

Due Diligence Report

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India: Inclusive, Resilient and Sustainable Housing
for Urban Poor Sector Project in Tamil Nadu –
Women, Siruseri, Chennai, Tamil Nadu

Report for Output 2

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

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Environmental, Social, and Governance Due Diligence of Industrial Housing Facility for Women, Siruseri, Chennai, Tamil Nadu

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ABBREVIATIONS

BMTPC	Building Materials and Technology Promotion Council	INR	Indian National Rupees
CPCB	Central Pollution Control Board	KWH	Kilo Watt Hour
BUA	Built-up Area	KVA	Kilo Volt Ampere
DG set	Diesel Generator set	KWH	Kilo Watt Hour
EIA	Environmental Impact Assessment	LPG	Liquified Petroleum Gas
E&S	Environmental and Social	NABL	National Accreditation Board for Testing and Calibration Laboratories
EPC	Engineering, Procurement, and Construction	NOC	No Objection Certificate
EHS	Environmental, Health & Safety	NGO	Non-Governmental Organization
EMC	Environmental Management Centre Pvt. Ltd	OHS	Occupational Health and Safety
EPF	Employee Provident Fund	PPE	Personal Protective Equipment
ESAP	Environmental and Social Action Plan	PM	Particulate Matter
ESGDD	Environmental Social and Governance Due Diligence	PMC	Project Management Consultants
ESMS	Environmental and Social Management System	PUC	Pollution Under Control
ESI	Employee State Insurance	RCC	Reinforced Cement Concrete
EWS	Economically Weaker Section	SIPCOT	State Industries Promotion Corporation of Tamil Nadu Ltd
FSI	Floor Space Index	SPCB	State Pollution Control Board
HR	Human Resources	TNIFMC	Tamil Nadu Infrastructure Fund Management Corporation
HSE	Health, Safety and Environment	TNIHPL	Tamil Nadu Industrial Housing Private Limited

EXECUTIVE SUMMARY

The 'Industrial Housing Project at Siruseri' is a residential project, to be developed by M/s Tamil Nadu Industrial Housing Private Limited (TNIHPL), a State Industries Promotion Corporation of Tamil Nadu Ltd, (SIPCOT) SPV in Egattur Village, Thiruporur Taluk, Kanchipuram District, Tamil Nadu. The project involves the construction of a G+12 floor structure with designated commercial areas on the ground floor over a land of 1.03 acre. The total built-up area proposed (FSI + non-FSI) is 1,38,000 sq. ft. The overall project shall comprise of 807 beds for women employees working in SIPCOT and in the nearby localities.

The project is proposed to be located within the State Industries Promotion Corporation of Tamil Nadu (SIPCOT) Siruseri Industrial Park. SIPCOT acts as a Nodal Agency of Government of Tamil Nadu in the sanction / disbursement of structured package of assistance to large industrial units and provides basic and comprehensive infrastructure facilities. The allotted land parcel with Survey No.76 has been designated as a hostel in the master plan submitted to the Directorate of Town and Country Planning, Government of Tamil Nadu. SIPCOT will be leasing this 1.03-acres land to TNIHPL for the project.

The project is currently at a pre-construction stage. Earth filling is being carried to raise the land level to the road height. The construction will commence once the necessary approvals have been obtained. As reported by SIPCOT during the site visit, a Project Management Consultant (PMC) will be engaged to manage the project. A tender will be issued to select an Engineering, Procurement, and Construction (EPC) contractor for the construction. The Superintending Engineer, SIPCOT will oversee the tendering process.

TNIHPL will engage a Project Management Consultant (PMC) to manage the construction of the project. The PMC shall identify and shortlist a contractor for the Engineering, procurement, and construction (EPC) of the project through tendering process. The EPC contractor will make a site-specific Environmental Management Plan. The PMC will oversee the activities of the project as per the EMP requirements. The project is proposed to be divided in three phases, pre-construction, construction & operational phase. The pre-construction phase would require EPC Contractor to procure all the legal clearances and permissions prior to construction. It is recommended that regular monitoring of air, ground water, noise and the mitigation measures be carried out prior to construction and during the construction phase of the project.

The Tamil Nadu Shelter Fund (TNSF) adopted its Environmental, Social, and Governance Management System (ESGMS) in 2020. The key components of TNSF's ESGMS includes an Environmental, Social, and Governance (ESG) Policy, implementation procedures presented as tools, process flowcharts, formats & templates, and a resource library. The ten tools which are part of the ESGMS are designed to enable compliance with the ESG requirements established for the TNSF.

TNSFs ESGMS outlines the screening, categorization, and due diligence (including identification of environmental and social impacts and mitigation) for potential investments under TNSF. Subprojects meeting the subproject eligibility criteria can be included under the project. Subprojects listed in the appendix 5 of the Prohibited Investment Activities List (PIAL) will not be included. Category A subprojects will not be considered for investment. In addition to the ESGMS, an action plan has been agreed with TNIFMC that applies to Asian Development Bank (ADB)-funded investments under the TNSF to ensure compliance with ADB Safeguard Policy Statement (SPS).

The methodology used for conducting the study includes collection of secondary information, site observation by EMC team, meetings with TNIFMC and TNIHPL and meeting with local community around the project in the project area.

The project shall obtain all applicable and necessary approvals from regulatory authorities. A robust stakeholder engagement plan and grievance redressal mechanism is proposed to be implemented for the project.

Reporting of the ESGMS and agreed action plan shall be submitted to ADB on a semi-annual basis during project implementation; these semi-annual reports on ESGMS and action plan implementation will be shared with ADB and publicly disclosed.

The chapter-1 of this report provides the background and scope of the Environment and Social Due Diligence (ESDD) assignment along with the approach and methodology adopted. The project details including the status of the project and description on land status and land-use, site connectivity, and social infrastructure around the project site have also been described in this chapter.

Chapter-2 includes the key findings from the ESG risk rating tool developed by TNSF. The project has got an overall risk rating of 37.5% which falls on medium-high risk on project risk rating scale.

The chapter-3 discusses the project's compliance requirements to environment, occupational health and safety, and labour & working conditions. The project's compliance to IFC performance standards and ADB safeguards has also been assessed.

Chapter-4 of this report includes the mitigation action plan including an E&S action plan and an ESAP for IFC performance standards.

Chapter-5 of this report includes the conclusion section which concludes that the project will not cause any significant adverse environmental and social impacts during construction, or operation of the project. The risks to the project at this stage based on the risk rating tool are medium-high however, most of the associated impacts are site specific and manageable. They are expected to be limited to the construction phase and will therefore be temporary in nature. Adequate mitigation actions will be undertaken in line with management and monitoring of the set of recommended mitigation measures. No physical and/or economic displacement of people shall not be required for project implementation.

1 INTRODUCTION

1.1 Background and Scope

1. The Tamil Nadu Infrastructure Fund Management Corporation (hereafter referred to as TNIFMC), is an Asset Management Company (AMC) promoted by the Government of Tamil Nadu (GoTN) for the purpose of raising and managing alternative investment funds focused on sectors like infrastructure, affordable housing etc. TNIFMC is managing Tamil Nadu Shelter Fund (TNSF) which is registered as a Category I (Social Venture) Alternative Investment Fund, with a mandate to invest in affordable housing projects in Tamil Nadu.

The primary focus of TNSF is:

- Affordable housing – with focus on housing for the Economically Weaker Sections (EWS) and Low-Income Groups (LIG),
- Hostels - for Working Women from all sections of the society.
- Industrial Housing for workers in and around Industrial Complexes/ Parks/ Clusters
- Senior and Assisted Living

2. Tamil Nadu Industrial Housing Private Limited (“TNIHPL” or “Company”) is developing an affordable industrial housing project in Kanchipuram district, Tamil Nadu. The TNSF is planning to invest in the proposed project and is committed to integrate ESG principles into this project. As per the TNSF ESG screening tool, this project has been categorized as a B.¹ In this context Environmental Management Centre (EMC) Pvt. Ltd was appointed by TNIFMC to conduct the ESG Due Diligence (ESGDD) assessment for the project.

3. This document presents the findings of the ESGDD assessment and necessary remedial Environmental and Social (E&S) Action Plan (ESAP) providing relevant mitigation measures.

1.1.1 Objectives of Assignment

4. The objectives of conducting the ESGDD are to assess and rate the ESG risks associated with the proposed project and recommend suitable mitigation measures against the identified risks. This shall help Tamil Nadu Shelter Fund (TNSF) to make an objective decision on the proposed investment/target.

1.1.2 Scope of Work

5. Assessment of environmental, social and governance aspects of the project owner and proposed project against the applicable standards. The consultant has used the TNIFMC ESG policy, Asian Development Bank (ADB), World Bank and International Finance Corporation’s (IFC) performance standards. The assessment includes, but is not limited to, the following aspects:

- (i) Background check of project owner/– on corporate governance including policies and incidents related to anti bribery and corruption, fraud, whistle-blower, diversity & inclusiveness, prevention of sexual harassment, child labour, forced labour, environment health and safety policies, governance structure, regulatory compliances, incidents against Key Management Personnel of the project owner/promoter/sponsor, etc.
- (ii) On-site investigation with respect to:
 - Past land use of the site and lease agreement review
 - Whether there are any disputes/claims/arbitration in any court of law pertaining to the land.
 - Surrounding land use
 - Area geology, and potential soil and ground water contamination
 - Loss of biodiversity due to land clearing, waste disposal

¹ The project may result in specific environment and social impacts, that are site specific for which mitigation measures need to be developed.

- Sources and availability of water (ground/surface),
 - Consumption of water
 - Impact on water availability for the local community in the area
 - Potential impact on soil and water bodies nearby
 - Effluents – type and quantity of effluent generated, are there any hazardous effluents generation, is there an effluent treatment plant, effluents (quality and quantity) and pollution prevention measures in line with local laws, standards, and regulations.
 - Proximity to sensitive areas such as environmental, cultural and heritage site
 - Adverse impact of air, water, aesthetic pollution on the environmental, cultural and heritage sites due to project activity
 - Loss of accessibility to the local community
 - Past track record – have there been any serious environmental or social incidents in the past.
 - Liabilities - Is the project exposed to potentially significant environmental liabilities, such as those arising from land or ground water contamination, related to the company's past or ongoing operations? Is the company exposed to potentially significant health and safety liabilities, such as those from ongoing or future claims from negatively affected workers and / or communities?
- (iii) On-site consultations with relevant stakeholders such as local community, key regulatory authorities, etc.
- (iv) Review with respect to the site on these mandatory topics:
- Past legal non compliances/ incidents of violation of laws
 - Adverse media articles
 - Any voluntary or involuntary resettlement (physical and economic) scenarios due to the project
 - To assess whether designs are certified by licenses structural engineers for their structural stability and safety including against seismic and wind forces.
 - Project related regulatory documents – consents/ permits/ licenses obtained so far against those applicable for the project.
 - Assess the capacity of the project owner/ to deal with the environmental and social risks and impacts and implement appropriate training and capacity building measures for safeguards compliance.
 - Due Diligence will also be conducted if the project has any “associated facilities” that are not funded as part of the project (funding may be provided separately by the borrower or by third parties) if those facilities viability and existence depend exclusively on the project and whose goods or services are essential for successful operation of the project.
 - As per ADB safeguard requirements 1 available in ADB's website: environment (Appendix 1, page 30, para 4) - At an early stage of project preparation, it is required to identify potential direct, indirect, cumulative, and induced environmental impacts on and risks to physical, biological, socioeconomic, and physical cultural resources and determine their significance and scope, in consultation with stakeholders, including affected people and concerned NGOs. The project owner / promotor / sponsor shall assess cumulative and induced impacts due to further development of similar projects or other projects in the area, as appropriate.
 - Review of any established baseline for common natural resources, livelihoods, social interactions, support systems, other social and cultural characteristics by the project owner/promoter/sponsor

- Review of metrics or indicators to gauge the effectiveness of stakeholder engagement process defined by the project owner/promoter/sponsor.
- Review of metrics or indicators to gauge the effectiveness of grievance redressal process defined by the project owner/promoter/sponsor.

