

Environmental and Social Due Diligence Report

Project Number: 47083-004
December 2019

INDIA: Accelerating Infrastructure Investment Facility in India – Tranche 3 Mytrah Vayu (Krishna) Private Limited (Part 10 of 10)

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

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Environmental Consultants & Analytical Services

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

Sample description	Drinking Water Collected at Vijayapura Guest House
Our Ref No	TC506418000003980

S.No	Characteristic	Test Method	Units	Test Results	Drinking Water Limits As per IS: 10500:2012
27.	Arsenic as As	IS: 3025 Part 37 1988, RA-2003	mg/L	<0.01	0.01
28.	Zinc as Zn	IS 3025 Part 49 1994	mg/L	<0.001	5 - 15
29.	Manganese as Mn	IS: 3025 Part 24 2006	mg/L	<0.001	30 - 100
30.	Copper as Cu	IS 3025 Part 42 1992	mg/L	<0.001	0.05 - 1.5
31.	Nickel as Ni	IS 3025 Part 54 2003	mg/L	<0.001	3.0 - 5.0
32.	Boron	IS 3025 Part 57 2005	mg/L	0.065	1.00
33.	Anionic Detergents	IS 13428 Annex K	mg/L	<0.001	0.20
34.	Mineral Oil	APHA 23 rd Edition 2012	mg/L	<0.001	0.01
35.	Aluminium as Al	IS 3025 Part 55 2003	mg/L	<0.001	0.03
36.	Mercury as Hg	IS 3025 Part 48 1994	mg/L	<0.0002	0.00
37.	Pesticides	USEPA	µg/L	<0.001	<0.001
38.	Total Plate Count	IS:5402 : 2012	CFU/mL	Not detected	Must not be Detected
39.	E. Coli	IS: 15185 : 2016	CFU/100mL	Not detected	Must not be Detected

Page 2 of 2

Checked by	Sr. Chemist	Authorized Signatory

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H.No. 16-11-23/37/A, Flat No. 205, 2nd Floor, Opp. R.T.A. Office, Musarambagh, Malakpet, Hyderabad - 500 036.
 Tel : 040-24544320, 24541338, Mob : 98491 10019 / 94408 41338, E-mail : Info@visonlabs.com, vison.labs@gmail.com
 NOTE : This Report is subject to the terms and conditions mentioned overleaf.



TEST REPORT

Issued to: Mytrah Vayu (Krisna) Private Limited. # 8001, Q-City, S.No:109, Nanakramguda, Gachibowli, Hyderabad-500 032, India. Site: Mytrah Vayu (Krisna) Private Limited. Survey No:490/3, Horti Post, Taluka: Indi, District- Vijayapura, Near Inchgiri village-586117, Karnataka		Issued Date	12.11.2018
		Our Ref No	TC506418000003981
		Work Order No	9300006843
		Your Ref Date	26.10.2018
Sample description	Surface Water Collected at Jgjeevagi Village	Mode of Packing	Pet bottle
Appearance of the Sample	Color Liquid	Sample condition of testing	Found Ok
Sample collection date	06.11.2018	Sample Quantity	1 ltr
Sample Collection Time	2:10 pm	Analysis starting date	08.11.2018
Sample Registration date	08.11.2018	Analysis Completion date	12.11.2018
Sample collected by VISON LABS			

TEST RESULTS PHYSICAL PARAMETERS

S.No	Characteristic	Test Method	Units	Test Results	IS: 2296 Class C Specifications
1.	pH at 25 deg C	IS:3025 part 11 1983 RA-2012	-	8.44	6.5 – 8.5
2.	Color	IS: 3025 Part 4 1983 RA-2006	Hazen	100	300
3.	Conductivity at 25 deg C	IS: 3025 Part 14 1984 RA-2013	mS/cm	671	--
4.	Temperature at Site	IS: 3025 Part 38 1989 RA-2003	°C	26.2	--
5.	Turbidity	IS: 3025 Part 10 1984 RA-2002	NTU	12.4	--
6.	Dissolved Oxygen	IS: 3025 Part 38 1989 RA-2003	mg/L	4.2	4 min
7.	Chemical Oxygen Demand	IS: 3025 Part 58 2006	mg/L	80	--
8.	Total Suspended Solids	IS: 3025 Part 17 1984 RA-2012	mg/L	19.2	--
9.	Total Dissolved Solids	IS: 3025 Part 16 1984 RA-2006	mg/L	464	1500
10.	BOD (3 days at 27°C)	IS: 3025 Part 44 1993 RA-2009	mg/L	25	< 3.0
11.	Total Hardness as CaCO ₃	IS: 3025 Part 21 2009	mg/L	120	--
12.	Chloride as Cl	IS: 3025 Part 32 1988, RA-2009	mg/L	65	600
13.	Fluorides as F ⁻	IS: 3025 Part 60 2008	mg/L	0.52	1.5
14.	Sulphate as SO ₄ ²⁻	IS: 3025 Part 24 1986, RA-2003	mg/L	61.4	400
15.	Alkalinity	IS: 3025 Part 23 1986, RA-2003	mg/L	170	--
16.	Total Nitrogen	IS: 3025 Part 34 1988, RA-2003	mg/L	2.4	--
17.	Cyanides as CN	IS: 3025 Part 27 1986, RA-2009	mg/L	<0.001	0.05
18.	Calcium as Ca	IS: 3025 Part 40 1991, RA-2009	mg/L	124	--
19.	Magnesium as Mg	IS: 3025 Part 46 1994, RA-2003	mg/L	14.4	--
20.	Sodium as Na	IS: 3025 Part 45 1993, RA-2009	mg/L	94.9	--
21.	Potassium as K	IS: 3025 Part 45 1993, RA-2009	mg/L	2.7	--
22.	Iron as Fe	IS: 3025 Part 53 2003, RA-2003	mg/L	0.12	50
23.	Lead as Pb	IS 3025 Part 47 1994	mg/L	<0.001	0.1
24.	Copper as Cu	IS 3025 Part 42 1992	mg/L	0.028	1.5
25.	Arsenic as As	IS: 3025 Part 37 1988, RA-2003	mg/L	<0.02	0.2
26.	Phenolics as C ₆ H ₅ OH	APHA 23 rd Edition 5330D	mg/L	<0.001	0.005
27.	Boron	IS 3025 Part 57 2005	mg/L	0.014	--

