

# Due Diligence Report

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

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# Environment and Social Due Diligence Report

Gangaikondan

**Prepared For:** Tamil Nadu Infrastructure Fund Management Corporation

**Developer Name:** Tamil Nadu Industrial Housing Private Limited

**Project Name:** Industrial Housing Project, SIPCOT, Gangaikondan, Tamil Nadu

## Contents

Executive Summary .....	1
1. Introduction .....	3
2. Project Overview .....	7
3. Key Findings Sections .....	11
4. Regulatory Compliance .....	13
5. Assessment of IFC Performance Standards .....	25
6. Assessment of Green Building Certification.....	45
7. Compliance to ADB Safeguards- Key findings .....	46
8. Environment & Social Action Plan .....	50
9. Stakeholder Engagement Plan.....	52
10. Grievance Redressal Mechanism .....	54
11. Conclusion and Way Forward.....	56
12. Abbreviations.....	76

### List of Figures

Figure 1: Project Location.....	7
Figure 2: Topography of the Project.....	7
Figure 3: Ground water Categorization Map .....	46
Figure 4: Grievance Redressal Structure.....	55

### List of Tables

Table 1 Project Details.....	1
Table 2: Connectivity to the project site .....	8
Table 3: Social Infrastructure .....	9
Table 4: Legal Requirements - Environment.....	13
Table 5: Project Insurance .....	19
Table 6: Occupational Health and Safety.....	20
Table 7: Labour and Working Conditions .....	22
Table 8: Assessment and Management of E&S Risks and Impacts.....	25
Table 9: IFC PS 2.....	27
Table 10: IFC PS 3.....	33
Table 11: IFC PS 4.....	38
Table 12: IFC PS 5.....	40
Table 13: IFC PS 6.....	42
Table 14: IFC PS 7.....	43
Table 15: IFC PS 8.....	44
Table 16: Green building Certification.....	45
Table 17: Environment & Social Action Plan .....	50
Table 18 Stakeholder consultation summary .....	68

## Executive Summary

1. **Project Background.** The “Industrial Housing Project” is a residential project, to be developed by Tamil Nadu Industrial Housing Private Limited (TNIHPL) in Gangaikondan, Tamil Nadu. The proposed project involves the construction of one block of an industrial housing project for industrial workers. The project is spread across 2.07 acres of land with proposed total built-up area of 11,185.3m<sup>2</sup>, located at Plot No H-2, Survey No 1641/10, Gangaikondan Village – I, SIPCOT Industrial Park, Gangaikondan, Tirunelveli, Tamil Nadu, - 627 354. The project will be constructed in 18 months. The details of proposed developments are provided in the table below.

### 2. Proposed Development Details

**Table 1 Project Details**

S. No	Block No	Floor	Usage	No. Of Rooms	No. Of Beds
1	Block A	Ground Floor	Residential	24	150
2	Block A	First Floor	Residential	38	240
3	Block A	Second Floor	Residential	38	240
4	Block A	Third Floor	Residential	38	240

3. As per the Government of India’s EIA notification 2006 and its subsequent amendments, this subproject is exempted from obtaining environmental clearance (EC), as the total built-up area comes around 11,185.3 sq. m., which is less than the stipulated requirement of 20,000 sq. m for category B2 projects (project schedule 8(a) for Building and Construction Projects). The project is currently in the pre-construction phase, and construction activities will commence after obtaining all necessary approvals.

4. According to revenue records, the land is registered in the name of Tamil Nadu Industrial Housing Private Limited (TNIHPL). The land was transferred from the State Industries Promotion Corporation of Tamil Nadu hereinafter referred to as ‘SIPCOT’. The land does not have any issues with respect to resettlement, land legacy issues and the site does not have any cattle rearing or cattle grazing.

5. During the E&S site visit, it was observed that the project site has presence of 5 Toddy Palm trees (*Borassus flabellifer*) and shrubs at the project site and shrubs which may be required to be cleared before commencing construction activity. Tree cutting and replantation NOC will be required from the Forest Department before commencing construction activity. The project site is in proximity to Thalaisyuthu Reserved Forest (375m south of the project site) (survey no. 1854) and Gangaikondan Spotted Deer Sanctuary (~ 1.83km to SE of the site) (survey no. 1653).

6. However, the site is located outside the Reserved Forest boundary and a deer sanctuary outside the Ecologically Sensitive Area (ESA) of the Sanctuary. Regular monitoring will also be carried out throughout both the construction and operational phases. TNIHPL is accountable for ensuring the effective implementation of the Environmental and Social Action

Plan (ESAP) for the project.

7. The responsibility for managing the construction activities of the project will be handled by TNIHPL. The project is planned to progress in three phases: pre-construction, construction, and operational phases. During the pre-construction phase, TNIHPL will be required to secure all the requisite legal clearances and permissions before initiating construction. It is advisable to generate the primary data of ambient air quality, groundwater conditions, ambient noise levels, soil characteristics to know the baseline information and the necessary mitigation measures before construction begins. Regular monitoring will also be carried out throughout both the construction and operational phases.

8. Furthermore, it is essential for TNIHPL to conduct regular training for construction workers on ESAP and Occupational Health and Safety-related matters. A grievance redressal committee and mechanism should be established for the project to promptly address public complaints related to the project.

# 1. Introduction

## 1.1 Background

9. 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 Shelter Fund (TNSF) which is registered as a Category I (Social Venture) Alternative Investment Fund, with a mandate to invest in affordable housing projects in Tamil Nadu.

10. The primary focus areas of TNSF 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.

11. TNSF is considering an investment in “Industrial Housing Project” located in Gangaikondan, Tirunelveli district, Tamil Nadu. As part of the investment process, TNIFMC has hired Colliers India to conduct the ESG due diligence for the proposed project.

## 1.2 Primary objective & Scope of Study

12. The objective of conducting ESG due diligence is to assess the ESG 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 TNSF to make an informed decision on the proposed investment.

## 1.3 Scope of Work

13. 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 is 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.

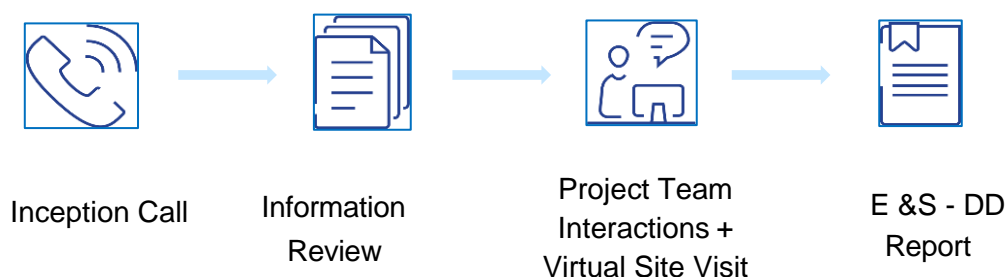
#### 1.4 Reference Framework for E & S-DD

14. The reference framework for E & S –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 SPS

#### 1.5 Approach & Methodology of E & S-DD

15. The approach and methodology adopted for E & S- DD is presented in the subsequent subsections.



#### 1.6 Inception call

16. A call was conducted with the Company on 04.3.2024 with the following objectives:

- Obtain an overview of the project and status.
- Explain the approach and methodology adopted for the E & S DD.

#### 1.7 Information review

17. Colliers 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 and the site visit was conducted on 08.03.2024 at the Client project site from the Site Manager.

### 1.8 Team Interaction

18. Assessment of the target company and project management was conducted through team's discussions on the following topics:

- A. Understanding the following aspects of project implementation:
  - EHS management measures are 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 w.r.t fair wages, equal remuneration, inter-state migrant workers, building construction workers, contract labour etc.
- B. 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, safety practices and local community grievance redressal.
- C. 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.
- D. **GHG emissions** sources and mitigation, water and energy conservation measures adopted.

### 1.9 Limitation of the Study

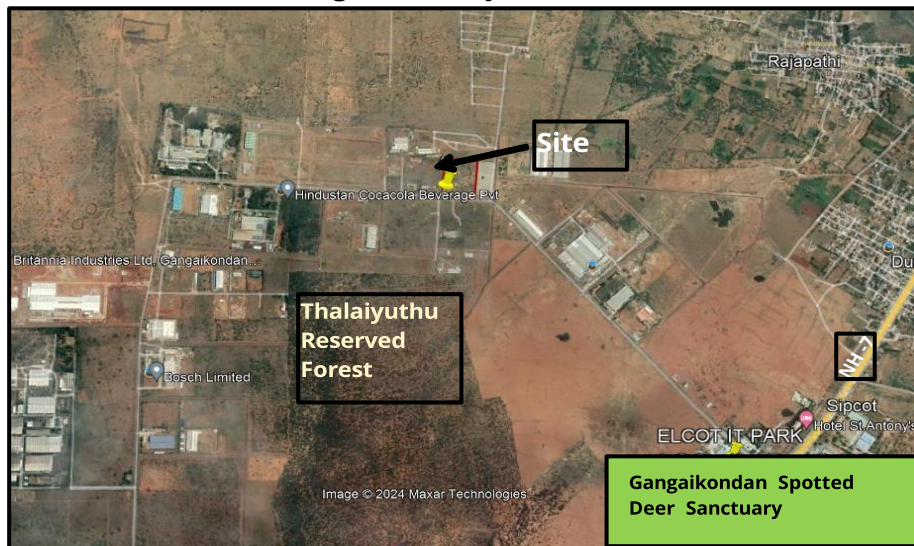
19. The present E&S Due Diligence of the proposed project is compiled based on the E&S site visit observations and the documentation provided by the developer. The data and findings presented herewith are to the best of knowledge of the E&S consultant.

