

# **ESG Due Diligence Report for Proposed Working Women’s Hostel at Tambaram**

Prepared by Tamil Nadu Infrastructure Fund Management Corporation Ltd. (TNIFMC), Government of Tamil Nadu for the Asian Development Bank.

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## List of abbreviations

ADB	Asian Development Bank
CMDA	Chennai Metropolitan Development Authority
CRZ	Coastal regulation zone
CTE	Consent to Establish
CTO	Consent to Operate
Dept.	Department
DSW	Department of Social Welfare
DFR	Detailed Feasibility Report
EIA	Environmental Impact Assessment
EMP	Environment Management Plan
ESG	Environment, Social and Governance
ESGMS	Environment, Social and Governance Management System
GoTN	Government of Tamil Nadu
GRM	Grievance Redressal Mechanism
IFC	International Finance Corporation
MoEFCC	Ministry of Environment Forest and Climate Change
NOC	No Objection Certificate
OSD	Officer on Special Duty
PMU	Project Management Unit
SPV	Special Purpose Vehicle
TN	Tamil Nadu
TNIFMC	Tamil Nadu Infrastructure Fund Management Corporation Limited
TNSF	Tamil Nadu Shelter Fund
TNWWHCL	Tamil Nadu Working Women's Hostels Corporation Limited

# Chapter 1

## Project Overview

### 1.1 Background

1. Considering the huge demand for safe, professionally run, and affordable rental accommodation with basic amenities for working women, the Tamil Nadu Shelter Fund (TNSF) along with the Department of Social Welfare & Social Welfare (DSW&WE) of the Government of Tamil Nadu (GoTN) have proposed to develop working women's hostel at Tambaram, Chennai in the state of Tamil Nadu in India.
2. TNSF is committed towards integrating environment, social and governance (ESG) into its investee companies and proposed project. KPMG Assurance and Consulting services LLP (hereinafter referred to as 'KPMG') was commissioned by Tamil Nadu Infrastructure Fund Management Corporation Limited (TNIFMC) to conduct ESG due diligence of the proposed construction of the working women's hostel. The assessment included desk-based review of corporate governance of project owner, on-site investigations, on-site consultations with relevant stakeholders, identifying gaps and propose environmental and social action plan.

### 1.2 Objectives and scope of work

3. The objectives of conducting the ESG due diligence is to assess and rate the various ESG risks associated with the proposed project. The scope of work for the current assessment includes the following:
  - i. Desk based review of project related information provided by the special purpose vehicle (SPV) established for construction, operation and maintenance of the working women hostel
  - ii. Consultations with relevant stakeholder to obtain information of the site and its present status
  - iii. Review adequacy of the organizational capacity to address environmental and social impacts at the site level
  - iv. Review the status of permits/licenses applicable to the project
  - v. Review of publicly available information on the SPV and proposed project site on any environmental and social issue representing a potential risk (e.g, any litigation, liabilities, protest, complaints etc.;and
  - vi. Provide an environment and social action plan.

### Applicable reference frameworks

The assignment has been conducted in accordance to the following framework:

1. TNSF ESGMS
2. Applicable local and national environmental and social regulations
3. World Bank, International Finance Corporation, Asian Development Bank guidelines

### Approach and methodology

The ESG due diligence has been carried out based on the review of the documents provided by the SPV and the Department of Social Welfare from ESG perspective, site visit to the project site and consultations with the relevant stakeholders

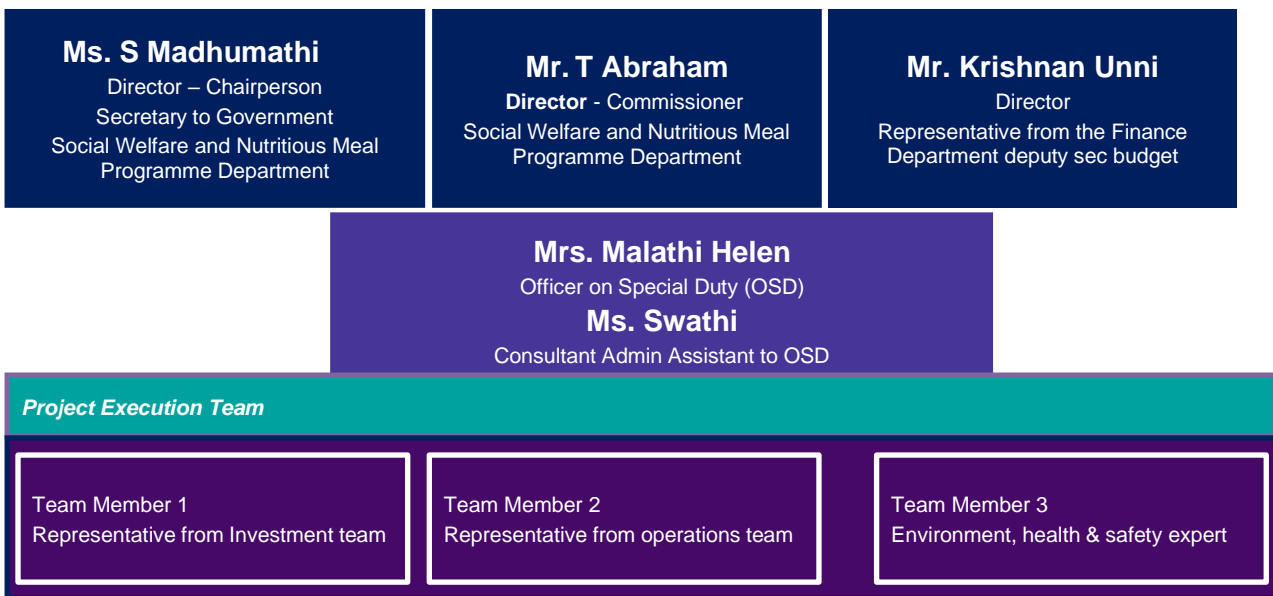
- **Review of documents:** KPMG reviewed Detailed Feasibility Report (DFR) the project site, maps, and site-specific EMP.
- **Stakeholder identification:** Based on the review of the Detailed Feasibility Report (DFR) about the project and consultations with TNSF, KPMG identified relevant stakeholders who might impact or get impacted by the project activities
- **Site visits:** KPMG undertook half-day site visit at the project site in Tambaram on 2<sup>nd</sup> February 2021.
- **Stakeholder consultations:** KPMG also undertook discussions with the relevant project related stakeholders like- the District Social Welfare Officer, officer from revenue department and local residents.

- **Reporting:** This report presents key ESG issues and risks and mitigation measures for high-risk issues.

### About project developer

The Tamil Nadu Social Welfare Department has established Tamil Nadu Working Women’s Hostels Corporations Ltd. (TNWWHCL) in May 2019 as a Special Purpose Vehicle (SPV) under the Companies Act 2013. TNWWHCL will be responsible to undertake infrastructure projects, management, and maintenance of certain projects of social welfare department such as working women hostels, creches, senior citizen homes, childcare institutions including creches and projects for third gender welfare and all related infrastructure with funding through TNIFMC.