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Sample description	Surface Water Collected at Jgjeevagi Village
Our Ref No	TC506418000003981

S.No	Characteristic	Test Method	Units	Test Results	IS: 2296 Class C Specifications
28.	Total Chromium as Cr	IS 3025 Part 52 2003	mg/L	<0.001	0.05
29.	Zinc as Zn	IS 3025 Part 49 1994	mg/L	0.056	15
30.	Total Phosphorus	IS 3025 Part 31 1988, RA-2003	mg/L	<0.02	--
31.	Mercury as Hg	IS 3025 Part 48 1994	mg/L	<0.001	--
32.	Oil and grease	IS 3025 Part 39 1991	mg/L	<1.0	0.1
33.	Coli form Organisms	IS: 1622:1981 RA 1996	MPN/100 ml	510	Should not exceed 5000
34.	Faecal Coliform	IS: 1622:1981 RA 1996	MPN/100 ml	240	--
35.	Pesticides	USEPA	µg/L	<0.001	<0.001

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		Our Ref No	TC506418000003982
		Work Order No	9300006843
		Your Ref Date	26.10.2018
Sample description	Ground Water Collected at Near Project Site	Mode of Packing	Pet bottle
Appearance of the Sample	Clear Liquid	Sample condition of testing	Found Ok
Sample collection date	06.11.2018	Sample Quantity	1 ltr
Sample Collection Time	1:30 pm	Analysis starting date	08.11.2018
Sample Registration date	08.11.2018	Analysis Completion date	12.11.2018
Sample collected by VISON LABS			

TEST RESULTS

PHYSICAL PARAMETERS

S.No	Characteristic	Test Method	Units	Test Results	Drinking Water Limits As per IS: 10500:2012
1.	pH at 25°C	IS:3025 part 11 1983 RA-2012	--	8.02	6.5 - 8.5
2.	Turbidity	IS: 3025 Part 10 1984 RA-2002	NTU	<1.0	5 - 10
3.	Conductivity at 25°C	IS: 3025 Part 14 1984 RA-2013	µMho/cm	604	--
4.	Total Suspended Solids	IS: 3025 Part 17 1984 RA-2012	mg/L	<1.0	--
5.	Total Dissolved Solids	IS: 3025 Part 16 1984 RA-2006	mg/L	414	500-2000
6.	Colour	IS: 3025 Part 4 1983 RA-2006	Hazen	<05	5.00
7.	Taste	IS:3025 part 08 1984 RA-2002	-	Agreeable	Agreeable
8.	Odor	IS:3025 part 05 1983	-	Unobjectionable	Unobjectionable

CHEMICAL PARAMETERS

9.	Total Alkalinity as CaCO ₃	IS: 3025 Part 23 1986, RA-2003	mg/L	130	--
10.	Chlorides as Cl ⁻	IS: 3025 Part 32 1988, RA-2009	mg/L	40	250 - 1000
11.	Sulphates as SO ₄ ⁻²	IS: 3025 Part 24 1986, RA-2003	mg/L	97.6	200 - 400
12.	Nitrates as NO ₃	IS: 3025 Part 34 1988, RA-2003	mg/L	7.0	40 - 100
13.	Phosphates as PO ₄	IS: 3025 Part 31 1988, RA-2003	mg/L	0.028	--
14.	Total Hardness as CaCO ₃	IS: 3025 Part 21 2009	mg/L	80	200 - 600
15.	Calcium as Ca	IS: 3025 Part 40 1991, RA-2009	mg/L	20	75 - 200
16.	Magnesium as Mg	IS: 3025 Part 46 1994, RA-2003	mg/L	7.2	30 - 100
17.	Sodium as Na	IS: 3025 Part 45 1993, RA-2009	mg/L	97.5	--
18.	Potassium as K	IS: 3025 Part 45 1993, RA-2009	mg/L	2.3	--
19.	Fluorides as F ⁻	IS: 3025 Part 60 2008	mg/L	0.74	1 - 1.5
20.	Iron as Fe	IS: 3025 Part 53 2003, RA-2003	mg/L	0.24	0.3 - 1
21.	Phenolic Compounds	APHA 23 rd Edition 5330D	mg/L	<0.001	0.001 - 0.002
22.	Cyanide as CN ⁻	IS 3025 Part 27 1986	mg/L	<0.001	0.005
23.	Residual Chlorine as Cl ⁻	IS 3025 Part 26 1986	mg/L	<0.001	0.2
24.	Cadmium as Cd	IS 3025 Part 41 1992	mg/L	<0.001	0.01
25.	Total Chromium as Cr	IS 3025 Part 52 2003	mg/L	<0.001	0.05
26.	Lead as Pb	IS 3025 Part 47 1994	mg/L	<0.02	0.05

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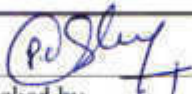
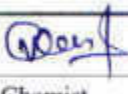

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Sample description	Ground Water Collected at Near Project Site
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28.	Zinc as Zn	IS 3025 Part 49 1994	mg/L	0.098	5 - 15
29.	Manganese as Mn	IS: 3025 Part 24 2006	mg/L	<0.001	30 - 100
30.	Copper as Cu	IS 3025 Part 42 1992	mg/L	0.120	0.05 - 1.5
31.	Nickel as Ni	IS 3025 Part 54 2003	mg/L	<0.001	3.0 - 5.0
32.	Boron	IS 3025 Part 57 2005	mg/L	0.052	1.00
33.	Anionic Detergents	IS 13428 Annex K	mg/L	<0.001	0.20
34.	Mineral Oil	APHA 23 rd Edition 2012	mg/L	<0.001	0.01
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37.	Pesticides	USEPA	µg/L	<0.001	<0.001
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Community Health and Safety Management Plan