## 2. Project Overview

### 2.1 Land

20. The project is an Industrial Housing Project to be developed at Plot No H-2, Survey No 1641/10, Gangaikondan Village – I, SIPCOT Industrial Park, Gangaikondan, Tirunelveli, Tamil Nadu, Pin Code - 627354. The project is to be developed by TNIHPL. The project is being designed exclusively for industrial housing for industrial workers and it involves the construction of 138 rooms (870-bed) facility. Geographically the project is situated at 8°51'01"N Latitude and 77°45'16"E Longitude.

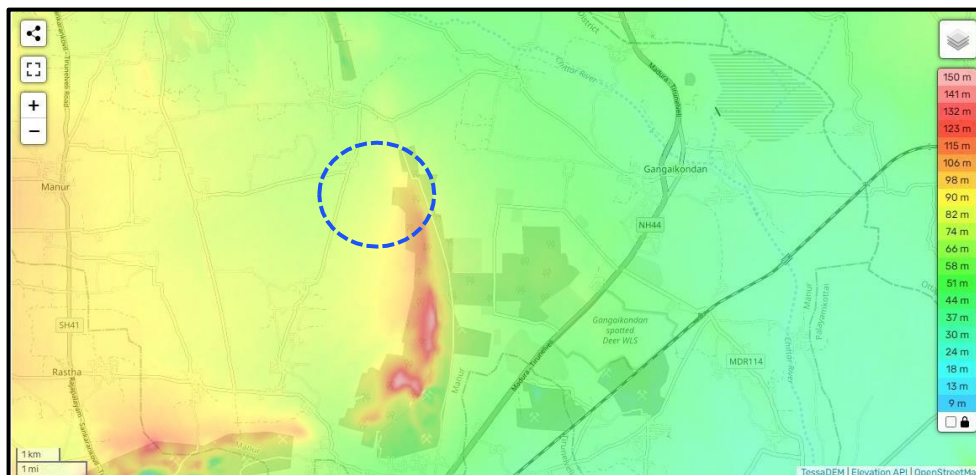
**Figure 1: Project Location**



21. The project land is registered in the name of TNIHPL. Due diligence has confirmed that there is no resettlement or relocations or evictions related issues on the project site. The lease documents are in the favor of TNIHPL (Ref Annex 9) and there are no land legacy issues. The site does not have any cattle grazing or cattle rearing.

### 2.2 Topography

**Figure 2: Topography of the Project**



22. The topography of an area mainly depicts the elevation, relief, natural features (waterbodies, mountains, hills, ridges etc..) and man-made features (roads, highways, railways, walking paths.) The average elevation of the site is 73 m above mean sea level.

### 2.3 Connectivity

**Table 2: Connectivity to the project site**

Sl.no	Site location from key focal nodes	Observation
1.	Project Borders	<p><b>North:</b> Saguna Foods Manufacturing Plant followed by open vacant land</p> <p><b>East:</b> SIPCOT Truck Parking followed by SIPCOT road followed by various manufacturing plants and warehouses</p> <p><b>West:</b> SIPCOT road followed by open or partially built plots, followed by manufacturing plants of Hindustan Coca Cola manufacturing plant and Ramco Industries at about 1km to the west.</p> <p><b>South:</b> SIPCOT road followed by open or partially built plots, followed by Reserved Forest at about 375m to the South.</p>
2.	Highway	Near NH-7, Hosur to Kanyakumari Highway
3.	Railway Station	Gangaikondan (3 km) Tirunelveli Junction (21 km)
4.	Bus station	Tirunelveli Central Bus Stand (21 km)
5.	Airport	Madurai International Airport (144 km) Tuticorin Airport (35 km)

## 2.4 Social Infrastructure

**Table 3: Social Infrastructure**

<b>Schools</b>	Kalainger Colony School- 1.6 km St. Johns School- 3.7 km Government Public School- 7.3 km
<b>Health facilities</b>	Kauveri Hospital Tirunelveli- 17.5 km Annai Velankanni Multispeciality Hospital- 18 km Rosemary Missions Hospitals- 18.7 km Peace Health Centre- 21.6 km CSI Bell Pins Indrani Chelladurai Mission Hospital- 18.4 km
<b>Colleges</b>	St. Jhon's College- 19.8 km Sankar Institute of Polytechnic College- 10.9 km St. Xavier College- 20.3 km Thamirabharani Engineering College- 13.5 km
<b>Police station</b>	Gangaikondan Police Station- 4.8 km Thalaiyuthu Police Station- 9.7 km Palayamkottai Police Station- 20.3 km

## 2.5 Hydrology

23. Thamirabarani river is the main river of the Tirunelveli district. The small part of the district in the northern part falls in river Vaippar basin. In Tirunelveli District, during the pre-monsoon, the water level generally in declining trend ranges from G.L. to 15m. The depth of well below Ground Level 12.0m becomes dry during hot season like May, June, July. In the post monsoon, the water level generally has an upward trend due to rainfall and it may reach the Ground Level also.

24. The major river basins in the State of Tamil Nadu. As depicted in the map the river basin flowing through Tirunelveli is Thamirabarani river basin. The other two rivers draining the district are river Nambiar and Hanumanathi of Nanguneri taluk in the south that are not part of the Thamirabarani river basin.

## 2.6 Flora Fauna:

25. The entire area is a dry and the predominant species observed in the area are Prosopis Juli flora and Acacia species. In total 30 plant species consist of 6 trees, 5 shrubs, 19 herbs, were recorded from Gangaikondan Deer Sanctuary. In total 33 faunal species were recorded from the Gangaikondan Deer Sanctuary area that belong to 4 mammals, 12 birds, 3 reptiles and 11 butterflies. The patches of Reserved Forest areas found outside the Western Ghat in Tirunelveli district are usually of degraded thorny scrub or dry deciduous type with lesser diversity and without much wild animals. However, Gangaikondan Spotted Deer Sanctuary is an exception with a healthy population of Spotted Deer which are not only regular inhabitants but, over time they have also spread over surrounding areas. A mitigation plan to conserve the biodiversity of the area has been conducted using IBAT tool. Other associated species like

mongoose, hares, varieties of reptiles and avifauna are also found in this small patch of the Reserved Forest. The area lacks adequate fodder and water resources, and a population of spotted deer has been progressing over the surrounding areas, resulting in damage of crops consequently vulnerable to poaching, accidents and attack by stray dog.

26. **Flora:** Major flora of the Sanctuary includes Kundumani (*Abrus precatorius* L.), Silladai (*Acacia chundra* Roxb. Willd.), Avaram (*Acacia auriculata*), Indu (*Acacia caesia* L.) Willd), Anaimullu (*Acacia latronum*), Velveli (*Acacia leucophloea* Roxb. Willd) etc. At the Site five (5 Nos) Toddy Palm trees (*Borassus flabellifer*) and some shrubs were identified at the project site

27. **Fauna:** Major fauna found in the Sanctuary are spotted deer (*Axis axis*), sambar (*Cervus unicolor*), pea fowls (*Pavo cristatus*), hare (*Lepus nigricollis*), mongoose (*Herpestesedwardsi*), white breasted kingfisher (*Halcyon smyrnesis*), red-whiskered bulbul (*Pycnonotus jocosus*), peafowl (*Pavo cristatus*), blue pansy (*Junonia orithya*), blue tiger (*Tirumala limniace*), common bush brown (*Mycalesis perseus*), common green forest lizard (*Calotes calotes*), common keeled grass skink (*Eutropis carinata*), spotted supple skink (*Lygosoma punctuate*), etc. while Kuthithi (*Nibhuriaepitala*) is an endangered species present in the protected area.

### 3. Key Findings Sections

#### 3.1 ESG Risk Rating Tool

ESG Risk Rating Tool - TNSF (Version 1.0)			
Project Details			
Name of the Project	Industrial Housing Project	Start of Evaluation Date	
Site Location / Alternatives under consideration	Gangaikondan	Project Developer	TNIHPL

Dimension	No. of Observations
<b>List of ESG Issues</b>	<b>6</b>
Environment	2
Social	2
Governance	2
<b>Material ESG Risks</b>	<b>4</b>
Environment	2
Social	1
Governance	1

Note to the user
1. The ESG Risk Rating Tool is developed to assist in evaluation of the ESG risks of the identified project. 2. The person using this tool should not tamper with the in-built evaluation criteria. Any changes to the criteria shall be done so after getting requisite approval from Impact Monitoring Officer. 3. All changes shall be indicated in the document control log provided below.

