land owners directly in the name of MEIPL.</p> <p>Non Agriculture activities could be commenced upon purchase of lands.</p> <p>Application for Conversion of lands to be submitted to Collector within 45 Days from the date of Registration of land in the name of the company.</p> <p>If the Project is given on Turnkey Development basis to the other Developers, we will be scrutinizing the documents and obtain Legal Opinion as well as Title Search report from a Third Party Counsel on right marketable title of the Seller/ Land owner on the land.</p>

F.4 Types of Holding of Land

Initially Land will be acquired either in the name of MEIPL or in the name of Subsidiary through lease deed in respect Revenue land / Forest lands.

MEIPL / Subsidiary will execute Transfer of lease in favour of the customer in respect of Forest and Revenue lands subsequent to Commissioning of the project.

The private lands will be procured in the MEIPL or its subsidiary after due conversion of lands or transferred directly to the Customer as the case may be. The holding of Pvt. Lands by MEIPL is as under:

Sl. No	Land Required	Ownership
1	Lands required for WTGs and pathways connecting each turbine incl. approach	Held by MEIPL on free hold basis. The lands will be converted and held in the name of MEIPL
2	Sub-station/ pooling station land	Held by MEIPL on free hold basis. The lands will be converted and held in the name of MEIPL Will be transferred in favour of State Utilities if required
3	Performance Wind Monitoring	Held by MEIPL on free hold basis. The lands will be converted and held in the name of MEIPL
4	Wind monitoring stations Stock Yards/ Material yard Batching plants (If planned)	Since usage of the lands for the purpose mentioned is Temporary in nature, the lands will be taken on Lease on fixed term of 2/3 years or till the completion of the project.
5	Transmission Lines RoW	Only the foot prints of the Electricity pole and the Supporting wires (Guy wires) are paid for against an agreement of exclusive Usage of Land.

F.4.1 Demarcation of Boundaries / Perimeter of Land

MEIPL to demarcate the boundaries of lands either on its own behalf or on behalf of concerned customers to prevent any tress pass / encroachment of the areas procured or diverted by Govt. agencies.

F.4.2 Private Land

After acquisition of land, Regional Office will put boundary stones (2 feet height above ground) with zebra colour, at cost of MEIPL.

F.4.3 Forest Land

RCC pillars to be constructed to demarcate the leased area as per terms of lease agreement.

F.4.4 Revenue Land

After taking possession of land, Regional Office will put boundary stones (2 feet height above ground) with zebra colour, at cost of MEIPL.

The Projects team will be given possession of the land after duly indicating the boundary stones which have to be kept intact in order to safe guard the asset and to avoid future dispute with adjacent land owners.

F.4.5 Annual Lease Rentals and Local Authority taxes & Other payments

Local Authority Taxes such as Gram Panchayat/ Town Panchayat/ Municipality taxes are to be paid by MEIPL/Subsidiary as per the periodicity.

Annual Lease rentals in respect of lands diverted from Forest Department and Revenue Lands at the rates fixed by respective departments.

Any other charges as applicable and payable on periodical basis during the life cycle of the wind farm.

Customers are to pay the lease rentals and local taxes directly to the respective agencies upon transfer of lands in their favour.

F.4.6 Essential Safeguards With Respect To Land Procurement

This requirement does not apply to resettlement resulting from voluntary land transactions (i.e., market transactions in which the seller is not obliged to sell and the buyer cannot resort to expropriation or other compulsory procedures sanctioned by the legal system of the host country if negotiations fail). It also does not apply to impacts on livelihoods where the project is not changing the land use of the affected groups or communities.

However, it is very difficult to ensure that the willing buyer willing seller agreement is followed in spirit. To ensure that willing buyer willing seller agreement happens in true spirit, as a matter of best practice certain procedures need to be put in place by MEIPL even in case of willing buyer willing seller agreements.

MEIPL's land procurement process is broadly as follows:

1. Process of land purchase involves a land sale deed between the seller and the buyer in compliance with applicable legal requirements. Developers in many cases adopt different methods of land purchase in different geographies, which is mostly due to the local social sensitivities and quality of land records.
2. MEIPL or its agency undertakes a self-review process which includes survey of land rates in the area, survey of prevailing market rate and then arrive at a range of rate (minimum and maximum value) within which the negotiation is done.
3. Certain key considerations to be kept in mind, mostly as a matter of implementing the best practices, especially as it is a case of willing buyer and willing seller (apart from the land acquisition process, where it is mandatory). MEIPL will, wherever required strictly comply with the provisions of the applicable law in the process of procurement of land.
4. In the case of forest land and revenue land, the compliance to the local laws is given the topmost priority.,

Note: This is typically a process that is followed for the Self-development sites, in which MEIPL is involved from the initial stages of the project. In case of Turnkey Based projects, where the land aspect is directly handled by the EPC contractor or through its land aggregators, MEIPL will ensure that the land procurement process will be assessed keeping the MEIPL considerations in mind. The requirements may vary depending upon the stage at which MEIPL as developer will enter into the project.



Annexure G

Frame work of Resettlement Action & Indigenous People Plan



G. Outline of A Typical Resettlement Action Plan (RAP) and/or Livelihood Restoration Plan (LRP)

In alignment with the requirements of ADB's Safeguard Requirements 2 on Involuntary Resettlement, the following sections outline the requirements or aspects of a typical resettlement action plan aligned with GOI statute. GOI with his relevant act ensures Resettlement Action Plan (RAP) and /or Livelihood Restoration Plan and directly monitor the same. The substantive aspects of the outline will guide the preparation of the resettlement plans, although not necessarily in the same order. Its level of details and comprehensiveness will vary with the scale of the project and would be commensurate with the significance of potential involuntary resettlement impacts and risks.

An RAP will be triggered on the occurrence of the following events consequent to direct purchase of lands for projects by the company:

- Physical displacement from the land parcels selected for the project;
- Economic Displacement of people using the land for economic and livelihood activities and
- Obstruction to access to natural resources and cultural heritage sites used by the local communities.

A RAP will need to be made if there is a physical as well as economic displacement of more than 200 people. If there is an impact only on the livelihood of people, then an LRP will be sufficient and shall be triggered whatever the scale of economic displacement. The RAP and LRP can be supplemented by the company's suitable programmes.

G.1 Executive Summary

This section provides a concise statement of project scope, trigger for a RAP/LRP, key survey findings, entitlements and recommended

actions, organisational requirements and an implementation plan.

G.2 Project Description

This section provides a general description of the project, discusses project components that result in land acquisition either by private purchase directly by the company or by way of government acquisition for subsequent lease or assignment to the company, involuntary resettlement, or both and identify the project area. It also describes the alternatives considered to avoid or minimize resettlement. Include a table with quantified data and provide a rationale for the final decision.

G.3 Scope of Land Acquisition and Resettlement

This section:

- Discusses the project's potential impacts and includes maps of the areas or zone of impact of project components or activities;
- Describes the scope of land acquisition (provide maps) including details as to whether it is a private acquisition by the company or a government acquisition on behalf of the company and explains why it is necessary for the main investment project;
- Summarizes the key effects in terms of assets acquired and displaced persons; and
- Provides details of any common property resources that will be acquired.

G.4 Legal Framework

This section:

- Describes national and local laws and regulations that apply to the project and identify gaps between local laws and ADB's policy requirements; and discuss how any gaps will be addressed.
- Describes the legal and policy commitments from the executing agency for all types of displaced persons;
- Outlines the principles and methodologies used for determining valuations and compensation rates at replacement cost for assets, incomes and livelihoods; and set out the compensation and assistance eligibility criteria and how and when compensation and assistance will be provided with regard to a private land purchase directly by the company. In the case of land acquisition by the government the provisions of the Land Acquisition Act, 2013 would apply with regard to compensation and other aspects incidental to the acquisition.
- Describes the land acquisition process and prepare a schedule for meeting key procedural requirements where acquisition is directly made by the company. Where acquisition is by the government the provisions of the Land Acquisition Act, 2013 would apply.

G.5 Socio Economic Information and Profile

This section outlines the results of the social impact assessment, the census survey and other studies, with information and/or data disaggregated by gender, vulnerability and other social groupings, including:

- Define, identify and enumerate the people and communities to be affected;
- Describe the likely impacts of land and asset acquisition on the people and communities affected taking social, cultural and economic parameters into account;

- Discuss the project's impacts on the poor, indigenous and/or ethnic minorities and other vulnerable groups; and
- Identify gender and resettlement impacts and the socioeconomic situation, impacts, needs and priorities of women.

Some of the key baseline indicators to be captured as part of the RAP and also monitored overtime as part of the monitoring process in case affected as a result of the project implementation have been provided in the following box.

Box 0.1 Baseline Monitoring Indicators

- Number of vulnerable households and their status;
- Standard of living quantified by asset ownership, quality of house, access to amenities (clean drinking water, sanitation, roads, electricity etc.);
- Land ownership/user rights of affected families;
- Occupation/livelihood profile and changes therein;
- Health and education levels;
- Other agreed quality of life indicators;
- Occupational pattern of the family number of family members in occupations and nature of that occupation and income generated from it;
- Average annual income levels of households;
- Proportion of landless, agricultural labourers, sharecroppers;
- Type of housing/commercial structure value;
- Personal access to durable assets and any movable assets;
- Ownership of livestock;

G.6 Information Disclosure, Consultation and Participation

MEIPL has to develop a dedicated stakeholder engagement mechanism for the project in order to identify relevant stakeholders impacted as a result of the project, the result of engagement with these stakeholders, information disclosed to the same and engagement of these stakeholders as per the prescribed or devised schedule.