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



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1.0 INTRODUCTION

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

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

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

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

1.1 SCOPE

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

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

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

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

2.0 CONTEXT OF ORGANIZATION

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

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

2.1 POLICY STATEMENT AND OBJECTIVES

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

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2.2 ENVIRONMENTAL POLICY




ENVIRONMENTAL POLICY

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

Objectives

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

Date: 18.04.2018


(Vikram Kailas)
Vice Chairman & MD



2.3 OCCUPATIONAL HEALTH AND SAFETY POLICY




OCCUPATIONAL HEALTH AND SAFETY POLICY

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

Objectives:

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

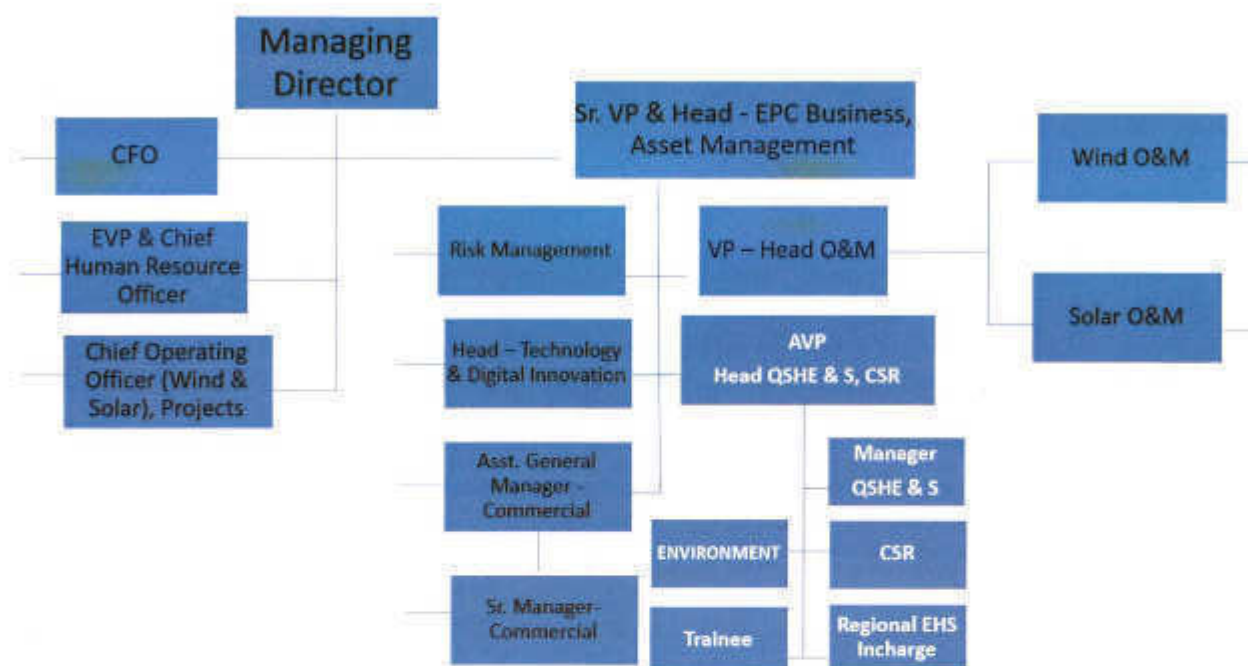
Date: 18.04.2018


(Vikram Kailas)
Vice Chairman & MD



3.0 Organization Chart

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



4.0 Summary of Community Health and Safety Management Plan

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

TABLE-4.1
COMMUNITY HEALTH AND SAFETY MANAGEMENT PLAN

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

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

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

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

5.0 Road Safety and Traffic Management Plan

5.1 Scope and Purpose

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

5.2 During Construction Phase

The following mitigation measures will be implemented during this phase:

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

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

5.3 During Operational Phase

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

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

6.0 Community Complaints

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

7.0 Community Reporting

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

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

GOVERNMENT OF ANDHRA PRADESH

ABSTRACT

Lands – Kurnool District – Lease of Govt. land totaling an extent Ac. 32.57 cts., ie., an extent of Ac. 11.57 cts. in Sy.No. 1068 to 1080 of Racherla village, Peapully Mandal, and an extent of Ac.21.00 cents in Sy.No. 976 etc. of Kunukuntla village, Owk Mandal in favour of NREDCAP for establishment of Wind Power Project, for a period of 25 Years, duly collecting lease rent basing on the market value @ 50,000/- per acre, as per the norms issued in GO. Ms. No. 571, Rev(Assn.I) Dept., dt. 14.09.2012. The NREDCAP in turn will allot the land to the third party as per the existing norms of Energy Department on lease basis and monitor the utilization of land- Orders – Issued.

Revenue (Assignment .V) Department

GO. Ms. No. 511

Dated: 27-09-2013

Read the following:

- Ref: 1. G.O.Ms.No.571. Rev(Assn I) Department, dated. 14.09.2012.
2. From the Collector, Kurnool Lr. No. E5/2906/2012, dated 19.03.2013.
3. From the Collector, Kurnool Lr. No. E5/2906/2012, dated 19.03.2013.
4. From the Spl.CS & CCLA., AP. Hyderabad Lr. No. BB3/883/2012, dt. 03.05.2013.

:-0:-

ORDER

In the references 2nd & 3rd read above, the District Collector, Kurnool has submitted proposals for allotment of Government lands in Racherla village of Peapully Mandal, and Kunukuntla village of Owk Mandal on lease basis for the period of 25 years in favour of M/s. Mytrah Wind Developers Private Limited, Hyderabad for establishment of Wind Power Project. The details of lands are as follows :

Sl. No.	Name of the Village	Name of the Mandal	Extent Ac. Cts.	Sy.Nos
1	Racherla	Peapully	11.57	Sy.Nos. 1068-1080 each Ac. 0.89 cts.
2.	Kunukuntla	Owk	21.00	Sy.Nos. 976, 978-990, 992-995, and 997-999 (each Ac. 0.89 cts.) Sy. No. 977 (Ac. 0.99 cts), Sy.No. 991(Ac. 0.49 cts) Sy.No. 996 (Ac. 0.83 cts)

2. The District Collector, Kurnool has reported that the proposed lands are situated on the edge of hill top and covered with rocks and bushes. The lands are unfit for cultivation. There are no permanent structures on the proposed lands. A1 notices have been published in the villages and no objection were received within stipulated time. The Joint Collector has inspected the proposed lands along with concerned officials and reported that the proposed lands are table land on the hill and suitable for establishment of Wind power project. The lands under proposal are not covered by the prohibitive provisions for assignment etc., under Acts and Rules. With regard to fixation of market value, the District Collector, Kurnool has reported that taking into consideration of the nature of the lands (i.e, Hill rock and unfit for cultivation), he has proposed the Market value at Rs.50,000/- (Rupees fifty thousand only) per acre.