Project Risk Rating	
Risk Level (%)	ESG Risk Rating
<b>19.444444</b>	<b>medium</b>

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

Sign-off and Document Control (to be updated at regular intervals and each version post revision to be stored)						
Revision	Effective Date	Updated Sections	Document Owner (Name & Signature)	Team Leader / Senior TL Approvals	Investment Manager (Name & Signature)	Comments (if any)
Sl. No.	Dimension	Risk Score				
1	Environment	6.00				
2	Social	4.00				
3	Governance	4.00				
1						
2						
3						
4						

28. TNSF 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.

29. The issues identified are based on the current project status and may evolve during construction and operational phase. The overall risk rating is 19.44 % which falls on “med-high” risk on project risk rating scale. The separate scores for environment, social and governance are discussed below:

<b>Environmental</b>	6
<b>Social</b>	4
<b>Governance</b>	4

The material risks identified from the tool includes the following.

<b>Environmental</b>	<ul style="list-style-type: none"> <li>• Tree cutting and replantation NoC not obtained</li> <li>• Solid waste management plan not developed</li> </ul>
<b>Social</b>	<ul style="list-style-type: none"> <li>• OHS Plan not developed</li> </ul>
<b>Governance</b>	<ul style="list-style-type: none"> <li>• ESG Management System not developed</li> <li>• ESG Manager/ Team not developed</li> </ul>

### 3.2 Compliance with Environment and Social Legal Requirements

30. 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.
- The last column provides a remark on the status of compliance.

C	Regulation and its requirements are applicable to the project. The project is <b>COMPLIANT</b> to the requirement.
PC	Regulation and its requirements are applicable to the project. The project is <b>PARTIALLY COMPLIANT</b> to the requirement.
NC	Regulation and its requirements are applicable to the project. The project is <b>NON-COMPLIANT</b> to the requirement.
NA	Regulation and its requirements are <b>NOT APPLICABLE</b> to the project
No Info	<b>INSUFFICIENT INFORMATION</b> to assess the status of compliance/conformance

## 4. Regulatory Compliance

### 4.1 Legal Requirements- Environment

**Table 4: Legal Requirements - Environment**

Legal Requirements- Environment							
S. No	Regulation	Status	Legal Requirement	Authority Responsible	Observations	Compliance Status	Recommendation
1	Environmental Impact Assessment Notification 2006 and amendments thereof	The built-up area of 11,185.3m <sup>2</sup> is less than 20,000 sqm which is required for obtaining environmental clearance. Hence, not applicable.	Obtain Environmental Clearance (EC) under the EIA Notification 2006	Tamil Nadu Environmental Impact Assessment	Not applicable as EC is not required for the proposed project.	NA	None
			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
			Submission of environmental statement for the financial year ending the 31st of March in Form V to TNPCB on or before the thirteenth day of September every year (u/r 14)	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)	Not applicable. The project	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 the project site is in the land stage. A CTE certificate is applicable prior to the start of construction work. Hence, not applicable to the present stage of the project.	NC	Recommend ensuring that a CTE certificate is obtained before the start of construction.

Legal Requirements- Environment							
S. No	Regulation	Status	Legal Requirement	Authority Responsible	Observations	Compliance Status	Recommendation
	and Water Prevention and Control of Pollution Act, 1974 (Water Act)	site is in the land stage.	Comply with the conditions of CTE			NC	Recommend ensuring compliance with CTE conditions after obtaining CTE certificate.
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 the project. At present the project is on the land stage. Hence, not applicable.	NC	Recommended obtaining 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.	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	Based on the E&S site visit observations, the project site does not utilize DG sets for emergency power supply.	NC	Recommend ensuring compliance with DG set rules during the operational phase of the project.
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	Tamil Nadu Pollution Control Board	Based on the E&S site visit observation noise generating activity is not ongoing at the proposed project site. Hence, not applicable	NC	Recommend the developer to conduct an ambient noise monitoring report. It is further recommended that the

			shall not be used or operated during night-time in residential areas and in silence zones. (u/r 5A (2))				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, Handling and Transboundary Movement) Rules 2016	Not Applicable. The project site does not have hazardous waste.	Occupier shall be responsible for safe and environmentally sound management of Hazardous and other waste. u/r 4(2)	Tamil Nadu Pollution Control Board	Based on the E&S site visit observations, there is no presence of '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 TNPCB.	NA	None.

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. The proposed project site is presently constructed and not operational.	NA	None.
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 segregated wastes to authorized waste pickers or waste collectors as per the direction or notification by the local authorities from time to time. u/r 4(a)	Tamil Nadu Pollution Control Board	Based on the E&S site visit observations, there is no solid waste present at the proposed project site.	NC	Recommend ensuring proper solid waste management during the operational phase of the project.
10	E-Waste (Management) Rules, 2016	Not applicable to the present stage of the	Ensure e-waste generated by them is channelized through collection center of authorized producers or dismantlers or recyclers or through the designated take back service provider of the	Tamil Nadu Pollution Control Board	Based on the E&S site visit observations, there is no e-waste present or expected from the project.	NA	None

			producer to authorized dismantlers or recyclers. u/r 9(1) Maintain records of E- Waste generated in Form-2. u/r 9(2)				
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Legal Requirements- Environment							
S. No	Regulation	Status	Legal Requirement	Authority Responsible	Observations	Compliance Status	Recommendation
11	Central Ground Water Authority Guidelines to regulate and control Ground Water Extraction in India dated 1 June 2019 Groundwater (Development and Management) Act, 2009	Not Applicable to the present stage of the project operation.	Registration of existing borewells/NOC for new borewells.	Central Ground Water Authority (CGWA) / SIPCOT	Based on the E&S site observations there is no borewell present at the Project site. SIPCOT is expected to supply fresh water.	NC	Obtain water supply consent letter from SIPCOT.
			Installation of digital water flow meter (confirming to BIS standard) in the abstraction structure (s)				Going forward recommends installing a digital flow water meter at the project site.
12	Tree Cutting and Replantation NOC scheme	Requirement for trees cutting for construction works to commence on Project site.	In case of any tree felling, permission is required for cutting/transplanting trees for any development	District forest officer/divisional forest officer	Based on the E&S site visit observations, five (5Nos) Today Palm trees ( <i>Borassus flabellifer</i> ) and some shrubs were identified at the project site. In case tree felling is required, the developer is required to obtain tree cutting and replantation NOC from district forest officer/divisional forest officer having jurisdiction of the area.	No info	Recommend conducting geotagging of trees and ensure obtaining tree cutting and replantation NOC before cutting trees at the project site. It is further recommended as a good practice to retain trees with girth size ranging from 0.3 to >1.2m. Compensatory afforestation in the ratio of 1:10 is to be

							carried out at the project site
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## 4.2 Insurance

**Table 5: Project Insurance**

		Project Insurances		
S. No	Applicable Insurances	Observations	Compliance Status	Recommendations
1	General Insurance for the property	The project is in the final stage of approval from the Tamil Nadu State Government Department. Hence, not applicable to the present stage of project operations.	No Info	The developer to obtain requisite insurance before starting the project activities.
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.	No Info	
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.	No Info	
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.	No Info	

### 4.3 Legal Compliance- Occupational Health & Safety

**Table 6: Occupational Health and Safety**

**Legal Requirements- Occupational Health & Safety**

S N	Applicable Regulation	Status	Legal Requirement	Observations	Compliance Status	Recommendations
1	The Building and Other Construction Workers ‘(Regulation of Employment and Conditions of Service) Central Rules, 1998	At present there is no construction work on-going at the project site. Hence, not applicable to the present stage of the project operations	<p><b>Registration of establishment</b></p> <p>a) Hours of work, rest and weekly off (Chapter XXVI</p> <p>b) Safe &amp; Health- General Provisions (Chapter IV)- physical hazards, PPE, and electrical hazards.</p> <p>c) Provision of drinking water (u/s 32)</p> <p>d) Provision of latrines and urinals (u/s 33)</p> <p>e) Provision of accommodation (u/s 34)</p> <p>f) Provision of creches (u/s 35)</p> <p>g) First aid facilities (u/s 36)</p> <p>h) Fire protection (u/r 35)</p> <p>i) Emergency action plan</p> <p>j) Stability of structures (u/s</p> <p>k) Lifting appliances and gear (Chapter VII)- testing, safe, load indicators, ropes</p>	The regulation is applicable during the construction phase of the proposed project. At present there is no construction activity on- going at the project site. Hence, not applicable.	NC	Recommend developers to comply with the legal requirements pertaining to Occupational Health & Safety when the project construction activity commences at the project site.