1.2 Approach & Methodology of ESG-DD

6. The approach and methodology adopted for the ESG-DD is presented in the subsequent subsections.



7. The reference framework for the ESDD included:

- Applicable national, state, and local environmental and social legislation.
- International Finance Corporation's Environmental & Social (E&S) Performance Standards (2012)
- World Bank Group's General Environmental, Health & Safety (WB-EHS) Guidelines (2007)
- ADB Safeguards

Inception Call:

8. A call was conducted with team members from TNIFMC on 17th May 2023 – including Mr. Rohit Siddareddy- Senior Associate and Ms. Pruthvi S- ESG Consultant with the following objectives:

- Obtain an overview of the project and current status.
- Explain the approach and methodology to be adopted for the ESG-DD.

Information Review:

9. EMC prepared a **Project Information Sheet** for obtaining information about the project and its management. A detailed list of **documents and records** required for review and aligned to the reference framework was shared with TNIFMC in the sheet. The information received from the "Project" were reviewed for scoping the project site visit and team interactions.

Desk Review: Project's Reputation in Public Domain on E&S aspects:

10. A review of publicly available media sources through web search was conducted to identify any past issues of the Company on aspects related to environment, occupational health and safety, labour welfare and community welfare and safety. The review also included search for any ongoing or past NGO attention/campaigns, or items that may lead to reputational risks to the Company and/or Investors.

The review did not bring forward any significant issues on aspects related to environment, occupational health and safety, labour welfare and community welfare and safety.

Site Team Interactions:

11. The site team interaction was conducted to corroborate project details received through documents with the management and site team. Assessment of the project details was conducted through discussions with stakeholders of the project.

12. The stakeholders interviewed include [REDACTED] (Project Officer [REDACTED] at Siruseri) and [REDACTED] on the following topics

- **Current land status**
- **Access points** to site and the **adjoining properties** on all sides of project site
- Current environmental conditions at the project location including rainfall, existing drainage, etc.
- **Waste management**
- **Worker accommodation** conditions

1.3 Project Details

13. The 'SIPCOT Industrial Housing Project' project is a residential project to be developed by M/s Tamil Nadu Industrial Housing Private Limited (TNIHPL) in Egattur Village, Thiruporur Taluk, Kanchipuram District, Tamil Nadu.

14. The project involves the construction of a G+12 floor structure with designated commercial areas on the ground floor over a land of 1.03 acre. The total built-up area proposed (FSI + non-FSI) is 1,38,000 sq. ft. The overall project shall comprise of 807 beds for women employees working in SIPCOT and in the nearby localities.

15. The project is proposed to be located within the State Industries Promotion Corporation of Tamil Nadu (SIPCOT) Siruseri Industrial Park. SIPCOT acts as a Nodal Agency of Government of Tamil Nadu in the sanction / disbursement of structured package of assistance to large industrial units and provides basic and comprehensive infrastructure facilities. The allotted land parcel with Survey No.76 has been designated as a hostel in the master plan submitted to the Directorate of Town and Country Planning, Government of Tamil Nadu. SIPCOT will be leasing the 1.03-acre land to TNIHPL for the project.

1.3.1 Current Status of Project

16. The project is currently at a pre-construction stage. Construction will commence once all the necessary clearances are obtained.

1.3.2 Project Description

17. The project is located at SIPCOT Industrial Park, Siruseri, Egattur Village, Thiruporur Taluk, Kanchipuram District, Tamil Nadu



Figure 1: Map showing the project location



Figure 2: Project map with the surroundings
Location: (<https://goo.gl/maps/YGBzjyo74BZEGbhp8>)

18. The project is located Siruseri SIPCOT area, near TCS office, Siruseri, Thiruporur Taluk, Kanchipuram District, Tamil Nadu. For further investigation of the site a 5 km buffer around the site was created. Refer to Figure 3.

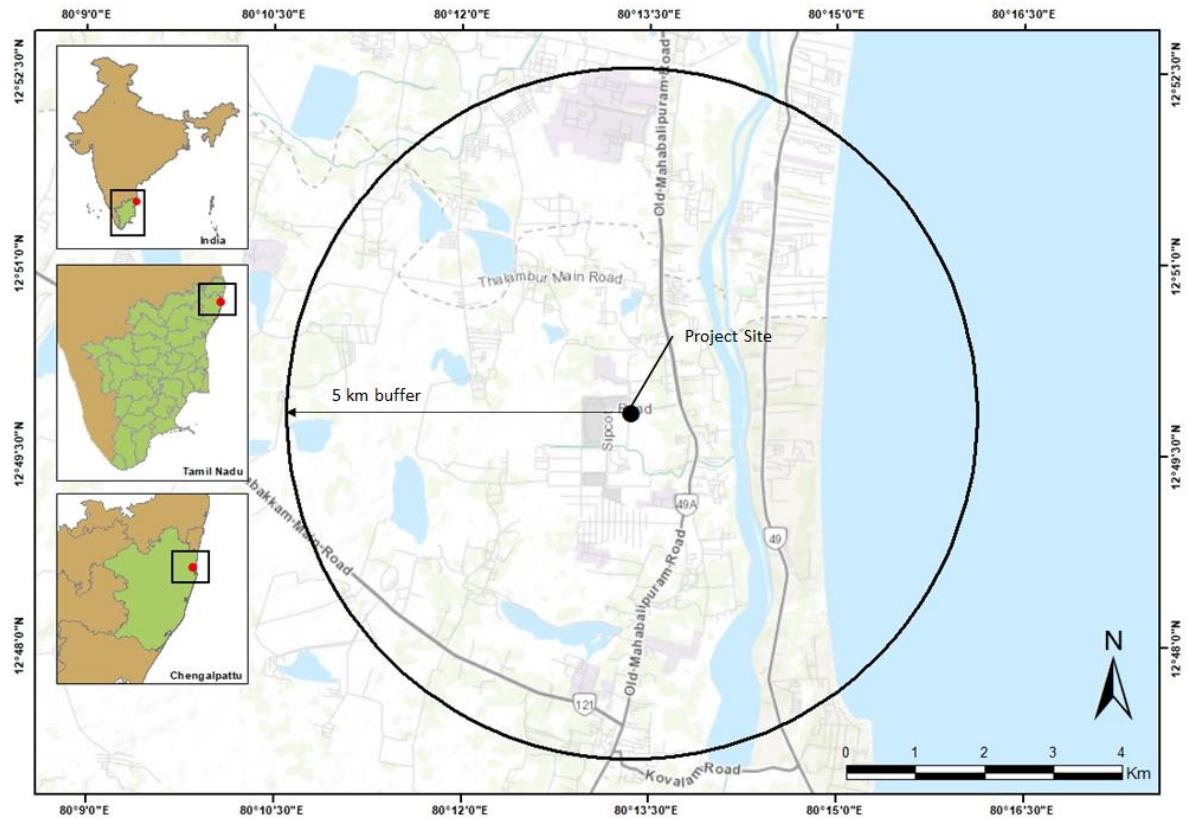


Figure 3: 5km buffer around the site

1.3.3 Land

19. Land Status- The land to the total extent of 1.03 acre is currently registered in name of SIPCOT and the project will be taken up for development by M/s TNIHPL through a lease agreement which will be entered into shortly. The land can be classified as a dry land. The land does is not barricaded, however during the observations there wasn't encroachment or stray grazing. As reported by the SIPCOT project office the land does not have any voluntary/involuntary resettlement or displacement. The land currently is not encroached or has the presence of grazing cattle.

1.3.4 Site connectivity

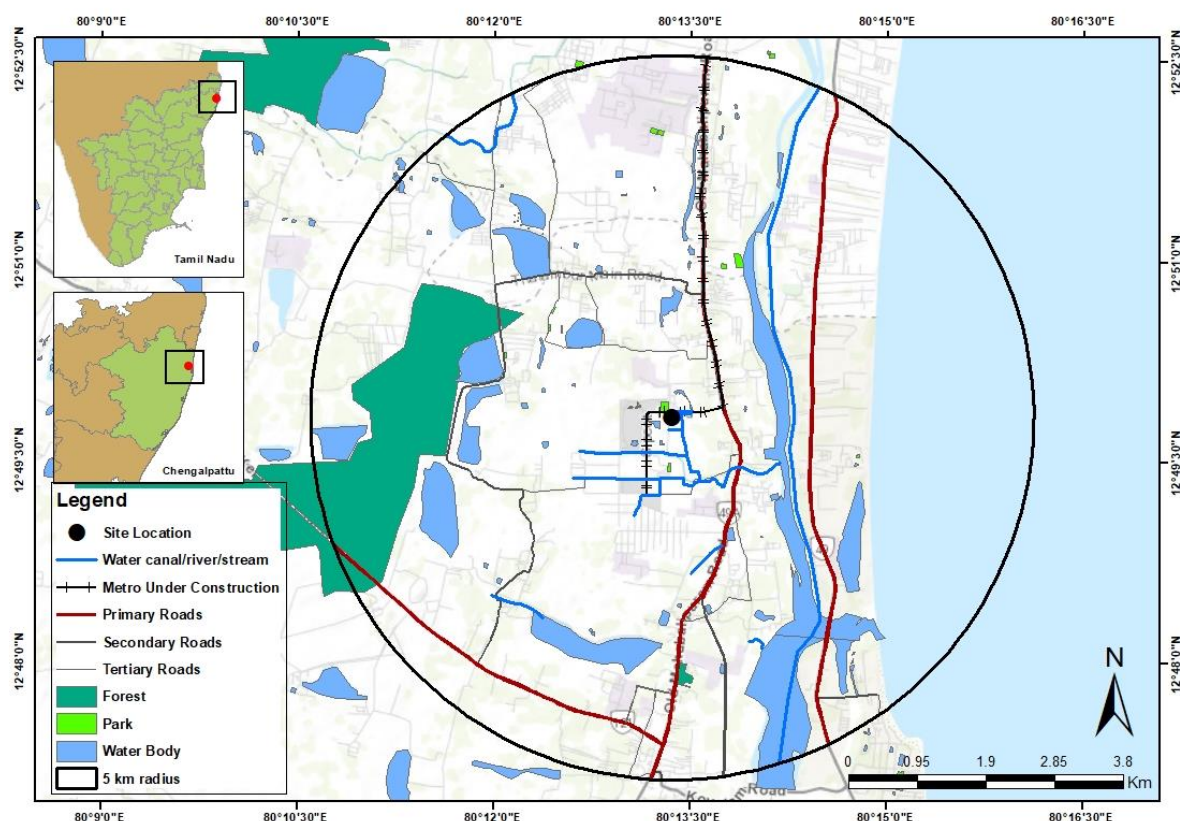


Figure 4: Connectivity of the Site

22. The site is well connected through a primary road, the Rajiv Gandhi Salai Road. The nearest railway station is Velachery Railway Station at an aerial distance of 15.31 km towards the north direction and Vandalur Railway Station at an aerial distance of 16.45 km towards north-west direction. The nearest airport is Chennai International Airport that is located at a distance of approximately 20 km from the project site in the north direction.

Project immediate surroundings	The project site is located in Siruseri SIPCOT area, surrounded majorly by various IT & ITeS companies. The project has Rajiv Gandhi Salai Road towards the east, TCS campus towards the west, and mixed land use development (office, educational institutes & apartments) towards north & south of the project site.
Highways	The project site is connected to the State Highway 49A, also called Rajiv Gandhi Salai Road towards the east of project site.
Railway Stations	The nearest railway station from the project location is Vandalur Railway Station located at an aerial distance of approx. 16.45 km north-west direction.
Bus Stations	S.I.P.C.O.T. (Muttukadu) Bus stop is the closest bus stop to the project at an aerial distance of approx. 0.7 km east.
Airport	Chennai International Airport is located at an approx. aerial distance of approximately 20 km North of project.