As part of the information disclosure, consultation and participation should:

- Identify project stakeholders, especially primary stakeholders;
- Describe the consultation and participation mechanisms to be used during the different stages of the project cycle;
- Describe the activities undertaken to disseminate project and resettlement information during project design and preparation for engaging stakeholders;
- Summarizes the results of consultations with affected persons (including host communities) and discusses how concerns raised and recommendations made were addressed in the resettlement plan;
- Confirms disclosure of the draft resettlement plan to affected persons and includes arrangements to disclose any subsequent plans; and
- Describes the planned information disclosure measures (including the type of information to be disseminated and the method of dissemination) and the process for consultation with affected persons during project implementation.

G.7 Grievance Redressal Mechanism

This section describes mechanisms to receive and facilitate the resolution of affected persons' concerns and grievances. It explains how the procedures are accessible to affected persons and gender sensitive.

G.8 Entitlements, Assistance and Benefits

This section:

- Establishes the strategy and policy framework for the RAP and/or the LRP where the land acquisition is done by direct purchase by the company. With regard to government acquisition the appropriate laws would apply.
- Defines displaced persons' entitlements and eligibility and describes all resettlement assistance measures (includes an entitlement matrix);
- Specifies all assistance to vulnerable groups, including women and other special groups; and.
- Outlines opportunities for affected persons to derive appropriate development benefits from the project.

G.9 Relocation of Housing and Settlements

It has to be noted that in-case the project implementation entails a relocation of or displacement of a large number of people and providing resettlement site and housing is a part of the resettlement, the following key aspects should be covered as part of the RAP

- Describe options for relocating housing and other structures, including replacement housing, replacement cash compensation and/or self-selection (ensure that gender concerns and support to vulnerable groups are identified);
- Describe alternative relocation sites considered; community consultations conducted; and justification for selected sites, including details about location, environmental assessment of sites and development needs;
- Provide timetables for site preparation and transfer;
- Describe the legal arrangements to regularize tenure and transfer titles to resettled persons;

- Outline measures to assist displaced persons with their transfer and establishment at new sites;
- Describe plans to provide civic infrastructure; and
- Explain how integration with host populations will be carried out.
- Outlines measures to provide social safety net through social insurance and/or project special funds;
- Special measures to support vulnerable groups;
- Explaining gender considerations; and
- Assessment of relevant training programs.

G.10 Income Restoration and Rehabilitation

The income restoration and rehabilitation aspects of a RAP incorporate aspects that include:

- Identification of livelihood risks and preparation of disaggregated tables based on demographic data and livelihood sources;
- Describing income restoration programs, including multiple options for restoring all types of livelihoods (examples include project benefit sharing, revenue sharing arrangements, joint stock for equity contributions such as land, discuss sustainability and safety nets);

G.11 Monitoring and Reporting

This section describes the mechanisms and benchmarks appropriate to the project for monitoring and evaluating the implementation of the resettlement plan. It specifies arrangements for participation of affected persons in the monitoring process. This section will also describe reporting procedures.

Sample monitoring indicators have been provided in the following Table 1.1 for reference. It is to be noted that applicability of these indicators is limited with the requirements arising from respective projects.

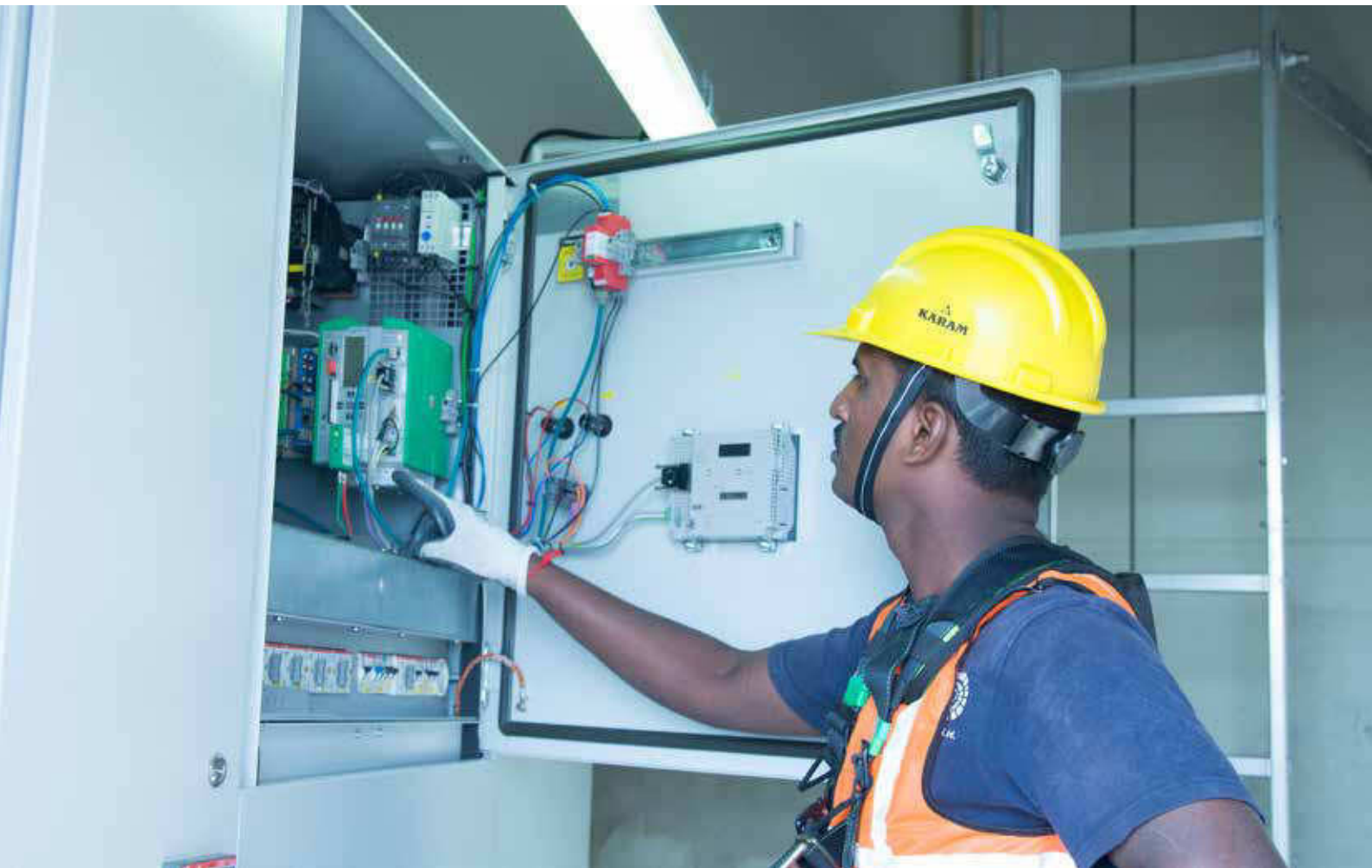


Table G.1 Monitoring and Evaluation Indicators

Type	Indicator	Examples of Variables - All Data should be disaggregated by gender, vulnerable groups as required and for different groups of PAPs/PAHs.
Input	Staffing	<ul style="list-style-type: none"> Number of Resettlement Officers and assistants from MEIPL located in the field
	Budget and Time Frame	<ul style="list-style-type: none"> Have all land acquisition and resettlement staff been appointed and Mobilised for the field and office work on schedule ? Have the capacity building and training activities pertaining to R&R have been completed on schedule ? Is there sufficient availability of funds for resettlement available ? Have payment arrangements been established achieved on time ? Have funds been disbursed according to the agreed compensation plans ? Has all land been acquired and occupied in time for implementation ?
	Basic information on Project Affected Households (PAH)/ Project Affected Persons(PAP)	<p>Information has to be collected pertaining to the project affected households which shall include:</p> <ul style="list-style-type: none"> Location Composition and structure, ages, educational and skill levels Gender of household head Ethnic group Access to health, education, utilities and other social services Housing type Land and other resource owning and using patterns Occupations and employment patterns Income sources and levels Agricultural production data (for rural households) Participation in neighbourhood or community groups Access to cultural sites and events Value of all assets forming entitlements and resettlement entitlements

Process Indicator	Consultation, Grievance	<ul style="list-style-type: none"> Grievances by type and resolution Number of field visits by resettlement officers/assistants Have consultations taken place as scheduled including meetings, groups and community activities ? Have resettlement leaflets been prepared and distributed ? How many PAPs know their entitlements ? How many know if they have received the correct entitlement ? Have any PAPs used the grievance redress procedures? What were the outcomes ? Have conflicts been resolved ? Was the community preparation/sensitisation phase implemented ? Were special measures for vulnerable peoples implemented as necessary ?
	Participation	<ul style="list-style-type: none"> No. of General meetings (for both men and women) Percentage of women out of total participants Number of meetings exclusively with women Number of meetings exclusively with vulnerable groups Level of participation in meetings (of women, men & vulnerable groups)
	Procedures in Operation	<ul style="list-style-type: none"> Census and asset verification/quantification procedures in place Effectiveness of compensation delivery system Number of land transfers effected
Output Indicators	Acquisition of Land	<ul style="list-style-type: none"> Area of cultivation land acquired Area of other private land acquired Area of communal land agreed Area of cultural sites acquired
	Cultural heritage management	<ul style="list-style-type: none"> Number of agreements on management of cultural heritage elements Number of design adaptations implemented to preserve immovable heritage sites
	Buildings	<ul style="list-style-type: none"> Number, type and size of private buildings acquired Number, type and size of community buildings acquired Number, type and size of community infrastructure built

