

Due Diligence Report

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March 2025

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

Working Women Hostel, Coimbatore by Tamil Nadu
Working Women's Hostels Corporation Limited,
Tamil Nadu

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

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Environment, Social, and Governance Due Diligence Report

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IND: Inclusive, Resilient and Sustainable Housing for Urban Poor Sector Project in Tamil Nadu – Working Women Hostel, Coimbatore by Tamil Nadu Working Women’s Hostels Corporation Limited, Tamil Nadu

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ABBREVIATIONS

S. No.	Abbreviation	Extension
1.	BMTPC	Building Materials and Technology Promotion Council
2.	BUA	Built-up Area
3.	CPCB	Central Pollution Control Board
4.	CTE	Consent to Establish
5.	CTO	Consent to Operate
6.	DG set	Diesel Generator Set
7.	EIA	Environmental Impact Assessment
8.	E&S	Environmental and Social
9.	EHS	Environmental, Health & Safety
10.	EMC	Environmental Management Centre LLP
11.	EPF	Employee Provident Fund
12.	ESAP	Environmental and Social Action Plan
13.	ESGDD	Environmental Social and Governance Due Diligence
14.	ESGMS	Environmental, Social and Governance Management System
15.	ESI	Employee State Insurance
16.	EWS	Economically Weaker Sections
17.	FSI	Floor Space Index
18.	HR	Human Resources
19.	HSE	Health, Safety and Environment
20.	INR	Indian National Rupees
21.	KWH	Kilo Watt Hour
22.	KVA	Kilo Volt Ampere
23.	LPG	Liquified Petroleum Gas
24.	NABL	National Accreditation Board for Testing and Calibration Laboratories
25.	NOC	No Objection Certification
26.	NGO	Non-Governmental Organization
27.	OHS	Occupational Health and Safety
28.	PPE	Personal Protective Equipment

29.	PM	Particulate Matter
30.	PMC	Project Management Consultant
31.	PUC	Pollution Under Control
32.	RCC	Reinforced Cement Concrete
33.	SPCB	State Pollution Control Board
34.	TNWWHCL	Tamil Nadu Working Women’s Hostels Corporation Limited
35.	TNIFMC	Tamil Nadu Infrastructure Fund Management Corporation Limited

Introduction

1.1 Background

Tamil Nadu Infrastructure Fund Management Corporation Limited (hereafter referred to as TNIFMC), is an Asset Management Company (AMC) promoted by 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 Working Women’s Hostel Corporation Limited 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 areas of TNWWHCL are:

- Affordable housing- with focus on housing for the Economically Weaker Section (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
- Others- Rental housing for students, co-living spaces etc.

TNSF is considering an investment in a “Working Women’s Hostel” located at Government Medical College-Coimbatore, next to Electronics Corporation of Tamil Nadu Limited Special Economic Zone (ELCOT SEZ), Vilankurichi Road, Peelamedu, Coimbatore South, Tamil Nadu. As part of the investment process, TNIFMC has hired Grant Thornton Bharat LLP (hereinafter referred to as “GT Bharat”), a sustainability and E&S services firm, to conduct the ESG due diligence for the proposed project.

1.2 Primary objective & Scope of Study

The objective of conducting the ESG due diligence is to assess the rate of ES&G risks associated with the proposed project. The primary objective is to identify, mitigate and recommend appropriate measures to improve the ESG performance of the proposed project to aid TNWWHCL to make an informed decision on the proposed investment.

1.3 Scope of Work

Assessment of environmental, social and governance aspects of the project owner and proposed project against the applicable standards. The consultant will use the TNIFMC’s ESG policy, Asian Development Bank, World Bank, and International Finance Corporation (IFC) Performance Standards. The assessment will include but not limited to the following aspects:

Background check of project-owner/- on corporate governance including policies and incidents related to anti-bribery and anti-corruption, fraud, whistle-blower, diversity and inclusiveness, prevention of sexual harassment, child labour, forced labour, environmental health and safety policies, governance structure, regulatory compliances, incident against Key Management Personnel of the project owner/promoter/sponsor etc.

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
- 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 effluents 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 on 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?
- On-site consultation with relevant stakeholders such as the local community, key regulatory authorities, etc.
- 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 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 safeguard compliance.
- Due Diligence will also be conducted if the project has ay “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 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/ promoter/ 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/ promotor/ sponsor

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

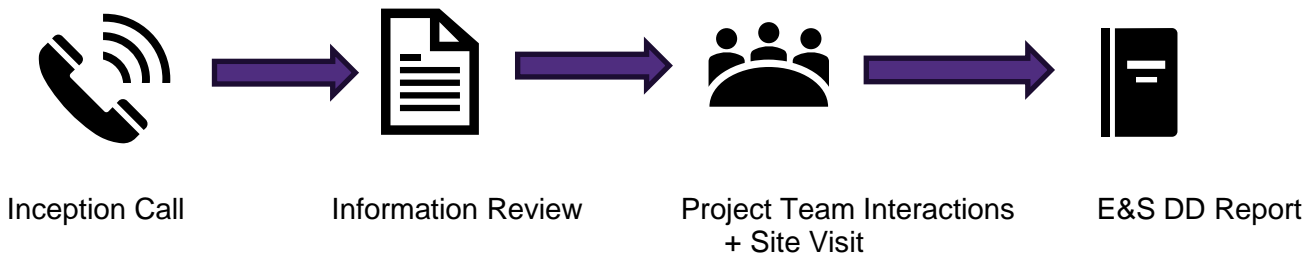
1.4 Reference Framework for ESG Due Diligence

The reference framework for ESG–DD includes:

- TNSF’s EGSMS
- National, State (Tamil Nadu) and sector specific rules and regulations covering ESG aspects.
- World Bank, International Finance Corporation and Asian Development Bank Guidelines

1.5 Approach & Methodology of ESG Due Diligence

The approach and methodology adopted for ESG Due Diligence is presented in the subsequent subsections.



1.5.1 Inception Call

An inception call was conducted with the Company with the following objectives:

- ❖ Obtain an overview of the project and status.
- ❖ Discuss Site visit and project data requirements.
- ❖ Explain the approach and methodology adopted for the ESG Due Diligence.

1.5.2 Information Review

GT Bharat 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 the Company in the sheet. Additional requests for information were made based on the outcomes of the subsequent interactions. The documents and records received from the target company were reviewed for scoping the project.

1.5.3 E&S Site Visit

E&S Site visit was conducted on 26th November 2024 at the Client project site by the assistants from the District Social Welfare Office to guide the representatives of Grant Thornton Bharat LLP during the due diligence process. Team interactions were held between to corroborate the project details received through documents with the management and with the site team.

1.5.4 Team Interaction

Initial interaction took place between SPOC persons from Grant Thornton Bharat and TNIFMC representative. However, assessment of the target company and project management for the Coimbatore location was conducted through discussions with District Social Welfare officers on the following topics:

- Understanding the following aspects of project implementation:
 - EHS management measures adopted in the project.

- E&S Legal Compliance management in the project
- Organization structure at project level and entity level implementation of environmental and social aspects of the project.
- Contractor management with respect to fair wages, equal remuneration, inter-state migrant workers, building construction workers, contract labour etc.
- Measures planned/undertaken on environment, health & safety management at the project site including safe work practices, waste management, training of workers, incident management, emergency preparedness & response and local community grievance redressal.
- Practices on human resource management including payment of wages, hours of work, leaves, worker grievance handling, procedures of prevention of sexual harassment for women workers, labour accommodation.
- GHG emissions sources and mitigation, water and energy conservation measures adopted.

1.6 Limitation of the Study

The present E&S Due Diligence of the proposed project is compiled based on the E&S site visit observations and the documentation as provided by the developer.

2. Project Overview

The “Working Women’s Hostel” is a working women’s hostel project which is to be developed by Tamil Nadu Working Women’s Hostel Corporation Limited (TNWWHCL). The project is to be developed close to Government Medical College-Coimbatore within Vilankurichi, beside Coimbatore IT- Road and located close to the ELCOT EZ area on Vilankurichi Road, Peelamedu, Coimbatore, Tamil Nadu. The site is located at latitude 11°01’48” N and longitude 77°01’04” E. The details of the proposed developments are provided below. At present, no construction activity is ongoing at the project site.

2.1 Current Status of the Project

Currently, the project proponent has not begun construction as mentioned earlier; however, TNWWHCL has selected a potential land parcel for the construction of the "Thozhi" (Friend) Hostel. However, the land is in process of being transferred from Coimbatore Medical College to the Social Welfare Department. The project will have a total built up area of 2,632 m² and take a total of 12 months to finish completion.

2.2 Project Location, Connectivity and Land Use Land Cover

The Project site is located in Vilankurichi, beside Coimbatore IT- Road and closely located to the ELCOT EZ area, on Vilankurichi road.



Figure 1: Project Location

2.3 Land

As per the DFR, the project is proposed to be constructed over a land of 0.5 acres and have a built-up area of 2,632.8 sq. m. (28,340 sq feet). As per the land ownership details provided within the assessment report conducted by ITCOT, it is clear that the proposed land parcel for the project is in the process of being transferred from Coimbatore Government College to the Social Welfare and Women Empowerment (SW&WE) Department of Tamil Nadu. Once it is transferred to SW&WE department, it will be leased to TNWWHCL for a period of 28 years. The land transfer process is expected to be completed by March 2025 and the construction may commence from April 2025. The ES DD will be updated with the land lease documents once it is registered. The due diligence confirms that land does not have any voluntary/involuntary resettlement or displacement, legacy related issues or cattle

grazing/rearing or any other use. The land parcel is a vacant land, devoid of any structure or building in the allocated project site.

2.4 Topography

The topography of an area mainly depicts the elevation, relief, developed infrastructure features (schools, residential complexes, office spaces, hills, etc.) and man-made features (roads, highways, railways, walking paths.) The topography of the project site is vegetated land, covered with bushes and shrubs with an average elevation of 434 to 439 m above mean sea level.

2.5 Connectivity

Table 1 Connectivity to the project site

S. No.	Site location from key focal nodes	Observation
1.	Project Borders	The Site falls in the neighborhood of Peelamedu, Vilankurichi Road, with Kovai medical college to the east and west; ELCOT SEZ boundary to the north; and Coimbatore IT Park Road to the south.
2.	Highway/ Access Road	The proposed site in Vilankurichi is located along National Highway 544, Perundurai-Coimbatore Road, connecting important cities in Tamil Nadu such as Erode, Tiruppur, and Salem.
3.	Railway Station	Pothanur Railway Station, Nanjundapuram Road, Sundarapuram, Kurichi, Podanur, Tamil Nadu, 13 Kms from the project site Coimbatore Railway Station, Tamil Nadu, Pin code - 641018 which is located 8.5 kms from the project site.
4.	Bus station	Nearest bus station is the Coimbatore Singanallur bus stand which is 4.5 km from the project site.
5.	Airport	The nearest airport to the project area is Coimbatore International Airport, which is 1.93 km from the project site.