1.3.5 Social Infrastructure

Hospitals	Swaram Hospital & Specialty Clinic (approx. 9.0 km North) is the nearest hospital to the project. Other nearby medical facilities (LIMAT- Multi Specialty Clinic, Annai Hospital, Unittas Hospital, Arshan Speciality Hospital, Sri Isari Velan Mission Hospital, Tafe Health Centre, Govt. Child
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	Care Centre, Siruseri, ABC Medical Clinic, SV Medical, Madhura Hospital) are located within 5 km radius of the project.
Schools & Colleges	The schools and colleges located within 5 km radius of the project site include MSAJAA Architecture College, Mohamed Sathak A.J. College of Engineering, Mohamed Sathak A J College of Nursing, Chennai Mathematical Institute, Anand Institute of Higher Technology, SRR Engineering College, Jeppiaar College of Arts and Science, Dr Ambedkar Govt Law College, Avichi College, Vruksha International School of Montessori, Panchayat Union Primary & Medium School and St.John's Public School
Police Station	The nearest police station is Thalambur Police Station located at an aerial distance of approximately 1.8 km north from the project site.

1.3.6 Land use

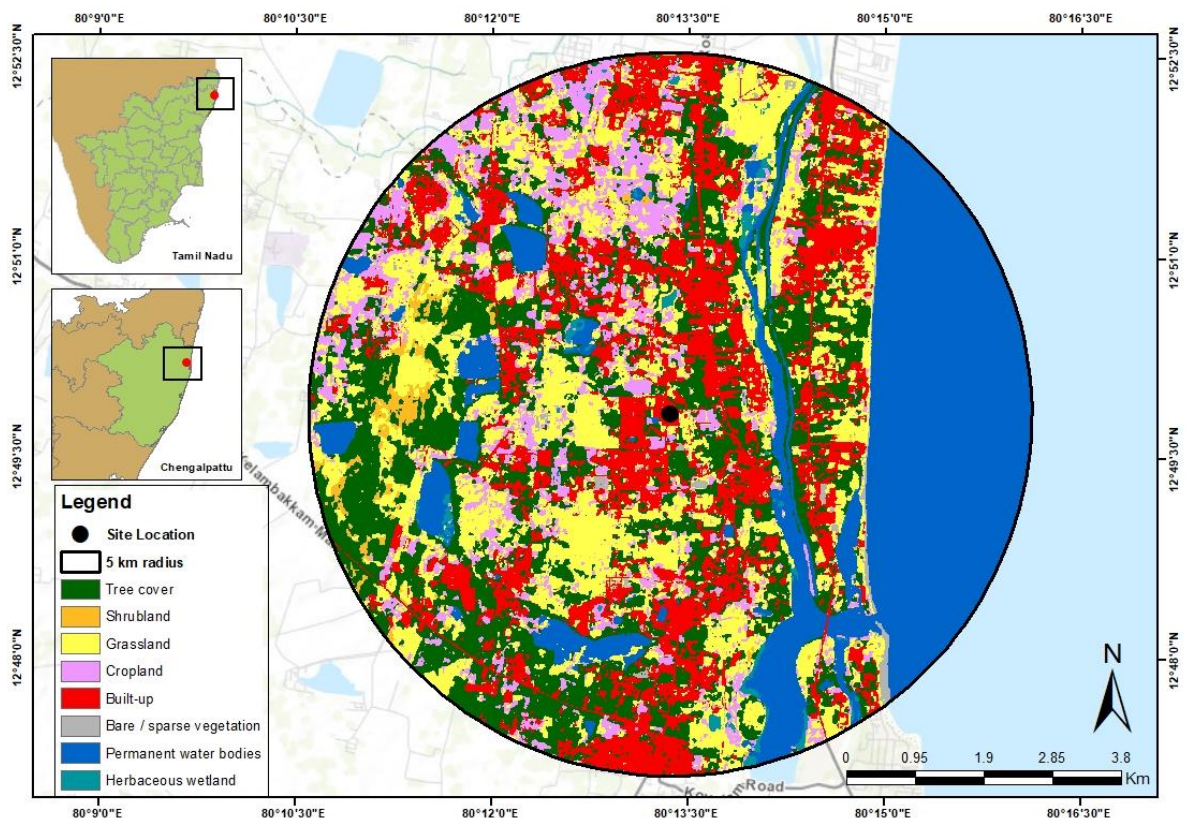


Figure 5: Map showing land use land cover map around Site

20. The map in Figure 5 shows land use and land cover map of the area around site. The maximum area around the site is occupied by tree cover & water bodies, both accounting for 23% each, followed by grassland and built-up, which are 21% and 20%, respectively. The lowest area percentages have been recorded in terms of herbaceous wetland, shrub land and bare/ sparse vegetation, 1% each. The cropland, about 10%, is uncultivated land consisting primarily of bushes and shrubs.

21. As per the Directorate of Town and Country Planning (DTCP) approved for SIPCOT Siruseri IT Park, the land is classified as a dry land.

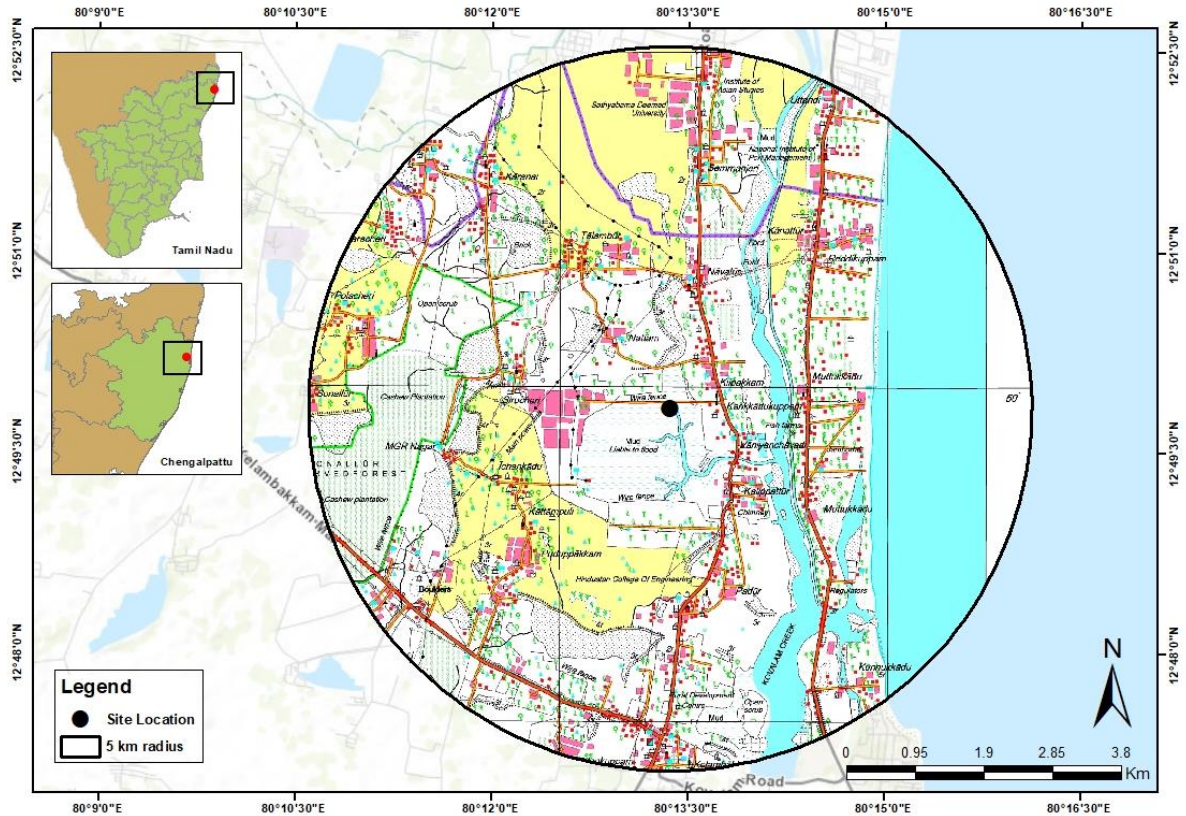



Figure 6 Map Showing SOI topographic sheet data around the site area

22. As per the analysis of the Survey of India (SOI) topographic sheet, it is observed that part of Sonallor reserved forest and Kulattur Reserved Forest are located within the study area, while Mambakkan Reserved Forest (6.19 km) and Maduraiykkam Reserved Forest (7.38 km) are in close proximity to the study area and may be affected by the project activities. However, physical site visits and due diligence confirm that there will be no impact on them by the project activities.

2 ESG RISK RATING TOOL – KEY FINDINGS

ESG Risk Rating Tool - TNSF (Version 1.0)			
Project Details			
Name of the Project	SIPCOT's Industrial Housing Facility for Women	Start of Evaluation Date	22-05-2023
Site Location / Alternatives under consideration	Egattur Village, Thiruporur Taluk, Kanchipuram District, Tamil Nadu	Project Developer	M/s Tamil Nadu Industrial Housing Private Limited
Total Project Cost (in INR Million)		TNSF Investment (in INR Million)	
		Investment Period	

Dimension	No. of Observations
List of ESG Issues	14
Environment	7
Social	4
Governance	3
Material ESG Risks	11
Environment	4
Social	4
Governance	3

Project Risk Rating		
	Risk Level (%)	ESG Risk Rating
	37.5	

Sl. No.	Dimension	Risk Score
1	Environment	25.00
2	Social	20.00
3	Governance	18.00

Project Risk Rating - Scale	
Scale	Risk Level
Low	0-15%
Medium	16-30%
Med-High	31-45%
High	46-60%
Very High	>60%

Note to the user

- The ESG Risk Rating Tool is developed to assist in evaluation of the ESG risks of the identified project.
- The person using this tool should not tamper with the in-built evaluation criteria. Any changes to the criteria shall be done so after getting requisite approval from Impact Monitoring Officer.
- All changes shall be indicated in the document control log provided below.

TNSF has developed as ESG risk rating tool under its ESG management system, to identify and evaluate material ESG risks related to the project activities. Based on the site visit, stakeholders' 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. The overall risk rating is 37.5% which falls on medium-high risk on project risk rating scale. The separate scores for environment, social and governance are discussed below:

Environmental	25.00
Social	20.00
Governance	18.00

3 COMPLIANCE TO E&S LEGAL REQUIREMENTS, IFC PERFORMANCE STANDARDS AND ADB SAFEGUARDS

3.1 Method of Assessing Compliance

24. The compliance status of the project on applicable Environment Health and Safety (EHS) legal regulations will be presented in this section. The method of reading the tables is as follows:

- The regulations and their applicable requirements will be listed in the first and second columns, respectively.
- The compliance of project with legal requirements will be indicated based on the legend given below.

C Regulation and its requirement are applicable to the project.
The project is **COMPLIANT** to the requirement.

PC Regulation and its requirement are applicable to the project.
The project is **PARTIALLY COMPLIANT** to the requirement.

NC Regulation and its requirement are applicable to the project.
The project is **NON-COMPLIANT** to the requirement.

NA Regulation and its requirements are **NOT APPLICABLE** to the project

Imp Regulation and its requirement are applicable to the project.
TO BE IMPLEMENTED, currently not applicable.

- The last column will provide remarks on the status of compliance. Text in bold will describe the nature of non-compliance.

3.2 Legal Compliance – Environment

#	Regulation	Reason for Application	Legal Requirements	Compliance Status	Details of Compliance/ Non-Compliance
1.	Water (Prevention and Control of Pollution) Act, 1974; and Rules 1975 Air (Prevention and Control of Pollution) Act, 1981; and Rules 1982	The project shall generate wastewater and air emissions and is required to obtain Consent to Operate from the SPCB.	Consent to Establish and Consent to Operate from SPCB u/s 25 Water Act and u/s 21 of the Air Act. The CTE and CTO shall also be obtained separately for the batching plant, if planned to be used on site. Comply with conditions of Consent to Establish and Consent to Operate.	Imp	<ul style="list-style-type: none"> • A valid Consent to Establish (CtE) shall be obtained before commencing the operations from SPCB. • In case the contractor plans to use the batching plant during the construction phase, valid CtE and CtO shall be obtained. • If the project proposes to have a DG set installed on the site, a valid CtO shall be obtained by the contractor. • The project will have to comply to the stipulated conditions in the CtE and CtO.
2.	Noise Pollution (Regulation and Control) Rules, 2000	The project construction shall result in noise pollution	No horn shall be used in silence zones or during night-time in residential areas except during a public emergency Sound emitting construction equipment shall not be used or operated during night-time in residential areas ² and silence zones	Imp	<ul style="list-style-type: none"> • The project has not conducted any noise monitoring yet, as the construction activities have not begun. • The project should comply with the requirements and provisions in the CtE and CtO.
3.	Hazardous Wastes (Management, Handling and Transboundary Movement) Rules 2016	The project construction may result in generation of hazardous waste.	Occupier shall be responsible for safe and environmentally sound management of hazardous and other wastes. u/r 4(2)	Imp	<ul style="list-style-type: none"> • The project currently does not generate any hazardous waste because the construction has not started. • A waste management plan for construction phase can be developed, to ensure safe disposal of hazardous waste.