### 2.1 Structure of TNWWHCL



### 2.2 Description of the proposed project site

Parameters	Description
Project details	Construction of working women’s hostel building G+5 level structure Total capacity - 466 beds
Site Location	The proposed project site is located at 1 <sup>st</sup> main road, Nirmala garden home road, Judges’ colony at Tambaram Sanitorium, Chennai- 600047, District- Kancheepuram in Tamil Nadu. The land parcel allocated for the women’s hostel is part of the existing premises of the Tambaram Service Home campus of the Dept. of Social Welfare of GoTN.
Survey nos.	230/B, 231/1, 232, 233B & 234B of Chitlapakkam, village Chitlapakkam town Panchayat
Total area	1.36 acres
Topography	The site is a flat land with a mild gradient to the north and east side
Present land use	The site is classified under ‘institutional zone’ under the jurisdiction of Chennai Metropolitan Development Authority (CMDA). The site is filled with wild growth of weeds and shrubs.

Past land use	As informed by the Service Home staff, the site is with the Service Home since 1948. The site allocated for the hostel construction is mostly a vacant land with some abandoned single floor buildings, within the campus of the Service Home. The abandoned structures were used as school buildings.
Boundary	North side: Vacant land belonging to a college (MIT) Southern side: Remaining land of Tambaram Service Home of DSW&WE Eastern side: Existing Service home building and an approach road Western side: Broad gauge railway line connecting Tambaram Sanatorium and Chromepet station
Adjoining area	1. One stop center of DSW&WE inside the campus 2. School of DSW&WE inside the campus 3. Early intervention center of DSW&WE inside the campus 4. Warehouse of the Central Warehousing Corporation on the north boundary 5. Private residential area (Judges' colony)
Access road	The site has a frontage of about 800 feet on the access road
Land type	Government ownership land within the existing Service Home campus of the DSW&WE
Land acquisition	Based on the interaction with DSW officer, it is understood that land has been transferred from revenue department to social welfare department. No concerns noted with respect to the government land acquisition.





## Land

The SW&WE department is in possession of the land at all three sites for construction of working women's hostels. TNWWHCL is in the process of executing lease agreements with SW&WE department for a nominal lease rent of Rs.1000 per annum per site.

## Chapter 2

# Regulatory Requirements and Status of Applicable Permits

S. No	Applicable legal requirements	Regulatory authority/ Agency responsible	Status	Remarks
1.	Environmental Clearance as per Environment Impact Assessment (EIA) Notification 2006 and amendments	Ministry of Environment Forest and Climate Change (MoEF & CC) or State Environmental Impact Assessment Authority (SEIA)	Not applicable	Applicable if the project site is more than 20,000 sq. mts.
2.	Consent to Establish (CTE)/ Consent to Operate (CTO) under The Air Prevention and Control of Pollution Act, 1981 and The Water Prevention and Control of Pollution Act, 1974	Tamil Nadu Pollution Control Board	Not Applicable	Not applicable as there is no batching plant and STP
3.	No Objection Certificate (NOC) for tree cutting	District revenue department/ Tehsil office	Applicable	The site is filled with weeds and shrubs and 5-10 old big trees. The land clearance activities for construction of the hostel may require cutting of trees.
4.	NOC for ground water withdrawal	State Ground and Surface Water Resources Data Centre-Water resources department	Not Applicable	There are two borewells at the site. If the water requirement is to be met from the existing borewell, then contractor must obtain NOC before water extraction.
5.	Disposal of waste under the Construction and Demolition Waste (Management) Rules 2016	Tamil Nadu Pollution Control Board	Applicable	During construction phase, to dispose demolition and construction waste such as debris, wood, metal scrap etc.
6.	Clearance for Coastal Regulation Zone under CRZ notification dated Jan,1991 and amendments under The Environment Protection Act 1986	Government of Tamil Nadu, Department of Environment	Not Applicable	As the proposed project site does not fall within the 500 m from High Tide Line.
7.	Forest clearance under the Forest (Conservation) Act,1980.	Forest Department	Not applicable	The proposed project site does not fall under forest area.



S. No	Applicable legal requirements	Regulatory authority/ Agency responsible	Status	Remarks
8.	Fire NOC	Fire and Rescue Services Department, Tamil Nadu	Not Applicable	As the NOC is required for multi storied buildings, with a height of 17.25 m and above.
9.	Approval from Electrical Inspectorate for DG and other electrical equipment installation	Tamil Nadu Electrical Inspectorate	Not Applicable	As it is applicable only when there is an installation of DG and other electrical equipment.
10.	Clearance for High Tension (HT) line	Tamil Nadu Electrical Inspectorate	Not applicable	No HT lines pass through the proposed project site
11.	NOC for height clearance	Airports Authority of India	Not applicable	The clearance is required for multi-stored buildings with a height above 18 m.
12.	NOC from Railway Authority	Railway Authority	Not Applicable	The proposed project site does not fall within 30m from the railway boundary.
13.	Land conversion certificate	Directorate of Town and Country Planning, Government of Tamil Nadu / Revenue Department	Not Applicable	According to DFR, the proposed project site is classified under Institutional zone under the jurisdiction of Chennai Metropolitan Development Authority.
14.	NOC from Gram Panchayat for development of the project	Gram Panchayat	Not Applicable	As the project land is already transferred to the Social Welfare Department
15.	Land lease agreement	Social Welfare Department/ TNWWHCL/ TNPHC	Not Applicable	As the proposed project land is Government owned land within the existing Service Home campus of the Social Welfare Department, GoTN.
16.	Planning permit and approved building plan	Revenue department, Local Municipality body	Applicable	The project plan has been approved by local authority.
17.	Registration under the building and other construction workers (regulation of employment and conditions of service) act 1996	Department of Labour, Government of Tamil Nadu	Applicable	During construction phase

S. No	Applicable legal requirements	Regulatory authority/ Agency responsible	Status	Remarks
19.	License under the Tamil Nadu Hostels and Homes for Women and Children (Regulation) Act, 2014.	District magistrate	Applicable	Before commencement of hostel building
20.	Private Security Registration License for Security Service Providers	State's designated controlling Authority	Applicable	During construction and operation phase

# Chapter 3

## Applicability of International Standards

### IFC Performance Standards

IFC Performance Standards	Applicability	Coverage in the report	Remarks
<b>Performance Standard 1</b> Assessment and Management of Environmental and Social Risks and Impacts	Yes	~ E. 17 - Availability and validity of the environmental clearance ~ E. 18 - Environmental management plan implementation ~ E. 19 - Assessment of environmental risks, impacts ~ G. 2 - Grievance redressal mechanism ~ G. 3 - Monitoring and reporting	~ The requirements of the performance standard have been met by the project developer/owner through the Environment Management Plan (EMP) ~ The EMP covers: <ol style="list-style-type: none"> <li>a. Potential environmental impacts and mitigation measures</li> <li>b. Monitoring and reporting</li> <li>c. Grievance redressal mechanism</li> <li>d. Capacity building program</li> </ol>
<b>Performance Standard 2</b> Labor and Working Conditions	Applicable only in construction phase	~ G. 1 - Corporate level governance policies ~ G. 4 - Contractor management	~ The requirements of the performance standard to be met by the contractor during construction of hostel building.
<b>Performance Standard 3</b> Resource Efficiency and Pollution Prevention	Yes	~ E. 4 - Potential soil and ground water contamination ~ E. 6 - Construction and other waste disposal ~ E. 7 - Source and availability of water ~ E. 8 - Consumption of water ~ E. 9 - Impact on water availability in the local community ~ E. 10 - Potential impact on soil and waterbody nearby ~ E. 11 - Effluent management	~ The requirements of the performance standard have been met by the project developer/owner through the Environment Management Plan ~ The project developer/owner has identified the sources of environmental pollution and established the control measures in the EMP. ~ Based on the site visit, there is no significant environmental features at the site.