Type	Indicator	Examples of Variables - All Data should be disaggregated by gender, vulnerable groups as required and for different groups of PAPs/PAHs.
	Trees and Crops	<ul style="list-style-type: none"> Number and type of private trees acquired Number and type of government/community trees acquired Crops destroyed by area, type and number of owners
	Restoration of community	<ul style="list-style-type: none"> Have PAHs adopted the housing options developed? Have community networks been restored? Have PAHs achieved replacement of key social and cultural elements? Have host communities absorbed re-settlers amicably Are community heritage site provisions working
	Delivery of Entitlements	<ul style="list-style-type: none"> Have all PAPs received entitlements according to numbers and categories of loss set out in the entitlement matrix? Have PAPs received payments on time? Have PAPs who were impacted by temporary land access been compensated? Have all PAPs received the agreed transition costs, shifting allowance, income support and any other resettlement allowances, according to schedule? Are measures in place to provide land titles/security of tenure or community land agreements to PAPs as agreed? How many households have received land titles/ other forms of tenural security or community agreements? Is restoration proceeding for social infrastructure and services? Are income and livelihood restoration activities being implemented as set out in the Livelihoods restoration plan?
	Restoration of Livelihoods	<ul style="list-style-type: none"> Has employment provision adequately supplemented measures to compensate loss of earnings Were compensation payments sufficient to replace lost assets? Was sufficient replacement land available of suitable standard? Did transfer and relocation payments cover these costs? Did income restoration allow for re-establishment of enterprises and production? Have livelihood restoration programmes been implemented Have vulnerable groups been provided income-earning opportunities?
	Levels of PAP Satisfaction	<ul style="list-style-type: none"> How much do PAPs know about resettlement procedures and entitlements? Do PAPs know their entitlements? Do they know if these have been met? How do PAPs assess the extent to which their own living standards and livelihoods have been restored? How much do PAPs know about grievance procedures and conflict resolution procedures?

	Effectiveness of Resettlement Planning	<ul style="list-style-type: none"> • Were the PAPs and their assets correctly enumerated? • Was the time frame and budget sufficient to meet objectives? • Were entitlements sufficient? • Were vulnerable groups identified and assisted? • How did resettlement implementers deal with unforeseen problems?
	Compensation Payments and entitlements	<ul style="list-style-type: none"> • Was compensation paid on time? • Were other entitlements distributed on time, allowances, loss of income support? • Were there additional costs PAP's had to bear? • Were adequate funds available to meet the costs of resettlement?
	Restoration of Livelihood	<ul style="list-style-type: none"> • Were income restoration activities appropriate to restore or improve living standards? • How many PAP's/PAHs were impoverished as a consequence of resettlement? • Were vulnerable groups adequately assisted to improve living standards? • Are the livelihood schemes as described in the PARC being implemented satisfactorily?
	Reestablishment of Community Resources and Community Compensation structures	<ul style="list-style-type: none"> • Number of community buildings repaired or replaced • Number of cultural sites relocated and inaugurated • Number of community compensation structures or infrastructure agreed and built • Community management committees in place for community structures
Impact Indicator as appropriate	Household Earning Capacity	<ul style="list-style-type: none"> • Employment status of economically active members • Landholding size, area cultivated and production volume, by crop • Selling or transfer of cultivation land • Changes to income-earning activities (agriculture) – pre- and post-disturbance • Changes to income-earning activities (off-farm) – pre- and post-disturbance
	Changes to Status of Women	<ul style="list-style-type: none"> • Receipt and use of compensation • Access to and use of bank accounts • Participation in training programmes • Use of credit facilities • Take up of formal employment • Participation in commercial enterprises

G.12 Resettlement Budget and Financing Plan

This section:

- Provides an itemized budget for all resettlement activities, including for the resettlement unit, staff training, monitoring and evaluation and preparation of resettlement plans during loan implementation.
- Describes the flow of funds (the annual resettlement budget should show the budget-scheduled expenditure for key items).
- Includes a justification for all assumptions made in calculating compensation rates and other cost estimates (taking into account both physical and cost contingencies), plus replacement costs.
- Includes information about the source of funding for the resettlement plan budget.

G.13 Institutional Arrangements

This section:

- Describes institutional arrangement responsibilities and mechanisms for carrying out the measures of the resettlement plan;
- Includes institutional capacity building program, including technical assistance, if required;
- Describes role of NGOs, if involved and organizations of affected persons in resettlement planning and management; and
- Describes how women's groups will be involved in resettlement planning and management.

G.14 Implementation Schedule

This section includes a detailed, time bound, implementation schedule for all key resettlement and rehabilitation activities. The implementation schedule should cover all aspects of resettlement activities synchronized with the project schedule

of civil works construction and provide land acquisition process and timeline.

G.15 Outline of a Typical Scheduled Tribes Development Plan Indigenous Peoples Plan

A Scheduled Tribes Development plan/ Indigenous Peoples plan (IPP) is required for all projects with impacts on Indigenous Peoples. The following plan showcases the key aspects of a typical plan

A. Executive Summary of the Indigenous Peoples Plan

This section concisely describes the critical facts, significant findings and recommended actions.

B. Description of the Project

This section provides a general description of the subproject; discusses subproject components and activities that may bring impacts on Indigenous Peoples; and identify project area.

C. Social Impact Assessment

This section:

- Reviews the legal and institutional framework applicable to Indigenous Peoples in project context.
- Provides baseline information on the demographic, social, cultural and political characteristics of the affected Indigenous Peoples communities; the land and territories that they have traditionally owned or customarily used or occupied; and the natural resources on which they depend.
- Identifies key project stakeholders and elaborate a culturally appropriate and gender-sensitive process for meaningful consultation with Indigenous Peoples at each stage of project preparation and implementation, taking the review and baseline information into account.
- Assesses, based on meaningful consultation with the affected Indigenous Peoples communities, the potential adverse and positive effects of the subproject. Critical to the determination of potential adverse impacts is a gender-sensitive analysis of

the relative vulnerability of and risks to, the affected Indigenous Peoples communities given their particular circumstances and close ties to land and natural resources, as well as their lack of access to opportunities relative to those available to other social groups in the communities, regions, or national societies in which they live.

- Includes a gender-sensitive assessment of the affected Indigenous Peoples' perceptions about the subproject and its impact on their social, economic and cultural status.
- Identifies and recommends, based on meaningful consultation with the affected Indigenous Peoples communities, the measures necessary to avoid adverse effects or, if such measures are not possible, identifies measures to minimize, mitigate and/or compensate for such effects and to ensure that the Indigenous Peoples receive culturally appropriate benefits under the subproject.

D. Information Disclosure, Consultation and Participation

This section:

- Describes the information disclosure, consultation and participation process with the affected Indigenous Peoples communities that was carried out during project preparation;
- Summarizes their comments on the results of the social impact assessment and identifies concerns raised during consultation and how these have been addressed in project design;
- In the case of subproject activities requiring broad community support, documents the process and outcome of consultations with affected Indigenous Peoples communities and any agreement resulting from such consultations for the subproject activities and safeguard measures addressing the impacts of such activities;
- Describes consultation and participation mechanisms to be used during implementation to ensure Indigenous Peoples participation during implementation; and
- Confirms disclosure of the draft and final IPP to the affected Indigenous Peoples communities.

E. Beneficial Measures

This section specifies the measures to ensure that the Indigenous Peoples receive social and economic benefits that are culturally appropriate and gender responsive.

F. Mitigative Measures

This section specifies the measures to avoid adverse impacts on Indigenous Peoples; and where the avoidance is impossible, specifies the measures to minimize, mitigate and compensate for identified unavoidable adverse impacts for each affected Indigenous Peoples groups.

G. Capacity Building

This section provides measures to strengthen the social, legal and technical capabilities of (a) government institutions to address Indigenous Peoples issues in the subproject area; and (b) Indigenous Peoples organizations in the subproject area to enable them to represent the affected Indigenous Peoples more effectively.

H. Grievance Redressal Mechanism

This section describes the procedures to redress grievances by affected Indigenous Peoples communities. It also explains how the procedures are accessible to Indigenous Peoples and culturally appropriate and gender sensitive.

I. Monitoring, Reporting and Evaluation

This section describes the mechanisms and benchmarks appropriate to the subproject for monitoring and evaluating the implementation of the IPP. It also specifies arrangements for participation of affected Indigenous Peoples in the preparation and validation of monitoring and evaluation reports.

J. Institutional Arrangement

This section describes institutional arrangement responsibilities and mechanisms for carrying out the various measures of the IPP. It also describes the process of including relevant local organizations and NGOs in carrying out the measures of the IPP.

K. Budget and Financing

This section provides an itemized budget for all activities described in the IPP.



Annexure H

Stakeholder Engagement Framework



H. Stakeholder Engagement Framework

H.1 Introduction

Stakeholder engagement is about building and maintaining constructive relationships over time. It is an ongoing process between a company and its project stakeholders that extends throughout the life of the project and encompasses a range of activities and approaches, from information sharing and consultation, to participation, negotiation and partnerships. The nature and frequency of this engagement should reflect the level of project risks and impacts.

The purpose of a Stakeholder Engagement Framework is to guide a company's strategy and program for development of dedicated stakeholder engagement plan(s) that will guide the company in engaging with stakeholders in a culturally appropriate manner as part of its project(s) implementation. The goal is to ensure the timely provision of relevant and understandable information by implementation of the developed stakeholder consultation plan. It is also to create a process that provides opportunities for stakeholders to express their views and concerns and allows the company to consider and respond to them.