2.6 Social Infrastructure

Table 2 Social Infrastructure

1.	Schools	<ul style="list-style-type: none"> GRG matriculation secondary high school- 0.36 Kms Vidhya Niketan School- 2 Kms GRD Public school- 1.32 Kms VIBGYOR High Coimbatore CBSE School, Kamarajar Road, next to Aloft Hotel, R.V.L Nagar, Uppilipalayam, Tamil Nadu- 2.06 Kms
2.	Health facilities	<ul style="list-style-type: none"> Coimbatore Medical Hospital- 6.45 Kms
3.	Colleges	<ul style="list-style-type: none"> Coimbatore Medical College, Avinashi Road, Peelamedu, Civil Aerodrome Post, Coimbatore, Tamil Nadu- 0.53 Kms Coimbatore Institute of Technology, Avinashi Road, Civil Aerodrome Post, Coimbatore, Tamil Nadu- 0.69 Kms PSG College of Arts and Science, Avinashi Road, PSG CAS, Civil Aerodrome Post, Coimbatore, Tamil Nadu- 1.77 Kms Government Polytechnic College Coimbatore, Avinashi Road, Civil Aerodrome Post, Coimbatore, Tamil Nadu- 1.26 Kms

4.	Police station & academy	<ul style="list-style-type: none"> • Athiyaman TNPSC POLICE- 1.23 Kms • Peelamedu E2 Police Station, Avinashi - Coimbatore Road, Coimbatore, Tamil Nadu- 1.02 Kms
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2.7 Hydrology

In addition to examining how human activity affects water availability and conditions, the study of hydrology also examines how water is distributed and moves both above and below the Earth's surface.

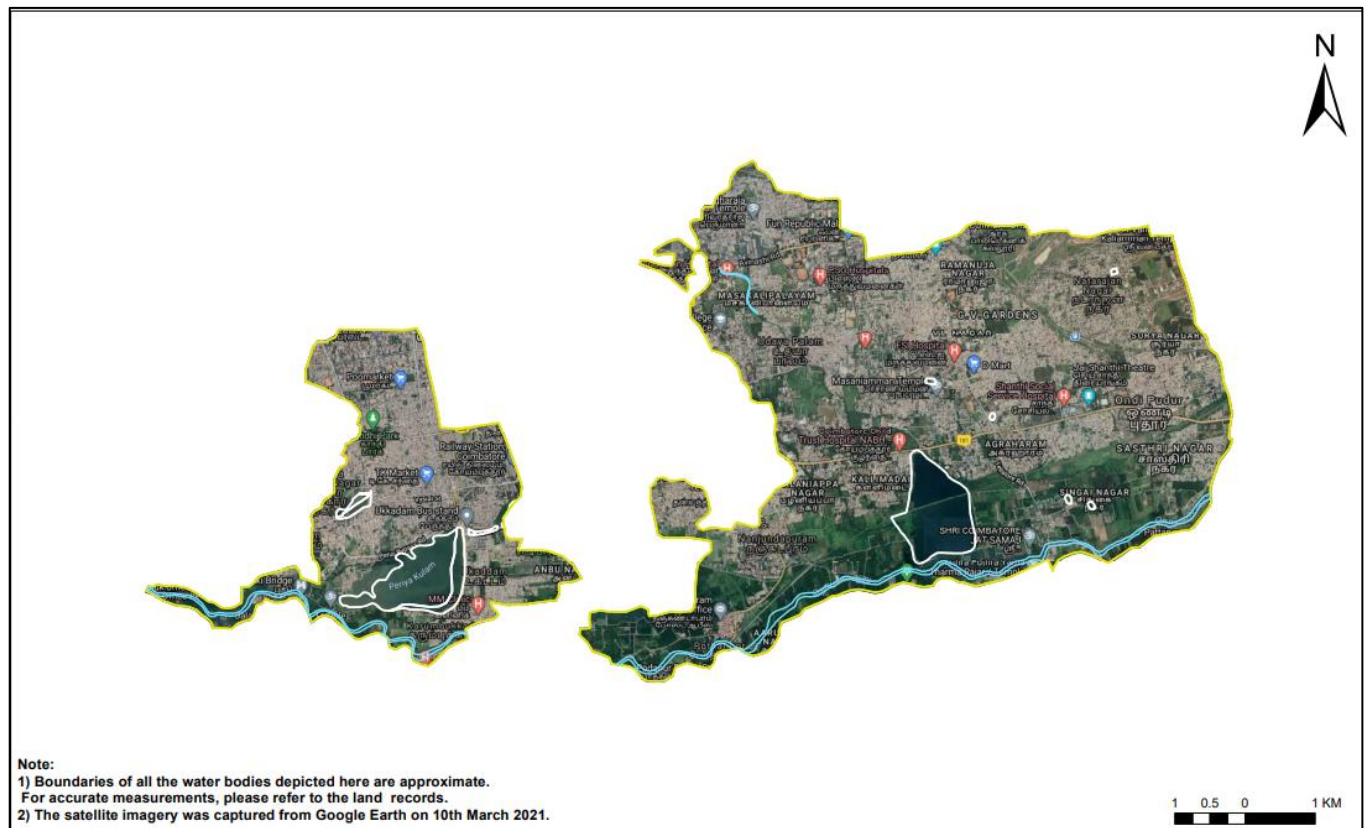


Figure 2 Coimbatore District Hydrology Map

2.8 Land Use and Land Cover

The physical and biological characteristics of the Earth's surface, including both natural and man-made features, are described by the term "land cover". It classifies what can be seen on the ground, including metropolitan areas, deserts, wetlands, grasslands, and aquatic bodies and also includes agricultural fields and forest regions.

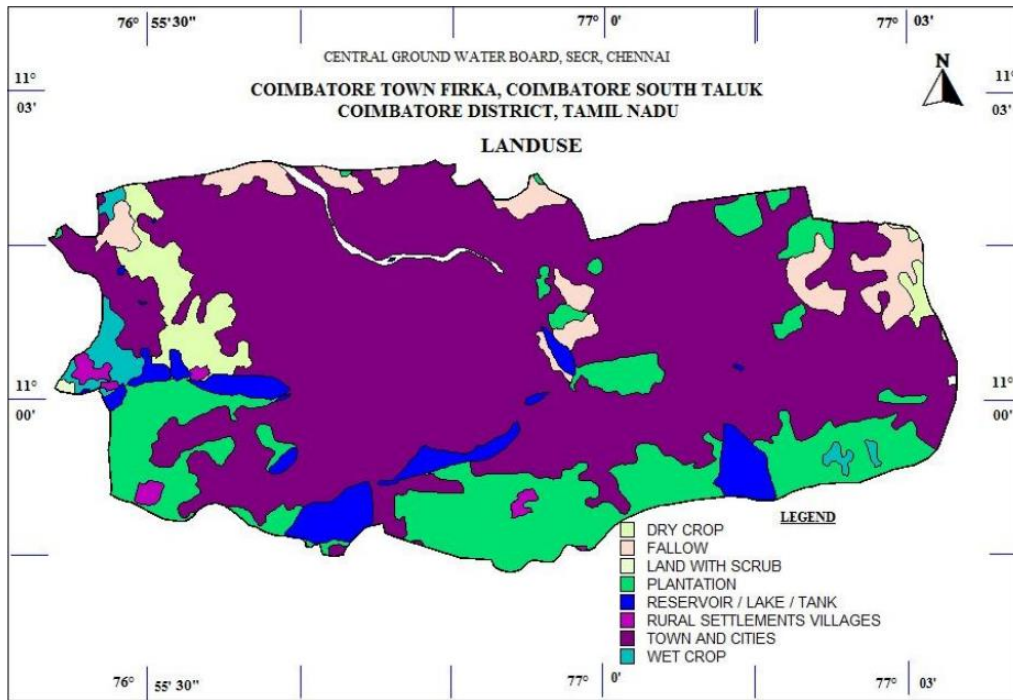




Figure 3 Land Cover- Coimbatore South¹

The above figure provides the land use of the area around the project site. The maximum area of the district and larger study area is rural settlements and villages, followed by plantation lands. Post this, reservoirs, and other water bodies such as lakes and tanks are dominant. The proposed site is currently not being used for any purpose.


¹ https://www.cgwb.gov.in/sites/default/files/2022-10/coimbatore_district_3coimbatore_south_final.pdf:

3. Key Findings Section

3.1 ESG Risk Rating Tool

Observations	Highly adverse impact	Moderately adverse impact	Low adverse impact	No adverse impact	Needs Investigation	
Basic ESG Screening	0	4	7	25	5	
	Environment	0	1	2	7	0
	Social	0	1	3	9	2
	Governance	0	1	0	8	2
Social Safeguards Screening	0	0	0	37	0	
	Involuntary Resettlement	0	0	0	11	0
	Indigenous Population	0	0	0	10	0
	Stakeholder Identification and Grievance Mechanism	0	0	0	9	0
Total	0	4	7	62	5	

Project Categorization - Risk Scale	
Definitions	Category
The project / sub-projects / investment is likely to have significant adverse environmental impacts that are sensitive, diverse or unprecedented. A potential impact is considered “sensitive” if it may be irreversible (e.g., lead to loss of a major natural habitat), affect vulnerable groups or ethnic minorities, involve involuntary displacement and resettlement, or affect significant cultural heritage sites. For governance, if the company has been allegedly indicted for corruption inclusive of bribery and fraud including tax fraud, then such company or investments will fall under Category ‘A’ projects.	A
The project / sub-projects / investment may result in specific environmental and social impacts, these impacts are site specific and many. If any of them are irreversible, in most cases mitigation measures are predetermined. Potential adverse environmental and social impacts on human populations or environmentally important areas are less adverse than those of Category A projects. The project includes involuntary resettlement impacts that are not deemed significant and likely to have limited impacts on indigenous people, but a resettlement plan, which includes assessment of social impacts, is required. On the governance, if the promoter of the investee company is a dominant shareholder and exerts undue influence on the management and Board which is detrimental to the interests of the company and / or other shareholders, then the company or investment will fall under this Category.	B
The project / sub-projects / investment is likely to have minimal or no adverse environmental and social impacts. No further assessment is required. Even if the investee company has the above risks but has adequate controls and safeguards, the investment will fall under this Category.	C

Project Categorization Overall		Regulations Screening	
	B <i>Note: Does not include output of Climate Risk and Regulations Screening</i>	Obtained	0
		Under process	0
		Not applied for	22
		Not applicable	0

TNWWHCL has developed an 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 construction and operational phase. The overall Project Categorization is “B” which falls on “medium” risk on project risk rating scale.

The material risks identified from the tool includes the following.