		<ul style="list-style-type: none"> <li>~ E. 12 - Sensitive areas such as environmental, cultural and heritage site</li> <li>~ E. 13 - Adverse impact of air water, aesthetic pollution on the environmental, cultural and heritage sites due to project activity</li> <li>~ E. 16 - Significant environmental liabilities</li> </ul>	
<b>Performance Standard 4</b> Community Health, Safety, and Security	Yes (community health and safety)	<ul style="list-style-type: none"> <li>~ S. 1 - Safety and security</li> <li>~ S. 2 - Community concerns</li> <li>~ S. 3 - Past legal non-compliance</li> <li>~ S. 4 - Adverse media articles, Background check of SPV, Background check of Social Welfare Department</li> <li>~ E. 14 - Loss of accessibility to the local community</li> <li>~ E. 15 - Serious environmental and social incidents</li> </ul>	<ul style="list-style-type: none"> <li>~ The requirements of the performance standard have been met by the project developer/owner through the Environment Management Plan</li> </ul>
<b>Performance Standard 5</b> Land Acquisition and Involuntary Resettlement	No	<ul style="list-style-type: none"> <li>~ E. 1 - Past land use</li> <li>~ E. 2 - Any disputes/claims/ arbitration to the land</li> <li>~ E 3 - Surrounding land use</li> </ul>	<ul style="list-style-type: none"> <li>~ There was no human habitation or agricultural and commercial activities on the proposed project land.</li> <li>~ The proposed project land has been transferred to social welfare department from the revenue department.</li> <li>~ No land disputes have been reported so far.</li> <li>~ Hence, this performance standard is not applicable for the project site.</li> </ul>
<b>Performance Standard 6</b> Biodiversity Conservation and Sustainable Management of Living Natural Resources	No	<ul style="list-style-type: none"> <li>~ E. 5 - Loss of biodiversity due to land clearing</li> <li>~ E. 12 - Sensitive areas such as environmental, cultural and heritage site</li> </ul>	<ul style="list-style-type: none"> <li>~ Based on the site visit and review of detailed feasibility report, it is understood that the project site is not within 10 km of any protected areas</li> </ul>

			(such as national park, wildlife sanctuary, biosphere reserves) or biodiversity areas. ~ Hence, this performance standard is not applicable for the project
<b>Performance Standard 7</b> Indigenous Peoples	No	-	~ This performance standard is not applicable for the project site.
<b>Performance Standard 8</b> Cultural Heritage	No	~ E. 12 - Sensitive areas such as environmental, cultural and heritage site	~ This performance standard is not applicable for the project as the project site is not located near to any cultural heritage or protected sites.

## ADB Safeguard Requirements

ADB Safeguard Requirements	Applicability	Coverage in the report	Remarks
<b>Safeguard Requirement 1</b> <b>Environment</b> <ul style="list-style-type: none"> <li>○ Environmental Assessment</li> <li>○ Environmental Planning and Management</li> <li>○ Consultation and Participation</li> <li>○ Grievance Redress Mechanism</li> <li>○ Monitoring and reporting</li> <li>○ Unanticipated Environmental Impacts</li> <li>○ Biodiversity Conservation and Sustainable Natural Resource Management</li> </ul>	Yes (Health and safety covered in terms of community health and safety)	~ E. 4 - Potential soil and ground water contamination ~ E. 6 - Construction and other waste disposal ~ E. 7 - Source and availability of water ~ E. 8 - Consumption of water ~ E. 9 - Impact on water availability in the local community ~ E. 10 - Potential impact on soil and waterbody nearby ~ E. 11 - Effluent management ~ E. 12 - Sensitive areas such as environmental, cultural and heritage site	~ The requirements of the performance standard have been met by the project developer/owner through the Environment Management Plan (EMP) ~ The EMP covers: <ol style="list-style-type: none"> <li>a. Potential environmental impacts and mitigation measures</li> <li>b. Monitoring and reporting</li> <li>c. Grievance redressal mechanism</li> <li>d. Capacity building program</li> </ol>

ADB Safeguard Requirements	Applicability	Coverage in the report	Remarks
<ul style="list-style-type: none"> <li>○ Pollution Prevention and Abatement</li> <li>○ Health and safety</li> <li>○ Physical Cultural Resources</li> </ul>		<ul style="list-style-type: none"> <li>~ E. 13 - Adverse impact of air water, aesthetic pollution on the environmental, cultural and heritage sites due to project activity</li> <li>~ E. 14 - Loss of accessibility to the local community</li> <li>~ E. 15 - Serious environmental and social incidents</li> <li>~ E. 16 - Significant environmental liabilities</li> <li>~ E. 17 - Availability and validity of the environmental clearance</li> <li>~ E. 18 - Environmental management plan implementation</li> <li>~ E. 19 - Assessment of environmental risks, impacts</li> <li>~ S. 1 - Safety and security</li> <li>~ S. 2 - Community concerns</li> <li>~ S. 3 - Past legal non -compliance</li> <li>~ G. 2 - Grievance redressal mechanism</li> <li>~ G. 3 - Monitoring and reporting</li> <li>~ G. 4 – Contractor management</li> </ul>	
<p><b>Safeguard Requirement 2</b> Involuntary Resettlement</p>	No	<ul style="list-style-type: none"> <li>~ E. 1 - Past land use</li> <li>~ E. 2 - Any disputes/claims/ arbitration to the land</li> <li>~ E 3 - Surrounding land use</li> </ul>	<ul style="list-style-type: none"> <li>~ There was no human habitation or agricultural and commercial activities on the proposed project land.</li> <li>~ The proposed project land has been transferred to social welfare department from the revenue department.</li> </ul>

ADB Safeguard Requirements	Applicability	Coverage in the report	Remarks
			<ul style="list-style-type: none"> <li>~ No land disputes have been reported so far.</li> <li>~ Hence, this performance standard is not applicable for the project site.</li> </ul>
<b>Safeguard Requirement 3</b> Indigenous Peoples	No	-	~ This performance standard is not applicable for the project site.