A typical structure of an applicable stakeholder engagement plan as developed for any project

comprises of the following aspects based on the appropriate activities taken by project proponent throughout the project lifecycle:

- Regulatory, lender, company and/or other requirements for consultation and disclosure
- Identification and prioritization of key stakeholder groups
- In-place strategy and timetable for sharing information and consulting with each of these groups
- Structured roles and responsibilities for implementing stakeholder engagement activities
- Describe how stakeholder engagement activities will be incorporated into a company's management system.

This framework broadly discusses the aforementioned aspects in detail in the following sections and details out how and what is encompassed within these respective aspects while developing any stakeholder engagement plan and undertaking stakeholder engagement as part of the projects social safeguard activities.

H.2 Key Definitions

A set of key terminologies used within this framework and their respective definitions have been provided in the following table.

Table H.1 Definition of Key Terms

Sl. No	Terminology	Definition
1	Affected Party	Stakeholders who are affected by the company or operation, both positively and negatively. Within this it is possible to distinguish between those that are directly affected and indirectly affected by the company or operation. Communication (with regard to stakeholders).

Sl. No	Terminology	Definition
2.	Dialogue between MEIPL and affected or interested parties.	Communication is exchanging (giving and receiving) information. Communication enables MEIPL to convey the aspects, risks and opportunities of their operations and to receive information from a range of stakeholder's concerns, questions and suggestions shared in response.
3.	Consultation	Consultation is not the same as communication although both are two-way processes. Consultation is purposeful and deliberately seeks input from stakeholders in order to shape relations and the development of programmes. It involves the business, key individuals, organisations and groups affected by or interested in the development and outcomes of the issue/process being discussed. The aim is to ensure mutual understanding and for all parties to be able to manage decisions that have a potential to affect all concerned. A good consultation process needs to be supported by a strong communication programme.
4.	Interested Party	Persons or groups who, although not affected by the MEIPL or operations, have an interest in or influence over MEIPL and its operations.
5.	Operation(s)	A location or activity that is operated by MEIPL or any of its associate EPC contractors on assets having MEIPL's ownership.
6.	Records of communication / consultation	Records of communication / consultation may include key e-mails, letters, newsletters, memorandums, complaints, opportunities for improvement, records of distribution/attendance, records of formal and informal meetings and records of commitments. Note: the businesses need to identify communications that are critical to ensure avoidance of risks (both to community and employees).
7.	Representative Participation	Through stakeholder engagement all stakeholders and parts of society are represented and able to participate in dialogue with operations which they are directly impacted by or interested in.
8.	Stakeholder	Persons or groups that are directly or indirectly affected by a project as well as those that may have interests in a project and/or the ability to influence its outcome, either positively or negatively. This can refer to shareholders, lenders, employees, communities, industry, governments and international third parties.
9.	Stakeholder engagement	An umbrella term encompassing a range of activities and interactions between MEIPL and stakeholders over the life of a project that is designed to promote transparent, accountable, positive and mutually beneficial working relationships. Stakeholder engagement includes stakeholder identification and analysis, information disclosure, communication, problem/conflict anticipation and prevention, on-going consultation, formation of partnerships, construction of grievance resolution mechanisms, negotiated problem solving, employee involvement in project monitoring, regular reporting forums and procedures and other related management activities.

H.3 Project Area Baseline

The initial step to any stakeholder engagement planning and implementation process is identifying the relevant project footprint area. MEIPL is required to establish as part of its impact assessment practices for any given project, the baseline of the project area and understand the local social context and setting. The baseline should take into considerations the following key aspects:

- Local demography
- Land use profile and background on the land footprint of the project
- Existing occupation and livelihood practices
- Health and education levels
- Local tribal and indigenous population groups (if any)
- Local religious and cultural practices (if any)
- Existing vulnerability and vulnerable groups (if any)
- Other agreed quality of life indicators
- Local economy and capital income of households
- Ownership of fixed and movable assets
- Access/arrangement/adequacy of physical infrastructure (road, electricity, drinking water, sanitation, telecommunication, etc.)
- Access/arrangement/adequacy of social infrastructure (education, health, credit sources, markets, skill development, play grounds, worship places, etc.)

Once the baseline has been established, the impact assessment process for the project identifies the various stakeholders that are likely to be affected or influenced by or because of the project. Stakeholder identification and analysis shapes simultaneously during the process of baseline development; in fact, it shapes the baseline development as well as gets informed by the baseline.

The identification and analysis of stakeholders have been explained in the following section.

H.4 Stakeholder Identification and Analysis

“Stakeholder Analysis” is the process of identifying the individuals or groups that are likely to affect or be affected by a proposed project and sorting them according to their impact on the project and the impact the project will have on them. This information is then used to assess the way the interests of the stakeholders should be addressed in the project plan, policy, program, or other action.

The importance of such an analysis lies in the role played by such an understanding in the assessment of the social environment surrounding the project. It allows for the:

- Identification of the interests, concerns and potential risks surrounding the stakeholders, as well as conflicts of interests (if any).
- Identification of relations between stakeholders that may enable “coalitions” of project sponsorship, ownership and co-operation as well as the mechanisms which may have a role in influencing other stakeholders.
- Key groups/ individuals to be pin pointed who need to be informed about the project during the execution phase.
- Identifying stakeholders (those who are likely to have an adverse impact from the project) and taking appropriate measures to combat their influence.
- Generation of information essential to the planning, implementation and monitoring of the project.
- Development of a framework for participatory planning and implementation of various project activities, if any.

The identification of stakeholders and their inclusion in the decision-making process is thus essential in the process of prioritizing, analyzing and addressing issues; and in creating management systems and strategies to address the concerns/ expectations of the various stakeholders.

H.4.1 Stakeholder Profiling

A stakeholder is “a person, group, or organization that has a direct or indirect stake in a project/organization because it can affect or be affected by the Project/organization's actions, objectives and policies”. Stakeholders thus vary in terms of degree of interest, influence and control they have over the project. As part of the impact assessment study, these stakeholders must be identified.

The identified stakeholders who have direct impact on or are directly impacted by the project are known as **Primary Stakeholders**, those who have an indirect impact or are indirectly impacted are known as **Secondary Stakeholders**. Typical stakeholders that are relevant to MEIPL's projects or are typically influenced in solar or wind projects in India have been provided in **Table H.3** is not limited and other stakeholders.

Table H.3 Stakeholder Group Categorization

Stakeholder Groups	Primary Stakeholders	Secondary Stakeholders
Community	<ul style="list-style-type: none"> • Turnkey Contractors • EPC Contractors • Sub-contractors • Contractual Labourers under MEIPL (if applicable) • Contractual Labourers under Contractor • Land owners, land users, agricultural Labourers (if applicable) • Communities where project is located • Project Affected Families 	<ul style="list-style-type: none"> • Local community outside the immediate impact zone of the project • Non-government organizations, interest groups or other civil society groups
Institutional Stakeholders	<ul style="list-style-type: none"> • Gram Panchayats • Project investors 	<ul style="list-style-type: none"> • Village Institutions (schools, health centres).
Government Bodies	<ul style="list-style-type: none"> • Regulatory Authorities; • District Administration 	
Other Groups	<ul style="list-style-type: none"> • Gram Panchayats • Project investors 	<ul style="list-style-type: none"> • Other industries/projects • Other external influences

H.4.2 Stakeholder Mapping & Analysis

“Stakeholder mapping” is a process of examining the relative influence that different individuals and groups have over a project as well as the influence of the project over them. The purpose of a stakeholder mapping is to:

- Identify each stakeholder group;

- Study their profile and the nature of the stakes;
- Understand each group's specific issues, concerns, as well as expectations from the project that each group retains.

Based on such an understanding, every stakeholder engagement plan for a project categorises

stakeholders into high influence/priority, medium influence/ priority and low influence/priority. The stakeholders who are categorized as high influence are those who have a high influence on the project or are likely to be heavily impacted by the project activities and are thus high up on the project proponent's priority list for engagement and consultation. Similarly, the stakeholders categorized as medium influence are those who have a moderate influence on the project or even though they are to be impacted by the project, it is unlikely to be substantial and is thus neither high nor low in the project proponent's list for engagement. On the other hand, the stakeholders with low influences are those who have a minimal influence on the decision-making process or are to be minimally impacted by the project and are thus low in the project proponent's engagement list. Kindly refer to **Table 1.3** for further details.

H.5 Stakeholder Engagement

H.5.1 Objectives of Engagement

The process of stakeholder engagement refers to the exchange of information, as well as communication with the stakeholders. The primary focus of such an engagement process is to allow for the project proponent and the stakeholders to develop a relationship based on mutual understanding and trust on issues of common interest. Such relationships are enabled by a better understanding of the stakeholders and their perspective on key issues. This in turn allows for informed decision making to take place through the generation of business intelligence and the building of brand equity and reputation, developing and expanding markets or opportunities as well as avoiding and reducing risks.

This section outlines the how an engagement process should be outlined in a stakeholder engagement plan and the process for undertaking the engagement process with the stakeholders identified for the project.

H.5.2 Engagement & Consultation Process

The process of engagement and consultation in any project is a process which spans the entire lifetime of a project, from its inception to its closure. This process along with its modus operandi is crucial in safeguarding the

project against any social risks by engaging the respective stakeholders during the various phases of the project lifecycle based on the significant needs.