			Legal Requirements- Occupational Health & Safety			
S N	Applicable Regulation	Status	Legal Requirement	Observations	Compliance Status	Recommendations
			l) Reporting of accidents (u/r 237)			
			m) Medical examination of crane operators, exposure to special occupational hazard (u/r 250)			
			n) Safety Officer (u/s 38 & u/r 209)			
			o) Health and Safety Policy (u/r 39)			
2	Central Electricity Authority (Measures relating to safe and Electric Supply) Regulations, 2010		<p>General safety requirements for:</p> <p>a) Electric Supply lines and apparatus safety</p> <p>b) Cut-out</p> <p>c) Earthed terminal</p> <p>d) Dangerous notice</p> <p>e) Flexible cables</p> <p>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</p>		NC	

#### 4.4 Legal Compliance- Labour & Working Conditions

**Table 7: Labour and Working Conditions**

Legal Compliance- 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.	a) Registration of Establishment as principal employer (u/s 7)	The regulation is applicable during the construction phase of the proposed project. At present there is no construction work on-going at the project site. Hence, not applicable to the present stage of project operation.	NC	Recommend obtaining registration and complying when the construction activities commence at the project site.
			a) Contractor's license for workers more than 50 (u/s 12)			
2.	Minimum Wages Act, 1948		Payment of minimum wages as per the 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			

			Legal Compliance- Labour & Working Conditions			
S No.	Applicable Regulation	Status	Legal Requirement	Observations	Compliance Status	Recommendations
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)	TNIHPL is expected to adhere to the requirement	NC	Recommend obtaining registration and compliance before construction activities commence at the project site.
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)	The regulation is applicable during the construction phase of the proposed project.  At present there is no construction work on-going at the project site. There are no laborers deployed at the project site.	NC	Recommend obtaining registration and compliance before construction activities commence at the project site.

Legal Compliance- Labour & Working Conditions						
S No.	Applicable Regulation	Status	Legal Requirement	Observations	Compliance Status	Recommendations
				Hence, not applicable to the present stage of project operations.		
8.	Prevention of Sexual Harassment	Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013	a) Receive complaints of sexual harassment (u/s 9) b) Conduct enquiry on receipt of complaint (u/s 11)	TNIHPL's POSH policy is to be adopted.	NC	Recommend compliance during construction activities at the project site.
9.	Maternity Benefit	Maternity Benefit Act, 1961	Maternity benefit leaves of 26 weeks (u/s 5(3))	TNIHPL's Maternity Benefit policy to be adopted.	NC	Recommend compliance during construction activities at the project site.
10	Child Labour	Child and Adolescent Labour (Prohibition & Regulation) Act, 1986 amended in 2016	Clients will not employ children in any manner that is economically exploitative or to interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral, or social development	At present there is no construction activity on-going at the project site.	NC	Recommend the developer to ensure that there is no child laborers employed at the project site during the construction and operational phase.

## 5. Assessment of IFC Performance Standards

### 5.1 Assessment of IFC PS 1

**Table 8: Assessment and Management of E&S Risks and Impacts**

SN	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1	Policy	Applicable at entity level.	IFC PS1	a. Establishing E & S Policy which incorporates national laws	The E&S due diligence confirms that TNIHPL adopts TNIFMC's ESGMS.	C	None.
				b. Policy to indicate competent professional to ensure conformance & execution of the Policy			
				c. Communication of the policy to all levels of organization			
2	Identification of risks & impacts	Not applicable as the project built-up area is less than the required threshold for conducting EIA.		a. Conducting environmental and social impact assessment. (ESIA or EIA) of the project, appropriate to the nature of the project's environment and social risks	The proposed project encompasses 6.4 acres of parcel land with a total built-up area of 11,185.3m <sup>2</sup> . 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 EC.	NA	None
				b. ESIA should consider baseline environmental and social data (for instance CO <sub>2</sub> emission, air & water pollution)		NA	None.

SN	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
3	Monitoring and review	Not applicable. The proposed project site is in the pre-construction phase.		a. Establish procedures to monitor and measure the effectiveness of the management program	The proposed project site is in the pre-construction phase. Hence, monitoring and review is not applicable to the present stage of project operations.	NC	Going forward recommends implementing monitoring and review as good practice.
				b. Senior management in the client organization will receive periodic performance reviews of the effectiveness of ESMS		NC	
4	Emergency preparedness & response			Establish and maintain an emergency preparedness response system to respond to accidental and emergency situations associated with the project. -- 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	The proposed project site is in the pre-construction phase. Hence, emergency preparedness and response system are not applicable to the present stage of project operations.	NC	Going forward, recommends implementing emergency preparedness and response system as a good practice.
5	Stakeholder engagement			Developing a stakeholder engagement plan	The project site is in the pre-construction phase. Hence, a stakeholder engagement plan is not applicable to the present stage of project operations.	NA	Going forward recommends implementing a stakeholder engagement plan as good practice including engagement with SIPCOT.

6	External communication and grievance mechanism			Implement and maintain procedures for external communications: -- receive and register external communication from the public -- screen, assess & determine issues -- proven track & document responses	The project site is in the pre-construction phase. An external communication and grievance mechanism has not been established during E&S visit.	NA	Going forward, recommend implementing an external communication and grievance redressal mechanism.
7	Ongoing Reporting to Affected Communities			Client to provide periodic reports to affected communities annually that describe the ongoing risk or impact on the affected communities	The land is owned by TNIHPL, which was acquired from SIPCOT and there are no reportedly affected communities.	NA	None

## 5.2 Assessment of IFC PS 2

Table 9: IFC PS 2

SN	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1	Human Resources	Applicable at entity level.	IFC Performance	a. Anti-bribery and Anti-corruption b. Code of Ethics and Conduct	TNIHPL has all the listed policies.	C	None

SN	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
	Policies & Procedures		Standard 2	c. Whistle Blowers Policy			
				d. Prevention of Sexual Harassment Policy			
				e. Equal Employment Opportunity			
				f. Leave Policy			
2	Working conditions and terms of employment			a. Communication of documented information regarding their rights under national labour and employment law	E&S due diligence confirms that the employment relationship is based on non- discrimination and equal employment opportunity.	C	A policy for Working conditions and terms of employment to be developed and implemented for the project.
			b. Workers right to form and join workers organization the client shall respect collective bargaining agreements	Provision of the collective bargaining agreement is not applicable for the current E & S due diligence assessment as it is not an industrial project.			
			c. Base the employment relationship on the principle on non-discrimination and equal employment opportunity	E&S due diligence confirms that employment relationship is based on non- discrimination and equal employment opportunity.			

SN	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
				d. Procedure for addressing collective dismissal/retrenchment	E&S due diligence confirms that procedure for addressing collective dismissal/retrenchment is in place.		
				e. Client to ensure that all workers receive notice of dismissal and severance payments mandated by law and collective agreements in a timely manner	E&S due diligence confirms that workers will receive notice of dismissal and severance payments.		

SN	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
3	Protecting the workforce	Not applicable. The project is in its pre-construction 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	At present the project site is in its pre-construction phase and no child laborers are deployed at the project site. Hence, not applicable	NC	Going forward, recommend the developer to ensure that there are no child laborer's present at the project site during the construction and operational phase.
4	Safe and Healthy Work Environment	Not applicable. The project is in its pre-construction phase.	World Bank Group General EHS Guidelines, 2007	a. 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	At present the Project site is in its pre-construction phase. Hence, not applicable to the present stage of project operations.	NC	Going forward Recommend complying with the safe and healthy work environment conditions during the construction stage.

SN	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
				b. Communication and training-toolbox talks	At present the Project site is in its pre-construction phase. Hence, not applicable to the present stage of project operations.		
				c. Accidents & disease monitoring	At present the Project site is in its pre-construction phase. Hence, not applicable to the present stage of project operations.		
5.	Workers engaged by third parties		Contract Labour (Regulation and Abolition) Act, 1970	<ol style="list-style-type: none"> <li>1. Registration of establishment as principal employer (u/s 7)</li> <li>2. Contractor's license for workers more than 50 (u/12)</li> </ol>	At present the Project site is in its pre-construction phase. Hence, contract labour registration and contract labour license is not applicable to the present stage of project operations.	<p>NC</p> <p>NC</p>	Going forward recommends obtaining contract labour registration and contract labour license during the construction phase of the project.

SN	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
6	Worker's accommodation process and standards		IFC Guidelines on Workers accommodation: Guidance note by IFC and ERBD	a. Building construction materials, resistance to earthquakes (labour camps are always temporary in nature)	At present the project is in its pre-construction phase. Hence, labour accommodation is not applicable to the present stage of project operations.	NC	Going forward, recommends complying with workers accommodation process and standards.
				b. Ventilation, slip resistant flooring			
				c. Fire extinguishers			
				d. Water and sanitary connection			
				e. Canteen, cooking, and laundry facilities			
				f. Separate toilets			
				g. Wastewater and solid waste segregation			
				h. First aid kit			
7	Primary supply chain		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.	The project site is in its pre-construction stage and monitoring of the supply chain for any incident of child labour or forced labour is not applicable to the present stage of project operations.	NC	Going forward recommends ensuring monitoring of primary supply chain to prevent any incident of child labour or forced labour as a good practice.