## World Bank Environmental, Health, and Safety Guidelines

Requirements	Applicability	Coverage in the report	Remarks
<b>1. Environmental</b> <ul style="list-style-type: none"> <li>~ Air Emissions and Ambient Air Quality</li> <li>~ Energy Conservation</li> <li>~ Wastewater and Ambient Water Quality</li> <li>~ Water Conservation</li> <li>~ Hazardous Materials Management</li> <li>~ Waste Management</li> <li>~ Noise</li> <li>~ Contaminated land</li> </ul>	Applicable during construction and operational phase	Nil	<ul style="list-style-type: none"> <li>~ The requirements of the performance standard to be met by the contractor during construction of hostel building</li> <li>~ Although, the project developer has established control measures in the Environment Management Plan.</li> </ul>
<b>2. Occupational Health and Safety</b> <ul style="list-style-type: none"> <li>~ General Facility Design and Operation</li> <li>~ Communication and Training</li> <li>~ Physical Hazards</li> <li>~ Chemical Hazards</li> <li>~ Biological Hazards</li> <li>~ Radiological Hazards</li> </ul>	Applicable during construction phase	Nil	~ The requirements of the performance standard to be met by the contractor during construction of hostel building

Requirements	Applicability	Coverage in the report	Remarks
<ul style="list-style-type: none"> <li>~ Personal Protective Equipment (PPE)</li> <li>~ Special Hazard Environments</li> <li>~ Monitoring</li> </ul>			
<p><b>3. Community Health and Safety</b></p> <ul style="list-style-type: none"> <li>~ Water Quality and Availability</li> <li>~ Structural Safety of Project</li> <li>~ Infrastructure</li> <li>~ Life and Fire Safety</li> <li>~ Traffic Safety</li> <li>~ Transport of Hazardous Materials</li> <li>~ Disease Prevention</li> <li>~ Emergency Preparedness and Response</li> </ul>	Applicable during construction phase	Nil	~ The requirements of the performance standard to be met by the contractor during construction of hostel building
<p><b>4. Construction and Decommissioning</b></p> <ul style="list-style-type: none"> <li>~ Environment</li> <li>~ Occupational Health and Safety</li> <li>~ Community Health and Safety</li> </ul>	Applicable	<ul style="list-style-type: none"> <li>~ E. 4 - Potential soil and ground water contamination</li> <li>~ E. 6 - Construction and other waste disposal</li> <li>~ E. 7 - Source and availability of water</li> <li>~ E. 10 - Potential impact on soil and waterbody nearby</li> <li>~ E. 11 - Effluent management</li> <li>~ E. 13 - Adverse impact of air water, aesthetic pollution on the environmental, cultural and heritage sites due to project activity</li> <li>~ S. 1 - Safety and security</li> </ul>	~ The requirements of the performance standard have been met by the project developer/owner through the Environment Management Plan (EMP)



Requirements	Applicability	Coverage in the report	Remarks
		~ S. 2 - Community concerns	

# Chapter 4

## Key Findings Section

### Environment

S. No.	Topic	Key findings
E.1	Past land use	<p>The site is classified under ‘institutional zone’ under the jurisdiction of Chennai Metropolitan Development Authority (CMDA). The Service Home site is completely fenced with concrete wall along all its boundary. The land parcel allocated for the hostel is a mostly a vacant land filled with weeds and shrubs and approximately 10-15 big old trees.</p> <p>Also, there are 5-6 abandoned single story small buildings on the land allocated to the hostel which are owned by the SW&amp;WE department and are unused structures which were demolished before construction of the hostel. There is no human habitation or agricultural and commercial activities on the land allocated for the hostel construction.</p>
E.2	Any disputes/ claims/ arbitration to the land	As confirmed during interview with local residents, no land disputes have been reported so far.
E.3.	Surrounding land use	<p>The area surrounding the Service Home is a completely residential area. A broad-gauge railway track is approximately 30m away from the project site on the western boundary the site. Since the working women’s hostel facility is of institutional residential type, there will be no adverse impact on the current land use of the area.</p>
E.4	Potential soil and ground water contamination	<p>The site is surrounded by residential and institutional area. There are no sources of industrial pollution in the immediate vicinity of the site. It is observed that currently the Service Home has septic tanks for collection and treatment of domestic sewage.</p> <p>There are no other sources of ground water contamination at the site. Hence, there are no chances of percolation and contamination of soil and ground water.</p> <p>As informed by the Service Home staff, testing of water quality and soil investigation have not been conducted so far at the site. Hence the current status with respect to contamination of ground water and soil is not known.</p>
E.5	Loss of biodiversity due to land clearing	<p>The project site has not been used for a long time. A significant uncontrolled growth of plants and shrubs were observed in the project site. The project site is covered with weeds, shrubs, and few old big trees (about 5-10). It was informed by the Service Home staff and residents of the area that the project site is infested with snakes. The land clearance activities for construction of the hostel may require cutting of existing trees. There are no protected biodiversity</p>

S. No.	Topic	Key findings
E. 6	Construction and demolition waste disposal	<p>hotspots around the site. The project site does not fall under forest area and ecologically sensitive zone.</p> <p><b>Existing waste</b> Currently the site is an empty site with few abandoned structures. There is no garbage, or any other type of solid waste dumped at the site. However, the land clearance for project construction will generate demolition waste from the existing abandoned buildings. It was also observed some waste asbestos sheets are stored in one of the abandoned buildings in the project area. As mentioned by site personnel, asbestos sheets are used in toilet blocks in the campus and there are other wastes generated during demolition of old toilet blocks at the site. The waste asbestos sheets, and demolition waste may result in soil contamination.</p> <p><b>During site development</b> The project construction activity will generate construction waste such as empty paint containers, construction debris, wood, metal scrap etc. and apart from those generated from the demolition of the existing structures.</p>
E. 7	Source and availability of water	<p>As informed by the Service Home staff, the current source of water supply for the Service Home is from the city corporation's piped water supply, one open and two borewells at the site.</p> <p>In addition, there are two abandoned bore wells and an open well which are dry. The depth of borewell is approximate 300 ft from the ground level. No test report of the borewell or open well water was available, however the staff did not report any potential contamination of the water or its unsuitability for domestic and drinking purpose. Currently the water is being treated in a Reverse Osmosis (RO) plant.</p>
E. 8	Consumption of water	<p>It was informed by the SW&amp;WE and TNSF staff that the existing corporation water supply supplemented with borewell and open well will be used for supplying water during construction and operation of the women's hostel which will have approximately 450 inmates. Hence overall the risk with respect to water availability is considered as low.</p>
E. 9	Impact on water availability in the local community	<p>During summer season water availability through bore well is very less at the site. Based on the interaction with site personnel, they have not faced any water scarcity in the Service Home so far. Although, Chennai city has faced acute water shortage during the recent past.</p>