Environment	<ul style="list-style-type: none"> Development of Climate Change and Risk Management Plan 	<ul style="list-style-type: none"> The region is prone to high wind speeds and is categorized under high damage risk zone. Further, Coimbatore lies under the Moderate damage risk zone as per BMTPC for earthquakes and experiences between 31-45 thunderstorms as per the thunderstorm incidence map released by BMTPC.
Social	<ul style="list-style-type: none"> Stakeholder Engagement for affected communities Emergency Preparedness and Response Plan 	<ul style="list-style-type: none"> Stakeholder engagement plan (SEP) has not been developed yet as part of ESMS. Company shall identify all related stakeholders, and categorize them as internal and external. Subsequent engagement, evaluation and communication plans should be incorporated as part of SEP. An emergency preparedness and response plan define composition of Emergency Response team at corporate and facility level, identification of different kinds of emergencies, their mitigation measures, response measures for man-made and natural emergencies, reporting escalation, evacuation plan, emergency contacts etc.

3.2 Compliance to Environment and Social Legal Requirements, IFC Performance Standards and ADB Safeguards

Method of Assessing Compliance

The status of compliance of the project with applicable E&S legal regulations is presented in the subsequent sub-sections. The method of reading the tables is as follows:

- The regulations and their applicable requirements are listed in the first and second columns, respectively.
- The compliance of projects with legal requirements has been 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.
No Info	INSUFFICIENT INFORMATION to assess the status of compliance/conformance.

The last column provides a remark on the status of compliance. Text in **bold** describes the nature of non-compliance.

3.3 Legal Requirements - Environmental

Table 3: Legal Requirements-Environment

Legal Requirements - Environment							
Sl. No.	Regulation	Status	Legal Requirement	Authority Responsible	Observations	Compliance Status	Recommendation
1.	Environmental Impact Assessment Notification 2006 and amendments thereof	Not Applicable. The proposed project encompasses 0.50 acres parcel land with a total built-up area of 2,632.87 m ² .	Obtain Environmental Clearance (EC) under the <i>EIA Notification 2006</i>	Tamil Nadu Environmental Impact Assessment	An environmental clearance is not required for the proposed project as the total built-up area of the project is less than 20,000 sqm which is considered as the threshold limit of built-up area to be eligible for EC.	NA	None
		The total built-up area of the project is less than 20,000 sqm which is considered the threshold limit of built-up area to be eligible for environmental clearance.	Submission of bi-annual compliance report post EC	Tamil Nadu Pollution Control Board	Not applicable as EC is not required for the proposed project.	NA	None
2.	Air Prevention and Control of Pollution Act, 1981 (Air Act) and Water	Applicable. All potential pollution activities will require Consent to Establish from Pollution Control Board	Consent to Establish Certificate (CTE) u/s 21 of Air Act and u/s 25 of Water Act	Tamil Nadu Pollution Control Board	At present no construction activity has commenced at the project site. The developer is yet to apply for the CTE certificate.	NA	Developer to ensure that no construction activity is commenced at the project site without obtaining CTE certificate.

Legal Requirements - Environment							
Sl. No.	Regulation	Status	Legal Requirement	Authority Responsible	Observations	Compliance Status	Recommendation
	Prevention and Control of Pollution Act, 1974 (Water Act)	before commencing construction activity at the proposed project site.	Comply with the conditions of CTE		Compliance to CTE conditions which includes but not limited to-treatment of domestic effluents (conditions under Water Act).	NA	Developer to comply with the CTE conditions during the construction phase of the project.
3.	Air Prevention and Control of Pollution Act, 1981 and Water Prevention and Control of Pollution Act, 1974	Not Applicable to the present stage of the proposed project site.	Consent to Operate (CTO)		A CTO certificate is required to be obtained before commissioning of the proposed project. At present there is no construction activity ongoing at the project site. Hence, not applicable.	NA	Developer to obtain CTO before commissioning the project.
4.	Environment Protection Second Amendment Rules 2002 (DG set) & 2004	Not Applicable because the project is not utilizing DG sets for emergency power supply at present.	The stack height of the DG should be as per the regulations. DG set should be housed in an acoustic enclosure	Tamil Nadu Pollution Control Board	No construction activity is ongoing at the proposed project site. Based on the E&S site visit observations, the project site does not utilize DG sets for emergency power supply.	NA	Recommend ensuring compliance with DG set rules.

Legal Requirements - Environment							
Sl. No.	Regulation	Status	Legal Requirement	Authority Responsible	Observations	Compliance Status	Recommendation
5.	Noise Pollution (Regulation and Control) Rules, 2000	Not Applicable to the present stage of project operation.	No horn shall be used in silence zones or during nighttime (u/r 5A (1)) Sound emitting construction equipment shall not be used or operated during night-time in residential areas and in silence zones. (u/r 5A (2))	Tamil Nadu Pollution Control Board	No construction activity is ongoing at the proposed project site. Hence, not applicable	NA	Developer to conduct ambient noise monitoring report. It is further recommended that the developer should take adequate measures to control noise levels and restrict to 55 dB(A) during daytime and 45dB(A) during nighttime which is the prescribed national noise level standards for residential areas.
6.	Gas Cylinder Rules, 2016	Not Applicable. The project site does not store gas.	Specifications for labelling (u/s 9) and storage (u/s 21) of gas cylinders (vertically in a cool dry, well-ventilated place under cover away from heat.	Petroleum and Explosives State Organization	There is no storage of gas cylinders at the project site.	NA	None
7.	Hazardous wastes (Management,	Not Applicable	Occupier shall be responsible for safe and environmentally sound management	Tamil Nadu Pollution Control Board	Based on the E&S site visit observations, there is no presence of	NA	None

Legal Requirements - Environment							
Sl. No.	Regulation	Status	Legal Requirement	Authority Responsible	Observations	Compliance Status	Recommendation
	Handling and Transboundary Movement) Rules 2016		of Hazardous and other waste. u/r 4(2).		'hazardous waste' as defined under section 3(17)(i), (ii) and (iii) being generated/ handled/ stored/ Processed hazardous waste which should comply with the rules and obtain consent from TNPCCB.		
8.	Construction and Demolition Waste Management Rules, 2016	Not applicable to the present stage of project operations.	Mode of disposal of C&D waste. u/r 4	Tamil Nadu Pollution Control Board	Based on the E&S site visit observations, there is no construction activity ongoing at the proposed project site.	NA	Developer to ensure proper storage and disposal of construction and demolition waste during the construction stage of the project.
9.	Solid Waste Management Rules, 2016	Not applicable to the present stage of project operations	Every waste generator shall segregate and store the waste generated by them in three streams, namely, biodegradable, non-biodegradable, and domestic hazardous wastes in suitable bins and handover	Tamil Nadu Pollution Control Board	Based on the E&S site visit observations, there is no solid waste present at the proposed project site.	NA	Developer to ensure the generated solid waste at the proposed project site and labour camp shall be stored and disposed as per municipal solid waste rules during the

Legal Requirements - Environment							
Sl. No.	Regulation	Status	Legal Requirement	Authority Responsible	Observations	Compliance Status	Recommendation
			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)				construction stage of the project.
10.	E-Waste (Management) Rules, 2022	Not applicable to the present stage of the project operations	Ensure e-waste generated by them is channelized through collection center or dealer of authorized producer or dismantler or recycler or through the designated take back service provider of the producer to authorized dismantler or recycler. u/r 9(1) Maintain records of E-Waste generated in Form-2. u/r 9(2)	Tamil Nadu Pollution Control Board	Based on the E&S site visit observations, there is no e-waste present at the proposed project site.	NA	None
11.	Central Ground Water Authority	Not Applicable to the present stage of the project operation.	Registration of existing borewells/NOC for new borewells.	Central Groundwater Authority	Based on the E&S site observations, there are no	NA	Going forward in case borewell is to be developed, a prior

Legal Requirements - Environment							
Sl. No.	Regulation	Status	Legal Requirement	Authority Responsible	Observations	Compliance Status	Recommendation
	Guidelines to regulate and control Ground Water Extraction in India dated 1 June 2019 Groundwater (Development and Management) Act, 2009				borewells present at the proposed project site. Water will be supplied via Municipality or Groundwater during construction phase.		approval to be obtained.
			Installation of digital water flow meter (confirming to BIS standard) in the abstraction structure (s)		Not applicable.	NA	
12.	Tree Cutting and Replantation NOC scheme	Requirement for tree cutting for construction works to commence at Project site.	Permission is required for cutting/transplanting trees coming in proposed construction of high-rise residential building	District Forest Officer (DFO), Tamil Nadu Forest Department	Based on the E&S site visit observations, there are approximately 30 mature trees and other shrubs present at the proposed project site. Hence, applicable.	NA	Tree replantation in 1:10 ratio has to be done for every tree cut.

3.4 Insurances

Table 4 Project Insurance

Project Insurances				
S No.	Applicable Insurances	Observations	Compliances Status	Recommendations
1	General Insurance for the property	The general insurance of the project was not shared for review.	NA	Developer to obtain general insurance for the property, if applicable.
2	Contractor All Risk Policy	At present there is no construction ongoing at the project site. Hence, not applicable to the present stage of project operation.	NA	Developer to obtain contractor all risk policy when construction activity commences at the project site.
3	Third Party Liability Policy	At present there is no construction ongoing at the project site. Hence, not applicable to the present stage of project operation.	NA	Developer/ contractor to obtain all risk insurance policy to cover the construction activities.
4	Environmental Liability insurance	At present there is no construction ongoing at the project site. Hence, not applicable to the present stage of project operation.	NA	None

3.5 Legal Requirements – Occupational Health & Safety

Table 5 Occupational Health and Safety

Legal Requirements – Occupational Health & Safety						
S No.	Applicable Regulation	Status	Legal Requirement	Observations	Compliance Status	Recommendations
1	The Building and Other Construction Workers ‘(Regulation of	At present there is no construction work on-going at the project site. Hence, not	Registration of establishment Hours of work, rest and weekly off (Chapter XXVI	At present, the proposed project is in the pre-construction stage.	NA	The developer to comply with the legal requirements pertaining to

Employment and Conditions of Service) Central Rules, 1998	applicable to the present stage of the project operations.	Safe & Health- General Provisions (Chapter IV)- physical hazards, PPE, electrical hazards.	No construction activity has commenced, and laborers are not deployed at the project site. Hence not applicable.		Occupational Health & Safety when the construction activity commences at the project site.
		Provision of drinking water (u/s 32)			
		Provision of latrines and urinals (u/s 33)			
		Provision of accommodation (u/s 34)			
		Provision of creches (u/s 35)			
		First aid facilities (u/s 36)			
		Fire protection (u/r 35)			
		Emergency action plan			
		Stability of structures (u/s			
		Lifting appliances and gear (Chapter VII)- testing, safe, load indicators, ropes			
		Reporting of accidents (u/r 237)			
		Medical examination of crane operators, exposure to special occupational hazard (u/r 250)			
		Safety Officer (u/s 38 & u/r 209)			
	NA				
	NA				