### 5.3 Assessment of IFC PS 3

**Table 10: IFC PS 3**

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1.	Resource Efficiency & Pollution Prevention:	Not applicable. The project site is in the pre-construction phase.	World Bank Group General EHS Guidelines (Part 1: Environmental) & IFC PS 2	a. Reducing project related GHG emissions	The project site is in the pre-construction phase and reducing project related GHG emissions is not applicable to the present stage of project operations.	NC	Going forward recommends reducing project related GHG emissions as good practice.
				b. Quantification of GHG emissions	The project site is in the pre-construction phase and quantification of GHG emissions is not applicable to the present stage of project operations.	NC	Going forward recommends quantifying GHG emissions as good practice.
				c. Water conservation measures - Storm/Rainwater harvesting - zero discharge design/use of treated wastewater to be included in project design operation - water reuse	The project site is in the pre-construction phase and water conservation measures are not applicable to the present stage of project operations.	NC	Recommend implementing water conservation measures during the conservation and operational phase.

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
				d. Energy conservation measures - use of LED lighting - use low carbon fuels - minimizing no. of boilers or heaters - Planting trees as thermal shields around buildings	The project site is in the pre-construction phase and energy conservation measures are not applicable to the present stage of project operation.	NC	Recommend implementing energy conservation measures during the operational stage.
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 pre-construction phase and consent to establishment certificate is applicable prior to the start of construction activity.	NC	Recommend ensuring obtaining CTE certificate before commencing construction activity.
				b. Comply with the conditions of consent to Establish		NC	Going forward recommends complying with the conditions of CTE after Obtaining a CTE certificate.
				c. Consent to operate from TNPCB	A CTO certificate is required to be obtained before operations. At present the project is on the land stage.	NC	Recommended obtaining a CTO certificate before operation of the project.
				d. Comply with the conditions to operate			

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
3.	Solid Waste		World Bank Group EHS Guidelines (Part 1: Environmental) & Solid Waste Management Rules, 2016	Every waste generator shall segregate and store the waste generated by them in three streams, namely, bio-degradable, non-bio-degradable and domestic hazardous wastes in suitable bins and handover segregated wastes to authorized waste pickers or waste collector as per the direction or notification by the local authorities from time to time. u/r4(a)	Based on the E&S site visit observations, there is debris such as plastic, bottles, beedi and paan littered due to lack of barricading of the project site. At present there is no construction activity on-going at the project site.	NC	Recommend clearing the debris littered at the project site as per municipal solid waste management rules before commencing construction activity. Further recommend the developer ensure the generated solid waste at the proposed project site during the construction and operational phase shall be stored and disposed of as per municipal solid waste rules.
4.	Hazardous Waste		World Bank Group EHS Guidelines (Part 1: Environmental) Hazardous Wastes	Occupier shall be responsible for safe and environmentally sound management of Hazardous and other waste. u/r 4(2)	Based on the E&S site visit observations, there is no presence of 'hazardous waste' as defined under section	No Info	None.

		(Management, Handling and Transboundary Movement) Rules, 2016		3(17)(i), (ii) and (iii) being generated/ handled/ stored/ processed hazardous waste which should comply with the rules and obtain consent from TNPCB.		
5.	Construction & Demolition waste	World Bank Group EHS Guidelines (Part 1:Environmental) Construction and Demolition Waste Management Rules, 2016	Mode of disposal of c & d waste. u/r 4	Based on the E&S site visit observations, there is no construction activity ongoing at the proposed project site.		Recommend approval or agreement to be obtained from a competent authority management and disposal of construction waste.
6.	E-waste	World Bank Group EHS Guidelines (Part 1: Environmental) & E-Waste (Management) Rules, 2016	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. U/r 9(1) Maintain records of e-waste generated in Form 2. u/r 9(2)	Based on the E&S site visit observations, there is e-waste expected from the proposed project site.	NA	Recommend approval or agreement to be obtained from a competent authority management and disposal of e-waste.

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
7.	Noise Pollution		World Bank Group EHS Guidelines (Part 1: Environmental) & Noise Pollution (Regulation and Control) Rules, 2000	<p>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</p> <p>Ambient noise monitoring</p>	Based on the E&S site visit observation Noise generating activity is not ongoing at the proposed project site. Hence, not applicable.	NC	<p>Going forward it is recommended to the developer to conduct an ambient noise monitoring report. It is further recommended that the developer should take adequate measures to control noise levels and restrict it to 55 dB(A) during daytime and 45dB(A) during nighttime which is the prescribed national noise level standards for residential areas.</p>

### 5.4 Assessment of IFC PS4

**Table 11: IFC PS 4**

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1.	Water Availability	Not applicable. The project is in the pre-construction phase and community health, safety and security are not applicable to the present stage of the project operations.	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)	a. Registration of existing borewells/NOC for new borewells.	At present there are no borewells present on the project site . The water supply is expected to be from SIPCOT.	NA	Recommend obtaining water supply confirmation letter from SIPCOT.
				b. Installation of digital water flow meter (conforming to BIS standard) in the abstraction structure (s)		Going forward, recommend RWH system and installing digital flow water meter as good practice.	
2	Infrastructure and Equipment Design & Safety		IFC PS 4	a. Structural elements will be designed and constructed by competent professionals and certified or approved by competent authorities or professionals	At present the project site is in its pre-construction phase and infrastructure and equipment design and safety are	NC	Going forward recommends ensuring obtaining structural stability certificate prior to occupancy.

				b. 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.	not applicable during the construction phase of the project.	NC	Going forward recommends the developer to ensure avoiding the Occurrence of incidents and injuries to the public.
3	Hazardous Materials and Management Safety			Exercise of special care where there is a potential for the public (workers and their families) to be exposed to hazardous materials and substances	At present there is no presence of hazardous materials and substances.	No Info	None.
4	Ecosystem Services			Clients to avoid degradation of natural resources that may result in adverse health and safety risks and impacts to affected communities.	The construction and operation activity are not expected to have a detrimental impact on the ecosystem.	NA	None
5	Emergency Preparedness and Response Systems			In addition, this aspect specified in IFC PS 1 Client to assist and collaborate with affected communities, local government agencies to respond effectively to emergency situations.	At present there are no affected communities on site.	NA	However, it is best practice to have an emergency manual..
6	Life & Fire Safety		World Bank EHS guidelines: Community Health and Safety; National Building Code 2005/2016;	a. Provision of firefighting infrastructure - portable fire extinguishers - hose reel - Down comer Yard hydrant		NC	Recommend providing firefighting infrastructure before the project site is operational.

7	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: -hiring -rules of conduct -training -equipping -monitoring of such workers	There are no security guards present at the proposed project site. Hence not applicable.	NC	Going forward, recommend obtaining Private Security Guard Registration during the construction and operational stage.
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### 5.5 Assessment of IFC PS 5

Table 12: 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	a. Avoidance or at least minimization of involuntary resettlement by exploring alternative project designs balancing environmental	Based on the E&S due diligence the land is owned by TNIHPL and does not involve any land acquisition or involuntary resettlement due to the project.	NA	None.
				b. Compensation and benefits for displaced people if applicable	Not required as there is no displacement of people.	NA	None.

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
				c. Client will engage with affected communities through the process of stakeholder engagement described in PS 1	At present there are no affected communities on the project site.	NA	None.
				d. The client 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 on the project site.	NA	None.
				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.

## 5.6 Assessment of IFC PS 6

**Table 13: IFC PS6**

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1	Biodiversity Conservation & Sustainable Management of Living Resources	Applicable for the project.	IFC PS 6	a. Protection and conservation of biodiversity	<p>The project site is in proximity to Thalaiyuthu reserved forests (375m away). Gangaikondan Spotted Deer Sanctuary is also located about 1.85km away.</p> <p>At present the project is in the pre- construction phase and currently there is no impact on the biodiversity due to the project operations. At site, five (5 Nos) Toddy Palm trees (<i>Borassus flabellifer</i>) and some shrubs were identified at the project site</p>	NC	<p>It is to be ensured that Reserved Forest area or ESZ of Gangaikondan Spotted Deer Sanctuary is to be avoided for any project related man or vehicle movement. In case any forest animal or endangered bird is found at the site, the forest department to be informed.</p> <p>A tree inventory should be carried out, and in case any mature tree is to be cut, a prior permission to be obtained from the forest department.</p>

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
				b. Management of eco-system services	The project is not likely to have adverse impacts on ecosystem services. However, IBAT study is recommended.	C	IBAT assessment has been conducted.
				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.

### 5.7 Assessment of IFC PS 7

Table 14: IFC PS7

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1	Indigenous people	Not Applicable for the project	IFC PS 7	a. 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.

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
				b. The Client will undertake an engagement process with the Affected communities of Indigenous people as required in PS 1. The engagement process includes stakeholder analysis and engagement planning, information disclosure, consultation, and participation in a culturally appropriate manner	As there are no indigenous people identified hence, there is engagement process.	NA	None.