² Ambient Air Quality Standards in respect of Noise for Residential area:

Day Time (6.00 a.m. to 10.00 p.m.) = 55 Db(A) Leq*; Nighttime (10.00 p.m. to 6.00 a.m.) = 45 Db(A) Leq*

* dB(A) Leq denotes the time weighted average of the level of sound in decibels on scale A which is relatable to human hearing

#	Regulation	Reason for Application	Legal Requirements	Compliance Status	Details of Compliance/ Non-Compliance
					<ul style="list-style-type: none"> The project should comply with the requirements and provisions in EC, CtE and CtO.
4.	Construction and Demolition Waste Management Rules, 2016	The project construction shall generate C&D waste.	Mode of disposal of C&D waste. u/r 4	Imp	<ul style="list-style-type: none"> The project site is currently being filled with earth from other construction activities within SIPCOT. A waste management plan for construction phase can be developed, to ensure proper disposal of construction and demolition waste. The project should comply with the requirements and provisions in EC, CtE and CtO.
5.	Solid Waste Management Rules, 2016	The project generates solid waste in the marketing office and shall also generate it in the labour camps post commencement of construction.	Every waste generator shall segregate and store the waste generated by them in three streams, namely, bio-degradable, non-bio-degradable and domestic hazardous wastes in suitable bins and handover segregated wastes to authorized waste pickers or waste collector as per the direction or notification by the local authorities from time to time. u/r 4(a)	Imp	<ul style="list-style-type: none"> The project currently does not generate any solid waste because the construction has not started. However, it is reported that the same will be taken care by the agency hired by SIPCOT for waste management for the entire Industrial Park. The project will comply with the requirements and provisions in the EC, CtE and CtO
6.	Central Ground Water Authority Guidelines to regulate and control Ground Water Extraction in India dated 1 June, 2019 Tamil Nadu Groundwater	The project site does not have any well	Registration of existing bore wells/ NOC for new bore wells Installation of digital water flow meter (conforming to BIS standard) in the abstraction structure(s)	NA	<ul style="list-style-type: none"> As per the information received from the SIPCOT, the water shall be sourced supplied by SIPCOT or via tankers for construction and drinking purposes.

#	Regulation	Reason for Application	Legal Requirements	Compliance Status	Details of Compliance/ Non-Compliance
	(Development and Management) Act, 2003				
7.	Environmental Protection Second Amendment Rules 2002 (DG Set) & 2004	The project uses DG sets for power generation.	a) Stack Height of DG set should be as per the regulations. b) The DG set should be housed in an acoustic enclosure	Imp	<ul style="list-style-type: none"> The project currently does not have any DG sets on site as the construction work has not started. In case the contractor plans to utilize DG sets during the construction phase, the stack height of the sets must be regulated along with housing the set in an acoustic enclosure for safety of the workers. A temporary electrical connection may be taken for construction phase.

3.3 Legal Compliance – Occupational Health & Safety

#	Regulation	Reason for Application	Legal Requirements	Compliance Status	Details of Compliance/ Non-Compliance
1.	The Building and Other Construction Workers' (Regulation of Employment and Conditions of Service) Central Rules, 1998	The project under assessment shall enter the construction phase. Further the regulation provides requirements on Occupational, Health and Safety measures pertaining to construction activities.	a) Safety & Health – General Provisions (Chapter IV) – physical hazards, PPE, electrical hazards, vehicular traffic b) Fire Protection (u/s 35 & u/r 62) c) Stability of structures (u/s 49 & u/r 76) d) Lifting appliances and gear (Chapter VII) – testing, safe load indicators, ropes, e) Reporting of Accidents (u/r 237)	Imp	<ul style="list-style-type: none"> The project construction has not started, hence cannot be ascertained. However, the same shall be taken care by contractor during the construction phase. The contractor will be applying for the BOCW registration for employing the construction workers at project site. The contractor will abide by the international best practices on occupational health and safety such as those in Section 4.2 of World Bank EHS Guidelines on Construction and

#	Regulation	Reason for Application	Legal Requirements	Compliance Status	Details of Compliance/ Non-Compliance
			f) Medical examination – crane operators, exposure to special occupational hazard (u/r 250)		Decommissioning Activities ³ which shall be incorporated into the project-specific occupational health and safety plan to be developed for the project.
2.	Central Electricity Authority (Measures relating to Safety and Electric Supply) Regulations, 2010	The project uses electricity for various activities at the project site	a) General safety requirements for: <ul style="list-style-type: none"> - Electric supply lines and apparatus safety - Cut-out - Earthed terminal - Dangerous Notice - Flexible Cables 	Imp	<ul style="list-style-type: none"> • The total power requirement for the project shall be sourced from TNEB. • Apart from this, the project currently does not have any electrical distribution system in place since the construction has not started. However, the same shall be taken care by the contractor during the construction phase.
			b) Fire buckets filled with clean dry sand and ready for immediate use for extinguishing fires, in addition to fire extinguishers suitable for dealing with electric fires shall be kept at site	Imp	<ul style="list-style-type: none"> • The project site is located just behind SIPCOT's fire station. • The firefighting equipment has not been provided on the site yet as the construction has not begun. However, the same shall be taken care by contractor during the construction phase.
3.	Fire NOC from Municipal Corporation under the Development Control Regulations	The project classifies as high-rise buildings and needs approval for more than 17.25 m in height	a) Obtaining Fire NOC from the Municipal Corporation	Imp	<ul style="list-style-type: none"> • The project construction has not started. • However, the same will be taken care by contractor during the construction phase as it is a G+12 structure being proposed.
4.	Central Motor Vehicle Act 1988 and Rules 1989 (amended 2016)	The project may lease vehicles from third party vendors used for transportation and construction.	a) Driver to obtain a driving license authorizing him to drive/operate the vehicle b) Owner to obtain Certificate of Registration for the vehicle	Imp	<ul style="list-style-type: none"> • If the project plans to lease any motor vehicles for transportation and construction purposes, the contractor shall ensure to implement the legal requirements as per the rules and act of Central Motor Vehicle.

³ IFC World Bank Group. 2007. Environmental, Health, and Safety (EHS) Guidelines – General EHS Guidelines: Construction and Decommissioning https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines

#	Regulation	Reason for Application	Legal Requirements	Compliance Status	Details of Compliance/ Non-Compliance
			c) For valid registration, a transport vehicle should have a Certificate of Fitness d) Owner to obtain insurance policy for the vehicle		

3.4 Legal Compliance – Labour & Working Conditions

#	Regulation	Reason for Application	Legal Requirements	Compliance Status	Details of Compliance/ Non-Compliance
1.	Building and Other Construction Workers (Regulation of Employment and Conditions of Service) Act 1996 and Rules 1998	The Company will employ more than ten building workers in building or other construction work on daily basis.	a. Registration of establishment and workers under the Building and Other Construction Workers (BOCW) Act 1996 and Rules 1998	Imp	<ul style="list-style-type: none"> The project construction has not started, hence cannot be ascertained. However, the same shall be taken care by contractor during the construction phase. The contractor will be applying for the BOCW registration for employing the construction workers at project site.
			b. Hours of work, rest intervals & weekly off (Chapter XXVI)	Imp	<ul style="list-style-type: none"> The construction has currently not started for the project on site.
			c. Welfare of Building workers (Chapter XXVIII) – latrine, urinal, canteens		<ul style="list-style-type: none"> The same needs to be taken care by the contractor as part of EMP in the construction stage.
2.	The Contract Labour (Regulation and Abolition) Act, 1970; and Contract Labour (Regulation & Abolition) Central Rules, 1971	The Company shall appoint contractors who may have appointed sub-contractors for various project activities	a. Registration of principal employer	Imp	<ul style="list-style-type: none"> The contract labour has not yet been appointed. In case required, the license shall be obtained by the contractor for contracting 50 or more workmen employed on any day of the preceding twelve months as contract labour.
			b. Contractor's license for workers more than 50.		

#	Regulation		Legal Requirements	Compliance Status	Details of Compliance/ Non-Compliance
3.	Minimum Wages Act 1948	The Company, through its sub-contractors will engage unskilled, semi-skilled and skilled personnel in the project	a. Payment of minimum wages as per latest circular. u/s 5&12 b. Copy of minimum wages abstract issued by the respective state	Imp	<ul style="list-style-type: none"> The workforce has not been employed for the construction work yet. Provisions of the requirement will be applicable in future.
4.	Employee Compensation Act 1923 and Amendment Act 2009	The Company may employ workers directly and through Contractors whose remuneration is more than INR 21,000/- per month and are not covered under ESI	Payment of compensation to employee. Obtaining insurance policy for the same. u/s 4(2)	Imp	<ul style="list-style-type: none"> The workforce has not been employed for the construction work yet. Provisions of the requirement will be applicable in future.
5.	Employees' State Insurance Act (ESI), 1948	The Company through its contractors engages personnel whose remuneration is less than INR 21,000/-	Deduction of employee contribution and deposit of employee and employer contribution with the ESI Corporation. u/s 40(1)	Imp	<ul style="list-style-type: none"> The workforce has not been employed for the construction work yet. Provisions of the requirement will be applicable in future.
6.	Employees' Provident Funds (EPF) and Miscellaneous Provisions Act, 1952 amended upto 1996's	The Company, if itself and through its contractors employs more than 20 persons at the project, shall be considered for compliance under this Act.	Deduction of employee contribution and deposit of employee and employer contribution with the authority. u/s 6		
7.	Inter-State Migrant Workers Act 1979	The project may employ migrant construction labourers	a. Registration of Establishment as principal employer (u/s 4) b. Contractor's license for engaging migrant workers (u/s 8)	Imp	<ul style="list-style-type: none"> The workforce has not been employed for the construction work yet. Provisions of the requirement will be applicable in future.

#	Regulation		Legal Requirements	Compliance Status	Details of Compliance/ Non-Compliance
8.	The Child and Adolescent Labour (Prohibition & Regulation) Act, 1986 amended in 2016	The Company, through its sub-contractors may engage unskilled, semi-skilled and skilled personnel in the project	Prohibit the engagement of children in all occupations and to prohibit the engagement of adolescents in hazardous occupations and processes	Imp	<ul style="list-style-type: none"> The workforce has not been employed for the construction work yet. Provisions of the requirement will be applicable in future. The contractor should develop a mechanism to ensure that no child labour is engaged during the entire construction phase
9.	Private Security Agencies (Regulation) Act, 2005	If the company employs a private security agency to provide security at the project.	a. Private Security Agency to obtain a license. u/s 4	Imp	<ul style="list-style-type: none"> No private security agency has been hired for the project yet. Therefore, provisions of the requirement will be applicable in future.
10.	The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013	The project employs female employees at site and may employ female workers at site during construction phase.	a. Constitution of Internal Complaints Committee (ICC). u/s 4 b. Receive complaints of sexual harassment. u/s 9 c. Conduct enquiry on receipt of complaint. u/s 11	Imp	<ul style="list-style-type: none"> The workforce has not been employed for the construction work yet. The contractor should develop a policy on POSH to prevent the sexual harassment of women workers at the project site. Provisions of the policy will be applicable in future.

3.5 Applicability of IFC Performance Standards

25. There is a total of eight (8) Environmental and Social Performance Standards under IFC's Sustainability Framework of 2012, the applicability of which is assessed in Table 3-1.