S. No.	Topic	Key findings
E. 10	Potential impact on soil and waterbody nearby	<p>The site is located in the Chromepet area of Chennai metropolitan. The Chromepet area has a legacy of ground water contamination due to chromium and copper, primarily in the area in the vicinity of the tanneries. No reports of water testing were available for the borewell at the site. However, there are no tanneries near the proposed site.</p> <p>Also, as informed by the Service Home staff, the open well and bore well water currently in use has been found to be fit for consumption while no test reports are available. Hence, the overall risk is considered as medium.</p>
E. 11	Effluent management	<p>The site has been in use in its current form as a Service Home (residential) since 1948 and generating only domestic sewage. Domestic wastewater generated at site is currently collected in septic tanks. Total four numbers of septic tanks are present in the site. One underground sewage pipeline is passing through the allocated project area towards MIT college. The area is also served by municipal sewerage network. As per the Detailed Feasibility Report a sewage treatment facility will be provided in the project site. Hence the overall risk on wastewater management is considered as low.</p>
E. 12	Sensitive areas such as environmental, cultural and heritage site	<p>There are no sites of cultural, archaeological importance in the immediate proximity to the project site. Hence no sensitive structures are likely to be impacted by the project construction.</p>
E. 13	Adverse impact of air water, aesthetic pollution on the environmental, cultural and heritage sites due to project activity	<p>During construction phase, the movement of construction vehicles for transportation of construction materials and debris disposal may cause increase in air pollutants, dust pollution and high noise in the surrounding area. Utilization of water for construction will create a stress on ground water or other water sources.</p>
E.14	Loss of accessibility to the local community	<p>No such cases observed during the site visit. The site has a frontage of about 800 feet on the access road.</p>
E.15	Serious environmental and social incidents	<p>Based on the interaction with site personnel and residents, no incidents of environmental emergencies have occurred. This was also verified through google search.</p>
E.16	Significant environmental liabilities	<p>The site does not store or handle any hazardous chemicals neither there is any ecologically sensitive receiving water body. Hence, there is no significant environmental liabilities for the proposed project site.</p>

S. No.	Topic	Key findings
E.17	Availability and validity of the environmental clearance.	The Environmental Clearance (EC) is not applicable as the proposed project construction area is less than 20,000 sq. meters. As mentioned in detailed feasibility report, the water for construction stage will be met from one of the existing borewells at the site acquired. However, no objection certificate of the existing borewell was not available for review. Forest and CRZ clearances are not applicable as the proposed project area does not fall under forest area and within 500m from high tide line.
E.18	Environmental management implementation plan	Environment Management Plan (EMP) has been prepared and documented along with e-tendering pre-qualification tender document. The contractor will be responsible for implementation and monitoring of EMP at the site.
E.19	Assessment of environmental impacts of risks,	Environmental issues have been identified and possible mitigation measures are documented in the EMP.

## Social and Governance

S. No.	Topic	Key findings
S. 1	Safety and security	The allocated project site is located in the Service Home campus of the DSW&WE of GoTN. The entire campus is fenced with boundary wall and no outsiders are allowed inside the area.
S. 2	Community concerns	Based on the interaction with site personnel and local residents, no concerns from the surrounding community have been reported.
S. 3.	Impact on local residents	People living in the adjacent area, are generally pensioners. They can be affected due to project activities.
S. 4	Impact on children with mental retardation and associated disabilities	The project site is adjacent to early intervention center for children with mental retardation and associated disabilities. During construction and operation phase, there are chances for adverse impact on the physical and mental health of the sensitive children due to potential noise and dust pollution.
S. 5	Past legal non-compliance	Based on the interaction with district social welfare officer, no incidents of legal non-compliance have occurred.

S. 6	<ul style="list-style-type: none"> <li>a. Adverse media articles</li> <li>b. Background check of SPV</li> <li>c. Background check of Social Welfare Department</li> </ul>	<p>Based on google search, there are no adverse news for the proposed project site. Also, we did not come across any incidents of bribery, corruption, fraud, sexual harassment, child labour, forced labour against the SPV.</p> <p>While conducting background check for the Social Welfare Department, we came across a corruption case that has been filed against the district social welfare officer and a health inspector.</p> <p>Reference:  <a href="https://www.dnnext.in/News/TamilNadu/2019/02/06044548/1105643/DVAC-registers-case-against-two-govt-officials.vpf">https://www.dnnext.in/News/TamilNadu/2019/02/06044548/1105643/DVAC-registers-case-against-two-govt-officials.vpf</a></p> <p>Corruption and conviction cases have been filed against the social welfare officers.</p> <p>Reference:  <a href="https://www.dvac.tn.gov.in/stat-otherofficer">https://www.dvac.tn.gov.in/stat-otherofficer</a>  <a href="https://www.dvac.tn.gov.in/convictions.html">https://www.dvac.tn.gov.in/convictions.html</a></p>
G.1	<p>Corporate governance policies on:</p> <ul style="list-style-type: none"> <li>1 Prevention of sexual harassment</li> <li>2 Anti-bribery and corruption,</li> <li>3 Child labour</li> <li>4 Forced labour</li> <li>5 Whistle- blower</li> </ul>	<p>No governance related policies are yet drafted/formed by the TNWWHCL.</p>
G.2	<p>Grievance Redressal mechanism</p>	<p>Based on the interaction with TNSF officials, it is understood that grievance redressal process has been drafted and documented in the EMP. The same has been verified.</p> <p>There are three levels of grievance mechanism.</p> <ul style="list-style-type: none"> <li>1. Project level: Investors can submit /raise their concerns to shelter fund through company secretariat.</li> <li>2. Site level: Site specific GRM officer is responsible for address grievances. After selection of contractor, grievance redressal mechanism will be implemented at the site.</li> <li>3. SPV level: SPV can submit/ raise their concerns to GRM committee. If concerns are not resolved within 14 days, it will be escalated to principle of shelter fund.</li> </ul> <p>GRM committee will be comprised of one person from ESG team, one person from risk team and one person from admin team. The committee is not yet formed.</p>
G.3	<p>Monitoring and reporting</p>	<p>As mentioned in the e-tendering pre-qualification tender document, TNWWHCL in coordination with TNPHC will conduct internal environmental monitoring, compliance review and prepare Quarterly Progress reports for the project site.</p>

All applicable legal requirements are identified and documented in the EMP. The contractor is responsible for obtaining all required permissions.

G.4 Contractor management

TNWWHCL in coordination with TNPHC has developed and documented pre-qualification criteria for selection of contractor. As mentioned in tender document, the contractor is responsible for preparing standard operation procedures for execution of work in the project site.

# Chapter 5

## ESG Risk Rating

We have used ESG risk rating tool developed by TNSF under its ESG management system, to identify and evaluate *material ESG risks* related to the project activities. Based on the site visit, stakeholder's consultation and documents review, issues have been identified and evaluated for its 'likelihood of occurrence' and 'severity of potential impact' for this project.

The issues identified are based on the current project status and may evolve during the course of construction and operational phase.