(contd. P.2)

3. In the reference 4th read above, the Special Chief Secretary & Chief Commissioner of Land Administration, AP. Hyderabad has reported that, the Energy Dept., has submitted the vetting/justification report in the prescribed check list and recommended to allot the land to an extent of Ac.32.57 cts. on lease basis jointly to the NREDCAP and M/s. Mytrah Wind Developers Private Limited, for developing the Wind Power Project. He has also informed that as per their departmental norms and MNRE guidelines one hectare of land (Acs. 2.47 cts.) is required for one MW Turbine. The requirement of the applicant for development of 31.45 MW is Acs 32.57 which is less than norms. (31.45x2.47= Acs. 77.68 cts. is actual requirement).

4. The Special Chief Secretary & Chief Commissioner of Land Administration, AP. Hyderabad has further reported that proposals were placed before the A.P Land Management Authority Meeting held on 26-4-2013, the APLMA has examined the proposal and after detailed deliberations, the Authority has *"recommended to Government for alienation of Government land on lease basis in favour of NREDCAP. The NREDCAP in turn will allot the land to the third party as per the Energy Department existing norms on lease basis and monitor the utilization of land"*. The Special Chief Secretary & Chief Commissioner of Land Administration, AP. Hyderabad has finally requested the Government to take appropriate action in the matter.

5. In the circumstance reported by the District Collector, Kurnool/ the Special Chief Secretary and Chief Commissioner of Land Administration, Hyderabad, and as recommended by the APLMA, the Government after careful examination of the matter hereby direct that the Government land to an extent of Ac. 32.57 cts., i.e., an extent of Ac. 11.57 cts. in Sy.No. 1068 to 1080 (each Ac. 0.89 cts) of Racherla village, Peapully Mandal and an extent of Ac. 21.00 cents in Sy.No. 976, 978-990, 992-995, and 997-999 (each Ac. 0.89 cts.), Sy. No. 977 (Ac. 0.99 cts), Sy.No. 991(Ac. 0.49 cts) Sy.No. 996 (Ac. 0.83 cts) of Kunukuntla village, Owk Mandal, Kurnool District be alienated on lease basis, for a period of 25 Years, duly collecting lease rent basing on the market value @ 50.000/- per acre, as per the norms issued in GO. MS. No. 571, Rev (Assn.I) Dept., dt. 14.09.2012, in favour of NREDCAP. for establishment of Wind Power Project, the NREDCAP in turn will allot the land to the third party as per the existing norms of Energy Department on lease basis and monitor the utilization of land.

6. The Special Chief Secretary & Chief Commissioner of Land Administration, AP. Hyderabad and the Collector, Kurnool District shall take necessary action accordingly.

(BY ORDER AND IN THE NAME OF THE GOVERNOR OF ANDHRA PRADESH)

B.R. MEENA

PRINCIPAL SECRETARY TO GOVERNMENT

To

The Collector, Kurnool District.

The Special Chief Secretary & Chief Commissioner of
Land Administration, AP. Hyderabad,

The VC&MD., NREDCAP., Nampally, Hyderabad.

Copy to:

The GA(Cabinet) Department, w.r.t. their CR.No. 169/2013, dt. 21.09.2013.

The Energy Department.

The P.S. to Principal Secretary to CM.

The P.S.to Minister (Revenue).

The P.S. to Principal Secretary (Revenue).

Sf/Sc.

//FORWARDED :: BY ORDER //

SECTION OFFICER



ఆంధ్రప్రదేశ్ ఆంధ్ర ప్రదేశ్ ANDHRA PRADESH

SI.No. 5269 Dated-26-05-2014, Rs.100/-
Sold To: K VEERABHADRA RAO
S/o: K V NARASIMHA RAO R/o Hyd.
For whom: MYTRAH VAYU (KRISHNA) PVT.LTD.

26 MAY 2014

BH 562213
GOPI SINGH
LICENSED STAMP VENDOR
L.C.No.16-10-10/2011/Ren.No.16-10-06/2014
H.No.9-4-131/1, Meera Colony,
TOLI CHOWKI, HYD-500 002.
HYDERABAD (SOUTH) DISTRICT
Call: 9000011077

LEASE DEED

Between

**New and Renewable Energy Development Corporation of AP Ltd.,
(NREDCAP)**

And

Mytrah Vayu (Krishna) Private Limited,

This deed of lease ("Lease Deed") executed on this 24th day of July 2014 at Hyderabad,

Between

New and Renewable Energy Development Corporation of AP Ltd., (NREDCAP), a fully owned State Government Company, (formerly known as NEDCAP) registered under the companies act, 1956, having its office at 5-8-207/2, Pisgah Complex, Nampally, Hyderabad – 500001, Andhra Pradesh, India represented by its Vice-Chairman and Managing Director, **Sri M. Kamalakar Babu**, herein after referred to as NREDCAP which expression shall unless it to be repugnant to the context or meaning thereof, includes its successors-in-office, administrators and permitted assignees , of the first part (herein after called as 'Lessor').

Contd-2

or Mytrah Vayu (Krishna) Private Limited


Authorized Signatory

For New & Renewable Energy Development Corporation of Andhra Pradesh Ltd.