			Health and Safety Policy (u/r 39)			
2	Central Electricity Authority. (Measures relating to Safety and Electric Supply) Regulations, 2023.		General safety requirements for: <ul style="list-style-type: none"> • Electric Supply lines and apparatus safety • Cut-out • Earthed terminal • Dangerous notice • Flexible cables 			
			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			
3	Gas Cylinder Rules 2016	Not applicable. No gas cylinders are present at the project site.	Specifications for labelling (u/s 9) and storage (u/s 21) of gas cylinders (vertically in a cool, dry, well-ventilated place under cover away from heat)	There are no gas cylinders present at the project site.	NA	None

3.6 Legal Requirements – Labour & Working Conditions

Table 6 Labour and Working Conditions

Legal Requirements – Labour & Working Conditions						
S No.	Applicable Regulation	Status	Legal Requirement	Observations	Compliance Status	Recommendations
1	Contract Labour (Regulation and Abolition) Act, 1970;	At present there is no construction work on-going at the project site. Hence, not applicable.	Registration of Establishment as principal employer (u/s 7)	At present there is no construction work on-going at the project site. There are no labourers deployed at the project site. Hence, not applicable to the present stage of project operations.	NA	Recommend obtaining and complying once construction activities commence at the project site.
			Contractor's license for workers more than 50 (u/s 12)			
2	Minimum Wages Act, 1948		Payment of minimum wages as per latest circular. u/s 5&12			
3	Employee Compensation Act, 1923 and Amendment Act, 2009		Obtaining insurance policy for the same. u/s 4(2)			
4	Employees' Provident Funds (EPF) and Miscellaneous Provisions Act, 1952 amended up to 1996's.		Deduction of employee contribution and deposit of employee and employer contribution with the authority. u/s 6			
5	Employees' State Insurance Act (ESI), 1948		Deduction of employee contribution and deposit of employee and employer contribution with the ESI Corporation. u/s 40(1)			
6	Equal Remuneration Act, 1976	Duty of employer to pay equal remuneration to men and women for same work				

			or work of similar nature (u/s 5)			
7	Inter-State Migrant Workers Act 1979		a) Registration of establishment as principal employer (u/s 4) b) Contractor’s license for engaging migrant workers (u/s 8) c) Payment of wages as per Minimum Wages Act (u/s13) d) Displacement allowance equal to fifty percent of the monthly wages (u/s 14) e) Journey allowance (to and from hometown payable by Contractor (u/s 15)			
8	Prevention of Sexual Harassment	Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013	Receive complaints of sexual harassment (u/s 9) Conduct enquiry on receipt of complaint (u/s 11)	A POSH Policy has not been developed at the present stage.	A POSH Policy has not been developed at the present stage.	Recommend contractor to formulate and implement a POSH policy when the Company has a workforce of more than 10 persons.
9	Maternity Benefit	Maternity Benefit (Amendment) Act, 2017.	Maternity benefit leave of 26 weeks (u/s 5(3))	Maternity benefit policy is not available.	Maternity benefit policy is not available.	Recommend contractor to formulate and implement a Maternity benefit policy when the

						Company has a workforce of more than 100 persons.
10	Child Labour	Child and Adolescent Labour (Prohibition & Regulation) Act, 1986 amended in 2016	Client will 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 be harmful to the child’s health or physical, mental, spiritual, moral, or social development	Child labour policy not available for review	Not available	The contractor to ensure that there are no child laborers present at the project site during the construction phase.

3.7 Assessment of IFC PS1

Table 7 Assessment and Management of E&S Risks and Impacts

S No.	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1	Policy	Applicable. The construction activities at the proposed project site give rise to environmental and/or social risks and impacts.	IFC PS1	Establishing E & S Policy which incorporates national laws Policy to indicate competent professional to ensure conformance & execution of the Policy Communication of the policy to all levels of organization	Environmental and social policy under Tamil Nadu Shelter Fund’s Environment and Social Management System (ESMS) is given.	NC	Ensure applicability of the policy during the project execution.

2	Identification of risks & impacts	ESG risks have been identified in ESMS. Not applicable as the project built-up area is less than the required threshold for conducting EIA.		Conducting an environmental and social impact assessment. (ESIA or EIA) IEE of the project, appropriate to the nature of the project’s environment and social risks	EIA/ESIA is not applicable. IEE has been conducted for the site.	NA	None
3	Monitoring and review	Applicable. The construction activities at the proposed project site gives rise to environmental and/or social risks and impacts.		Establish procedures to monitor and measure the effectiveness of the management program	An environmental and social management system was shared for review.	NC	The contractor/developer to establish procedures to monitor the effectiveness of the ESMS. The ESMS should be reviewed periodically by the senior management of the developer’s team.
			Senior management in the client organization will receive periodic performance reviews of the effectiveness of ESMS.	Information pertaining to review of ESMS by the senior management was shared for review.			
4	Emergency preparedness & response	Applicable. EPR will be necessary during the construction and operation phase.		Establish and maintain emergency preparedness response system to respond to accidents and emergency	An emergency preparedness and response system were neither shared for review nor	NC	Contractor to formulate emergency measures and procedures. The project site should identify any accidental areas and keep safety signages. All laborers should be equipped with PPE kits,

				<p>situations associated with the project.</p> <ul style="list-style-type: none"> -- identification of areas where accidents and emergency situations may occur -- impacted communities & individuals -- response procedure -- procedure of equipment & resource -- designation of responsibilities -- communication with potentially affected communities 	is mentioned in ESMS.		<p>safety boots etc. Contractor to ensure a Safety Engineer is deployed at the project site during the construction stage of the project.</p>
5	Stakeholder engagement	Stakeholder Engagement Plan is a part of ESMS.		Developing a stakeholder engagement plan	Available in ESMS.	Complied	-
6	External communication and grievance mechanism	It will be applicable during the construction and operation phase.		<p>Implement and maintain procedures for external communications:</p> <ul style="list-style-type: none"> -- receive and register external communication from public 	Contractor and Developer to ensure to comply with the mechanism available in ESMS for external communication	Complied.	-

				-- screen, assess & determine issues -- proven track & document responses	and grievance handling.		
7	Ongoing Reporting to Affected Communities	It will be applicable in case; project involves displacement of local communities		Client to provide periodic reports to affected communities annually that describe the ongoing risk or impact on the affected communities	The project does not identify any affected communities.	NA	Going forward, it is recommended to establish a grievance mechanism as a good practice

3.8 Assessment of IFC PS 2

Table 8 IFC PS 2

SN	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1	Human Resources Policies & Procedures	Applicable. The project employs laborers at site for construction works and entity level also there	IFC Performance Standard 2	a. Anti-bribery and Anticorruption b. Code of Ethics and Conduct c. Whistle Blowers Policy d. Grievance Policy e. Prevention of Sexual Harassment Policy f. Equal Employment Opportunity g. Leave Policy	Policies mentioned in ESMS are available and Contractor to ensure compliance with such policies during project execution.	Complied	-

2	Working conditions and terms of employment	are employees.		Communication of documented information regarding their rights under national labor and employment law		NA	None
				Workers right to form and join workers organization the client shall respect collective bargaining agreements	The provision of collective bargaining agreement is not applicable for the current E & S due diligence assessment as it is not an industrial project.	NA	None
				Based on employment relationship on the principle of nondiscrimination and equal employment opportunity	The non-discrimination and equal employment opportunity policy are not applicable at the present stage.	NA	None
				Procedure for addressing collective dismissal/retrenchment	Information pertaining to procedure for addressing collective dismissal / retrenchment is not applicable at the present stage.	NA	None
				Client to ensure that all workers receive notice of dismissal and severance payments mandated by law and collective	Not applicable to the present stage.	NA	None

				agreements in a timely manner.			
3	Protecting the Workforce	This will be applicable during the construction & operation phase.	Child and Adolescent Labour (Prohibition & Regulation) Act, 1986 amended in 2016	Client will 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 be harmful to the child’s health or physical, mental, spiritual, moral, or social development.	Not applicable to the present stage.	N/A	None
4	Safe and Healthy Work Environment	Not applicable. The project is currently in the land stage.	World Bank Group General EHS Guidelines, 2007	Physical Hazards, collisions, slips, falls, general facility, design and operations, Integrity of Workplace structures, workspace & exit, fire precautions, lavatories and showers, portable water supply, clean eating area, lighting, safe access, first aid, air supply, work environment temperature.	The project is currently on the pre-construction stage. Hence, not applicable.	NA	None

				Communication and training- toolbox talks	The project is currently in the land stage and no construction activity has commenced at the project site.	NA	None
				Accidents & disease monitoring	At present no construction activity has commenced at the project site. Hence not applicable.	NA	None
5.	Workers engaged by third parties		Contract Labour (Regulation and Abolition) Act, 1970	Registration of establishment as principal employer	At present no construction activity has commenced at the project site. Hence not applicable.	NA	None
				Contractor’s license for workers more than 50			
6	Worker’s accommodation process and standards		IFC Guidelines on Workers accommodation: Guidance note by IFC and ERBD	Building construction materials, resistance to earthquakes (labour camps will be temporary in nature)	At present no construction activity has commenced at the project site. Hence not applicable. However, contractor to ensure that worker’s camp are provided during the construction phase of the project.	NA	None
				Ventilation, slip resistant flooring			
				Fire extinguishers			

				Water and sanitary connection			
				Canteen, cooking, and laundry facilities			
				Separate toilets			
				Wastewater and solid waste segregation			
				First aid kit			
7	Primary supply chain	No supply chain has been hired so far.	IFC PS2	Monitor primary supply chain on an ongoing basis to identify new risks or incidents of child and or forced labour and life-threatening situations.	Not applicable to the present stage.	N/A	None

3.9 Assessment of IFC PS 3

Table 9 IFC PS 3

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1.	Resource Efficiency & Pollution Prevention:	Applicable during the construction and operation phase of the project as site will	World Bank Group General EHS Guidelines (Part 1: Environmental) & IFC	a. Reducing project related GHG emissions	There is no construction activity going on at the project site. Not applicable to the present stage of project operations.	NA	As informed, project will apply for green building certification, thereby, it is recommended to design the building in a manner to

		consume resources (water, energy), reduce GHG emissions and will generate wastes (solid, c & d)	PS 2				reduce GHG emissions.
				b. Quantification of GHG emissions	There is no construction activity going on at the project site. Not applicable to the present stage of project operations.	NA	Going forward, recommend quantifying GHG emissions during the construction phase of the project.
				c. Water conservation measures <ul style="list-style-type: none"> • Storm/Rainwater harvesting - zero discharge design/use of treated wastewater to be included in project design operation. • water reuse 	There is no construction activity going on at the project site. Not applicable to the present stage of project operations.	NA	Contractor to ensure to adopt RWH techniques.
				d. Energy conservation measures <ul style="list-style-type: none"> • use of LED lighting • use low carbon fuels • minimizing no. of boilers or heaters. • Planting trees as thermal shields around buildings 	There is no construction activity going on at the project site. Not applicable to the present stage of project operations.	NA	Contractor to ensure to adopt energy conservation measures during the operation phase of the project.