Some key principles that must be considered whilst devising an effective engagement and consultation process include:

- Providing meaningful information in a format and language that is readily understandable and tailored to the needs of the target stakeholder group(s)
- Providing information in advance of consultation activities and decision-making
- Disseminating information in ways and locations that make it easy for stakeholders to access it
- Respect for local traditions, languages, timeframes and decision making processes
- Two-way dialogue that gives both sides the opportunity to exchange views and information, to listen and to have their issues heard and addressed
- Inclusiveness in representation of views, including separate interviews or discussions with local women (keeping in view the local customs and done by female company staff or consultant), vulnerable and/or minority groups (if any)
- Processes free of intimidation or coercion
- Clear mechanisms for responding to people's concerns, suggestions and grievances
- Incorporating feedback into project or program design and reporting back to stakeholders, if the situation requires so.

H.5.3 Tools for Consultation

The methods recommended for the consultations and engagement with each stakeholder varies according to their profile. Some of the most common tools of engagement and consultation are discussions, consultations and meetings. These modes of engagement can be undertaken in the forms of groups or at individual levels. These serve the purpose of allowing the project proponents to gain an understanding of the viewpoint of the other stakeholders involved in a project regarding the functioning of the project, the implementation

of various provisions in the project. These modes of engagement also provide the stakeholder with an opportunity to be involved in the formulation and implementation of the various strategies and plans while allowing them to voice their concerns or suggestions pertaining to the project.

Some of the common tools being used are:

- One of the most forms of undertaking these consultations and discussions is that of **Focus Group Discussions** and **Semi-structured and Structured Interviews**. A Focus Group Discussion (FGD) refers to a discussion carried out amongst a group of people (6-8) from a similar background/profile on a specific topic while being guided by a moderator. The primary purpose of such discussions is to gather an insight into the thought process of the group regarding an issue. The FGDs to be undertaken for this project are to be undertaken with the Gram Panchayats and the vulnerable communities. This method would thus allow for the collective opinion of these groups to be captured and assessed. This method of consultation is imperative for the vulnerable groups because, in the present scenario; consultations with the entire community have an attached risk of the dominant group's views being propagated. Hence, to ensure that not only the vulnerable groups are provided with an opportunity to voice their opinions but also the issues/concerns pertaining to them specifically receive adequate attention, focus group discussions are to be undertaken.
- Apart from FGDs, general discussions with either the community or individual representatives are also undertaken as part of the engagement process. Discussion with the gram panchayats is important to allow for the proper formulation of development plans. The need for focused discussions lies in the fact that due to the vast mandate of the gram panchayat, clear agendas for meetings and discussions are required to ensure the meeting of the agenda of the meeting being held.
- Semi-structured interviews and checklists are also to be used as a method of inquiry in which a pre-determined set of open questions or check points are used to gather further information pertaining to specific themes or issues.
- Apart from these discussions and interviews,

Regular Open Meetings and **Open Group Consultations** also serve as extremely important tools for community engagement. These meetings and consultations not only form a part of certain regulatory requirements (such as public hearing) but also serve as useful tools for gathering information from larger groups (for instance, attendance of the annual Gram Sabha meetings). These meetings and consultations typically involve a notification (to publicise the matter to be consulted upon) and a consultation (a two-way flow of information).

H.6 Methods of Consultation

For undertaking a consultation and engagement process with such a diverse set of stakeholders it is imperative to tailor the consultation process to each stakeholder's individual profiles, purpose and objectives. This is so because the utilization of a common modus operandi for the all stakeholders and that too for the whole project duration may result in the failure of the engagement process in achieving its goals.

Towards this end, the methods of consultation to be undertaken by the project proponent for the individual stakeholders are summarized in the table given below. While the consultations with the community are/will be carried out within the village boundaries, according to the convenience of the stakeholders involved, the consultations with the other stakeholders (district administration, governmental departments, political parties amongst others) should be carried out in the offices of the stakeholders as per the availability.

The following **Table H.4** provides a sample summary of engagements which are required in a typical project lifecycle. It indicates the methodology on how these stakeholder consultations are accomplished.

Table H.4 Sample methods of Consultations and Engagement

Sl. No	Stakeholder	Stakeholder Category	Objective of Engagement	Stakeholder Influence	Methods of Consultation and Engagement	Frequency of Consultations and Engagement
1	Sub-contractors	Primary Stakeholder	To appraise about labour working condition and EHS compliance	Medium	<ul style="list-style-type: none"> Periodic Meetings (for information dissemination, including information regarding labour laws, local employment opportunities, safety measures and discussions of grievances) as per the working duration, Information dissemination regarding welfare provisions for labourers, employment opportunities, grievances, EHS and CSR activities through notice board and display of key messages on billboard 	<ul style="list-style-type: none"> Meetings and periodic reporting in the operations phase
2	Contractual Labourers	Primary Stakeholder	To appraise about labour working condition	Medium	<ul style="list-style-type: none"> Information dissemination regarding welfare provisions for labourers, Grievance Redressal Mechanism (GRM) and EHS through notice board and display of key messages on billboard, Open interactions as and when required 	<ul style="list-style-type: none"> Open discussion as per the requirement but at least quarterly, (when hired during the operations Phase)
3	Gram Panchayats	Primary Stakeholder	For necessary information disclosure of SEP. As Part of GRM Ensured involvement in CSR activities and local procurement if required	High	<ul style="list-style-type: none"> Consultations, meetings (FGD and individual interview) and Discussions; Sharing of documents, if required, as part of the disclosure mechanism; Meetings as a part of the Grievance Redressal mechanism, if required; Attendance at Panchayat meetings and participation in CSR activities and agreements with communities documented in minutes of meetings 	<ul style="list-style-type: none"> As and when required; and As per the regulatory requirements
4	Regulatory Authorities	Primary Stakeholder		High	<ul style="list-style-type: none"> Meetings and Discussions 	<ul style="list-style-type: none"> As per the regulatory requirements; and As per the need.
5	District Administration (Tehsildar, SDO, Patwari)	Primary Stakeholder	Regular engagement Participation in CSR Activities	High	<ul style="list-style-type: none"> Regular meetings and participation in CSR events 	<ul style="list-style-type: none"> Regular Meetings; or Monthly or as & when required

6	Land Sellers and Land Users	Primary Stakeholder	To seek support if required	Very Low	<ul style="list-style-type: none"> Attendance in plant functions/occasions, or seek their support as and when required 	<ul style="list-style-type: none"> Meeting and invitation in events
7	Local Community	Primary Stakeholder	Managing and ensuring participation in CSR activities. As part of GRM.	Low	<ul style="list-style-type: none"> Open Meetings, Interactions with community at Gram Panchayat, Sharing of CSR reports and other documents, if required, as part of the disclosure mechanism and the GRM; and Involvement in CSR activities 	<ul style="list-style-type: none"> As and when required
8	Local Women	Primary Stakeholder	Managing and ensuring participation in CSR activities. As part of GRM.	Low	<ul style="list-style-type: none"> Meetings specific to women or women's groups Sharing of CSR reports and other documents, if required, as part of the disclosure mechanism and the GRM; and Involvement in CSR activities 	<ul style="list-style-type: none"> As and when required
9	Agricultural Labourers	Primary Stakeholder	For necessary information Managing and ensuring participation in CSR activities. As part of GRM.	Very low/ Non Existent	<ul style="list-style-type: none"> Open Public Consultations sharing of reports and other documents as part of the disclosure mechanism (Provisioning of reports in Hindi/local language, if required) Involvement in CSR activities 	<ul style="list-style-type: none"> As and when required
10	Vulnerable Community (not affected by land acquisition)	Secondary Stakeholder	Managing and ensuring participation in CSR activities. As part of GRM.	Medium	<ul style="list-style-type: none"> Discussions, FGD, Open meetings and consultations with each category, meetings as part of the GRM and Involvement in CSR activities 	<ul style="list-style-type: none"> FGDs with each group Provisioning of reports in Hindi/ local language, if required.
11	Village Institution (School & PHC)	Secondary Stakeholder	Managing and ensuring participation in CSR activities	Low	<ul style="list-style-type: none"> Discussions, Consultations and Open Meeting and discussions, FGDS; and Involvement in planning and implementation of CSR activities 	<ul style="list-style-type: none"> Depending upon requirements.

H.7 Reporting and Documentation Process

Details of all the engagement activities is to be properly recorded in the form of minutes and maintained as a stakeholder engagement database for the projects that MEIPL undertakes. Such a database would allow for effective monitoring of the engagement process as well as ensure that the concerns and query of the stakeholders are resolved in a timely manner. The recording process is to be carried out in a definitive manner adhering to a framework which apart from illustrating the outcome of the meetings with the stakeholders in a comprehensive manner provides scope for demonstrating other vital aspects of each meeting such as date, place/ location of meeting, key participants and so on.

A Stakeholder Engagement Report consolidating the stakeholder engagement processes of multiple projects in the solar and the wind sectors respectively may be recorded annually that may include a summary of issues raised by stakeholders, numbers and subjects of grievances, a summary of key actions taken to address concerns, analysis of trends in KPIs, (if any) and plans for engagement in the next period.

H.8 Information Disclosure Mechanism

One of the most important aspects of any consultation or engagement process is the process of information disclosure. This process is not only part of certain regulatory requirements but also a requirement of the investors in the project. The process of information disclosure can be undertaken in two manners, either voluntary disclosure or disclosure as part of the regulatory requirements.

While regulatory disclosure involves the provisioning of information as required by the authorities and agencies involved in the project, voluntary disclosure refers to the process of disclosing information to the various stakeholders in a voluntary manner. The process of disclosure involves the provisioning of information in an accessible manner (a manner which allows for easy understanding, such as in the local language) to the various stakeholders in a project. This

disclosure not only allows for trust to be build amongst the stakeholders through the sharing of information but also allow for more constructive participation in the other processes of consultation and resolution of grievances due to availability of accurate and timely information.