### 5.8 Assessment of IFC PS 8

**Table 15: IFC PS8**

S N	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1	Cultural Heritage	Not 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 any cultural heritage sites	Based on the E&S site visit observations, the project site is not near any archaeological or cultural heritage site.	NA	None

## 6. Assessment of Green Building Certification

**Table 16: Green building Certification**

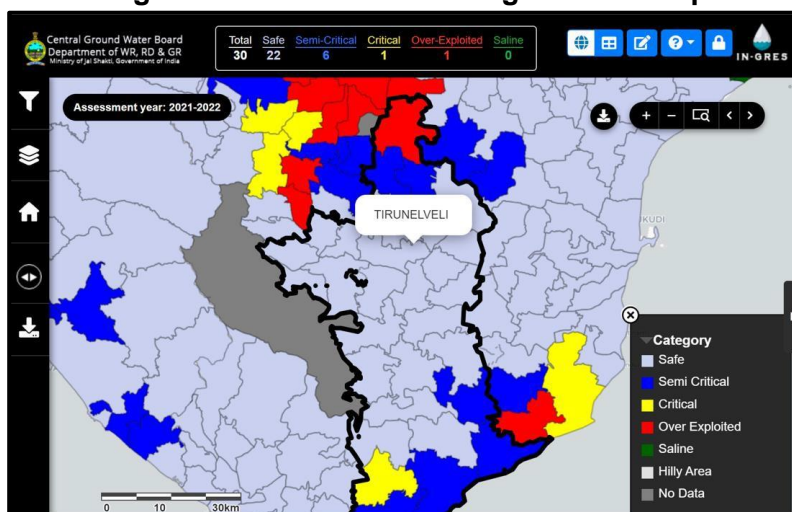
S No	Aspect	Certification Checkpoint	Observation		Recommendation
1	Green Building	Achieved certification	The proposed project is pursuing green building certification.	NC	It is good practice to obtain green building certification.
		Certification Category (Gold/Silver/Platinum)			
		Renewal of Certificate			
		Maintenance of documents And complying with green building audit			

## 7. Compliance to ADB Safeguards- Key findings

31. 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.

### 7.1 Impact of Environmental Stress and Climate Change on Project

Figure 3: Ground water Categorization Map



32. As per the Central Groundwater Board (CGWB), the project site is in Tirunelveli region is classified as “Safe”. The proposed project is in its pre-construction phase. The proposed water supply during the construction and operation phases will be from SIPCOT. Therefore, the risk of the project for depleting groundwater level is classified as “Low”.

33. Susceptibility to natural catastrophes and climate-related emergencies:

- 1) Earthquake: According to Building Materials and Technology Promotion Council (BMPTC) Earthquake hazard map, the project site lies in **Zone II i.e., Low Damage Risk Zone (MSK VI or Less)**.
- 2) Flood : According to BMPTC Flood Hazard Map, the project site is in the **Low-Risk Zone**.
- 3) Cyclone : The project is in the **Very High Damage Risk Zone -B maximum sustained wind (48-63) in Knots** as per BMPTC Wind and Cyclone Hazard Map.
- 4) Landslide: The project site is **Low risk** to landslides as per BMPTC report.
- 5) Thunderstorm : According to BMPTC Thunderstorm Incidence Map the site is in **Moderate risk zone**.
- 6) Drought : There are **moderate drought** events that happened in Tirunelveli.

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

34. **Critically Polluted area:** The project site is surrounded by commercial and industrial units. The project site is not located within 5km distance of any notified polluted areas as per Central Pollution Control Board in the 'Comprehensive Environmental Assessment of Industrial Clusters', 2013. Thus, the risk to the project from the polluted area is Low.

35. **Presence of Municipal Dump site/Hazardous Waste Landfills:** No MSW dump yard and hazardous waste landfill is present near to the site. Thus, the risk of exposure to pollution from dump sites to the project is "Low"

The risk from environmental stress/climate change on project is classified as "LOW"

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

## 7.2 Impact of Project on Environment and Climate Change

36. **Impact on Protected Areas:** Thalaiyuthu Reserved Forest (survey no. 1854, ~ 375m to South of the Site) and Gangaikondan Spotted Deer Sanctuary (survey no. 1653 ~ 1.83km to SE of the Site) are located close to the Site. However, the site is located away from the RF boundary and ESZ of the Gangaikondan Spotted Deer Sanctuary. It is to be ensured that Reserved Forest area or ESZ of Gangaikondan Spotted Deer Sanctuary is to be avoided for any project related man or vehicle movement. In case any forest animal or endangered bird is found at the site, the forest department to be informed. Since the impact of the site activities are expected to be limited to the Site, as the forest is ~2km from the project site and the nearest settlement is ~7km. Any risk from the project activities to the protected areas are considered as Low.

37. **Impact on Water:** At present, the project site is in the pre-construction stage. Therefore, the risk of the water resources from the current state of the project site is not envisaged. Water for the project is proposed to be sourced from SIPCOT and no dependence on any ground or surface water is expected.

38. **Impact on Air/GHG Emissions:** During the 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. DG sets to be housed in an acoustic enclosure with sufficient height and ambient noise monitoring to be conducted regularly. It is advisable to minimize the source of air pollution during the construction phase and to quantify the GHG emissions generated at the project site.

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 and operational phase.

## 7.3 Social Impact Assessment

39. 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.

40. **Landownership and Transfer details:** The project land is currently allotted in the name of TNIHPL (Ref Fig 2). The land use of the area is industrial; however, the original category of land was Dry Manavari Land Type – II. Due diligence has confirmed that there is no voluntary or involuntary resettlement or relocations or evictions from the property. The nearest communities are ~7 kms from the project site. The site also does not have presence of indigenous people as confirmed in the involuntary resettlement and indigenous population checklist documented as annexure 4. The site does not have any land legacy disputes, and it does not have any cattle grazing on the project site. A stakeholder engagement has been conducted, the details of which are documented as Annexure 5.

41. **Proximity to Cultural, Religious and Heritage sites:**

#### Heritage Site

S.NO	Heritage site	Locality/District	Distance from Project site
1.	Government Museum	Tirunelveli	19.7 km
2.	District Science Centre	Tirunelveli	18.9 km
3.	Remnants of Fort Palaiyankottai	Tirunelveli	18.2 Km

Source: Archaeological survey of India, All India Inventory of Sites and Monuments-Bhuvan- ISRO

#### Religious Places

S.NO	Name of Religious Places	Distance from Project site
1.	Sri Sundarashi Amman Temple	7.3 km
2.	Veli Kada Sastha Temple	11.5 km
3.	Mohideen Jumma Masjid Prayer Hall	10.1 km
4.	Jamiya Jumma Masjid	21.7 km
5.	Masjidur Rahman Mosque	10.3 km
6.	St. Michaels Church	13.0 km
7.	AG Church Sankar Nagar	12.1 km

42. None of the above-mentioned cultural, religious and Heritage sites are on the project site or have access through the project site, therefore it will not have an impact on the access to the surrounding community.

43. The risk to the project based on Cultural, Heritage and Religious site is classified as LOW.

#### 7.4 Grievance mechanism for workers

44. A grievance redressal policy 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.

### **7.5 Provision of welfare facilities for workers**

45. The proposed project has been constructed and has not been operational since its inception. Hence, during the operational phase of the project, provision of welfare facilities for housekeeping staff to be provided.

### **7.6 Practices on Anti-Bribery and Anti-Corruption:**

46. E&S due diligence confirms that TNIHPL has an anti-bribery and anti-corruption policy is in place. An overall risk given to the project due to social impacts is “Low”.

## 8. Environment & Social Action Plan

### 8.1 Methodology of Action Plan

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

47. 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.

48. The following are key elements to be included in the action plan:

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

### 8.2 Prioritization of Actions

49. The actions to be undertaken to establish compliance with legal requirements and industry’s 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.

<b>High</b>	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.
<b>Medium</b>	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.
<b>Low</b>	The ‘Low’ priority actions are those which are management program oriented. The actions are more practice oriented.

**Table 17: Environment & Social Action Plan**

S No	Aspect	Recommendation	Responsibility	Timeline	Priority	Monitoring Mechanism	Proposed Budget in Rs
Legal Requirements- Environment							
1	Solid Waste management	Ensure that solid waste is collected and disposed of as per municipal solid waste management rules before commencing	Developer	Before commencing construction activity.	Medium	To be implemented at project site	5 Lakh

S No	Aspect	Recommendation	Responsibility	Timeline	Priority	Monitoring Mechanism	Proposed Budget in Rs
		construction activity.					
2	Construction and Demolition Waste management	Construction waste generated to be disposed of as per construction and demolition waste management rules.	Developer	During construction activity.	Medium	To be implemented at project site	5 Lakh
3	Borewell Approval	None		-	-	None	-
4	Tree cutting and replantation NOC	In case any tree cutting is required, obtain tree cutting and replantation NOC from the forest department. Additionally, recommend practicing compensatory afforestation to the ratio of 1:10.	Developer	Before commencing construction activity.	Low	To be obtained	1.0

## 9. Stakeholder Engagement Plan

### 9.1 Stakeholder Consultations

50. Stakeholder consultations were conducted on February 4, 2024, at the project site to discuss the project details, the history of the land, and potential effects of construction on local communities. A Self-Employed person in the proximity to the site expressed no objections and was satisfied with the project, anticipating a positive impact on the business. Another person indicated no objections to the project and discussed the lack of housing facilities in the vicinity for the industrial workers. (Ref Annex 6)

51. Another set of consultations was held on December 19, 2024. The stakeholders included TNIHPL executives, forest department officials, local community and industrial workers. During the consultation, individuals were asked about the movement of deer, restriction of access to nearby reserve forests and the possible impacts of the project. The forest officials stated that the movement of deer in the project is minimum as the project site is 2km from the deer sanctuary. Additionally, the workers were welcoming the project as the nearest housing option is approximately 7 km away from the SIPCOT area making the commute difficult for the workers. Additionally, the TNIHPL executives elaborated the detailed checklist of the Mitigation Action Plan developed for the mitigation of any risks from the project.