Vice Chairman & Managing Director

And

M/s Mytrah Vayu (Krishna) Private Limited, a company incorporated under the Companies Act, 1956 having its registered office at 8001, Q-City, S.No.109, Nanakramguda, Gachibowli, Hyderabad – 500 032, through its Authorised Signatory **Sri.S.S.Murali**, Head-projects, authorized by the company vide its authorization letter, dated: 11.04.2014 (Which expression shall unless repugnant to the context or meaning thereof include its successors in office, administrators and assignees) party of the second part (herein after called as 'Lessee')

The Government of Andhra Pradesh has allotted the land described in the schedule attached, to NREDCAP for establishment of Wind Power Project on lease duly collecting the lease rent for a period of 25 years, the NREDCAP in turn will allot the land to the third party, vide GO. Ms. No. 511, Revenue (Assignment V) Department, dated: 27.09.2013.

WHEREAS;

- (A) The New and Renewable Energy Development Corporation of AP Ltd., (NREDCAP) is a nodal agency, which has been incorporated in the year 1986 with sole objective to encourage the generation of electricity through Renewable Energy sources like Wind, Solar, helping in energy conservation, facilitate adoption and import of viable technology in the areas of non-conventional energy sources and also to impart training and to promote Research & Development in the field of non-conventional energy sources and has been working hard to achieve these objectives.
- (B) The Government of Andhra Pradesh has issued uniform guidelines for allotment of Government land for various purposes, vide GO.Ms.No. 571, Revenue (Assignment 1) Department, dated: 14.09.2012. The said GO, says that the land will be allotted for wind power projects to the private developers on lease basis for a period of 25 years.
- (C) M/s Mytrah Wind Developers Private Limited (MWDPL) is a developer of Wind Power projects and was allotted 58.65 MW Capacity by NREDCAP on 03.10.2012. The NREDCAP has forwarded the proposals of M/s Mytrah Wind Developers Private Limited (MWDPL) for allotment of Ac. 11.57 Revenue land in Racherla Village, Peapully Mandal, Kurruol District for establishment of 31.45 MW capacity Wind Power Project jointly in favour of NREDCAP and Developer as per GO.MS .No. 571, Revenue (Assignment 1) Department, dated: 14.09.2012.

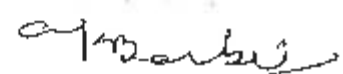
Contd-3

For Mytrah Vayu (Krishna) Private Limited



Authorised Signatory

For New & Renewable Energy Development
Corporation of Andhra Pradesh Ltd.



Vice Chairman & Managing Director

- (D) The Government of Andhra Pradesh vide GO. Ms. No. 511, Revenue (Assignment V) Department, dated: 27.09.2013 has allotted the Government land to NREDCAP to an extent of Ac. 11.57 in Sy. Nos. 1068-1080 (each Ac. 0.89 cts), situated at Racherla village, Peapully Mandal, Kurnool District, on lease basis for a period of 25 years duly collecting the lease rent from NREDCAP for establishment of wind power project, the NREDCAP in turn will allot the land to the second part herein on lease basis and monitor the utilization of land (hereinafter referred to as "the Scheduled Property", which is fully described in the Schedule attached hereto).
- (E) Basing on the request of the developer, capacity allotment i.e., 58.65 MW was transferred to M/s Mytrah Vayu (Krishna) Private Limited vide NREDCAP letter No. NREDCAP/WE/Lotus (Mytrah)/2013 dated 02.09.2013 and transfer agreement was entered on 16.09.2013 between NREDCAP & Developer.
- (F) Now, the NREDCAP has agreed to execute this lease deed in favour of M/s. Mytrah Vayu (Krishna) Private Ltd (MVKPL).

In Pursuant of above and in compliance with policies, procedures as laid down, the Tahsildar, Peapully, Government of Andhra Pradesh has handed over the possession of the Scheduled Property mentioned in the Schedule-1 to the Lessor vide Rc.B.159/2012, Dated 10.07.2014 after receiving the lease rental amount Rs. 57,850-00 (Rupees Fifty Seven Thousand Eight Hundred and Fifty Only) for first year paid by the M/s Mytrah Vayu (Krishna) Private Limited for the mentioned Schedule Property.

NOW THIS DEED OF LEASE WITNESSETH AS FOLLOWS –

- (1) That the government has fixed the market value of land at Rs.50,000/- (Rupees Fifty Thousand Only) per acre as per GO.Ms.No. 511, Revenue (Assignment V) Department, dated 27.09.2013 and the rental value is fixed at Rs.5,000/- per acre which is 10% on the market value i.e. Rs. 50,000/- per acre. Therefore, the lease rental amount for Ac. 11.57 x Rs. 5,000 = Rs.57,850-00 (Rupees Fifty Seven Thousand Eight Hundred and Fifty Only) per year.

For Mytrah Vayu (Krishna) Private Limited


Authorised Signatory

Contd-4

For New & Renewable Energy Development
Corporation of Andhra Pradesh Ltd.


Vice Chairman & Managing Director

- (2) That the District Collector, Kurnool issued proceedings, vide its no. Rc.E5/2906/2012, dated: 24.10.2013 to the Lessee to pay the total lease rental amount of Rs.57,850-00 (Rupees Fifty Seven Thousand Eight Hundred and Fifty Only) per year for Scheduled Property and the Lessee agreed to pay the said amount accordingly.
- (3) That the Lessee i.e. M/s Mytrah Vayu (Krishna) Pvt. Ltd., should pay an amount of Rs.57,850-00 (Rupees Fifty Seven Thousand Eight Hundred and Fifty Only) to the Revenue department, Govt. of Andhra Pradesh and has to submit the receipts to the Lessor for remaining 4 years for the first block of 5 years. For remaining blocks also the Lessee hereby agreed to pay the enhanced lease rental amount by increasing up to 10% of the previous block of 5 years from time to time or as fixed by the competent authority directly to the revenue department and submits the receipts to the Lessor.
- (4) That the Lessor shall handover the possession of the Scheduled Property to Lessee situated at Racherla village, Peapully-Mandal, Kurnool-District, and Andhra Pradesh.
- (5) That the Lessee acknowledges and confirms that it has been handed over unrestricted, absolute, vacant and peaceful physical possession of the Scheduled Property, on an exclusive basis by the Lessor.
- (6) That the Lessee shall use the Scheduled Property for wind power project only and shall not use or sub-lease this lease except for the said purpose mentioned under this lease deed.
- (7) That the Lessee shall be entitled to use the Scheduled Property as a part of the wind power project, installation of Wind Turbine Generators (WTGs) and carry on the activity of electricity generation generated by such WTG. The Lessee shall have the sole and exclusive ownership to anything installed (movable or fixed inclusive) on the Scheduled Property during the tenure of the lease.
- (8) That the Lessee i.e M/s Mytrah Vayu (Krishna) Private Limited hereby agreed that it shall not do any act, which is destructive, or permanently injurious to the Scheduled Property.