The disclosure of impact assessment reports and relevant plans is to be carried out in a manner which would make the information available to the community in an accessible and timely manner. Some of the disclosure related activities proposed for the future are as follows:

- This would include making copies of the main reports/executive summary, available in the Panchayat offices or the community centres and/or other locations readily accessible (through means such as pamphlets or leaflets) to the entire community in the locally preferred language.
- The provisioning of these reports and plans at the Panchayat Office or a small open meeting with the community to notify the stakeholders of the documents being disclosed and their nature and location as well as decide a date for receiving feedback from the community.
- Another approach could be to engage the community during the various other community development activities, including livelihood development, farmers meeting etc. These forums could also be used for the disclosure of the information to the community;
- As a part of the disclosure, the stakeholder reports or the key public consultation findings or the grievance related records can also be made available at project office;
- At minimum, such disclosure should be done on an annual basis to the various stakeholders through suitable manner.

H.9 Institutional setup for SEP Implementation

To manage its engagements with the project stakeholders and meet the objectives of stakeholder engagement, MEIPL is required to ensure that this engagement process is given as much importance as the other project activities as well as guarantee the availability of certain resources. To ensure

compliance of the objectives with the timeline given above, respective site incharge is overall responsible for the implementation of the same.

H.10 Monitoring and Review

The monitoring of the SEP and the efficacy of its implementation for any project are required to be carried out as per formats devised or planned as per requirement of the project. The monitoring and reviewing schedule can either be developed as part of the impact assessment planning and planned in commensuration with the developed

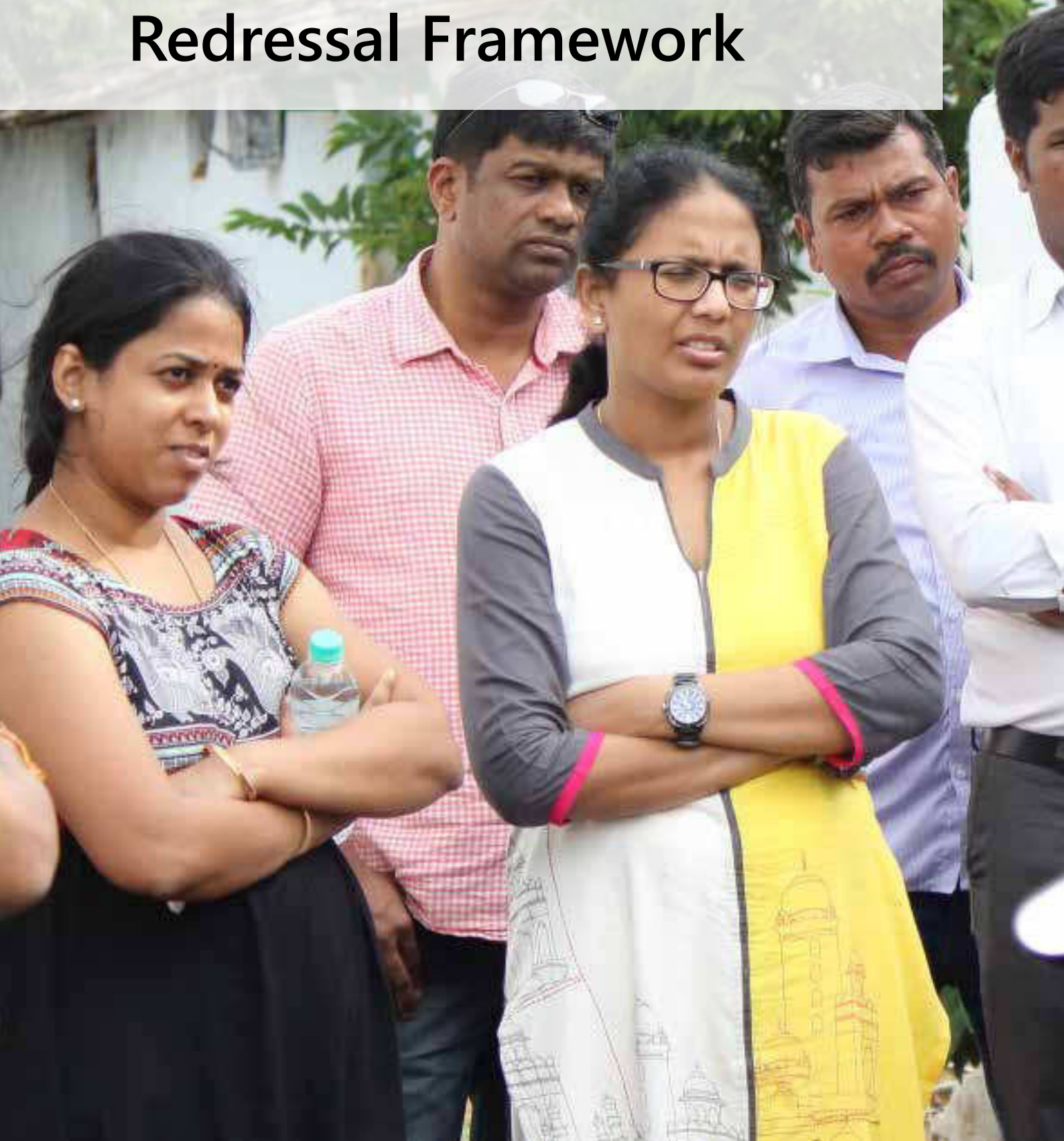
ESMP or developed standalone to meet or suffice the requirements of the project.

Note: This is typically a process of Stakeholder Engagement Frame Work, that is proposed to follow for the self-development sites with / through EPC contractor, in which MEIPL is involved from the initial stages of the project. In case of turnkey based projects, MEIPL will ensure that the Stakeholder Engagement Frame work of the turnkey contractor will full fill the basic requirement of lenders/investors specific standard/guidelines aligned with the ESMS.



Annexure I

Outline of Grievance Redressal Framework





I. Outline of Grievance Redressal Framework

I Introduction

This Grievance Redressal Framework (GRM) has been developed by MEIPL for managing grievances related to environmental and social performance arising from its operations in Solar /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

I.1 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:

I 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.

I 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;
- Working condition, health and safety of the employees;
- Unethical behaviour between senior and subordinate employees;
- Discrimination based on 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.

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 turnkey 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. MEIPL may engage third party based on the merit and sensitivity of grievance, directly / indirectly controlled by MEIPL

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 addressing 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

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 period to resolve the issues for its employees:

Stage 1: First level of grievance redressal

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 redressal

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 redressal

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 petty 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.

Stage 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.

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;

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 e.g.. 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 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.

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 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.

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, headed 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.

Grievance Register is recommended as follows:

Grievance Register is recommended as follows:

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



Annexure J1

Typical Terms of Reference for ESIA Study





J. Typical Terms of Reference for ESIA Study

The TOR of Environmental and social Impact Assessment Study proposes to support the funding mechanism with directive of its Lender/Funding agency/ Bank considering ADB's Safeguard Policy Statement (SPS 2009), Public Communications Policy (2011), Social Protection Strategy (2001), Gender and Development Policy (1998) and the World Bank Group's (WBG) Environmental, Health and Safety Guidelines covering General EHS matters, Wind Energy and Distribution, IFC performance standard, Equator principles aligned with all applicable host country statute. ESIA study should fulfil any specific requirement, mutually agreed by MAPPL and any lending/funding agency.

J.1 Objective

The objective of the study specifically will attempt the following;

- To establish the environmental baseline in the study area and to identify any significant environmental issue;
- To analyse, quantify the impacts and design project activities keeping in view environmental social impacts.
- To prepare an inventory of biodiversity (flora and fauna) affected due to project activity.
- To mitigate adverse impacts by the provision of the requisite avoidance and compensation measures of proposed project activities
- To identify & design appropriate safeguards for associated risk & disasters with proposed management plan
- To develop Environment and Social Management and Monitoring Plan(ESMMP) for implementation & monitoring of the mitigation measures along with applicable and suitable green /vegetation plan with proposed Budget.
- To integrate the environmental and Social issues in the project planning and design;

- Prepare a PAP profile through suitable survey using acceptable tool/s, as per the applicability
- Focused Group discussion to identify the needs, problems, if applicable
- Socio economic survey by need base assessment study based on secondary / primary information
- Identify socio-economic indicators to help implement and monitor the R & R process, if applicable
- Formulate and suggest suitable R & R and CSR plan (if applicable) for the specific project
- Check and confirm if the project is properly following to the ESMS provision agreed with ADB.
- Check and confirm if the project is falling into Environmental Category B considering ADB SPS 2009 as well as IFC standard.

J.2 Redressal Process

The broad scope of work will be considered for ESIA study includes the following aspect of proposed project but not limited to.

- Literature survey, data collection, examination of available environmental, social reports/data, understanding the proposed project through project report and discussions etc.
- Project cost & Implementation Schedule.
- Justification of the project
- Social & Environmental compliance requirement:

National regulation, social and environmental performance standards of the International Finance Corporation/Equator Principal, ADB Safeguard Principles (Check and confirm if the

project is properly following to the ESMS provision agreed with ADB. Also check and confirm if the project is falling into Environmental Category B considering ADB SPS 2009).