### Environmental risk rating

Category	Type of Issue	Source	Importance (in terms of financial risk to the Fund's performance)	Importance (in terms of Environmental or Social or Reputational risk to the Fund)	Total Risk Score	Dimensional Risk Score	Material Risk
Environmental	Fast land use	Due Diligence	1	1	2	48	No
	Disturbance to the land	Due Diligence	1	1	2		No
	Adverse impact in surrounding land	Due Diligence	1	1	2		No
	Potential soil contamination	Due Diligence	1	1	2		No
	Potential water contamination	Due Diligence	1	1	2		No
	Loss of biodiversity due to land clearing	Due Diligence	2	2	4		Yes
	Construction and demolition waste disposal	Due Diligence	2	2	4		Yes
	Source and availability of water	Due Diligence	2	1	3		No
	Consumption of water	Due Diligence	2	1	3		No
	Impact on water availability in the local community	Due Diligence	2	1	3		No
	Potential impact on soil and waterbody nearby	Due Diligence	2	2	4		Yes
	Driver's engagement	Due Diligence	2	0	2		No
	Sensitive areas such as environmental, cultural and heritage site	Due Diligence	1	1	2		No
	Adverse impact of air water, aesthetic pollution on the environmental due to construction activities	Due Diligence	2	3	5		Yes
	Serious environmental incidents	Due Diligence	1	1	2		No
	Significant environmental liabilities	Due Diligence	1	1	2		No
	Availability and stability of the environmental legislation	Due Diligence	1	1	2		No
	Environmental management plan implementation in the project site	Due Diligence	1	1	2		No
Assessment of environmental risk and impact	Due Diligence	1	1	2	No		

### Social risk rating

Category	Type of Issue	Source	Importance (in terms of financial risk to the Fund's performance)	Importance (in terms of Environmental or Social or Reputational risk to the Fund)	Total Risk Score	Dimensional Risk Score	Material Risk
Social	Safety and security	Due Diligence	1	1	2	18	No
	Construction or operation in protected area	Due Diligence	1	1	2		No
	Land acquisition	Due Diligence	1	1	2		No
	Loss of accessibility to the local community	Due Diligence	1	1	2		No
	Accidents and injuries	Due Diligence	1	1	2		No
	Interactions between mental relations and environmental liabilities	Due Diligence	2	1	3		No
							No

### Governance risk rating

Category	Type of Issue	Source	Importance (in terms of financial risk to the Fund's performance)	Importance (in terms of Environmental or Social or Reputational risk to the Fund)	Total Risk Score	Dimensional Risk Score	Material Risk
Governance	Non availability of anti-corruption policy	Due Diligence	3	2	5	41	Yes
	Non availability of anti-bribery policy	Due Diligence	3	2	5		Yes
	Non availability of whistle-blower policy	Due Diligence	3	2	5		Yes
	Non availability of child labour policy	Due Diligence	3	2	5		Yes
	Non availability of forced labour policy	Due Diligence	3	2	5		Yes
	Prevention of sexual harassment policy	Due Diligence	3	2	5		Yes
	Grievance redressal mechanism	Due Diligence	2	1	3		No
	Monitoring and reporting	Due Diligence	1	2	3		No
	Contractor management	Due Diligence	1	2	3		No
	Past/legal-non compliance	Due Diligence	1	1	2		No

Material ESG risks for the project are listed below

Environmental	Social	Governance
1. Loss of biodiversity due to land clearing	Nil	1. Non availability of governance policies such as anti-corruption, anti-bribery, whistle blower, forced labour, child labour and prevention of sexual harassment
2. Construction and demolition waste disposal		
3. Potential impact on soil and waterbody nearby		



<b>Environmental</b>	<b>Social</b>	<b>Governance</b>
4. Adverse impact of air water, aesthetic pollution on the environmental due to construction activities		

## Chapter 6

### Mitigation Action Plan

Finding reference, no	Key findings	Mitigation action plan	Responsibility	Timeline	Tentative cost
E.5	<p><b>Loss of biodiversity due to land clearing</b></p> <p>The project site has not been used for a long time. A significant uncontrolled growth of plants and shrubs were observed in the project site. The project site is covered with weeds, shrubs and few old big trees (about 5-10). It was informed by the Service Home staff and residents of the area that the project site is infested with snakes. The land clearance activities for construction of the hostel may require cutting of existing trees. There are no protected biodiversity hotspots around the site. The project site does not fall under forest area and ecologically sensitive zone.</p>	<ol style="list-style-type: none"> <li>It is recommended to submit tree cutting application to Tehsil office before cutting of trees.</li> <li>It is recommended to conduct rapid counting of the trees and assessment of the biodiversity at the site to identify presence of any endangered species of flora and fauna.</li> </ol>	<ol style="list-style-type: none"> <li>Contractor at the project site</li> <li>TNWWHCL</li> </ol>	<p>Before construction phase</p>	<ol style="list-style-type: none"> <li>Application fees</li> <li>Approx. INR. 30,000-40,000</li> </ol>
E.6	<p><b>Construction and demolition waste disposal</b></p> <p><b>Existing waste</b></p> <p>Currently the site is an empty site with some abandoned structures. There is no garbage, or any other type of solid waste dumped at the site. However, the land clearance for project construction will generate demolition waste from the existing abandoned buildings. It was also observed some waste asbestos sheets are</p>	<ol style="list-style-type: none"> <li>For disposing asbestos waste material, the norms notified under schedule 1(15.2 Discarded asbestos) Hazardous Waste (Management, Handling and Transboundary Movement) Rules, 2016, to be followed.</li> </ol>	<ol style="list-style-type: none"> <li>Contractor at the project site</li> <li>Contractor at the project site</li> </ol>	<p>Before and during construction phase</p> <p>Before and during construction phase</p>	<p>Transportation charges based on the quantity of waste</p>

	<p>stored in one of the abandoned buildings in the project area. As mentioned by site personnel, asbestos sheets are used only in toilet blocks in the campus. The waste asbestos sheets, and demolition waste may result in soil contamination.</p> <p><b>During site development</b> The project construction activity will generate construction waste such as empty paint containers, construction debris, wood, metal scrap etc. from the demolition of the existing structures</p>	<p>2. All asbestos sheets must be kept in closed area before its transportation to the disposal point so that no asbestos dust is emitted into the environment during transportation.</p> <p>3. The construction waste must be sent to authorized agency as per the Construction and Demolition Waste (Management) Rules 2016.</p>	3. Contractor at the project site	During construction phase	Transportation charges based on the quantity of waste
E.10	<p><b>Potential impact on soil and waterbody nearby</b> The site is located in the Chromepet area of Chennai metropolitan. The Chromepet area has a legacy of ground water contamination due to chromium and copper, primarily in the area in the vicinity of the tanneries. No reports of water testing were available for the borewell at the site.</p>	1. It is recommended to conduct water quality test of ground water samples at site and also the drinking water.	1. Contractor at the project site	At least once before construction	Approximate cost towards sampling INR. 1000-2000 per sample Total about INR. 100,000 – 150,000 based on number of samples. (From NABL accredited laboratory)

E.13	<p><b>Adverse impact of air water, aesthetic pollution on the environmental, cultural and heritage sites due to project activity</b></p> <p>During construction phase, the movement of vehicles for transportation of construction materials and debris disposal may cause increase in air pollutants, dust pollution and high noise in the surrounding area.</p>	<ol style="list-style-type: none"> <li>1. It is recommended to conduct ambient air, noise, water monitoring at the project site during construction period.</li> <li>2. Also, SPV shall ensure that equipment with high noise levels are not being used during night-time to avoid impact on local community.</li> <li>3. Water sprinkling to be carried out at the site on daily basis to suppress dust pollution.</li> </ol>	1. Contractor at the project site.	At least twice during peak time of construction	Approx. INR. 1000-2000 per sample Total about INR.300,000-350,000 based on number of samples (From NABL accredited laboratory)
G.1.	<p><b>Corporate governance policies</b></p> <p>Non- availability of governance policies on prevention of sexual harassment, anti-bribery, anti-corruption, child labour, forced labour, whistle- blower.</p>	TNWWHCL to develop and implement formal governance policies for prevention of corruption, bribery, child and forced labour and sexual harassment at the workplace.	1.TNWWHCL	Before construction phase	Nil

# Chapter 7

## Informal Public Consultation

The objective of the stakeholder consultation process was to collect information on the project and its expected impact. It also helps to determine the concerns amongst the community.