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For Mytrah Vayu (Krishna) Private Limited


Authorized Signatory

For New & Renewable Energy Development
Corporation of Andhra Pradesh Ltd.


Vice Chairman & Managing Director

- (9) That the Lessee agreed to maintain the said Scheduled Property in a clean and sanitary condition to the satisfaction of the Government of Andhra Pradesh and shall also maintain the structures, if any, erected thereon as aforesaid, in good, and substantial repair to the satisfaction of the Deputy Commissioner.
- (10) That the Lessee shall permit the officers and servants of the Government of Andhra Pradesh with or without workmen at all times to enter upon the Scheduled Property aforesaid to view the condition and state thereof.
- (11) That the Government reserve to themselves the right to all trees and their branches and roots which exist at the time of lease (which are described in the schedule attached) as well as those which may grow subsequently on the lands leased and the Government shall be at liberty to cut or dig out any such trees or their roots and branches and remove them from the land in question, be entitled to cut or remove them or cause them to be cut or removed without the permission of competent authority. However, such activities shall be carried out by the authorized officials of the Government of Andhra Pradesh without affecting the work/project and other interests of the Lessee.
- (12) That the Lessee may uproot, cut down or destroy such trees, plants, groves or bushes as in the opinion of the competent authority it is necessary to uproot, cut down or destroy to make the land fit for the purpose of erection of wind electric generators and infrastructure development such as road for same and may take them free of charges and dispose of them in any manner he likes. The Lessee may level the ground by removing embanked pathways and filling up low-lying places on the land so as to make the ground fit for the purpose of erection of wind electric generators and infrastructure development such as roads & transmission lines for same and cut the grass thereon and dispose off the same in any manner he likes and do any work on the land which, in the opinion of the Government, is necessary for such purposes.

Contd-6

For Mytrah Vayu (Krishna) Private Limited


Authorized Signatory

For New & Renewable Energy Development
Corporation of Andhra Pradesh Ltd.


Vice Chairman & Managing Director

(13) That the Lessee shall follow the instructions given by the competent authority/Revenue Dept. / NREDCAP from time to time.

(14) That after completion of the project the Lessor (NREDCAP) shall withdraw its rights over the Scheduled Property as per GO.Ms.No. 571, dated: 14.09.2012.

(15) That the **Lessee** may assign or mortgage its leasehold right in favour of any institution or institutions for the purpose of availing of financial assistance for establishment of wind power projects as sanctioned by NREDCAP/ Govt. Further Lessee can assign its rights to customer company after transfer of project to customer & commissioning.

(16) **AMENDMENTS**

Neither this Deed nor any term, covenant, condition or other provisions hereof may be waived, amended, varied, modified, supplemented, discharged or terminated except by an instrument, in writing, signed by a duly authorized officer on behalf of each of the Parties.

SCHEDULE

Sl.No.	District	Mandal	Village	Sy.No	Extent (in Ac.)
1	Kurnool	Peapully	Racherla	1068	0.89
2				1069	0.89
3				1070	0.89
4				1071	0.89
5				1072	0.89
6				1073	0.89
7				1074	0.89
8				1075	0.89
9				1076	0.89
10				1077	0.89
11				1078	0.89
12				1079	0.89
13				1080	0.89
Total Extent (in Ac.)					11.57

Contd-7

For Myrah Vaya (Kushn) Private Limited



Authorized Signatory

For New & Renewable Energy Development
Corporation of Andhra Pradesh Ltd.


Vice Chairman & Managing Director

IN WITNESS WHEREOF the Parties hereto have executed this Lease Deed as of the day and year first herein above written by their undersigned duly authorized representatives.

For Mytrah Vayu (Krishna) Private Limited


Authorized Signatory

For New & Renewable Energy Development Corporation of Andhra Pradesh Ltd.



Vice Chairman & Managing Director

SIGNED AND DELIVERED
By the within named "Lessee"
M/s Mytrah Vayu (Krishna) Private Ltd.

SIGNED AND DELIVERED
By the within named "Lessor"
NREDCAP Ltd.

Name:


Name:

Authorized Signatory

Authorized Signatory

In the presence of: -

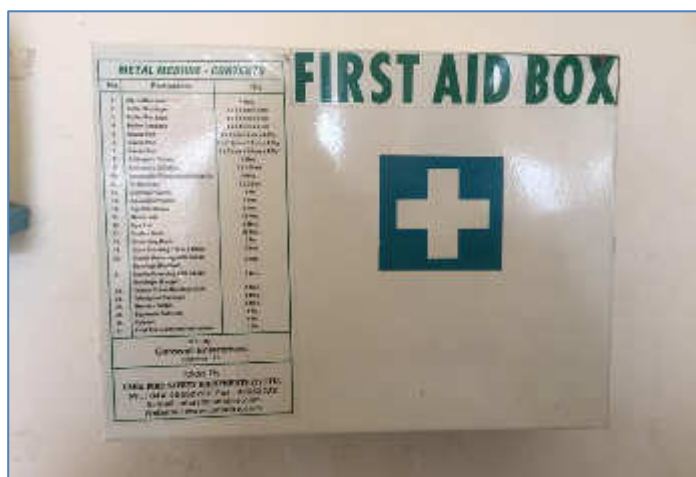
1. 
P.V. Ramesh, P.D., NREDCAP

2. 
D. NARASIMHA RAO, Executive,
Mytrah Energy (India) Ltd.

**Photoplate I : Site Visit Photographs
Mytrah Vayu (Krishna) Private Limited (MVKPL)**



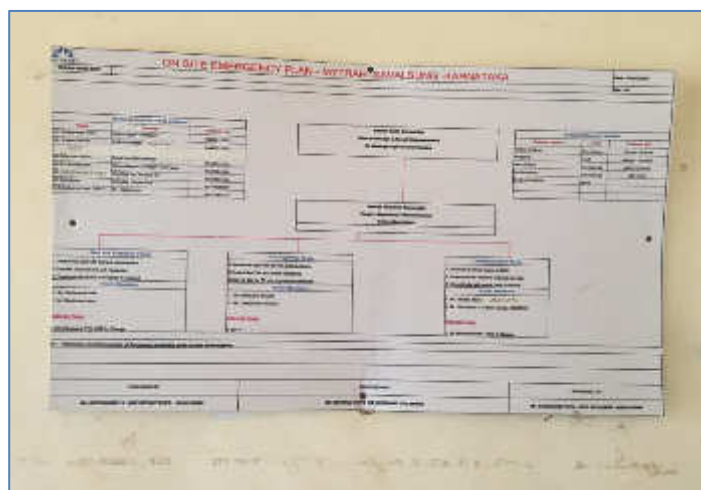
Safety Signage at MVKPL



First Aid Box at Site



Tips for Handling Emergency on Display



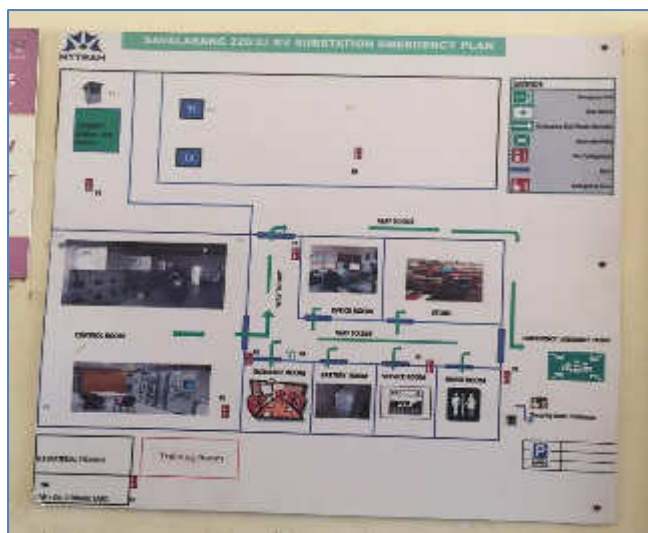
Onsite Emergency Plan on Display



Hazardous Waste Storage



Waste Storage at Site



Reply to the ADB's Observations on ESDDR of Mytrah Vayu Krishna Pvt Ltd (MVKPL)

S.No.	Observations from ADB	IIFCL Reply to Observations	Updated ESDDR reference
1.	<p>We note that the sub-project under consideration comprises of 118 wind turbine generators spread over nine villages in Bijapur District that was commissioned in April 2014 (almost 5 years back). The sub-project was implemented by MVKPL not in anticipation of finance from ADB. The ESDDR has confirmed that no environmental impact assessment study was undertaken for this sub-project. As a result, there is every likelihood that MVKPL might not have followed ADB's environmental safeguards related requirements during construction and operation & maintenance stages.</p> <p>MVKPL engaged a consulting firm to undertake a due diligence in 2016 from environmental (and social) safeguards related considerations of multi-lateral development banks (MDB) such as ADB. The ESDDR was submitted by a team of consultants in July 2016 (about 2.67 years back) to MVKPL. The consultants carried out review of associated documents made available</p>	<p>Updation of the ESDDR prepared by third party consultant is under preparation. Information related to corrective measures implementation has already been shared by the developer. Status of implementation of the corrective measures identified in the ESDDR will be reported in the updated ESDDR.</p> <p>It is noted that the updated ESDDR will be signed by IIFCL staff.</p>	<p>Status of implementation of the corrective measures identified in the ESDDR (July 2016) are reported in Table 5 & 6 of the updated ESDDR.</p> <p>ESDDR is signed by IIFCL staff.</p>

	<p>by MVKPL and undertook a field visit during 30 May – 2 June 2016 for assessment of implementation of environmental safeguards. This team held consultations with villagers and other stakeholders. Based on its review, the ESDDR had identified certain gaps in the implementation vis-à-vis the requirements of the MDBs and India's environmental regulations; and recommended corrective measures (tables 5.1 and 6.3).</p> <p>The ESDDR submitted to ADB by IIFCL is not signed by the IIFCL officials (signed by the team of consultants engaged by MVKPL). IIFCL is requested to follow the practice of endorsing the ESDDRs as has been done in the past.</p> <p>Further, given that this ESDDR was prepared in July 2016, IIFCL is requested to provide an updated version of the ESDDR as on date that would also include the status of implementation of the corrective measures identified in the ESDDR (dated July 2016) to achieve compliance.</p>		
2.	It is noted that the ESDDR has confirmed that none of the	Table-3.12 provides the details of possible occurrence of avifauna in the region. Data was	Already replied

	<p>components of the sub-project were located within or close to (i) core, buffer and eco-sensitive areas of national parks, sanctuaries or bio-sphere reserves; (ii) forests; (iii) wetlands; (iv) areas of ecological sensitives; and (v) protected monuments of archeological, cultural or historical importance. While the ESDDR has confirmed absence of endangered species of flora and fauna in the study area, table 3.12 has reported presence of five critically endangered bird species in study area. This may please be verified and reconfirmed. The ESDDR shall clearly define the study area considered for environmental impact assessment.</p>	<p>incorporated by third party consultant namely Voyants Solutions Pvt ltd. However, developer has confirmed that till date no such critically endangered species were observed and evident by local stakeholders.</p> <p>Developer has informed that WTGs and associated facilities with 2 km buffer area were considered as study area for impact assessment under ESDD.</p>	
3.	<p>The ESDDR has also confirmed that the sub-project area and its surroundings do not fall under any major flyway or migratory routes. Therefore, no significant impacts on bird and bat life were anticipated in terms of mortality caused due to collision of birds and/or bats with wind turbine rotor blades. However, in the ESDDR a periodic bird and bat study has been recommended to assess the risk on bird and bats. IIFCL is requested to share a copy of such monitoring study for this sub-</p>	<p>ESDDR suggested to undertake a periodic bird/bat carcass survey in the project by site personal in the core study area. Developer has confirmed that till date no bird carcass was observed / reported in the project area.</p> <p>IIFCL would report its assessment in the updated ESDDR.</p>	<p>Bird and Bat carcass survey is being conducted at the project and records maintained at site. Details are included in Section 14 Para 19 (Page 14) of the updated ESDDR. The updates are included in Table 5 (Page 31-32) and Table 6 (page 51-52).</p>