2.	Air emissions and Ambient air quality & Wastewater and Ambient Water Quality		World Bank Group EHS Guidelines (Part 1: Environmental) Consent to Establish from TNPCB u/s 25 Water Act and u/s 21 of the Air Act	a. Consent to Establish from TNPCB	At present the proposed project is in the land stage. Going forward recommended to obtain Consent to Establish before commencing construction activity at project site.	NA	Recommended to obtain CTE before commencing construction work at site.
				b. Comply with the conditions of consent to Establish	Not applicable to the present stage of project operations, as it’s greenfield.	NA	Recommended to get the certificate and comply with all the conditions of CTE.
				c. Consent to operate from TNPCB	Not applicable at the present stage	NA	None.
				d. Comply with the conditions to operate	Not applicable at the present stage	NA	None.
3.	Solid Waste		World Bank Group EHS Guidelines (Part 1: Environmental) & Solid Waste	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	At present the project site is in the land stage. There is no construction activity on-going at the project site. Hence not applicable.	NA	Going forward, the contractor to implement solid waste rules during the construction and operational phase of the proposed project.

			Management Rules, 2016	by the local authorities from time to time.			
4.	Hazardous Waste		World Bank Group EHS Guidelines (Part 1: Environmental) Hazardous Wastes (Management, Handling and Transboundary Movement) Rules, 2016	Occupier shall be responsible for safe and environmentally sound management of Hazardous and other waste.	At the present stage there are no hazardous wastes being generated at site.	NA	None
5.	Construction & Demolition waste		World Bank Group EHS Guidelines (Part 1: Environmental) Construction and Demolition Waste	Mode of disposal of c & d waste.	At present the site is in the pre-construction stage. There is no construction or demolition waste being generated at the project site.	NA	None.

			Management Rules, 2016				
6.	E-waste		World Bank Group EHS Guidelines (Part 1: Environmental) & E-Waste (Management) Rules, 2022	Ensure e-waste generated by them is channelized through collection center or dealer of authorized producer or dismantler or recycler or through the designated take back service provider to authorized dismantler or recycler. Maintain records of e-waste generated.	At present there is no e-waste being generated at site	NA	None
7.	Noise Pollution		World Bank Group EHS Guidelines (Part 1: Environmental) & Noise Pollution (Regulation and Control) Rules, 2000	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 and silence zones	At present the project is in the pre-construction stage.	NA	None
				Ambient noise monitoring	There is no DG present at site for emergency power supply	NA	None

3.10 Assessment of IFC PS4

Table 10 IFC PS 4

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1	Water Availability	Applicable. Community health: The under-construction activities and the life cycle of the project may have detrimental effects on neighbors. Safety: Structural elements used in the construction activity are designed by competent professional and approved by competent authority.	Central Groundwater Authority (Guidelines to regulate and control Groundwater extraction in India dated 1 June 2019, Groundwater (Depletion and Management) Act, 2009 & World Bank EHS Guidelines (Part 3, Community Health & Safety)	Registration of existing borewells/NOC for new borewells	There is no borewell present at the project site. Hence, not applicable.	NA	If site installs borewell, contractor to ensure to obtain permission from TNWSSB.
				Installation of digital water flow meter (conforming to BIS standard) in the abstraction structure (s)	There is no borewell present at the project site. Hence, not applicable	NA	None
2.	Infrastructure and Equipment Design & Safety	Security: The project site may retain direct or	IFC PS 4	Structural elements will be designed and constructed by competent professionals and certified or approved by competent authorities or professionals	At present, there is no construction activity ongoing at the project site. Hence, not applicable.	NA	None

		contracted workers to provide to safeguard its property		For projects that operate moving equipment on public roads, the client will seek to avoid the occurrence of incidents and injuries to members of the public associated with the operation of such equipment.	At present there is no construction activity ongoing at the project site. Hence, not applicable.	NA	None
3.	Hazardous Materials and Management Safety			Exercise of special care where there is a potential for public (workers and their families to be exposed to hazardous materials and substances.	At present there is no presence of hazardous materials and substances.	NA	None
4.	Ecosystem Services			Contractor to avoid degradation of natural resources that may result in adverse health and safety risks and impacts to affected communities.	The project location does not have detrimental effects on any ecosystem services.	Complied	None
5.	Community exposure to disease			Contractor to minimize exposure to Covid 19 and other communicable diseases	Not applicable to the present stage of project operations.	NA	None.
6.	Emergency Preparedness and Response Systems			In addition, this aspect specified in IFC PS 1, Contractor to assist and collaborate with affected communities, local government agencies to respond effectively to emergency situations.	At present there are no affected communities at site.	NA	Recommended to include procedure and measures to inculcate collaboration with affected communities

7.	Life & Fire Safety		<ul style="list-style-type: none"> World Bank EHS guidelines: Community Health and Safety. National Building Code 2016. Maharashtra Fire Prevention & Life Safety Measures Act, 2006 	Provision of firefighting infrastructure: <ul style="list-style-type: none"> - portable fire extinguishers - hose reel - Down comer - Yard hydrant - alarm system automatic sprinkler system	No construction activity has commenced at the project site. Not applicable to the present stage.	NA	None.
				Obtaining provisional Fire NOC at the time of obtaining commencement certificate from the Municipal Corporation	No construction activity has commenced at the project site. Not applicable to the present stage.	NA	None
8.	Security Personnel		Private Securities Agency Regulation Act, 2005	Client retaining direct or contracted workers to provide security to safeguard its personnel and property the following shall be the guiding principles: <ul style="list-style-type: none"> -hiring -rules of conduct -training -equipping 	There are no security guards present at the proposed project site. Hence not applicable	NA	None.

				-monitoring of such workers			
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3.11 Assessment of IFC PS 5

Table 10 IFC PS 5

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1.	Land Acquisition & Involuntary resettlement	Not Applicable for the project	IFC PS 5 IFC PS 5	a. Avoidance or at least minimization of involuntary resettlement by exploring alternative project designs	Based on the E&S due diligence, land acquisition and involuntary resettlement impact are assessed and no impact are being observed as the land allocated is a vacant land and the site visit confirms that no encroachment is observed.	NA	None
				b. Compensation and benefits for displaced persons if applicable	Not required as there is no displacement of persons	NA	None
				c. Client will engage with affected communities through the process of stakeholder engagement described in PS 1	At present there are no affected communities within the boundary of the project site.	NA	Going forward it is recommended that the Client should develop a stakeholder engagement for all stakeholders including directly and indirectly affected communities and stakeholders.

				d. The Contractor will establish a grievance mechanism consistent with PS 1 as early as possible in the project development phase	At present, there are no affected communities within the boundary of the project site.	NA	Going forward it is recommended that the Client should develop a stakeholder engagement for all stakeholders including directly and indirectly affected communities and stakeholders.
				e. Implementation of Resettlement Action Plan or Livelihood restoration Plan	As there has been no instance of involuntary resettlement or acquisition, no plan facilitating the same is required	NA	None

3.12 Assessment of IFC PS 6

Table 11 IFC PS6

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1	Biodiversity Conservation & Sustainable Management of Living Resources	Not Applicable for the project	IFC PS 6	a. Protection and conservation of biodiversity	The project site does not fall under modified habitats, natural habitat, and critical habitat	NA	None
				b. Management of ecosystem services	The project is not likely to have adverse impacts on ecosystem services.	NA	None

				c. Sustainable Management of Living Natural Resources	The Client is not engaged in the production of living natural resources such as natural and plantation forestry, agriculture, animal husbandry, fisheries etc.	NA	None
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3.13 Assessment of IFC PS 7

Table 12 IFC PS7

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1	Indigenous people	Not Applicable for the project since no indigenous people are available near the site.	IFC PS 7	Client to avoid adverse impacts on indigenous people and wherever unavoidable, the client will minimize, restore and/or compensate for these impacts in a culturally appropriate manner commensurate with the nature & scale of such impacts	The project site does not identify any indigenous people likely to be affected by the project activities	NA	None
				The Client will undertake an engagement process with the Affected communities of Indigenous people as required in PS 1. The engagement process includes stakeholder	As there are no indigenous people identified hence, there is no need for an engagement process.	NA	Going forward it is recommended as a good practice that the Client must develop an engagement plan with affected communities of indigenous people, if there any.

				analysis and engagement planning, information disclosure, consultation, and participation in a culturally appropriate manner			
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3.14 Assessment of IFC PS 8

Table 13 IFC PS8

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1	Cultural Heritage	Applicable for the project	IFC PS8 & The Ancient Monuments and Archaeological Sites and Remains (Amendment and Validation) Act 2010	The project site should not cause adverse impacts to cultural heritage sites	No cultural heritage site identified in the vicinity or the study area	NA	None

3.15 Compliance to ADB Safeguards- Key findings

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 the project activities. The risk rating ‘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.

3.15.1 Impact of Environmental Stress and Climate Change on Project

Groundwater Status: As per the Groundwater Exploitation Assessment Report by Central Ground Water Board (CGWB), the project site is located in the neighbourhood of Peelamedu, Coimbatore and is classified as an over-exploited unit. Source of raw water for the project will be through Metropolitan Water Supply and necessary measures will be adopted for rainwater harvesting and development of groundwater recharging systems. Therefore, the risk of the project for depleting groundwater level is classified as “**Low**”.