- ADB SPS Safeguard Requirement 2 and 3 on Involuntary Resettlement and Indigenous People respectively with mitigation and management measures as per the applicability
- Environment and Social Impact Assessment (ESIA)

A. Social Consultation

B. Impact Assessment

C. Conclusion

- Collection and generation of baseline environmental data (primary & secondary) & compilation of environmental status of proposed project
- Determination of major impacts on environment & their prediction with mutually approved methodology, recognised by host country/ Banker/Lender/ Funding Agency
- To list out all the species of flora and fauna affected due to project activity (both temporarily and permanently)
- Development of environmental management plan to mitigate the adverse impacts during construction & operation phase along with suitable green vegetation development plan (as per the applicability) with proposed budget

- Determination of risk & disaster for the proposed project and its management measures system in totality
- Close interaction with the project proponent, other concerned governmental agencies and stakeholders to identify specific issues that needs to be addressed to meet the statutory requirements.
- Review of land documents and land acquisition process adopted for the project and impact of land acquisition
- Environmental and social impact (if any) for any applicable ROW for solar projects and associate activities
- Study for profile of PDPs/ PAPs, considering project impacts and benefits to identify and formulate R & R plan, concurrence with legislative frame work, as per the applicability
- Baseline study of socio – economic & cultural profile of project impact area and need base assessment to identify, formulate and suggest CSR plan as per the applicability
- Active involvement in preparation of various clarifications and presentations (as and when required for FI).
- All necessary assistance as required till the final approval is obtained from FI
- Preparation & submission of environmental & social impact assessment & environmental management plan and Biodiversity Study reports along with risk assessment (RA) & disaster management plan (DMP) reports to FI



Table J.0.1 Typical Scope of Work for ESIA

Activity	Details
Description of site and Study Area	<ul style="list-style-type: none"> • Project area (including all appurtenances) of 10 km radius. • Terrain type
Baseline data	
Meteorology	<ul style="list-style-type: none"> • Wind velocity • Seasonal Variations • Natural weather phenomenon • Natural Hazards
Biological Resources	
Flora	<ul style="list-style-type: none"> • Forests and forest type • Vegetation Mapping • Species Diversity Index of biodiversity • Economically important plants, medicinal, as wells as timber, fuel wood etc. • Listing/quantification of rare, endemic, endangered and threatened species. • Location of biosphere reserve, National Park or sanctuary in the vicinity
Fauna	<ul style="list-style-type: none"> • List of terrestrial wildlife along with present status as per IUCN classification and wild Life Act • Zoogeographic distribution/affinities, endemic, threatened and endangered species • Migratory corridor • Habitat destruction, Habitat Fragmentation
Avifauna	<ul style="list-style-type: none"> • Status: endemic, threatened and endangered species • Resident/Migratory/Passage migrants • Migratory Flyway
Aquatic Ecology	<ul style="list-style-type: none"> • Aquatic Fauna: Macro-invertebrates, zooplankton, phytoplankton, benthos, etc. • Conservation Status
Air Quality	<ul style="list-style-type: none"> • Particulate Matter and other pollutant gases
Noise Level	<ul style="list-style-type: none"> • Background noise at the site and vicinity
Traffic Density	<ul style="list-style-type: none"> • Identify traffic loads peak and non-peak

Soil Quality	<ul style="list-style-type: none"> • Texture, contamination, etc
Socio-economic aspects	<ul style="list-style-type: none"> • Land details • Demographic Profile, including populations, family size, sex ration, literacy levels, • Ethnographic Profile- communities and ethnic groups and their relative levels of influence • Economic Profile including occupational patterns, secondary sources of incomes, seasonal variations (with sex-disaggregated data presented in tables) • Land use • Land ownership patterns- formal and informal/traditional • Access to basic amenities and local infrastructure • Local institutions and decision making – formal and informal • Community concerns and expectations
GIS & Land use Mapping	<ul style="list-style-type: none"> • Land use and land cover mapping • Drainage pattern • Soil map • Geo-physical feature, slope and relief maps • Demarcation of snow-fed and rain-fed areas for estimation of water availability
Impact Assessment	<ul style="list-style-type: none"> • Construction/ Operation / Decommissioning
Environment	<ul style="list-style-type: none"> • Shadow flicker, Noise, blade glint for Wind, water disposal in Solar
Air	<ul style="list-style-type: none"> • Effects on soils, material, vegetation and human health
Noise	<ul style="list-style-type: none"> • Change in ambient levels due to noise generated from construction and operation • Disturbance to fauna and habitation
Water	<ul style="list-style-type: none"> • Change in quality • Source and volume of water extraction • Impact on fish fauna • Impact on Downstream requirements
Land	<ul style="list-style-type: none"> • Change in land-use and drainage • Land quality, waste disposal • Hydrological data i.e. flood level records for the last 3 to 5 years

Activity	Details
Visual	<ul style="list-style-type: none"> • Shadow flicker and blade glint • Glare and reflection
Biological	<ul style="list-style-type: none"> • Deforestation and loss of habitat • Impact due to decreased flow of water • Impact on rare, endangered, endemic species, migratory path and route • Impact on breeding and nesting grounds • Impact on animal distribution, habitat fragmentation and destruction from construction
Socio economic Aspect	<ul style="list-style-type: none"> • Impact on local community including demographic changes • Impact on economic status and livelihood • Impact on human health • Impact of increased traffic • Presence of and significance of impact on scheduled tribes and other vulnerable groups such as the landless, those without legal title • Impacts on women and children • Impact on places of cultural, religious and tourist importance • Downstream impact on water, land and human environment due to diversion • Assessment of adequacy of assured lean season flow
Management/Action Plan	<ul style="list-style-type: none"> • Green Belt Plan/ conservation measures for ecology • Water, Air, Noise and Soil Pollution Abatement Plan • Traffic Management Plan • Social Management Plan • Local labour Recruitment and Management plan • Resettlement and Rehabilitations Plan (if required) • Indigenous Peoples Plan (if required) • Risk Assessment Plan • Emergency Response/ Disaster Management Plan • Restoration and Landscape Plan • Forest Protection Plan

J.2 Typical Terms of Reference for IEE Study

A typical scope of work for an IEE study of a solar and wind power project considering the requirements of ADB and IFC performance standard is presented below.

Table J.0.2 Typical Scope of Work for IEE

Activity	Details
Project Description	<ul style="list-style-type: none"> • Identification of the project and project proponent • Brief description of the nature, size and location of the project • Location of project • Descriptions of the project, including drawings showing project layout and project components
Description of Environment	<ul style="list-style-type: none"> i. Physical Resources: (e.g.) <ul style="list-style-type: none"> • Meteorology and air quality • Topography and soil type, • Surface water • Groundwater • Geology/seismology. ii. Ecological Resources: (e.g.) as applicable <ul style="list-style-type: none"> • Fisheries • Aquatic biology • Wildlife • Forests • Rare or endangered species • Protected areas • Coastal resources iii. Economic Development: (e.g.) as applicable <ul style="list-style-type: none"> • Infrastructure facilities (e.g. water supply, sewerage, flood control) • Transportation (roads, harbours, airports and navigation) • Land use (e.g. dedicated area uses) • Power sources and transmission • Agricultural development, mineral development and tourism facilities

Activity	Details
	iv. Social and Cultural Resources: (e.g.) <ul style="list-style-type: none"> • Population and communities • Health facilities • Education facilities • Socio-economic conditions (e.g. community structure, family structure, social wellbeing) • Physical or cultural heritage • Current use of lands and resources for traditional purposes by Indigenous Peoples • Structures or sites that are of historical, archaeological, paleontological, or architectural significance.
Screening of Potential Environmental Impacts and Mitigation Measures	<ul style="list-style-type: none"> • Screen out "no significant impacts" from those with significant adverse impact by reviewing each relevant parameter according to the following factors or operational stages. • Mitigation measures, where appropriate, will also be recommended. Potential environmental enhancement measures and additional considerations will also be covered.
i. Institutional Requirements and Environmental Monitoring Plan	<ul style="list-style-type: none"> • Identification of impacts to be mitigated and activities to implement the mitigation measures, including how, when and where they will be implemented. • Institutional arrangements for implementation • Environmental monitoring plan including cost for environmental management and monitoring
ii. Public Consultation and Information Disclosure	<ul style="list-style-type: none"> • Description of the process undertaken to involve the public and recommended measures for continuing public participation • Summary of information disclosed to date and procedures for future disclosure.
iii. Findings and Recommendations	<ul style="list-style-type: none"> • Evaluation of the screening process and recommendation whether significant environmental impacts exist needing further detailed study or ESIA.
iv. Conclusions	<ul style="list-style-type: none"> • Discussion on the result of the IEE and justification, if any, of the need for additional study or ESIA. • If an IEE, or an IEE supplemented by a special study, is sufficient for the project, then the IEE with the recommended institutional and monitoring program becomes the completed EIA.

Annexure J2

ESDD Template



J.2 Introduction And Project Description

The introduction and project description section of ESDD would include the following aspects:

- Objective and scope of work
- Applicable reference framework for the assessment- Please refer to Annexure D for register of regulations
- Brief description of the methodology followed for the assessment (refer Box 7.1 for details regarding key steps involved in ESDD process)
- Project Details:
- It will include details of project location, scale, size, affected people, project influence area, details of stakeholder consultations etc. Inclusion of any specific comments on environmental and social aspects like proximity to sensitive areas; wastewater management during construction and operation phase; land procurement, community, labour and workforce etc.

- Review of status of permits and consents etc.
- Review of Management Systems.