### 9.2 Stakeholder Engagement Plan

52. The project shall have a stakeholder engagement strategy which will encompass a wide range of stakeholders, including both those within the organization (internal stakeholders) and those external to it. Additionally, the strategy will ensure that it incorporates the participation of community stakeholders who are relevant to the project.

53. A stakeholder engagement should be conducted semi-annually with a notice given to the stakeholders at least 7 days prior to the consultation.

54. The target population for the project shall include industrial workers from nearby industries, contractor(s), daily labors, and employers of the industries.

55. Once the stakeholders are mapped, it's important to keep the momentum going and continue to manage stakeholder relationships effectively throughout the project development process.

56. Post every stakeholder analysis meeting is conducted with the target population, it is imperative to follow these steps outlined below

- 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.

## 10. Grievance Redressal Mechanism

57. The TNIHPL will establish the Grievance Redressal Committee to ensure that the proper functioning of the GRC, officers and focal points will be established within the PMC and Contractor prior to project construction commencement and display the three-tiered structure in the project site. Most complaints will be under the purview of the site level contractor and TNIHPL. It will be addressed via procedures described in the ESGMS. Records of complaints received and how they are addressed will be maintained by the TNIHPL and reported in the monitoring reports. Contact phone numbers and names of the staff concerned, and contractors will be posted at all construction sites in visible locations. The following GRM shall be followed. (Ref Table 18). Annexure 4 provides the sample grievance registration format.

58. **Field level.** The Contractor will designate an on-site Grievance Redress Officer (GRO)-1 in consultation with the PMC and TNIHPL. The field level GRC will be the Tier-1 committee, and it may consist of nominated members from the labor 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 TNIHPL and consist of Business Head, and project engineer from TNIHPL. 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 and Investment Analyst.

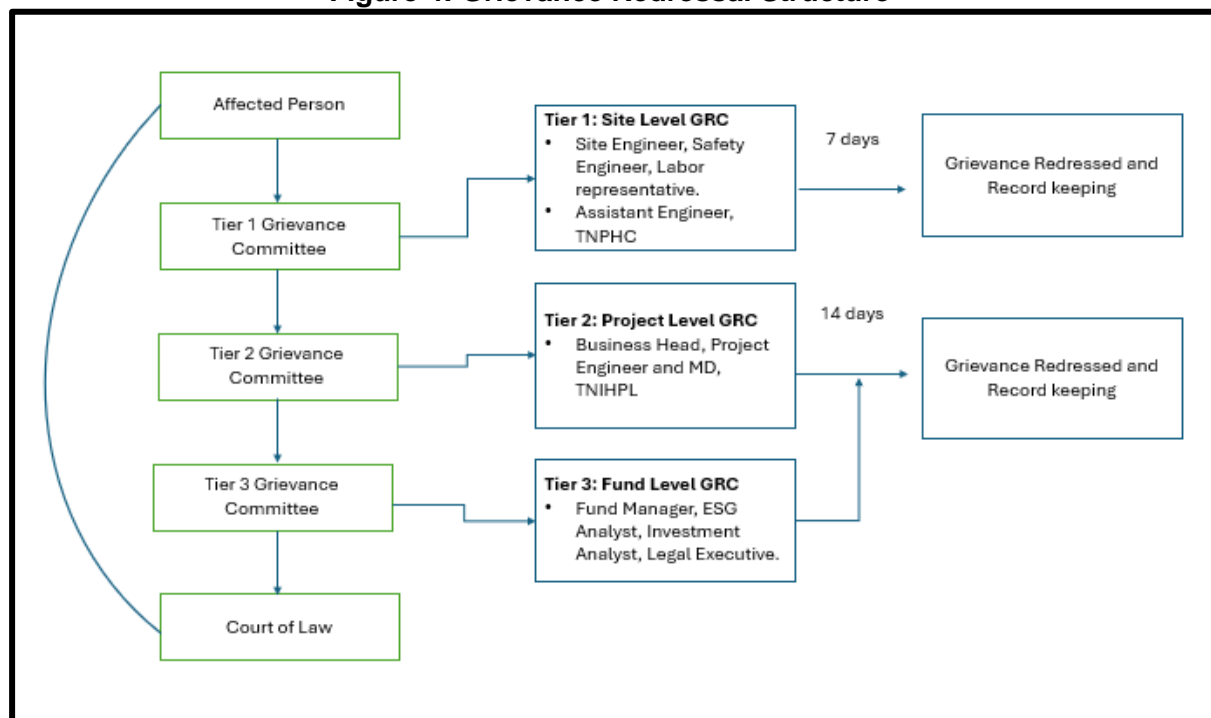
59. Alternatively, the complaint can be registered by phone call, message, email to GRO-1 and any complaints received by the contractor or site engineers will be reverted to the onsite GRO-1 for 1st level resolution. The complaint will be reviewed and on-site GRO-1 with assistance from the Site engineer 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.

60. **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.

61. **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 within 14 days of its receipt.

62. 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 4: Grievance Redressal Structure**



63. **ADB’s Accountability Mechanism.** If the established GRM is not able 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.

64. **Periodic review and documentation of lessons learned.** The PMC and TNIHPL 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.

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

## 11. Conclusion and Way Forward

66. 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, 6 ESG issues were evaluated using ESG risk rating tool of which 4 are considered as material ESG risk for the proposed project. Project risk level is 19.44 %. Hence, it is medium risk level.

### 67. Key findings of the study are:

- The due diligence confirms that the land belongs to TNIHPL, and no instance of resettlement activity, land acquisition related issues or legacy issues is involved for the proposed project site.
- Based on E&S site visit observation, the project site has five (5 Nos) Toddy Palm trees (*Borassus flabellifer*) and shrubs at the project site. some trees may require tree cutting and replantation.
- The project site is within an industrial housing colony owned by SIPCOT with Thalaiyuthu reserved forest (S.F No. 1854) located at 375m to south and Gangaikondan Spotted Deer Sanctuary, located 1.65km to the southeast. IBAT Mitigation measures using IBAT tool have been conducted to mitigate any risks from the project to the RF and Deer Sanctuary which have been incorporated in the EMP.
- 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.
- No potential negative impacts have been identified for this project.

### Way Forward

- It is to be ensured that Reserved Forest area or ESZ of Gangaikondan Spotted Deer Sanctuary is to be avoided for any project related man or vehicle movement. In case any forest animal or endangered bird is found at the site, the forest department to be informed.
- In case any tree cutting is required, approval/ NOC from the forest department is to be obtained.
- Training of project staff on the key points of the Environmental and Social Action plan by the project developer.
- 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.
-

- Regular monitoring of the recommended measures during the operational phase of the project. The E&S action plan should be revisited in case new impacts/non-compliances are identified.
- The project needs to activate the Grievance Redress Committee for prompt response to public complaints.
- 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.

## Annexures

### Annexure – 1 Site photographs



Photograph 1: Signage Indicating Site Address



**Photograph 2: Approach Road to project site towards the south side**



**Photograph 3: Another View of the Site**



**Photograph 4: View of the Site with Access Road on the south side**



**Photograph 5: View of the Site with Truck parking at the eastern plot**

## Annexure 2: Indigenous People Impact Screening Checklist

### Introduction

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

Information on project/subproject/component:

- a. District/administrative name: Tirunelveli/ SIPCOT Gangaikondan
- b. Location (km):
- c. Civil work dates (proposed): The proposed project is in its pre-construction stage.

Technical description: The projects involve the construction of the Industrial Housing Project.  
Screening Questions for Indigenous People Impact

KEY CONCERNS (Please Provide Elaborations In The "Remarks" Column)	YES	NO	Not Kno wn	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 Project site is in the pre- construction stage. 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. The project land is owned by the TNIHPL and does not have the presence of Indigenous people in and around the site. The nearest communities are ~7 km. from the project site.
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				

KEY CONCERNS (Please Provide Elaborations In The “Remarks” Column)	YES	NO	Not Know n	Remarks
9. Will the project directly or indirectly benefit or target indigenous people?		√		
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**

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

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

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

### 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: Gangaikondan SIPCOT
- b. Location (km): Gangaikondan
- c. Civil work dates (proposed): - Not anytime soon\_\_\_\_\_
- d. Technical description: The proposed project involves the construction of a industrial housing project.