Table 3-1: Establishing Applicability of IFC Performance Standards

Performance Standard	How the Performance Standard is applicable?	Statement on Applicability
Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts	The project activities have the potential to cause environmental and social impacts.	Applicable
Performance Standard 2: Labor and Working Conditions	The project may employ skilled, semi-skilled and unskilled personnel for various operations.	Applicable
Performance Standard 3: Resource Efficiency and Pollution Prevention	The project consumes resources (water, energy) and generates effluent and waste (solid, e-waste, hazardous waste, construction, and demolition).	Applicable
Performance Standard 4: Community Health, Safety, and Security	The project could potentially impact the community health, safety, and security.	Applicable
Performance Standard 5: Land Acquisition and Involuntary Resettlement	The project does not involve land acquisition and involuntary resettlement of any kind.	This standard is not applicable as the land is currently owned by SIPCOT and will be taken on lease by TNIHPL. The land is currently vacant and barricaded and there are no encroachments on the site.
Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	The project does not interact with forests or biodiversity rich areas.	Not Applicable
Performance Standard 7: Indigenous Peoples	The project has not been developed on Scheduled Areas or tribal lands.	Not Applicable
Performance Standard 8: Cultural Heritage	The project is not located in proximity to any place of cultural importance.	Not Applicable

3.5.1 World Bank Group's EHS Guidelines

26. The IFC Performance Standard 3: Resource Efficiency and Pollution Prevention refers to World Bank Group's EHS Guidelines. The **EHS General Guidelines** is applicable to the company. For ease of reference, the general guidelines have been integrated with the IFC Performance Standards as applicable.

3.5.2 Method of Assessing Compliance and Gaps

27. The assessment of projects with requirements of IFC Performance Standards 1, 2, 3, and 8 and WB-General EHS guidelines is presented in the subsequent sub-sections.

3.5.3 Method of Assessment

The method of reading the tables under these sections is as follows:

- The requirements of the IFC-PS and WB-EHS guidelines are listed in the first column.
- The level of alignment of the projects with the IFC-PS and WB-EHS guideline requirements has been determined and assessed based on the legend given below.

Aligned	Requirement is applicable to the project. The project is in alignment with the intended outcome of the requirement.
Partially Aligned	Requirement is applicable to the project. The project partially fulfils or partially aligns with the intended outcome of the requirement.
Not Aligned	Requirement is applicable to the project. The project does not fulfill or align with the intended outcome of the requirement.
To be implemented	Requirements are applicable to the project and to be implemented.
NA	Not Applicable

- The last column provides remarks on the status of alignment. Text in **bold** describes the nature of non-alignment.

3.6 Performance Standard 1 – Assessment and Management of Environmental and Social Risks and Impacts

#	IFC PS Requirements 2012	Alignment Status	Details of Conformance/ Non-Conformance
1.	Environmental and Social (E&S) Policy	To be implemented	<ul style="list-style-type: none"> • The project construction has not yet started. • SIPCOT is in the process of finalizing a Contractor for construction work.
2.	Process for identifying the environmental and social risks and impacts	To be implemented	<ul style="list-style-type: none"> • Recommend the contractor to be hired for the construction to have an EMS in place or have a process for identifying environmental impacts, OH&S risks, social risks, and impacts. • Provisions of the requirement should be incorporated by the contractor as a part of the EMP in the construction stage.
3.	Management programs for performance improvement measures and actions for identified environmental and social risks		
4.	Organization structure that defines roles, responsibilities, and authority to implement the ESMS	To be implemented	<ul style="list-style-type: none"> • At present the project team for this project is not identified. • Provisions of the requirement should be incorporated by TNIHPL and the contractor as a part of the EMP in the construction stage.

#	IFC PS Requirements 2012	Alignment Status	Details of Conformance/ Non-Conformance
5.	Emergency preparedness and response (EPR) system	To be implemented	<ul style="list-style-type: none"> The project construction has not started. TNIHPL shall have a project specific EPR protocol in place to ensure smooth functioning.
6.	Procedures to monitor and measure the effectiveness of the management program, as well as compliance with any related legal and/or contractual obligation	To be implemented	<ul style="list-style-type: none"> The project construction has not started. A preliminary checklist/ tracker to monitor legal requirements and other contractual obligations can be developed.
7.	Stakeholder Engagement for information disclosure and grievance mechanism Procedure for external communications receipt, analysis, response and action plan Ongoing Reporting to Affected Communities	To be implemented	<ul style="list-style-type: none"> A TNIHPL representative would be responsible for redressal of the grievances from stakeholders. A Stakeholder Engagement Plan for the Project shall be developed.

3.7 Performance Standard 2 – Labor and Working Conditions

#	IFC PS Requirements 2012	Alignment Status	Details of Conformance/ Non-Conformance
1.	Adopt and implement human resources policies and procedures	To be implemented	<ul style="list-style-type: none"> The project construction has not started, and no labourers have been hired yet at the site. The contractor should have HR policy and procedures that shall be applicable to the project.
2.	Provide workers with documented information regarding their rights under national labour and employment law	To be implemented	<ul style="list-style-type: none"> The project construction has not started, and no labourers have been hired yet at the site. Alignment to this IFC PS requirement cannot be ascertained at the current stage. Provisions of the requirement shall be incorporated by the contractor.
3.	Respect collective bargaining agreement with workers' organization	To be implemented	<ul style="list-style-type: none"> The project construction has not started, and no labourers have been hired yet at the site. Alignment to this IFC PS requirement cannot be ascertained at the current stage. Provisions of the requirement shall be incorporated by the contractor.
4.	Not discourage workers from electing worker representatives, forming or joining workers' organizations for collective bargaining. Will not discriminate against workers joining such organizations.		
5.	Provision of accommodation and basic services for migrant workers	To be implemented	<ul style="list-style-type: none"> The project plans to hire labourers for the project including migrant labourers.

#	IFC PS Requirements 2012	Alignment Status	Details of Conformance/ Non-Conformance
			<ul style="list-style-type: none"> The migrant labours shall be provided labour camp facilities and other basic amenities.
6.	Base the employment relationship on the principle of equal opportunity and fair treatment	To be implemented	<ul style="list-style-type: none"> TNIHPL has not yet finalized any Contractor for construction work. Alignment to this IFC PS requirement cannot be ascertained at the current stage.
7.	Take measures to prevent and address harassment, intimidation, and/or exploitation, especially regarding women	To be implemented	<ul style="list-style-type: none"> The contractor shall develop a POSH policy and a grievance redressal mechanism to address the issues such as harassment, intimidation, etc., especially related to women.
8.	Procedure for addressing collective dismissals/ retrenchment	To be implemented	<ul style="list-style-type: none"> The project construction has not started, and no labourers have been hired yet at the site. The contractor can draft retrenchment procedures which shall be applicable to the employees and workers employed at the project site.
9.	Provide a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns.	To be implemented	<ul style="list-style-type: none"> The project construction has not started, and no labourers have been hired yet. TNIHPL has not yet finalized any contractor for construction work. The contractor can develop a grievance redressal mechanism for the employees and workers. Alignment to this IFC PS requirement includes having a proper grievance redressal channel.
10.	Not employ children in any manner that is economically exploitative, or is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral, or social development	To be implemented	<ul style="list-style-type: none"> No child labour was observed during the site visit. The developer shall develop a Child labor policy/ mechanism for the project. The project construction has not started, and no labourers have been hired yet. The contractor shall not employ child labour in any of its construction and operation activity.
11.	Not employ forced labour, which consists of any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty	To be implemented	<ul style="list-style-type: none"> The project construction has not started, and no labourers have been hired yet. The contractor shall develop a forced labor policy/ mechanism for the project. TNIHPL has not yet finalized any Contractor for construction work. Alignment to this IFC PS requirement cannot be ascertained at the current stage.

#	IFC PS Requirements 2012	Alignment Status	Details of Conformance/ Non-Conformance
12.	Provide a safe and healthy work environment, considering inherent risks in its sector and hazards in work areas		
	a) Slips & Falls b) Struck by objects. c) Work at Height d) Overexertion	To be implemented	<ul style="list-style-type: none"> • The project construction has not started. • Provisions of required safe work environment keeping the health in mind shall be incorporated by the contractor
	e) Confined spaces & excavations	To be implemented	<ul style="list-style-type: none"> • The project construction has not started. • The contractor shall be alert and proactive regarding workers' safety especially in confined spaces and excavations.
	f) Moving machinery	To be implemented	<ul style="list-style-type: none"> • The project construction has not started. • Provisions of safety requirement including proper verification of license shall be incorporated by the contractor
	g) Dust	To be implemented	<ul style="list-style-type: none"> • The project construction has not started. • Provisions of the requirement shall be incorporated by the contractor
	h) Exposure to dust, chemicals, hazardous or flammable materials, and wastes in a combination of liquid, solid, or gaseous forms	To be implemented	<ul style="list-style-type: none"> • The project construction has not started. • The contractor shall have provisions to reduce and avoid exposure to dust, chemicals, hazardous or flammable materials, and waste.
	i) Fire precautions	To be implemented	<ul style="list-style-type: none"> • The project construction has not started. • The contractor shall have fire buckets filled with clean dry sand and ready for immediate use for extinguishing fires.
	j) Potable Water Supply	To be implemented	<ul style="list-style-type: none"> • The project construction has not started. • The contractor should have the provisions for portable water supply in the site area.
	k) First aid	To be implemented	<ul style="list-style-type: none"> • The project construction has not started. • TNIHPL has not yet finalized any Contractor for construction work. • Provisions of the requirement shall be incorporated by the contractor.
	l) Labour camps	To be implemented	<ul style="list-style-type: none"> • The project construction has not started. • The safety and security of the migrant labour camp shall be incorporated by the contractor.

#	IFC PS Requirements 2012	Alignment Status	Details of Conformance/ Non-Conformance
	m) Communication and Training <ul style="list-style-type: none"> • OHS Training • New Task Employee and Contractor Training • On-site first-aid training 	To be implemented	<ul style="list-style-type: none"> • The project construction has not started. • Provisions of the requirement shall be incorporated by the contractor.
13.	With respect to contracted workers, ascertain that the third parties who engage these workers are reputable and legitimate enterprises	To be implemented	<ul style="list-style-type: none"> • TNIHPL has not yet finalized any Contractor for construction work. • Provisions of the requirement shall be incorporated by the contractor.
14.	Monitor primary supply chain on an ongoing basis to identify new risks or incidents of child and/or forced labour, and life-threatening situations	To be implemented	<ul style="list-style-type: none"> • The project construction has not started. • TNIHPL shall regularly monitor its primary supply chain to identify risks and incidents of child/forced labour.

3.8 Performance Standard 3: Resource Efficiency and Pollution Prevention

#	IFC PS Requirements 2012	Alignment Status	Details of Conformance/ Non-Conformance
1.	Implement technically and financially feasible and cost-effective measures for improving efficiency in its consumption of energy, water, as well as other resources focusing on core business areas <ul style="list-style-type: none"> a) Energy Conservation b) Water Conservation 	To be implemented	<ul style="list-style-type: none"> • The project construction has not started. • TNIHPL along with the contractor shall implement measures for improving resource efficiency in its consumption on core activities.
2.	Take measures to avoid and reduce release of pollutants to air, water, and land due to routine, non-routine, and accidental circumstances with the potential for local, regional, and trans-boundary impacts.	To be implemented	<ul style="list-style-type: none"> • The project construction has not started. • TNIHPL along with the contractor shall have provisions for avoiding and reducing release of pollutants.
	a) Noise & Vibration	To be implemented	<ul style="list-style-type: none"> • This is anticipated but will be temporary during construction phase and limited to the project site. • The monitoring of the ambient noise levels should be performed regularly on the project site during the construction phase. • Prior to any heavy equipment/machinery /piling works the contractor should inform surrounding areas as well and it should be prohibited at night.