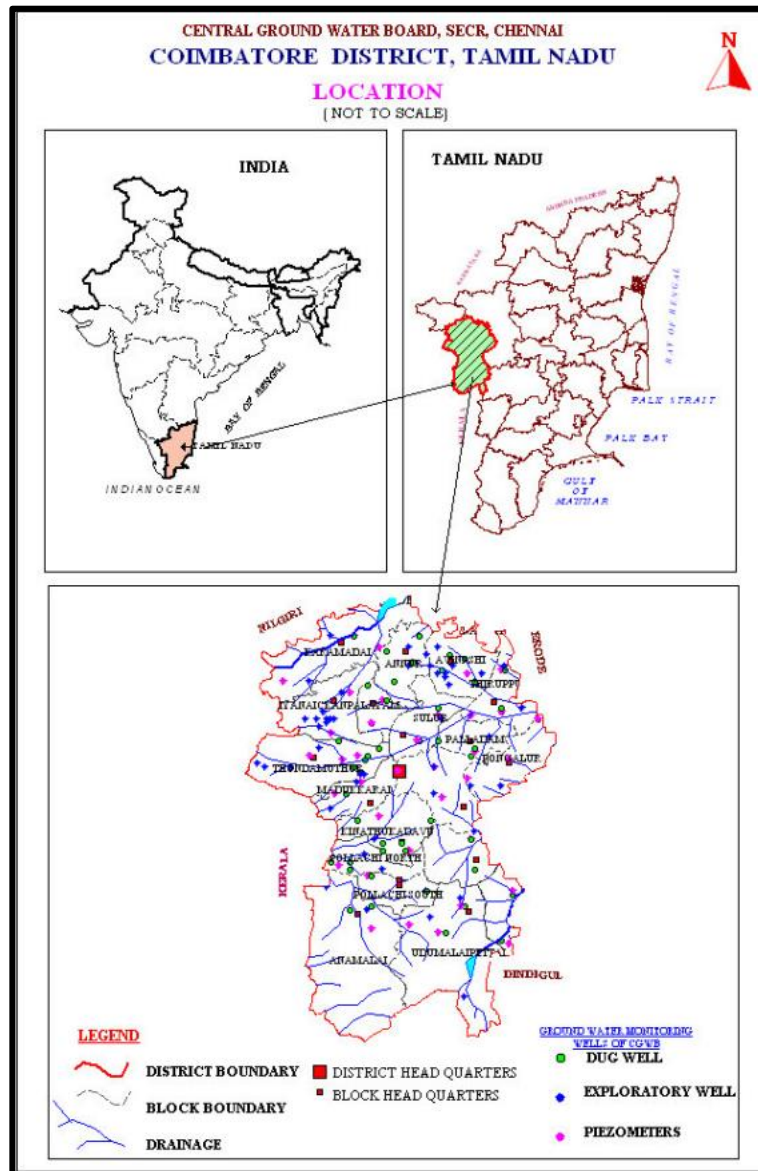


Figure 4 Groundwater Categorization Map

Susceptibility to natural catastrophes and climate-related emergencies:

- **Earthquake:** According to Building Materials and Technology Promotion Council (BMPTC) Earthquake hazard map, the project site lies in Zone III i.e., Moderate Damage Risk Zone (MSK VI). A disaster management plan needs to be prepared accordingly.
- **Flood:** According to BMPTC Flood Hazard Map, the project site is in the Low-Risk Zone. No additional mitigation measures need to be prepared.
- **Cyclone:** The project is in the Moderate Damage Risk Zone with a basic wind speed of 44m/s Maximum Sustained Wind (MSW) in knots as per BMPTC Wind and Cyclone Hazard Map. The project design needs to consider this effect.
- **Landslide:** The city is at high risk to landslides as per BMPTC report owing to the Annual rainfall normally ranging from 501-1000 mm per year. The project site is situated on the plains and hence not applicable.

- **Thunderstorm:** According to BMPTC Thunderstorm Incidence Map the site is in Moderate risk zone. The project design needs to consider this effect.
- **Drought:** There were no severe drought events in Coimbatore’s region, but as per Environmental Information System Tamil Nadu (ENVIS) report, Coimbatore is vulnerable to Drought. The project design needs to consider this effect and effective rainwater harvesting structure needs to be designed and developed.

The risk to the project from natural and climate related disasters is classified as “**Medium**”.

Critically Polluted area: The project site is surrounded by Residential complexes, including transportation infrastructure such as highways and working complexes for several companies. As per the CPCB which uses the CEPI index to assess the environmental impact of industrial clusters and is based on a source, pathway, and Receptor algorithm, and also includes a health component, categorizes Coimbatore as a severely polluted area. However, No hazardous waste landfill is present near to the site. Thus, the risk of exposure to pollution from dump sites to the project is “Low”.

Presence of Municipal Dump site/Hazardous Waste Landfills: There is the Peelamedu SWM transfer station which is 1.40 Kilometers from the project location. However, this will not have any residual environmental impacts on the natural ecosystems or the project. Necessary mitigation measures will be taken as a part of EMP to be developed for construction phase.

3.15.2 Impact of Project on Environment and Climate Change

Impact on Protected Areas: The project area does not have designated Protected areas. Therefore, the risk from the project activities to the protected area is negligible.

Impact on Water: The project will use groundwater and/or water supplied by municipal corporation for construction purposes, During the operational phase the wastewater at project site will be treated through a septic tank. The Contractor will ensure to comply with the conditions for the wastewater management as specified in the Consent to Operate (will be obtained during the operation phase) for the proposed project site and should adopt rainwater harvesting techniques. Therefore, the risk of the water resources from the current state of the project site is low.

Therefore, the risk to the water resources from the current state of the project site is “Low”.

Impact on Air/GHG Emissions: During construction and operational phase the project site shall utilize DG sets for emergency power supply of requisite capacity specified in CTE and CTO received for proposed project site. The DG sets shall be housed in an acoustic enclosure with sufficient height and ambient noise monitoring which is to be conducted regularly. Therefore, the risk to the air resources from the current state of the project site is negligible.

The risk of the project activities on environment/climate change is classified as ‘Low.’ Necessary mitigation measures will be taken as a part of EMP to be developed for construction phase.

3.15.3 Social Impact Assessment

The 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.

Landownership and Transfer details:

Currently, the land parcel is in the process of being transferred from the Government Medical College of Coimbatore to the Department of Social Welfare, Government of Tamil Nadu, The land ownership record/document will be provided in the next updated due diligence report or SSMR whichever is submitted for ADB's review earlier, as the land is still in the process of being transferred to Social Welfare and Women Empowerment Department. Once the land is transferred, it will be leased to TNWWHCL for 28 years and it is expected to be executed by March 2025 and the construction is set to commence by April 2025. The ESDD will be updated with the landownership documents once registered. The land does not have any land acquisition related legacy issues. The site is presently vacant and is government owned. Since the project site is within the boundary of Coimbatore Medical College, there are no settlements or structures on the site. The project is not anticipated to have any direct or indirect impacts on the dignity, human rights, livelihood systems or territories, or natural or cultural resources that are used, owned, occupied, or claimed by indigenous peoples or their ancestral domain or assets. There are no Indigenous Peoples present, and the project is not expected to impact Indigenous Peoples (IP) based on the field visit consultations. safeguards. Hence, the project has been categorized as Category C for both Involuntary Resettlement and Indigenous People as confirmed in the Involuntary Resettlement (IR) and Indigenous Peoples (IP) checklist documented in Annexure 3 and 4

The social safeguards risk of the project including Cultural, Heritage and Religious site is classified as LOW.

3.15.4 Stakeholder Engagement

The project shall have a stakeholder engagement strategy which will encompass a wide range of stakeholders, including Government College Hostel inmates and management, contractors, construction workers, neighboring communities, CSOs working on gender issues periodically. (Refer Annex 6)

During the public consultations during the site visit, various aspects of the project were discussed, including a comprehensive understanding of its scope, potential benefits, and disadvantages. Key concerns such as air and water pollution, environmental impact, and safety of the project site were addressed. Discussions also covered issues related to waste management, ensuring that proper disposal and mitigation measures would be implemented. Additionally, the availability and efficiency of transportation modes for residents were reviewed to assess accessibility and convenience. Feedback from stakeholders was considered to ensure that the project aligns with community needs and minimizes adverse impacts.

Grievance mechanism for workers: A grievance redressal policy (as mentioned in ESMS of TNSF) shall be established for the project prior to construction that will apply at three levels: the

project site, the overall project, and the company. The report provides a comprehensive description of the Project Grievance Redressal Mechanism (GRM) in Section 5.

- **Provision of welfare facilities for workers:** Since construction hasn’t commenced, it is not applicable at this stage. However, it is expected that the contractor will be required to develop an Environmental, Health, and Safety (EHS) Plan and comply with Environment Management Plan, which would undergo approval by the TNIFMC. This plan will encompass the provision of welfare facilities for the workers.
- **Prevention of child/forced labor:** At present no construction has commenced at the project site. Based on the E&S site visit observations there are no child laborers present at the project site. It is expected that the contractor appointed for the construction must comply with the Child Labour (Prohibition and Regulation) Act 1986 during the construction phase of the project.
- **Practices on Anti-Bribery and Anti-Corruption:** An anti-bribery and anti-corruption policy was not shared for review. It is expected that the company must adopt a policy on anti-bribery and anti-corruption which shall be communicated to TNWWHCL.

An overall risk given to the project due to social impacts is “Low”.

4. Environment & Social Action Plan

4.1 Methodology of Action Plan

Going forward, E&S compliances to be addressed by both Company and Project level.

Environmental and Social Action Plan (ESAP) is a tool to ensure that any outstanding issues at the time of the operation approval are addressed in a timely and appropriate manner, and to ensure continued compliance with environmental and social compliance requirements, as well as local legal requirements. Following key elements to be included in action plan:

- Issue & action.
- Objective
- Completion timeline
- Responsible person to complete the task.

Monitoring Mechanism

4.2 Prioritization of Actions

The actions to be undertaken to establish compliance with legal requirements and industry best practices have been provided in the subsequent sub-sections. The actions will be classified as follows to enable prioritization and planning of human and financial resources.

High	The ' 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	The ' 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	The ' Low ' priority actions are those which are management program oriented. The actions are more practice oriented.

Table 15 Environment & Social Action Plan

S No	Aspect	Recommendation	Responsibility	Timeline	Priority	Monitoring Mechanism	Proposed Budget
Legal Requirements- Environment							
1	Consent to Establish	Not applicable during the pre-construction phase.	Contractor	Before commencing		Copy of CTE	-
Project Insurances							
1	Insurances	General Insurance of the project not shared for review	Contractor	3 months	High	To be obtained	-
Assessment of IFC PS 1- Identification of Environmental & Social Risks and Impacts							
1	Emergency Preparedness Response Plan	It is suggested to develop emergency preparedness response plan which will be part of ESMS and shall be adopted at site during construction and operation phase.	Contractor	3 months	Medium	To be developed	-
Compliance to ADB Safeguards							
1	Impact of Environmental Stress and Climate Change on Project	It is suggested that the developer should adopt adequate measures during the construction and operation phase of the project to combat effect of natural hazards prone to the site such as cyclone, flood, thunderstorm. Further, the site is located in Coimbatore South which has experienced drought as well in the past, thereby it is recommended to take adequate measures before commencing the project.	Contractor	3 months	High	To be ensured by the contractor.	-

5. Grievance Redress Mechanism

The TNWWHCL will establish the Grievance Redress Committee prior to the commencement of civil construction work and the GRM structure will be displayed outside the project site to ensure that the suitable functioning of the GRC, officers and focal points will be established within the PMC and Contractor. Most complaints will be the responsibility of the site level contractor and TNWWHCL. It will be addressed via procedures described in the ESGMS. Records of complaints (refer Appendix 2 – sample grievance form) received and how they are addressed will be maintained by the TNWWHCL and reported in the monitoring reports. Contact details and names of the staff concerned and contractors, will be posted at all construction sites in visible locations. The names of the nominated GRC members will be reported by TNWWHCL to the TNIFMC. The TNIFMC will be responsible for documenting the status and progress of GRM implementation and will be reported to the SSMR for submission to ADB. The following GRM shall be followed. Field level - The Contractor will designate an on-site Grievance Redress Officer (GRO)-1 in consultation with the PMC and TNWWHCL. The field level GRC will be the Tier-1 committee, and it may consist of nominated member from the labour group, EHS Officer, senior engineer, safety engineer and chaired by assistant engineer of TNPHC. The Tier-2 GRC will be chaired by the MD of TNWWHCL and consist of Business Head, and project engineer from TNWWHCL. The Tier-3 GRC will receive and record the complaint of the subproject site, and it will be headed by the TNSF Fund Manager assisted by the ESG Analyst, Legal Executive, and Investment Analyst. Alternatively, the complaint can be registered by phone call, message, email to GRO-1 and any complaints received by the contractor or site engineers will be reverted to the onsite GRO-1 for 1st level resolution. The complaint will be reviewed and on-site GRO-1 with assistance from the Site engineer of the Contractor will try to resolve the issue on-site in consultation with the aggrieved party. This will be done within 7 days of receipt of a complaint/ grievance.