### Identification of Stakeholders

40. The stakeholders consulted for the project included the officer from revenue department, officer from TNPHC and officer from employment office. The consultation was undertaken during the site visit on 3<sup>rd</sup> February 2021.

### Details of Discussion

41. The details of the proposed hostel were informed and discussed with the stakeholders. They were supportive about the project and no concerns were raised during the stakeholder consultation.

Following stakeholders were consulted:

Social Welfare Department	Service Home in Charge	Early Intervention Center	Girls School	Local Residents
Mrs. Sangetha District social welfare officer	Maashilamoni – Site in charge of service home	Mrs. Kanchana devi	Mr. Triumalairajan – Office assistant	Residents from Gangotri apartment
	Prakasham – Record clerk	Mrs. Senthil Kumari – Project officer		

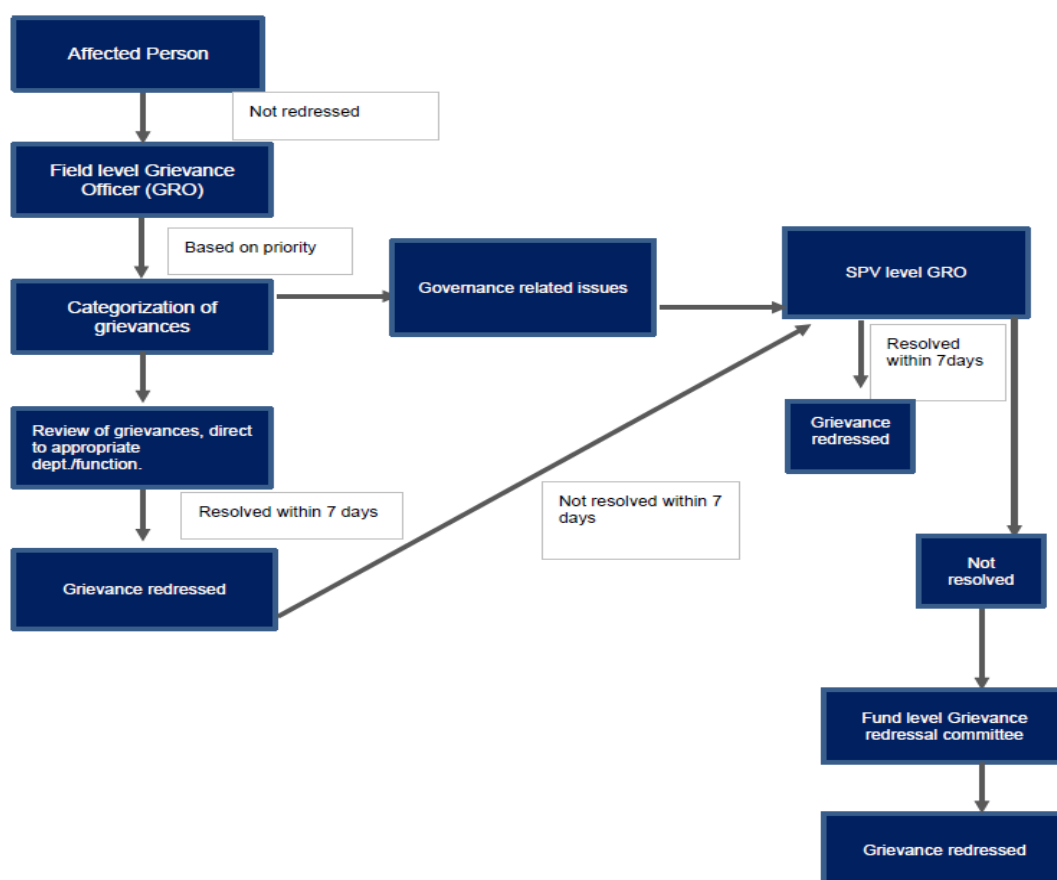
# Chapter 8

## Grievance Redressal Mechanism

42. The main objective of the grievance redressal mechanism is to provide a transparent mechanism to resolve complaints in the project site. The field level grievance redressal officer (GRO) will be responsible for handling grievances at the site. All complaints to be logged in writing and maintained in a database. A log of all the grievances to be maintained by field GRO in an excel. Every grievance received will be identified with a grievance number and the same shall be communicated to aggrieved party as an acknowledgement by the field level GRO. Grievances will be redressed within 7 days from the date of lodging the complaints. If resolution attempts at the site level fail, the site will refer the complaints to the SPV level. In case, after 7 days, if there are still any unresolved issues, the complaints will be transferred to the Fund level Grievance Redressal Committee. The grievance log will be shared by the field level GRO with SPV level GRO and project lead of the shelter fund on fortnightly basis.

Note: The GRM Policy is currently under internal review by TNIFMC. The current version is subject to further changes once final.

Flow chart of Grievance Redressal Mechanism



# Chapter 9

## Conclusion

Based on the due diligence conducted, no major ESG risk to the proposed project was noted. Overall, 35 ESG issues were evaluated using the ESG risk rating tool of which 10 are considered as **material ESG risks** for the proposed project. **Project risk level is 25%**. Hence, it is **medium risk level project**. Key findings of the study in connection to environmental, social and governance issues are:

- Governance related policies to be drafted by TNWWHCL
- No concerns are noted with respect to land acquisition
- There are approx. 5-10 old buildings, big trees on the proposed project site, as a result, demolition of houses and cutting of big trees will be required due to the construction activities
- No potential negative impact has been identified for this project

# APPENDICES

## List of documents reviewed

1. Detailed feasibility report
2. e – tendering pre-qualification tender document
3. Environment Management Plan for the project site
4. Approved site layout



## Appendix II- Site Pictures

Service home entrance



Service home office



Project site filled with shrubs



Old buildings in project site



Boundary wall



Asbestos sheets stored at site

## Appendix III- Involuntary Resettlement Impact Assessment with COVID-19 Screening Checklist

### Introduction

Each subsection/section needs to be screened for any involuntary resettlement impacts which will occur or have already occurred. This screening determines the necessary action to be taken by the project team.

### Information on subsection/section:

District/administrative name: Chennai

Location (km): 35.1 Km from city center

Civil work dates (proposed):

Technical description: The project involves construction of a single block with a G+5 level structure and a total capacity of 466 beds.

### Screening Questions for Involuntary Resettlement Impact

Below is the initial screening for involuntary resettlement impacts and due diligence exercise. Both permanent and temporary impacts must be considered and reported in the screening process.