#	IFC PS Requirements 2012	Alignment Status	Details of Conformance/ Non-Conformance
	b) Soil erosion	To be implemented	<ul style="list-style-type: none"> • Construction activities (including excavation and trenching works) shall be restricted during the monsoon season. • Though the SIPCOT officers have mentioned no significant runoff, the EMP of the project should provide measures to avoid or minimize the same. • For example, avoiding or minimizing heavy excavation works during monsoon season, providing silt traps or canals around the site, etc.
	c) Air quality	To be implemented	<ul style="list-style-type: none"> • This is anticipated but will be temporary during the construction phase. The sources of air pollution will be from trucks transporting materials to the site, operation of diesel engine, and machinery use. • The project shall conduct regular ambient air quality monitoring tests and DG stack emission tests at the project site.
	d) Construction & Demolition Waste	To be implemented	<ul style="list-style-type: none"> • It was informed by SIPCOT project office that excavated soil from other construction sites in SIPCOT will be reused to fill up the project site . • The waste generated shall be properly managed and reused in the construction activities, either as a fill material or otherwise, based on its suitability of reuse to the maximum extent possible. • Safe disposal of the extraneous material should be ensured in the pre-identified disposal locations. In no case, any construction waste will be disposed around the project locations indiscriminately.
	e) Stockpiling of materials	To be implemented	<ul style="list-style-type: none"> • Storage of construction material should be confined to work sites in a way to ensure that there is no obstruction to natural drainage pattern, efficient drainage is maintained. • Stockpiles shall be covered to reduce dust generation. • A Materials Management Plan (including warehouses / storage) is required to be drafted by the contractor. • A contingency plan can be developed by the contractor to prevent the release of any hazardous material during the handling, storage, use or spillage as

#	IFC PS Requirements 2012	Alignment Status	Details of Conformance/ Non-Conformance
			per Manufacture, Storage, and Import of Hazardous Chemical (Amendment) Rules
	f) Wastewater discharges	To be implemented	<ul style="list-style-type: none"> The project construction has not started. Provisions of the requirement shall be incorporated by the contractor
	g) Land & Vegetation management	To be implemented	<ul style="list-style-type: none"> There are trees present on the road adjacent to site. As per SIPCOT project office, the existing trees shall be retained in the site during the construction phase. As per the proposed plan, felling of trees is not envisaged at any stage of the project.

3.9 Performance Standard 4: Community Health, Safety, and Security

#	IFC PS Requirements 2012	Alignment Status	Details of Conformance/ Non-Conformance
1.	Design, construct, operate, and decommission the structural elements or components considering risks to third parties	To be implemented	<ul style="list-style-type: none"> The project construction has not started. TNIHPL along with the contractor should align its design, construction, operation, and decommission considering third party risk.
2.	Avoid or minimize the potential for community exposure to hazardous materials ⁴ and substances that may be released by the project.	To be implemented	<ul style="list-style-type: none"> The project construction has not started. The contractor shall avoid or minimize potential exposure to hazardous substances and materials.
3.	Avoid or minimize the potential for community exposure to water-borne, water-based, water-related, and vector-borne diseases, and communicable diseases that could result from project activities	To be implemented	<ul style="list-style-type: none"> The project construction has not started. Provisions for minimizing community level exposure to water borne diseases during its construction activates shall be incorporated by the contractor
4.	Assess risks posed by its security arrangements to those within and outside the project site.	To be implemented	<ul style="list-style-type: none"> The project construction has not started. TNIHPL has not yet finalized any Contractor for construction work. There are armed security guards near the entrance and exit within the project site of SIPCOT Siruseri.
5.	Assist and collaborate with the Affected Communities, local government agencies, and other relevant parties, in their	To be implemented	<ul style="list-style-type: none"> The project construction has not started. Provisions of the requirements such as access to civic amenities, contact

⁴ "Hazardous waste" means any waste which by reason of characteristics such as physical, chemical, biological, reactive, toxic, flammable, explosive or corrosive, causes danger or is likely to cause danger to health or environment, whether alone or in contact with other waste or substances.

#	IFC PS Requirements 2012	Alignment Status	Details of Conformance/ Non-Conformance
	preparations to respond effectively to emergency situations. <ul style="list-style-type: none"> • Emergency Preparedness and Response • Life and Fire Safety 		numbers of nearby hospitals and emergency services, and tie ups with the nearest hospitals have been established by SIPCOT.
6.	The project's direct impacts on priority ecosystem services may result in adverse health and safety risks and impacts to Affected Communities.	To be implemented	<ul style="list-style-type: none"> • The project construction has not started. • Provisions of the requirement shall be incorporated by the contractor.
7.	Traffic Safety	To be implemented	<ul style="list-style-type: none"> • The project construction has not started. • The site area is connected to the main arterial road inside the SIPCOT IT Park which currently might require provision for traffic safety.
8.	Restricting access to the site, through a combination of institutional and administrative controls	To be implemented	<ul style="list-style-type: none"> • The project construction has not started. • Provisions of the requirement shall be incorporated by SIPCOT by first level restriction entry restriction inside the IT Park
9.	Removing hazardous conditions on construction sites: <ul style="list-style-type: none"> • covering openings to small, confined spaces • ensuring means of escape for larger openings such as trenches or excavations • locked storage of hazardous materials 	To be implemented	<ul style="list-style-type: none"> • The project construction has not started. • The contractor shall have provisions to remove hazardous conditions within the construction site with respect to workers safety.

3.10 Compliance to ADB Safeguards – Key findings

28. This section classifies the risk to the project from environmental stress/climate change as well as the risk to the environment and climate change due to project activities. The risk rating of 'LOW', 'MEDIUM' and 'HIGH' is given to each of the aspects given below. Further, an overall risk is given to the project due to climate / environmental impacts.

3.10.1 Impact of Environmental Stress & Climate Change on Project

Ground Water Development Status:

The project site is in Siruseri in Thiruporur Taluk (Kanchipuram District) which is classified as 'Safe'⁵ in terms of Ground Water Development Status by the Central Ground Water Board (CGWB).

Therefore, the risk to the project from depleting ground water levels is classified as 'LOW'

⁵ Groundwater Categorization by Central Ground Water Board- 'Safe' where the stage of Ground water extraction is less than 70 %

Vulnerability to natural and climate related disasters:

Seismology –

The project lies in the Zone III i.e., Moderate Damage Risk Zone (MSK VII or less) according to the Building Materials and Technology Promotion Council (BMTPC) Earthquake Hazard Map.

Cyclones –

The project lies in the Very High Damage Risk Zone where maximum sustained wind is 48 to 63 m/s according to the BMTPC Cyclone Hazard Map

Floods –

The project is in the Low-risk Zone for floods according to the BMTPC Flood Hazard Map.

The risk to the project from natural and climate related disasters is classified as ‘MEDIUM’. It is recommended to develop a project-level Disaster Management Plan.

Critically Polluted Area:

The project site is not located near (within 5 km distance) any Notified Polluted areas as per Revised CEPI Concept and directions issued in April 2016.

The nearest critically polluted area to the project location is Manali, Tamil Nadu, which is located at an aerial distance of approximately 40 km from the project site.

Thus, the risk to the project from polluted area is negligible.

Presence of Municipal Dump Site/ Hazardous Waste Landfills:

The nearest active dumpsite from the project area is Perungudi Municipal Solid Waste Dumpsite and Perungudi Garbage Yard, which is located at an aerial distance of approx. 14 km towards the North of the Project.

Thus, risk of exposure to pollution from dump sites to the project is negligible.

Sources of pollution around the project location:

There is no major industrial area in close proximity to the project site. The project site is located in SIPCOT IT Park and have various IT & ITES companies, academic institutes and institutional housing in immediate surroundings.

The few small-scale industries located within the 5km radius of the project include engineering units, pharmaceutical formulation, and plastic industry.

Thus, risk of exposure to pollution from the nearby industries to the project is ‘LOW’.

The risk from environmental stress/climate change to the project is classified as 'Medium'.

Necessary mitigation measures will be taken as a part of EMP to be developed for construction.

3.10.2 Impact of Project on Environment & Climate Change

Impacts on Protected Area:

Part of Sonallor reserved forest and Kulattur Reserved Forest are located within the study area. In addition, Mambakkan Reserved Forest and Maduraipakkam Reserved Forest are in close proximity to the study area. However, physical site visits and due diligence confirm that they will not be impacted by the project activities.

Vedanthangal and Karikili Bird Sanctuary is the nearest notified Eco-Sensitive Zone (ESZ) as per the Ministry of Environment, Forest, and Climate Change (MoEFCC) from the project site and is located at an approx. aerial distance of approximately 50 km south-west from the project site.

Therefore, the risk from the project activities to the protected area is 'Low'.

Impacts on Water:

The project site is in Thiruporur Taluk (Kanchipuram District) which is classified as '**Safe**⁶' in terms of Ground Water Development Status by the Central Ground Water Board (CGWB).

Thalambur lake, Siruseri Periya Lake, Siruseri Chetri Lake, and Muttukadu backwaters are located within the study area. However, physical site visits and due diligence confirm that they will not be impacted by the project activities.

The project proposes to utilize water from private tankers & open wells present in the SIPCOT IT Park, for construction purposes.

Since the proposed project is a Green Building, it is envisaged that the wastewater generated will be treated using a STP in site. Further at least 50% of the wastewater treated shall be used for landscaping purposes and greywater recycling.

Therefore, the risk from the project activities to the water resources is classified as 'LOW'.

Impacts on Air/GHG Emissions:

The project during construction phase should use a low sulfur diesel, ensure regular air and noise emission and use acoustically enclosed temporary DG set with sufficient height

The risk from the project activities to air resources is classified as 'LOW'.

The risk of the project activities on environment/climate change is classified as 'Medium' as the project site lies in the Very High Damage Risk Zone of Cyclone Hazards.

Necessary mitigation measures will be taken as a part of EMP to be developed for construction phase.

⁶ Groundwater Categorization by Central Ground Water Board- 'Safe' where the stage of Ground water extraction is less than 70 %.

An overall risk given to the project due to for Climate / Environmental Impacts is 'Medium'.

[The highest category assigned to any of the above-mentioned aspect will be the risk category assigned to the project.]

3.10.3 Social Impact Assessment

29. This section classifies the risk to the project from social aspects. The risk rating of 'LOW', 'MEDIUM' and 'HIGH' is given to each of the aspects given below. Further, an overall risk is given to the project due to social impacts.

- **Proximity to Cultural, Religious & Heritage Sites:** The area was screened to find the cultural and heritage sites.
- Manual screening of cultural and religious sites through google earth showed the below temples, churches, and mosques located in the periphery of the site.
- However, none of these sites are on the project site or have access through the project site.

List of Religious Places		
Name	Distance (km)	Direction
Sri Kailasanathar Temple	1.10	NNW
Navagraha temple	2.35	SW
Jagannath Shrine	3.5	NE
Hameed Fathima Jumma Masjid	1.02	E
Selva vinayakar temple	2.0	W
Arulmigu Shri Sarva Siddhi Vinayagar Temple	2.45	NW
Krishnan Temple	1.57	N
Mohamed Sathak AJ Masjid	0.9	NW
Masjid E Qadiriya	2.2	NW
Jamia Masjid and Islamic Center	1.61	N
Marina Mall Masjid	1.0	NE
Rahmania Jumma Masjid	2.43	NE
NGC Church	24.4	NE
Hosanna House (Church)	2.13	NW
Praise A.G Church	2.22	W
REFUGE OF GOD CHURCH (RGC)	2.30	NW

The risk to the project based on location of the cultural, religious and heritage sites is classified as 'LOW'.

- **Practices on Anti bribery and Anti-corruption:**

TNIHPL shall develop policies on Anti bribery and Anti-corruption which are to be adopted by the contractor at project or organisation level as the SPV is newly established.

The risk to the project based on the practices on Anti bribery and Anti-corruption is classified as 'MEDIUM'.

- **Provision of welfare facilities for workers:**

The construction work has not yet started. The contractor shall ensure provisioning of welfare facilities for workers before commencing the construction.

The risk to the project based on provision of welfare facilities for workers is classified as 'LOW'.

- **Prevention of child/forced Labour:**

A prohibition of Child/Forced labor policy shall be adopted for the project.

The risk to the project based on practices related to prevention of child/forced Labour is classified as 'MEDIUM'.

- **Grievance mechanism for workers:**

TNIHPL shall develop a grievance redressal mechanism for the employees, workers and all stakeholders of the project.

The risk to the project based on the current grievance mechanism is classified as 'MEDIUM'.

An overall risk given to the project due to Social Impacts is 'MEDIUM'.

[The highest category assigned to any of the above-mentioned aspect will be the risk category assigned to the project.]