Subproject level. - All grievances that cannot be redressed within 7 days on-site level will be brought to the notice of the subproject level, tier 2 GRO officer. The subproject GRO-2 will resolve the grievance within 14 days of receipt of a complaint/ grievance with support of safety engineers and senior level engineers. The grievance at this tier 2 must be resolved in 14 days of its receipt.

Fund level. - If the grievance is not resolved in tier 2 level, the grievance will be referred to tier 3 committee at TNFIMC level. The grievance at this level must be resolved in 14 days of its receipt. The project GRM notwithstanding, an aggrieved person shall have access to the country's legal system at any stage. This can run parallel to accessing the GRM and is not dependent on the negative outcome of the GRM.

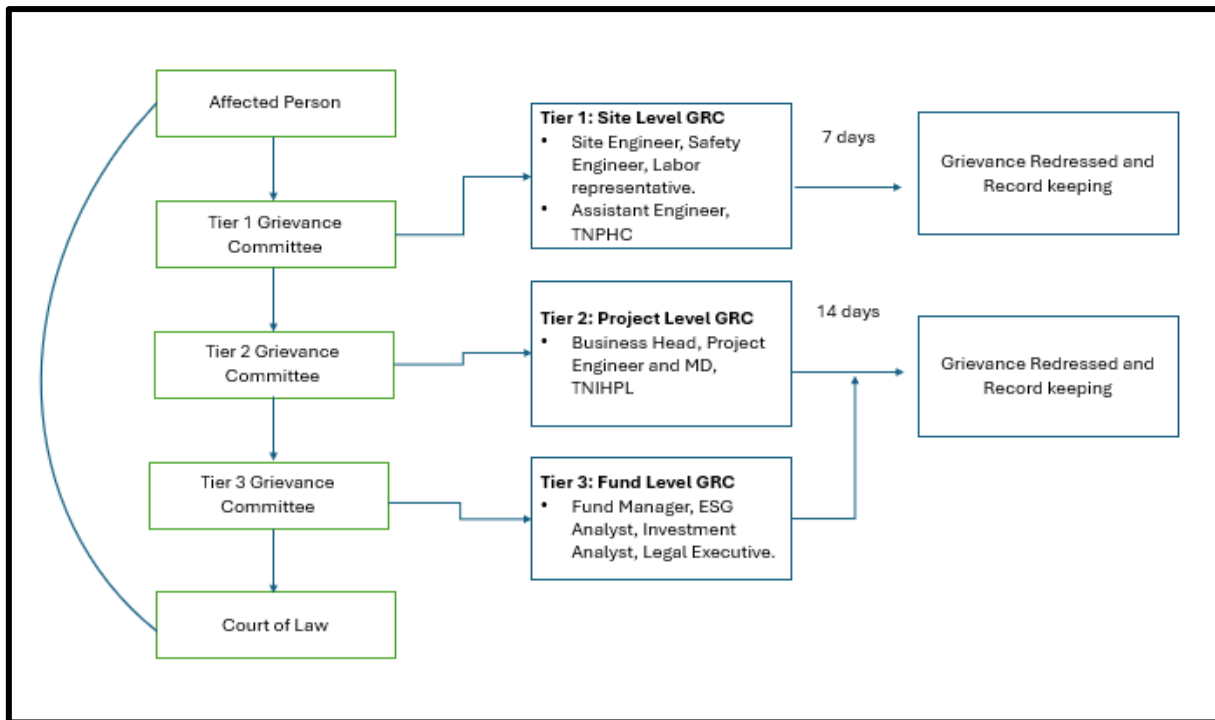


Figure 5: Grievance Redressal Mechanism

ADB’s Accountability Mechanism - If the established GRM is not in a position to resolve the issue, the affected persons can also use the ADB Accountability Mechanism by directly contacting (in writing) the complaint receiving officer at ADB headquarters or the ADB India Resident Mission. The complaint can be submitted in any of the official languages of ADB’s Developing Member Countries. The ADB Accountability Mechanism information will be included in the project information document to be distributed to the affected communities, as part of the project GRM.

Periodic review and documentation of lessons learned. -The PMC, TNWWHCL and TNIFMC will periodically review the functioning of the GRM and record information on the effectiveness of the mechanism, especially on the program’s ability to prevent and address grievances.

Costs. All costs involved in resolving the complaints (meetings, consultations, communication and reporting/ information dissemination) will be borne by the TNWWHCL.

6. Conclusion and Way Forward

Based on the thorough examination conducted for the project, which involved visiting the project site, no significant

ESG (Environmental, Social, and Governance) concerns were identified regarding the proposed project. Overall, 10 ESG issues were evaluated using ESG risk rating tool of which 4 are considered as material ESG risks for the proposed project. Project risk level is B. Hence, it is a medium risk level.

Key findings of the study are:

- The due diligence confirms that the land is yet to be transferred, and no instance of involuntary land acquisition is involved for the proposed project site.
- Presently, the land allocated for the subproject is vacant and has no formal or informal use is observed. Based on E&S site visit observation, the land parcel does not have any existing structure.
- Based on E&S site visit observation, the site is vacant and unused.
- The project is expected to have no direct or indirect effects on the dignity, human rights, livelihoods, territories, or the natural and cultural resources associated with indigenous peoples or their ancestral domains and assets.
- The proposed project site is devoid of any residences, or other structures barring heavy shrubs, bushes, and tree cover, meaning that there will be no need for displacement or demolition of houses or buildings because of the construction activities.
- Potential negative impacts have been identified for this project to involve removal of existing tree cover and shrubs.
- The project location is vulnerable to be affected by climate conditions including extreme weather-related events such as high wind speeds (High damage) and Earthquakes (Moderate risk) and thunderstorm (Moderate Risk). However, it is unlikely to be affected by these events.
- The proposed project site will lead to cutting of trees.
- No potential negative impacts have been identified for this project.

Way Forward

- The project needs to establish and activate the Grievance Redress Committee for prompt response to public complaints, prior to the start of construction.
- The project needs to continuously engage with stakeholders semi-annually and potential beneficiaries, building support for the proposed intervention, alerting the communities about likely job opportunities and any other envisaged benefits, seeking their feedback and incorporating the same into the project design and/or implementation plan.
 - The project needs to have comprehensive stakeholder engagement plan and maintain a relationship with the target audience (Refer Chapter 9) and management plan for smooth disclosure and sharing of information.
 - As a first step, a stakeholder analysis needs to be conducted. The stakeholder communities likely to be benefited, students or youth in nearby educational institutions, concerned departments, businesses and traders associations that may benefit from the development, community based organizations and other civil society organizations, etc. need to be identified. Next, the project needs to conduct a formal and organized stakeholder consultation with 7 days of notice and submit the findings/summary of the consultation in the

next SSMR. Such consultations will continue as per the stakeholder engagement plan and will be reported in the subsequent SSMRs.

-
- The project needs to have a comprehensive emergency preparedness response plan.
- Training of project staff on the key points of the Environmental and Social Action plan by the project developer.
- Regular monitoring of the recommended measures during the construction phase of the project. The E&S action plan should be revisited in case new impacts/non-compliances are identified.
- Obtaining all the necessary compliances listed as specified in the document.
- Further, the land is in the process of transfer from the Medical Department to the SW&WE department of Tamil Nadu. The land will then be leased to TNWWHCL by the end of March 2025. The civil work for the project will only start post the land transfer around April 2025. The ownership record/document will be updated in the due diligence report once the land is registered.

7. Annexures

7.1 Annexure 1: Site Photographs

Photo No. 1	Date- 26.11.24	Client name: TNWWHCL
		
<p>Site Location: Coimbatore, Peelamedu</p>	<p>Description: ELCOT IT Park, located near the project location where there many companies are located</p>	

Photo No. 2	Date- 26.11.24	Client name: TNWWHCL
		
<p>Site Location: Coimbatore, Peelamedu</p>	<p>Description: Railway track on opposing side of the site location</p>	

Photo No. 3	Date- 26.11.24	Client name: TNWWHCL
		
Site Location: Coimbatore, Peelamedu	Description: Tree cover and shrubs presently visible at the project site	

Photo No. 4	Date- 26.11.24	Client name: TNWWHCL
		
Site Location: Coimbatore, Peelamedu		Description: The existing access road will be used for the project

Photo No. 5	Date- 26.11.24	Client name: TNWWHCL
		
Site Location: Coimbatore, Peelamedu	Description: Project location with visible shrubs and tree cover	

7.2 Annexure 2: Indigenous People Impact Screening Checklist

7.2.1 Introduction

Each project/project/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.

Information on project/project/component:

- District/administrative name: Vilankurichi Road, Peelamedu, Coimbatore District
- Technical description: The projects involve the construction of a residential women’s hostel project.

Table 16 Screening Questions for Indigenous People Impact

KEY CONCERNS (Please provide elaborations in the “Remarks” column)	YES	NO	NOT KNOWN	Remarks
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 are no settlements near or around the project site. The land is vacant and within the premises of the Government Medical College of Coimbatore. The project is not anticipated to have any direct or indirect impacts on the dignity, human rights, livelihood systems or territories or natural or cultural resources that are used, owned, occupied, or claimed by indigenous people as their ancestral domain or assets.
2. Are there national or local laws or policies as well as anthropological research/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?				Not applicable
3. Do such groups self-identify as being part of a distinct social and cultural group?				Not applicable
4. Do such groups maintain collective attachments to distinct habitats or ancestral territories and/or to the natural resources in these habitats and territories?				Not applicable

5. Do such groups maintain cultural, economic, social, and political institutions distinct from the dominant society and culture?				Not applicable
6. Do such groups speak a distinct language or dialect?				Not applicable
7. Have such groups been historically, socially, and economically marginalized, disempowered, excluded, and/or discriminated against?				Not applicable
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?				Not applicable
Identification of Potential Impacts				
9. Will the project directly or indirectly benefit or target indigenous people?		√		The project is not anticipated to have any direct or indirect impacts on the indigenous people. The land is a vacant land and no IP occupy the allotted site or in the vicinity of the project site.
10. Will the project directly or indirectly affect indigenous people' traditional sociocultural and belief practices (e.g., child-rearing, health, education, arts, and governance)?		√		
11. Will the project affect the livelihood systems of indigenous people (e.g., food production system, natural resource management, crafts and trade, employment status)?		√		
12. Will the project be in an area (land or territory) occupied, owned, or used by indigenous people, and/or claimed as ancestral domain?		√		
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?		√		

D. Indigenous People Impact

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

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

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

7.3 Annexure 3: Involuntary Resettlement Impact Screening Checklist

1. 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.