Probable Involuntary Resettlement Effects	Yes	No	Not Known	Remarks
Involuntary Acquisition of Land				
1. Will there be land acquisition?		√		The land has been acquired for the purpose of construction of the project through a government order.
2. Is the site for land acquisition known?				
3. Is the ownership status and current usage of land to be acquired known?				The land was previously owned by Revenue department of GoTN and was a vacant land.
4. Will easement be utilized within an existing Right of Way (ROW)?	√			
5. Will there be loss of shelter and residential land due to land acquisition?		√		
6. Will there be loss of agricultural and other productive assets due to land acquisition?		√		The land is a barren land and there will be no loss of agricultural or other productive assets.
7. Will there be losses of crops, trees, and fixed assets due to land acquisition?		√		The site is filled with wild growth of weeds and shrubs and there are no trees in the site.
8. Will there be loss of businesses or enterprises due to land acquisition?		√		The land is vacant, and no business has been established at the site.
9. Will there be loss of income sources and means of livelihoods due to land acquisition?		√		The site is a barren land at time of acquisition
Involuntary restrictions on land use or on access to legally designated parks and protected areas				
10. Will people lose access to natural resources, communal facilities, and services?		√		
11. If land use is changed, will it have an adverse impact on social and economic activities?		√		

1. Will access to land and resources owned communally or by the state be restricted?		√		
Information on Displaced Persons:				
Any estimate of the likely number of persons that will be displaced by the Project? ] N/A If yes, approximately how many?	[ ]	No	[ ]	Yes [√]
Are any of them poor, female-heads of households, or vulnerable to poverty risks? ] N/A	[ ]	No	[ ]	Yes [√]
Are any displaced persons from indigenous or ethnic minority groups? ] N/A	[ ]	No	[ ]	Yes [√]

#### D. COVID-19 Risk Screening for Involuntary Resettlement Impact Assessments

Risk screening questions	Yes	No	Not sure	Remarks
Will project preparation be affected by the inability of experts/consultants, to visit the project site because of the pandemic?		√		COVID-19 has not affected the project evaluation.
Is the project likely to face challenges in achieving meaningful consultation because of the pandemic? If yes, please clarify the types of consultations to be affected and at what stages in social safeguards planning and implementation.  Examples: Project consultants are unable to travel to the project site and meet with affected people for RP planning; the project will face challenges in conducting with communities, etc.		√		
Is the project likely to face challenges in preparing safeguards assessments/planning instruments and/or implementing social safeguards plans because of the pandemic? Please be as specific as you can in the remarks section.  Example: The project might face challenges in conducting inventory of assets/DMS, arranging for adequate valuations, or conducting other related due diligence (e.g., cadastral mapping or title search) due to COVID-19 restrictions.		√		

Note: The project team may attach additional information on the project, as necessary.

## Appendix IV - Indigenous People Impact Assessment with COVID-19 Screening Checklist

### A. Introduction

Each project/subproject/component needs to be screened for any indigenous people impacts which will occur or have already occurred. This screening determines the necessary action to be taken by the project team.

### B. Information on project/subproject/component:

District/administrative name: Kancheepuram District

Location (km): 37.7 Km from the District Headquarters

Civil work dates (proposed):

Technical description: The project involves construction of a single block with a G+5 level structure and a total capacity of 466 beds.

### C. Screening Questions for Indigenous People Impact

KEY CONCERNS (Please provide elaborations in the "Remarks" column)	YES	NO	NOT KNOWN	Remarks
A. Indigenous People Identification				
1. Are there socio-cultural groups present in or using the project area who may be considered "tribes" (hill tribes, scheduled tribes, tribal people), "minorities" (ethnic or national minorities), or "indigenous communities" in the project?		√		The land is uninhabited.
2. Are there national or local laws or policies as well as anthropological researches/studies that consider these groups present in or using the project area as belonging to "ethnic minorities," scheduled tribes, tribal people, national minorities, or cultural communities?		√		
3. Do such groups self-identify as being part of a distinct social and cultural group?		√		
4. Do such groups maintain collective attachments to distinct habitats or ancestral territories and/or to the natural resources in these habitats and territories?		√		
5. Do such groups maintain cultural, economic, social, and political institutions distinct from the dominant society and culture?		√		
6. Do such groups speak a distinct language or dialect?		√		
7. Have such groups been historically, socially, and economically marginalized, disempowered, excluded, and/or discriminated against?		√		
8. Are such groups represented as "indigenous people," "ethnic minorities," "scheduled tribes," or "tribal populations" in any formal decision-making bodies at the national or local levels?		√		
B. Identification of Potential Impacts				
9. Will the project directly or indirectly benefit or target indigenous people?		√		

<b>KEY CONCERNS (Please provide elaborations in the "Remarks" column)</b>	<b>YES</b>	<b>NO</b>	<b>NOT KNOWN</b>	<b>Remarks</b>
10. Will the project directly or indirectly affect indigenous people' traditional sociocultural and belief practices (e.g., child-rearing, health, education, arts, and governance)?		√		
11. Will the project affect the livelihood systems of indigenous people (e.g., food production system, natural resource management, crafts and trade, employment status)?		√		
12. Will the project be in an area (land or territory) occupied, owned, or used by indigenous people, and/or claimed as ancestral domain?		√		
<b>C. Identification of Special Requirements</b> Will the project activities include:				
13. Commercial development of the cultural resources and knowledge of indigenous people?		√		
14. Physical displacement from traditional or customary lands?		√		
15. Commercial development of natural resources (such as minerals, hydrocarbons, forests, water, hunting or fishing grounds) within customary lands under use that would impact the livelihoods or the cultural, ceremonial, and spiritual uses that define the identity and community of indigenous people?		√		
16. Establishing legal recognition of rights to lands and territories that are traditionally owned or customarily used, occupied, or claimed by indigenous people?		√		
17. Acquisition of lands that are traditionally owned or customarily used, occupied, or claimed by indigenous people?		√		

#### D. Indigenous People Impact

After reviewing the answers above, executing agency/ safeguard team confirms that the proposed subsection/ section/subproject/component (tick as appropriate)

[ ] Has indigenous people (indigenous people) impact, so an indigenous people plan (IPP) or specific indigenous people action plan is required.

[√] Has No indigenous people impact, so no IPP/specific action plan is required

#### E. COVID-19 Risk Screening for IP Impact Assessments

<b>Risk screening questions</b>	<b>Yes</b>	<b>No</b>	<b>Not sure</b>	<b>Remarks</b>
Will project preparation be affected by the inability of experts/consultants, to visit the project site because of the pandemic?		√		All the site visits and consultations have been completed and were not disrupted due to the COVID pandemic.

<p>Is the project likely to face challenges in achieving meaningful consultation because of the pandemic? If yes, please clarify the types of consultations to be affected and at what stages in social safeguards planning and implementation.</p> <p>Examples: Project consultants are unable to travel to the project site and meet with affected people for IPP planning; the project will face challenges in conducting culturally appropriate consultations with IP communities, etc.</p>		√		
<p>Is the project likely to face challenges in preparing safeguards assessments/planning instruments and/or implementing social safeguards plans because of the pandemic? Please be as specific as you can in the remarks section.</p>		√		