3.10.4 Green Certification

30. The project is recommended to obtain a green building certification.

3.10.5 Stakeholder Engagement

31. A stakeholder engagement plan shall be developed for the project prior to construction of the project. Accordingly, consultations will be held with all key stakeholders including representatives from the surrounding communities and documented.

3.10.6 Environment & Social Management System (ESMS)

32. The construction work has not yet started yet on the site. An EHS personnel shall be employed on the site who shall be responsible for ensuring the health and safety and provisioning the welfare of the workers.

3.10.7 Chance Find Procedure

33. The chance find procedure defines the actions to be taken in case any previously unknown heritage resources, such as archaeological remains and objects, are discovered during the construction, excavation, or operation of a project.

34. The IFC performance standard 8 on Cultural Heritage includes some guidelines on the chance find procedures. According to the IFC PS-8 chance find procedure, the company is responsible for siting and designing a project to avoid significant damage to cultural heritage. When the proposed location of a project is in areas where cultural heritage is expected to be found, either during construction or operations, the company will implement chance find procedures established through the Social and Environmental Assessment.

35. The client will not disturb any chance finds further until an Assessment by a competent specialist is made and actions consistent with the requirements of this Performance Standard are identified.

36. The general procedure for a Chance Find case occurring at project site has been described below.

1. **Discontinuation of work:** The work in progress shall be paused in the vicinity of the find until the concerned authorities are informed. The construction work shall resume only when the concerned authorities grant permission to do so.
2. **Informing higher authorities:** The site supervisor on duty shall be notified of the chance find, who shall then escalate the information further to higher authorities.
3. **Proper records:** The records of the find shall be well recorded with proper reporting and photos.
4. **Site isolation and security:** The site of location of the find and its vicinity shall be completely isolated and secured to prevent any damages to the find. Enough security shall be maintained surrounding the area till the concerned authorities take over.
5. **Preliminary evaluation:** Once the archaeologists approach the site, the preliminary evaluation shall be performed through quick assessment for determining the value and importance of the find based on various parameters such as aesthetic, historic, scientific or research, social and economic values of the find.
6. **Recording and reporting:** The sites with minor significance shall be recorded by the Archaeologist as soon as possible to prevent causing any delays in the work. This should then be further reported to higher authorities such as the Ministry or the concerned agencies. The sites with high significance, the Ministry, or the concerned Archaeological agency responsible for the protection of National Heritage shall be immediately informed without a delay. The archaeologist on site shall properly record the details and photos of the finding and share it with the concerned authorities for its identification and thorough assessment.

37. Investigation by Ministry: The Ministry shall be responsible for investigating the matter at the earliest and submit a written response. This shall be followed by decisions on handling the find including its conservation, restoration, preservation, and salvage. In case the investigation is not performed in the earliest given time frame, the suspended construction works shall be authorized to resume without any further delay.

4 MITIGATION ACTION PLAN

4.1 Methodology of Action Plan

38. The E&S Action Plan (ESAP) for establishing compliance to EHS legal requirements guidelines will be provided.

The method of reading the E&S – Action Plan is as follows:

- a) The first column lists the non-compliance identified during the evaluation.
- b) The recommended actions for closing the non-compliance have been specified in the second column.
- c) The responsibility of implementation and required timeline is presented in the third & fourth columns.
- d) The fifth column assigns priority as High, Medium, Low, and Good Practice based on the nature of non-compliance identified.

The last column provides monitoring guidance (evidence to be checked on completion of the action).

4.2 Prioritization of Actions

39. The actions will be classified as 'High', 'Medium', 'Low' and 'Good Practice', to enable prioritization and planning of human and financial resources.

- **High** priority actions demand urgent attention. These actions if not implemented could lead to legal liabilities or emergency situations. These actions should be implemented at the earliest. These are mostly related to absence of consent/ permit/ approval from regulatory authorities that pose a threat to business continuity.
- **Medium** priority actions are those which are management program oriented. This also covers such actions, which if not implemented, can lead to potential legal liabilities. These actions would need time to create a systemic approach.
- **Low** priority actions are those which are management program oriented. The actions are more practice oriented.
- **Good Practice** are actions, which if implemented by the Company would add value to the system.

4.3 E&S Action Plan

#	Legal Compliances	Recommended Action	Responsibility	Timeline	Priority	Monitoring Mechanism	Budget
Environment							
1.	<ul style="list-style-type: none"> Consent to Establish/Operate from SPCB Consent to Establish/Operate for batching plant and DG sets. 	<ul style="list-style-type: none"> TNIHPL/PMC shall obtain a Consent to Establish (CtE) from SPCB post which a Consent to Operate (CtO) shall be obtained. Contractor shall obtain a CtE and CtO for the batching plant, if it is planned for use on site. TNIHPL/PMC shall obtain a CtO for the DG set. TNIHPL/PMC shall also comply with conditions stipulated in Consent to Establish/Operate at all times. 	TNIHPL/PMC and contractor	3 months to obtain CTE	High	CtE & CtO for project from SPCB	Management Time – Human Resources cost (Need for an Environmental officer to monitor conditions of CtO and CtE) - Part time Environmental Officer- INR 4,00,000/- per annum
2.	<ul style="list-style-type: none"> Noise Pollution (Regulation and Control) Rules, 2000 	<ul style="list-style-type: none"> TNIHPL/PMC shall conduct noise and vibration tests. 	TNIHPL/PMC	6-8 months (during construction period)	High	Noise and vibration test reports	
3.	<ul style="list-style-type: none"> Hazardous Waste Construction & Demolition Waste Solid Waste 	<ul style="list-style-type: none"> Development of a waste management plan to tackle all the different types of waste to be generated during the construction phase Sound disposal of waste generated at the site to authorized vendors or authority shall be ensured by the TNIHPL. 	TNIHPL/PMC	6-8 months	High	Waste disposal records (solid waste, hazardous waste, construction & demolition waste, and others), challans, and manifests.	Management Time – Human Resources cost (Need for an Environmental officer to monitor and implement waste management practices)- Part time Environmental Officer- INR 4,00,000/- per annum

#	Legal Compliances	Recommended Action	Responsibility	Timeline	Priority	Monitoring Mechanism	Budget
4.	<ul style="list-style-type: none"> Environmental protection rules (DG sets) 	<ul style="list-style-type: none"> TNIHPL/PMC shall ensure adequate fire safety around the DG set. TNIHPL/PMC shall conduct regular stack monitoring for the DG set. 	TNIHPL/PMC	3 months	High	Photographic evidence of fire safety equipment around DG set. DG Stack monitoring reports	Management Time – Human Resources cost (Need for an Environmental officer to monitor and implement waste management practices)- Parttime Environmental Officer- INR 4,00,000/- per annum)
Occupational Health & Safety							
1.	<ul style="list-style-type: none"> Building & Other Construction Work (BOCW) Rules Central Electricity Authority (CEA) Regulation Central Motor Vehicle (CMV) Rules 	<ul style="list-style-type: none"> TNIHPL/PMC shall ensure that the contractor appointed develops and implements an EHS Plan as per BOCW, CEA rules & CMV Rules 	Contractor	3-6 months	High	Copy of EHS Plan developed	Management Time – Human Resources cost- HR Department (Existing Personnel or outsource liaison officer 3 weeks- INR 75,000/-)
2.	<ul style="list-style-type: none"> Fire NOC Airport NOC 	<ul style="list-style-type: none"> TNIHPL/PMC shall ensure that the Fire NOC and NOC from Airport Authority is obtained from the relevant authorities for the project. 	TNIHPL/PMC and Contractor	3-6 months	High	Copy of Fire NOC Copy of NOC from Airport Authority of India	Management Time – Human Resources cost (Existing Personnel or outsource liaison officer 3 weeks- INR 1,50,000/-)
Employee Welfare/ Social							
1.	<ul style="list-style-type: none"> BOCW Registration Contract Labour Registration/License 	<ul style="list-style-type: none"> TNIHPL/PMC must ensure that BOCW registration, registration & license under 	TNIHPL/PMC and Contractor	6 months	Medium	Copy of application of registration	Management Time – Human Resources

#	Legal Compliances	Recommended Action	Responsibility	Timeline	Priority	Monitoring Mechanism	Budget
	<ul style="list-style-type: none"> Migrant Labour Registration/License Private Security Agency License 	<p>Contract Labour Act, registration & license under Inter-state Migrant Workers Act is obtained by Contractor / Company / Subcontractor.</p> <ul style="list-style-type: none"> The Security agency appointed on site shall obtain PSARA license. 				certificates and licenses	cost- HR manager Part time basis HR Manager- INR 3,50,000 per annum
2.	<ul style="list-style-type: none"> Minimum Wages EPF / ESIC Deductions Employee Compensation Insurance Child & Forced Labour Prohibition POSH at Workplace 	<ul style="list-style-type: none"> The contractor must ensure that all workers on site are paid equal to or above minimum wages latest notification, contribution to EPF and ESIC is made, Employee Compensation Insurance is obtained, Child/forced labour is prohibited, and POSH policy and procedures are established. 	Contractor /PMC	6 months	Medium	<p>Copy of Wage register</p> <p>EPF / ESIC Contribution</p> <p>Compensation Insurance</p> <p>Policies on POSH, Child/forced labour</p>	Management Time – Human Resources cost- HR manager- Part Time basis HR Manager- INR 3,50,000 per annum

4.4 ESAP – IFC Performance Standards

#	IFC PS Requirement	Recommended Action	Responsibility	Timeline	Priority	Monitoring Mechanism	Actual Estimate
1.	<ul style="list-style-type: none"> E&S Policy Identification of E&S risk and impacts Management Programs Roles & Responsibilities 	<ul style="list-style-type: none"> The TNIHPL / Contractor must develop an E&S Policy, identify potential risk and impacts arising out of project operations on which management programs are to 	TNIHPL/PMC or the Contractor	6-8 months	Medium	<p>E&S Policy</p> <p>HIRA & Aspect Impact Register</p>	Management Time and Third-party consultant (3 Months- Professional Fees- INR 2,00,000)

#	IFC PS Requirement	Recommended Action	Responsibility	Timeline	Priority	Monitoring Mechanism	Actual Estimate
	<ul style="list-style-type: none"> Emergency preparedness and response (EPR) system Monitor Effectiveness of Management Programs, Legal & Contractual Compliance Stakeholder engagement 	<p>be developed by assigning roles and responsibilities to individuals, develop and EPR system which shall identify all the potential emergencies which may occur.</p> <ul style="list-style-type: none"> Monitor management programs periodically. Identify stakeholders, develop stakeholder engagement plan and record and resolve stakeholder grievances. 				<p>Management programs</p> <p>Roles & Responsibilities</p> <p>EPR Plan and mock drills</p> <p>Legal Register</p> <p>Grievance register</p>	
2.	<ul style="list-style-type: none"> HR Policies & Procedure Provide documented information to workers on their rights Respective collective bargaining Accommodation and basic service for migrant workers Equal Opportunity Retrenchment Worker Grievance redressal Discourage Child/Forced Labour Provide Safe & Healthy Workplace Confined spaces and excavations Fire precautions 	<ul style="list-style-type: none"> The TNIHPL / Contractor must develop HR policies and procedures and provide documented information to workers on their rights. Workers shall not be discouraged from making their worker unions Basic accommodation and welfare facilities shall be provided especially to migrant workers Equal opportunity shall be available for male and female workers, child/forced labour shall be prohibited, and a safe healthy workplace shall be provided. The excavated earth piled up on other SIPCOT sites will be reused for construction 	TNIHPL / Contractor	6-8 months	Medium	<p>HR Policy & Procedures</p> <p>Accommodation & welfare facilities</p> <p>Clean & safe workplace and practices</p>	<p>Management Time- HR Department</p> <p>Part time basis HR Manager- INR 3,50,000 per annum</p>