	project. IIFCL is further requested to provide its assessment on the findings of such study in the updated ESDDR requested.		
4.	IIFCL shall also submit a duly signed REA checklist by its environmental experts and head of its Environment and Social Management Unit (ESMU).	Noted.	--
5.	It is further noted from ESDDR that the wind power projects required to obtain the consents to establish and operate in the year 2014 as per the then prevailing environmental regulations of India. IIFCL shall confirm that MVKPL had obtained the requisite regulatory permissions and provide copies of such permissions in the ESDDR.	Considering the fact that Wind power projects under renewable energy have very negligible negative impact on environment. Ministry of Environment Forests & Climate Change (earlier MoEF) has exempted these projects from obtaining Environment Clearance through EIA notification 2006. In general, Consents under Air (Prevention and Control of Pollution) Act, 1981 and Water (Prevention and Control of Pollution) Act, 1974 are required for the industries which cause air and water pollution, whereas wind farm operations do not result in air and water pollution. Ministry of New & Renewable Energy (MNRE), GOI has also propagated the fact that wind energy is a green energy and doesn't cause any pollution. However, in the initial stages of evolution of the wind energy sector, there was no uniform policy across different States in the matter of treatment of the sector from pollution perspective. This resulted in multiple views and practises in that regard and lead the wind developers to continuously represent to the MoEFCC, Central Pollution Control Board (CPCB), State Pollution Control Board (SPCB) for specifically exempting Wind Power Projects from	The status of all regulatory clearances and other information is included in Table 3 of the revised ESDDR.

		<p>the requirement of obtaining any consent from the SPCBs for establishment or operation. Eventually MoEFCC declared Wind industry as Green Industry in line with MNRE and subsequently changed it to White category status vide circular dated 7.3.2016, which was circulated to all SPCBs.</p> <p>Developer has informed that, there was neither a practice of obtaining Consent from SPCBs by the Wind Developers nor did the SPCB insist such consents at that time. It is pertinent to note that all the wind power projects are setup pursuant to Power Purchase Agreements signed with State / Central Utilities.</p> <p>Developer has further informed and shared acknowledgement copy of request for issue of NOC in respect to CTE/CTO from Karnataka State Pollution Control Board.</p> <p>The status of all regulatory permissions will be provided in the updated ESDDR.</p>	
6.	<p>The ESDDR had recommended that MVKPL should establish an environmental and social management system (ESMS) for the sub-project. IIFCL to confirm whether an ESMS has been established by MVKPL and the status of its functionality as on date while submitting the copy of ESMS with updated ESDDR as requested above.</p>	<p>Environmental and Social Management System covering the Environmental, Health, Safety and Social requirements throughout the project life cycle, has been developed by Mytrah Energy (India) Private Limited (MEIPL) which is implemented at MVKPL also.</p> <p>Copy of ESMS will be submitted with updated ESDDR.</p>	<p>Copy of ESMS is enclosed as Annexure IX of the revised ESDDR.</p>

7.	It is also noted from the REA checklist that MVPPL has developed detailed environmental, health and safety guidelines to handle community health & safety related risks during construction and operation phase of the sub-project. A copy of such guidelines and the status of its implementation may please be included in the updated ESDDR.	Community health and safety management plan is available for the sub-projects. Copy of the plan and status of its implementation will be included in the updated ESDDR.	Copy of Community Health and Safety Management Plan is attached with the revised ESDDR as Annexure XXII and status of its implementation is given in Table 8 in updated ESDDR.
8.	Based on the information furnished, the proposed sub-project appears to qualify as of environment category B, subject to the responses from IIFCL as requested above.	Noted	Categorization of sub-project is given in para 19 of the revised ESDDR.
9.	The sub-project was commissioned in 2014 without the knowledge of ADB financing, and therefore, it is unlikely to have followed ADB's SPS 2009 related requirements during construction as well as operation and maintenance stages.	Agreed	---
10.	During due diligence study performed by the team of consultants engaged by MVKPL in 2016, certain safeguard related gaps including lack of adherence with India's environmental regulations were identified and corrective actions have been recommended to achieve compliance. IIFCL needs to confirm that those	Noted	<p>Status of gap identification is given in Table 5 & 6 of the revised ESDDR. Section 12 of the revised ESDDR explains the compliance of the sub-project to IIFCL's ESSF.</p> <p>The sub-project is financed by IIFCL under Takeout scheme. It is in compliance to the ESSF and ADB's SPS, 2009.</p>

	corrective actions have been taken by MVKPL to bridge the identified gaps, achieved regulatory compliance, and that the sub-project is now in compliance with the agreed safeguards related requirements (as per IIFCL's ESSF 2013 and SPS 2009 applicable for this loan) for take-out financing.		
11.	IIFCL shall also undertake a field visit to verify and confirm that there are no residual environmental impacts as on date due to implementation of the sub-project (given that the ESDDR is dated 2016), and prepare an updated ESDDR with requested details, and submit its duly signed copy by IIFCL's ESMU for ADB's review.	Noted. Updation of ESDDR based on information shared by developer is under process. Field visit is to be undertaken by IIFCL to verify and confirm that there are no residual impacts as on date. Since elections going on in India, therefore, site visit could not be undertaken and will be taken up shortly.	Updated ESDDR has been prepared on the basis of site visit undertaken by IIFCL staff.