2. Information on subsection/section

- a. District/administrative name: Peelamedu, Coimbatore district
- b. Location (km): 300 km from Vellore
- c. Civil work dates (proposed): - _____
- d. Technical description: The proposed project involves the construction of a Working Women’s hostel.

3. 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.

Table 17: Screening for involuntary resettlement impacts

Probable Involuntary Resettlement Effects	Yes	No	Not Known	Remarks
Involuntary Acquisition of Land				
1. Will there be land acquisition?		√		The land ownership is with the Medical Department of Coimbatore. The land is in the process of transferring to Social Welfare and Women Empowerment Department. Once it is transferred, it will be leased to TNWWHCL for 28 years. The land is vacant and unused and hence land acquisition is not envisaged.
2. Is the site for land acquisition known?				Not applicable.
3. Is the ownership status and current usage of land to be acquired known?				Not applicable, as there is no land acquisition. The current project is still in the land transfer stage. The proposed site is vacant and unused.
4. Will easement be utilized within an existing Right of Way (ROW)?	√			Yes. The existing access road will be used.
5. Will there be loss of shelter and residential land due to land acquisition?				No land acquisition is involved in this project; therefore, it is not applicable.
6. Will there be loss of agricultural and other productive assets due to land acquisition?				Not applicable
7. Will there be losses of crops, trees, and fixed assets due to land acquisition?				Not applicable. Approximately 30 trees will be removed, but not due to land acquisition. Accordingly trees will be replanted in the area using minimum ratio of 10 trees for every 1 tree cut.
8. Will there be loss of businesses or enterprises due to land acquisition?				No land acquisition is involved in this project; therefore, it is not applicable.
9. Will there be loss of income sources and means of livelihoods due to land acquisition?				Not applicable
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 type="checkbox"/> Yes [<input checked="" type="checkbox"/>] 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 type="checkbox"/> Yes [<input checked="" type="checkbox"/>] N/A				
Are any displaced persons from indigenous or ethnic minority groups? <input type="checkbox"/> No <input type="checkbox"/> Yes [<input checked="" type="checkbox"/>] N/A				

7.4 Annexure 4: Sample Grievance Registration Form

a) English

The Project welcomes complaints, suggestions, queries, and comments regarding program implementation. We encourage people with a grievance to provide their name and contact information to enable us to get in touch with you for clarification and feedback.

In case you want to include your personal details but want information to remain confidential, please type CONFIDENTIAL above your name.

Date	Place of registration	
Contact Information/Personal Details		
Name	Gender	Age
Home Address		
Village/ Town		
District		
Phone no		
Email		
Complaint/Suggestion/Comment/Question please provide the details (who, what, where and how) of your grievance below is if included as an attachment/ note/ letter, please mention here:		
How do you want us to reach you for feedback on your comment/grievance?		

For Official Use only

Registered by: (Name of Official registering grievance)
Verified through Letter E-mail Verbal/Telephonic
Reviewed by: (Name/Position of Official(s) reviewing grievance)
Action taken:
Whether Action Taken Disclosed:
Means of Disclosure

b) Tamil

தேதி	பதிவு செய்யும் இடம்	
தொடர்பு தகவல்/தனிப்பட்ட விவரங்கள்		
பெயர்	பாலினம்	வயது
வீட்டு முகவரி		
கிராமம்/நகரம்		
மாவட்டம்		
தொலைபேசி எண்		
மின்னஞ்சல்		
புகார்/கருத்து/மதிப்புரை/கேள்வி:		
உங்கள் குறைவு குறித்து (யார், என்ன, எங்கு, எப்படி) விவரங்களை வழங்கவும்:		
உங்கள் கருத்து/புகாருக்கு மீள்பதிலாக எப்படித் தொடர்பு கொள்ள வேண்டும்?		

7.5 Annexure 5: Initial Consultations with Individuals/Stakeholders

Table 18 Stakeholder consultation summary

Consultation No.	Date / Time /Venue of Meetings	Stakeholders	No. of Participants			Issues discussed	Project responses
			Male	Female	Total		
1	26-11-2024 Project site	Community member	1		1	<ul style="list-style-type: none"> • Knowledge of local area • Climatic conditions during monsoon season, reporting no concern. • Any grievance related to project. • People were aware of this new development. 	No major concerns were noted.
2	26-11-2024 Project site	Community member	1		1	<ul style="list-style-type: none"> • Knowledge of project area and residual surroundings. • Climatic and extreme conditions, reporting no concern. • Convenience of site location owing to network connectivity • Any grievance related to project. • People were aware of this new development. 	No major concerns were noted.
3	26-11-2024 Project site	Community member	3		3	<ul style="list-style-type: none"> • Knowledge of Coimbatore project site. • Safety of local area (project location) • Climatic and extreme conditions, reporting no concern. • Any grievance related to project. • People were aware of this new development. 	No major concerns were noted.

4	26-11-2024 Project site	Community member	1		1	<ul style="list-style-type: none"> • Knowledge of project area. • Safety of local area (project location) • Project impact on social environment. • Any grievance related to project. • People were aware of this new development. 	Road blockage due to construction was raised as a concern.
5	26-11-2024 Project site	Community member		2	2	<ul style="list-style-type: none"> • Climatic and extreme conditions in Coimbatore, reporting no concern. • Any grievance related to project. • People were aware of this new development. • Safety concerns in the area 	No major concerns were noted.

7.6 Annexure 6: Stakeholder Engagement Plan

A. Overview

The active participation of stakeholder’s engagement plan in all stages of project preparation and implementation is essential for successful implementation of the project. It ensures that the projects are designed, constructed, and operated with utmost consideration to local needs, ensures community acceptance, and will bring maximum benefits to the people. Public consultation and information disclosure.

B. What is stakeholder engagement analysis

- Stakeholder analysis refers to endeavors to identify, understand, and prioritize the various parties involved in a project.
- In a nutshell, stakeholder analysis is a systematic process of mapping out the key individuals, groups, or organizations who have a vested interest in a project, assessing their needs and expectations, and determining the best strategies for managing relationships and communication with them.
- In project management, stakeholder analysis and management are critical as the landscape is often fast paced, highly competitive, and involves diverse interests. Engaging with stakeholders in a thoughtful way enables you to gain valuable insights and feedback to shape your product, build a strong ecosystem around it, and, ultimately, deliver a successful, high-impact product that meets the needs of all parties involved.

C. How to conduct a stakeholder Analysis

- The project will conduct stakeholder consultation semi-annually with target population. The target population may include workers, executives from TNWWHCL, contractors, nearby communities, college students, and IT workers.
- Identify stakeholders — List all potential stakeholders, including customers, employees, investors, partners, regulators, and more. Consider everyone who has an interest in the product.
- Prioritize stakeholder needs and expectations — Assess the impact of each stakeholder on the product, as well as their level of influence over its success. Consider factors such as their potential contribution, their ability to affect the outcome, and their importance in achieving project goals.
- Analyze stakeholder relationships — Understand the relationships between different stakeholders and identify any potential conflicts or synergies. This can help in developing strategies to manage their expectations and foster collaboration.
- Develop communication and engagement strategies — Based on the priorities and relationships identified, create tailored communication and engagement plans for each stakeholder group. This includes determining the most appropriate channels, frequency, and type of interaction.
- Monitor and adjust — Regularly review and update the stakeholder analysis, as relationships, priorities, and project requirements may change over time. Adapt communication and engagement strategies accordingly to maintain strong relationships.

D. Managing stakeholder relationship post analysis

Once you have conducted a comprehensive stakeholder analysis, it’s important to keep the momentum going and continue to manage stakeholder relationships effectively throughout the project development process.

Here are some additional steps to follow you’ve conducted your stakeholder analysis:

- **Document stakeholder information** — Maintain a detailed record of stakeholder information, including their roles, responsibilities, and contact details. This documentation will be helpful in keeping track of communications and ensuring that all relevant parties are informed and engaged.
- **Establish clear communication channels** — Ensure that all stakeholders are aware of the communication channels being used and the expected response times. This will help in streamlining communication and reducing potential misunderstandings or delays.
- **Involve stakeholders in decision-making** — Engage stakeholders in the decision-making process, especially when their input or expertise is crucial. This not only strengthens relationships but also improves the overall quality of the product by incorporating diverse perspectives.
- **Measure and evaluate stakeholder satisfaction** — Regularly assess stakeholder satisfaction to identify areas for improvement and address any concerns. This can be done through surveys, interviews, or informal feedback sessions.
- **Recognize and celebrate success** — Acknowledge the contributions of stakeholders and celebrate the successful completion of milestones or project phases. This fosters a positive atmosphere and encourages stakeholders to continue supporting the product.

By diligently following these steps and continually managing stakeholder relationships, product managers can ensure that they are working effectively with all stakeholders, ultimately leading to the successful development and the product.

7.7 Annexure 7: Stakeholder interactions

During the site visit to the project area, various stakeholders residing close to the vicinity of the land parcel were interviewed. However, the individuals expressed their concern and did not allow photographs to be taken. As a result, an attendance sheet appended below has been provided that gives a summary of the individuals who were interviewed.

Serial No	Names	Topics of discussion	Interviewee profile
1	JayaSurya	Reported that Monsoons do not cause flooding very often but could not answer for the site itself as the site is within the grounds of the Coimbatore Medical College He said the area is considered very safe, as even though he lives 1-2 km away, him and his friends prefer to meet in the area where the site is located. Further, no grievance were observed during the interview.	Student in the Engineering college close to the proposed site.
2	Manikandan	Has not faced any problems due to extreme weather conditions- except some traffic when it rains heavily. He believes the site location is very central- airport is not too far away, and the main bus stand is only a few kilometres away while the Police station is also 1-2 km away.	Ola driver who has grown up in the area around the site
3	Shanmuganami, Rajesh & Satya	They are quite pleased with the area, finding it both safe and centrally located. Additionally, they do not believe that flooding will pose a problem during the monsoon season.	Friends who work together at Wipro, in Tidel Park, have been working there for 2 years
4	Muthukumar	He is happy with the security of the area, finds it safe, central, and does not seem to think flooding could be an issue. However, he feels that the construction of the hostel could increase traffic as the new gate of the hostel would be right in front of a double u-turn, that tends to be busy. Otherwise, the site seemed okay to them.	Worker in the IT park for almost a year but has also lived in the area his whole life.
5	Santoshi & Lakshna	Both were very happy with the area, find it safe, central, and do not seem to think flooding could be an issue. They did not have any grievance/issue related to construction of site.	Lives in another women's hostel nearby and works in Coimbatore IT park.

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