#	IFC PS Requirement	Recommended Action	Responsibility	Timeline	Priority	Monitoring Mechanism	Actual Estimate
		<p>purposes. The construction area needs to be maintained and ensured for proper safety and precaution.</p> <ul style="list-style-type: none"> TNIHPL shall ensure to provide fire prevention and firefighting services/ equipment on site at various key locations. Mock drills and fire safety trainings should also be conducted regularly. 					
3.	<ul style="list-style-type: none"> Resource Efficiency – Energy & Water Avoid and reduce the release of pollutants Air quality Construction and demolition waste Stockpiling of Materials 	<ul style="list-style-type: none"> TNIHPL / Contractor must adopt water and energy conservation practices and avoid/minimize the release of pollutants from its operations. Storage of construction material should be confined to work sites in a way to ensure that there is no obstruction to natural drainage pattern, efficient drainage is maintained. A contingency plan should be developed to prevent the release of any hazardous material during the handling, storage, use or spillage as per Manufacture, Storage and Import of Hazardous Chemical (Amendment) Rules The solid waste burning on the project site shall be avoided. Periodic ambient air 	TNIHPL / Contractor/ sub-contractor	6-8 months	Medium	<p>Water/Energy conservation practices</p> <p>Pollution prevention practices</p>	<p>Management Time</p> <p>Part time Environmental Officer- INR 4,00,000/- per annum</p>

#	IFC PS Requirement	Recommended Action	Responsibility	Timeline	Priority	Monitoring Mechanism	Actual Estimate
	<ul style="list-style-type: none"> Land & Vegetation Management 	<p>quality monitoring shall be performed.</p> <ul style="list-style-type: none"> The waste generated should be properly managed and reused in the construction activities, either as a fill material or otherwise, based on its suitability of reuse to the maximum extent possible. Safe disposal of the extraneous material should be ensured in the pre-identified disposal locations. In no case, any construction waste will be disposed around the project locations indiscriminately. Excavated excess earth/ soil (cut and filling), should be and reused in the construction activities, either as a fill material or otherwise disposed in an authorised/ identified landfill or disposal area. All reasonable measures should be undertaken to ensure that no native fauna is harmed or placed at risk during the course of the clearing activities 					
4.	<ul style="list-style-type: none"> Consider, avoid, and minimize risk to third parties 	<ul style="list-style-type: none"> TNIHPL / Contractor shall ensure that no negligible risk 	TNIHPL/PMC or Contractor	6-8 months	Medium	Periodic monitoring records / management	Management Time-Hire Part time Safety Officer

#	IFC PS Requirement	Recommended Action	Responsibility	Timeline	Priority	Monitoring Mechanism	Actual Estimate
	<ul style="list-style-type: none"> Collaborate with affected communities Traffic Safety Access restriction Remove hazardous conditions 	<p>to third party shall be caused due to company operations.</p> <ul style="list-style-type: none"> Traffic safety measure shall be followed within and outside the site. The site shall be barricaded from all sides to ensure access control and all hazardous conditions shall be removed/resolved immediately. 				<p>procedures developed as part of E&S management system.</p>	INR 3,50,000/-

5 CONCLUSIONS AND RECOMMENDATIONS

39. This ESDD report examined the project in a detailed manner and assessed the various existing environmental parameters in and around the project along with compliances against the applicable environmental, occupational health & safety, and legal regulations. The project site is not in proximity to a sensitive ecosystem. The project is not proximal to significant locations from a historical and cultural perspective. The project will not cause any significant adverse environmental and social impacts during construction, or operation of the project. The risks to the project at this stage have been classified as medium-high as per the rating risk tool. However, most of the associated impacts are site specific and manageable. They are expected to be limited to the construction phase and will therefore be temporary in nature. Adequate mitigation actions will be undertaken in line with management and monitoring of the set of recommended mitigation measures. No physical and/or economic displacement of people shall be required for project implementation.

40. A Mitigation Action Plan (MAP) has been suggested for any potential environmental, social and governance impacts that may arise from the project. The detailed review of the MAP needs to be undertaken by the promoter and any suitable modifications may be made by the project team in consultation with TNSF.

41. In order to manage the potential adverse environmental impacts, especially in the construction phase of the project, the recommendations provided in the MAP should be followed with due diligence. Some of important actions required are:

- Regular monitoring of the recommended measures shall be carried out during the construction phase of the project. The MAP should be revisited in case new impacts/non-compliances are identified.
- Obtaining all the listed necessary compliances as specified in the MAP.
- Training of staff on MAP-related issues.
- Activation of the Grievance Redress Committee and prompt response to public complaints.
- Develop a comprehensive stakeholder engagement and management plan for smooth disclosure of information.
- Execution of Lease agreement of land and an update on the same will be submitted to ADB in the next monitoring report.

The document will be updated once the stakeholder consultations are conducted prior to the construction of the project.

ANNEXURE 1 – PHOTOS



Roadside boundary of the site



Presence of tree vegetation adjoining the site



Earth filling activities

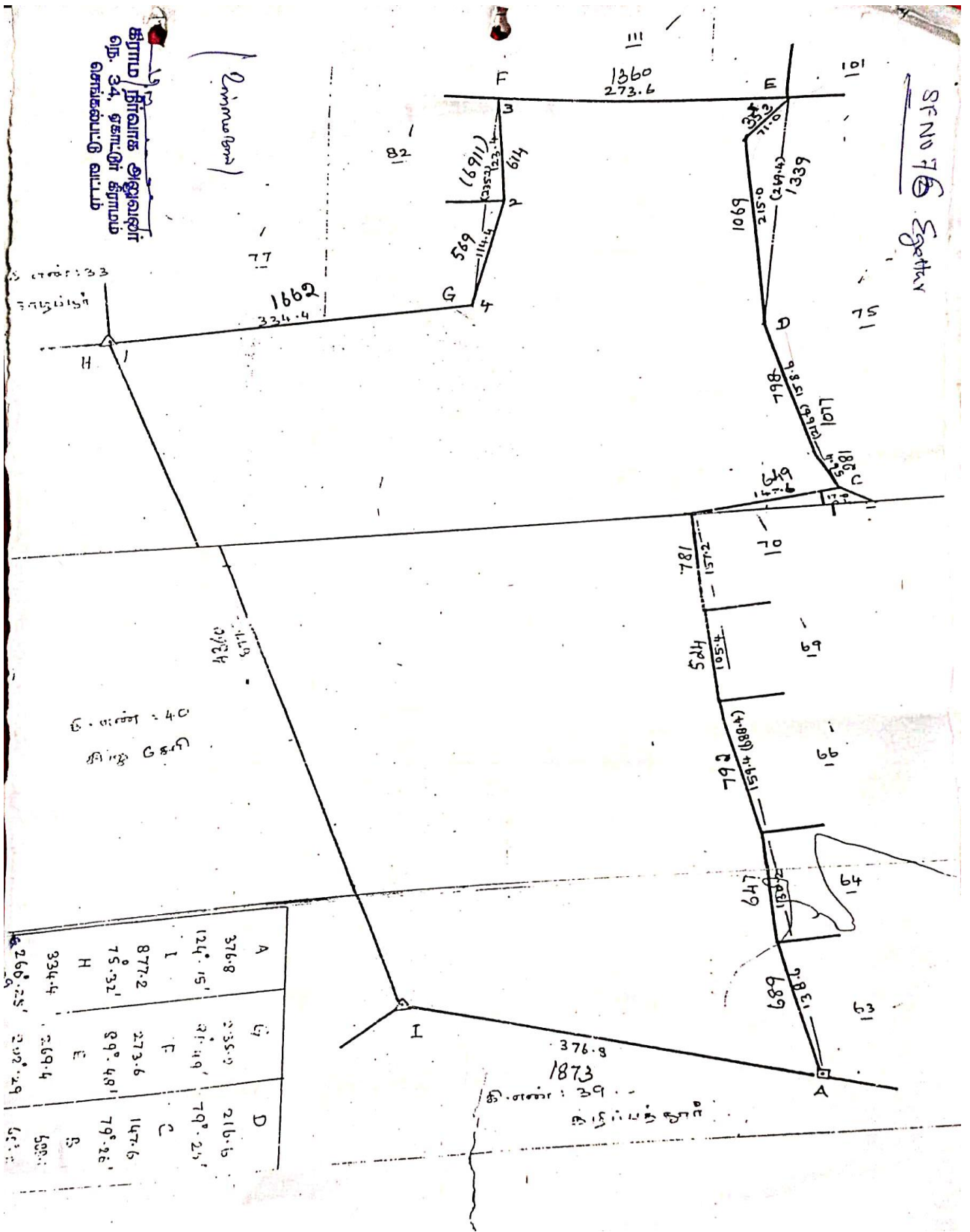


Fire station near the site



Roadway connectivity to the project site

ANNEXURE 2 - LIST OF DOCUMENTS REVIEWED



ANNEXURE 3 - INVOLUNTARY RESETTLEMENT IMPACT ASSESSMENT WITH COVID-19 SCREENING CHECKLIST

A. 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.

B. Information on subsection/section:

- District/administrative name: Kanchipuram District
- Location (km): 15 km from Chennai Bypass and 19 km from Chennai Outer Ring Road
- Civil work dates (proposed): _____
- Technical description: The project involves the construction of women hostel ground+12 floors with an expected capacity of 807 beds located in Egattur Village, Thiruporur Taluk, Kanchipuram District, Tamil Nadu

C. 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 for the site will be leased from SIPCOT by TNIHPL.
2. Is the site for land acquisition known?		√		
3. Is the ownership status and current usage of land to be acquired known?	√			The land is currently registered with SIPCOT Siruseri.
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?		√		The land is a vacant land free from any habitation.
6. Will there be loss of agricultural and other productive assets due to land acquisition?		√		As per the Directorate of Town and Country Planning (DTPC) and site observation, the land is classified as dry.
7. Will there be losses of crops, trees, and fixed assets due to land acquisition?		√		The land has some tree coverage. However, it has been decided that trees shall be retained.
8. Will there be loss of businesses or enterprises due to land acquisition?		√		

Probable Involuntary Resettlement Effects	Yes	No	Not Known	Remarks
9. Will there be loss of income sources and means of livelihoods due to land 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?		√		
12. 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? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes [√] N/A				
If yes, approximately how many?				
Are any of them poor, female-heads of households, or vulnerable to poverty risks? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes [√] N/A				
Are any displaced persons from indigenous or ethnic minority groups? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes [√] N/A				

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

Risk screening questions	Yes	No	Not sure	Remarks
1. Will project preparation be affected by the inability of experts/consultants, to visit the project site because of the pandemic?		√		The consultants have visited the site and drafted the necessary project documents.
2. 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. <i>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.</i>		√		

<p>3. 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> <p><i>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.</i></p>		√		
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Note: The project team may attach additional information on the project, as necessary.

ANNEXURE 4 - INDIGENOUS PEOPLE IMPACT ASSESSMENT WITH COVID-19 SCREENING CHECKLIST

1. 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.

2. Information on project/subproject/component:

- a. District/administrative name: Kanchipuram District
- b. Location (km): 15 km from Chennai Bypass and 19 km from Chennai Outer Ring Road
- c. Civil work dates (proposed): _____

3. 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. There is no presence of indigenous people during the due diligences conducted.
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?		√		

KEY CONCERNS (Please provide elaborations in the Remarks column)	YES	NO	NOT KNOWN	Remarks
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?		√		
10. Will the project directly or indirectly affect indigenous people's 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?		√		
C. Identification of Special Requirements 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?		√		

4. Indigenous People Impact

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

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

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

5. COVID-19 Risk Screening for IP Impact Assessments

Risk screening questions	Yes	No	Not sure	Remarks
1. Will project preparation be affected by the inability of experts/consultants, to visit the project site because of the pandemic?		√		The consultants have visited the site and drafted the necessary project documents.
2. 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. <i>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.</i>		√		
3. 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.		√		

ANNEXURE 5 – INFORMAL PUBLIC CONSULTATION

SIPCOT Project by M/s TNIHPL

CONSULTATION INFORMATION

CONSULTATION SUMMARY							
S. No	Date / Time / Venue of Meetings	Stakeholders	No. of Participants			Issues discussed	Project responses
			Male	Female	Total		
1	23-05-2023 Project site	██████████	1		1	<ul style="list-style-type: none"> • Women Safety and Security • Water Security • Transit facility • Waste management 	No major concerns have been noted.

Attendance Sheet

S.No.	Name	Occupation / Designation	Gender	Area/ location	Contact No
1	██████████	██████████	Male	Phone Call	