J.2 GAP Assessment to Applicable Reference Framework

J.2.1.1. Project Categorization

As part of its review of a project's expected social and environmental impacts, IFC and ADB use a system of social and environmental categorisation. MEIPL has developed more objective criteria for categorization of the project and project would be categorized using the criteria developed as part of the ESMS. Refer Table 7.1 of the ESMS document for categorization.

Table J.2.0.2 E&S Risk Categories

Parameter	Category A	Category B	Category C
Environmental Impacts			
Involuntary Resettlement (IR) Impacts due to Land Acquisition or Restricted Access			
Impacts on Indigenous Peoples (IP) (in this case Scheduled Tribe)			

The project would be evaluated for relevant sections of the gap assessment table and not every requirement might be applicable for every project. Where not applicable, adequate reasoning would be provided in the relevant sections.

Table J.2.0.2 Environmental and Social Gap Assessment as per IFC Performance Standards (2012) and ADB Safeguard and Social requirements

Sl. No	IFC Requirements in context of MEIPL	ADB Requirements	Remarks (where required)	Observation/Gap	Recommendation
		Requirements under Public Communications Policy 2011			
		Information disclosure to affected people or stakeholders: The borrower (i.e. MEIPL in this case) will provide relevant environmental information in a timely manner, in an accessible place and in a form and language(s) understandable to affected people and other stakeholders. For illiterate people, other suitable communication methods will be used.			
		Consultation and Participation: MEIPL will ensure meaningful consultation with affected people and other concerned stakeholders, including civil society within its capacity or through Turnkey/OEM contractor.			
		<ul style="list-style-type: none"> Timing and Frequency for consultation and participation: Meaningful consultation begins early in the project preparation stage and is carried out on an ongoing basis throughout the project cycle within its capacity or through Turnkey/OEM contractor. 			
1	IFC PS 1: Assessment and Management of Environmental and Social Risks and Impacts	<ul style="list-style-type: none"> ADB SPS Environmental Safeguards 			

Sl. No	IFC Requirements in context of MEIPL	ADB Requirements	Remarks (where required)	Observation/Gap	Recommendation
1.1	<p>MEIPL will establish and maintain an Environmental & Social Management System (ESMS) appropriate to the nature and scale of the project and commensurate with the level of social and environmental risks and impacts. The ESMS will incorporate the following elements:</p> <ul style="list-style-type: none"> • Social and Environmental Assessment (SEA or EIA) • Management program • Organisational capacity • Training • Community engagement • Monitoring • Reporting 	MEIPL will establish an ESMS and implement corrective action plan based on safeguards compliance audit.	<p>Based on the stage and categorization of the project, MEIPL will ensure the requirements stated in the ESMS document is followed for the project.</p> <p>If ESIA has been conducted, it will be reviewed to ensure its adequacy in line with the generic Terms of reference and project specific requirements.</p> <p>If the investment involves an existing facility or where there is prior land acquisition or procurement, ensure the gap (if any) will be taken care with suitable corrective action plan, if required.</p>		
1.2	MEIPL will establish an overarching policy defining the environmental and social objectives and principles that guide		MEIPL as part of the ESMS has established an QSHE, Integrated HR, CSR policies. As part of the ESDD, evaluation of		

	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			

Sl. No	IFC Requirements in context of MEIPL	ADB Requirements	Remarks (where required)	Observation/Gap	Recommendation
		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,				

Sl. No	IFC Requirements in context of MEIPL	ADB Requirements	Remarks (where required)	Observation/Gap	Recommendation
	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	<u>Non-discrimination and equal opportunity</u> 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.	Elimination of discrimination in employment and occupation The key six anti discrimination suggestions for ethnic discrimination identified by ADB as part of their Core Labour Standards (CLS) handbook applicable are: <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.			

Sl. No	IFC Requirements in context of MEIPL	ADB Requirements	Remarks (where required)	Observation/Gap	Recommendation
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.			

Sl. No	IFC Requirements in context of MEIPL	ADB Requirements	Remarks (where required)	Observation/Gap	Recommendation
3.4	<p><u>GHG Emissions</u></p> <p>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.</p>	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	<p><u>Pollution Prevention</u></p> <p>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</p>	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>			

Sl. No	IFC Requirements in context of MEIPL	ADB Requirements	Remarks (where required)	Observation/Gap	Recommendation
	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>Wastes:</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			

Sl. No	IFC Requirements in context of MEIPL	ADB Requirements	Remarks (where required)	Observation/Gap	Recommendation
		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





Mytrah

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



Mytrah: The Power of Green

Mytrah is a leading provider of sustainable energy solutions, committed to reducing carbon footprints and promoting renewable energy. Our Environmental & Social management System (ESMS) is a key component of our sustainable approach, ensuring that our business operations are environmentally friendly and socially responsible.

Our ESMS is designed to identify, assess, and manage environmental and social risks, ensuring that we meet our obligations to stakeholders and the environment. This system is integrated into our business processes, from procurement to operations, ensuring that sustainability is a core part of our business strategy.

By implementing our ESMS, we aim to achieve the following goals:

- Reduce greenhouse gas emissions
- Improve energy efficiency
- Enhance water management
- Protect biodiversity
- Engage and educate employees
- Support local communities

Our commitment to sustainability is reflected in our ESMS, which is a testament to our dedication to a greener future. We are proud to be a part of the sustainable energy revolution and to provide our clients with the most reliable and eco-friendly solutions.

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.

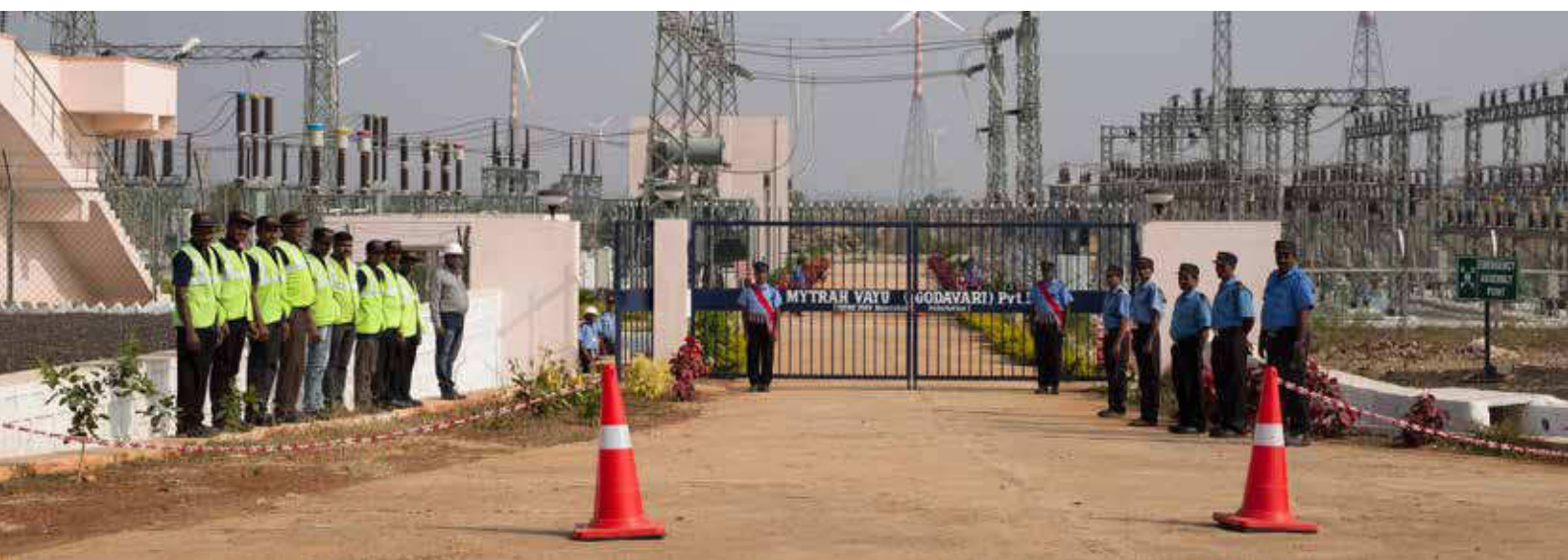
Trained contractors would eventually hold training session for their workforce which would be supervised and assisted by MEIPL Site In-charge/ Regional Safety Officer. For the Solar, Wind power projects with the current business arrangement MEIPLs expectation from the EPC contractors would be discussed 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. _____



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ESMS
AUDIT CHECK LIST
PROJECT, O&M & EPC



Annexure P2

ESMS Audit Checklist for Wind and Solar Projects-
Construction/Operation Phase

09.05.2019

Thursday.

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ESMS
AUDIT CHECK LIST
PROJECT, O&M & EPC



ESMS Audit Checklist for Wind and Solar Projects- Operation Phase

Date	09.05.2019
Location	Saralsary
Name of the Project Site	Mytrh SrG
Name of the Site Manager	Sadanand Patel / Shiranand.p.k / Sankarhyham (Gamer)
Project EHS Manager	Shiranand.p.k
Name of Auditor	Shiranand.p.k
Brief Description of Project	95.2 MW

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	N/A	
2	Is the Site complying with conditions stated under the CTO issued by respective State Pollution Control Board (SPCB), if not give the reason	N/A	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 Guidelines, if not justify the reason	Yes	White Ground Water
4	Has the Site obtained Forest Clearance (in case forest land diversion is required) for both main plant and associated facilities like transmission towers.	N/A	Not under forest
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	No	
6	Has the Site obtained power evacuation approval from the Power Transmission Company?	Yes	PPA Available
7	Is the Site following the Electricity Act, 2003 and rules e.g. providing insulation mats in front of the electrical	Yes	

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