#### 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.

Probable Involuntary Resettlement Effects	Yes	No	Not Known	Remarks
<b>Involuntary Acquisition of Land</b>				
1. Will there be land acquisition?		√		The land was a government land owned by SIPCOT. It was later transferred and the ownership is with TNIHPL. It is an industrial zone and hence no land acquisition is expected. The nearest communities are ~7 km. from the project site. There are no formal or informal forest users. There are no such restrictions or potential changes expected post-construction stage.
2. Is the site for land acquisition known?				Same as above.
3. Is the ownership status and current usage of land to be acquired known?				Same as above.
4. Will easement be utilized within an existing Right of Way (ROW)?	√			The existing access laid by SIPCOT 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?				Same as above
7. Will there be losses of crops, trees, and fixed assets due to land acquisition?				Not applicable. As reported, five (5) trees on TNIHPL land will be cut during the construction phase which

				will be taken care by Forest Authority. However, this impact is not due to land acquisition.
8. Will there be loss of businesses or enterprises due to land acquisition?				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?		√		There will be no loss of natural resources, communal facilities, and services.
11. If land use is changed, will it have an adverse impact on social and economic activities?		√		No such impact has been anticipated
12. Will access to land and resources owned communally or by the state be restricted?		√		No such impact has been anticipated
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				

### Annexure 4: Sample Grievance Registration Form

(To be made available in Local Language- Tamil)

The Proposed Industrial Housing 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			

**Annexure - 5- Informal Consultation/Stakeholder Consultation**



Name: Ms. Manjula Mani

Designation: She is a fruit and snacks vendor outside the project site.

Name: Ms. Raji Sankar

She is a coconut vendor outside the project site.

**Table 18 Stakeholder consultation summary**  
**Consultation Summary**

S. No	Date / Time / Venue of Meetings	Stakeholder	No. of Participants			Issues discussed	Project responses
			Male	Female	Total		
1	04-02-2024 9:25 am- 9:30 am Project site	Name: Manjula Mani Designation Self Employed		Yes	1	<ul style="list-style-type: none"> <li>• Project Details</li> <li>• History of land</li> <li>Effect of construction on local communities</li> </ul>	No Objections. Expressed satisfaction as her business might pick-up.
2	04-02-2024 9:30 am -9:40 am Project site	Name- Raji Sankar Designation- Self Employed		Yes	1	<ul style="list-style-type: none"> <li>• Project Details</li> <li>• History of land</li> <li>Effect of construction on local communities</li> </ul>	No Objections

## **Annexure 6: Appendix 5 of ADB’s SPS: ADB PROHIBITED INVESTMENT ACTIVITIES LIST**

The following do not qualify for Asian Development Bank financing:

- (i) production or activities involving harmful or exploitative forms of forced labor<sup>1</sup> or child labor;<sup>2</sup>
- (ii) production of or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements or subject to international phaseouts or bans, such as (a) pharmaceuticals,<sup>3</sup> pesticides, and herbicides,<sup>4</sup> (b) ozone-depleting substances,<sup>5</sup> (c) polychlorinated biphenyls<sup>6</sup> and other hazardous chemicals,<sup>7</sup> (d) wildlife or wildlife products regulated under the Convention on International Trade in Endangered Species of Wild Fauna and Flora,<sup>8</sup> and (e) transboundary trade in waste or waste products;<sup>9</sup>
- (iii) production of or trade in weapons and munitions, including paramilitary materials;
- (iv) production of or trade in alcoholic beverages, excluding beer and wine;<sup>10</sup>
- (v) production of or trade in tobacco;<sup>10</sup>
- (vi) gambling, casinos, and equivalent enterprises;<sup>10</sup>
- (vii) production of or trade in radioactive materials,<sup>11</sup> including nuclear reactors and components thereof;
- (viii) production of, trade in, or use of unbonded asbestos fibers;<sup>12</sup>
- (ix) commercial logging operations or the purchase of logging equipment for use in primary tropical moist forests or old-growth forests; and
- (x) marine and coastal fishing practices, such as large-scale pelagic drift net fishing and fine mesh net fishing, harmful to vulnerable and protected species in large numbers and damaging to marine biodiversity and habitats.

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<sup>1</sup> Forced labor means all work or services not voluntarily performed, that is, extracted from individuals under threat of force or penalty.

<sup>2</sup> Child labor means the employment of children whose age is below the host country’s statutory minimum age of employment or employment of children in contravention of International Labor Organization Convention No. 138 “Minimum Age Convention” ([www.ilo.org](http://www.ilo.org)).

<sup>3</sup> A list of pharmaceutical products subject to phaseouts or bans is available at <http://www.who.int>.

<sup>4</sup> A list of pesticides and herbicides subject to phaseouts or bans is available at <http://www.pic.int>.

<sup>5</sup> A list of the chemical compounds that react with and deplete stratospheric ozone resulting in the widely publicized ozone holes is listed in the Montreal Protocol, together with target reduction and phaseout dates. Information is available at <http://www.unep.org/ozone/montreal.shtml>.

<sup>6</sup> A group of highly toxic chemicals, polychlorinated biphenyls are likely to be found in oil-filled electrical transformers, capacitors, and switchgear dating from 1950 to 1985.

7 A list of hazardous chemicals is available at <http://www.pic.int>.

8 A list is available at <http://www.cites.org>.

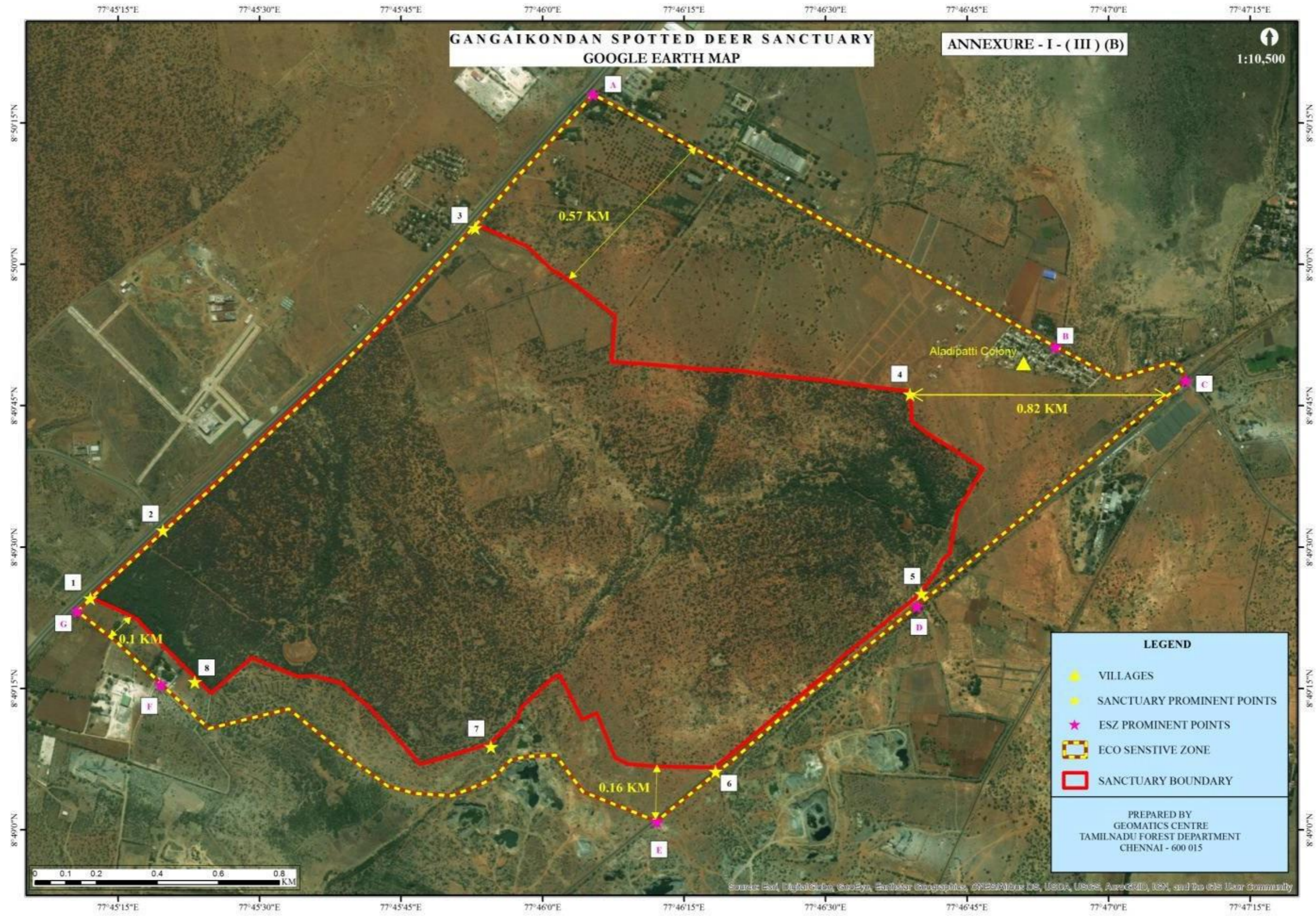
9 As defined by the Basel Convention; see <http://www.basel.int>.

10 This does not apply to project sponsors who are not substantially involved in these activities. Not substantially involved means that the activity concerned is ancillary to a project sponsor's primary operations.

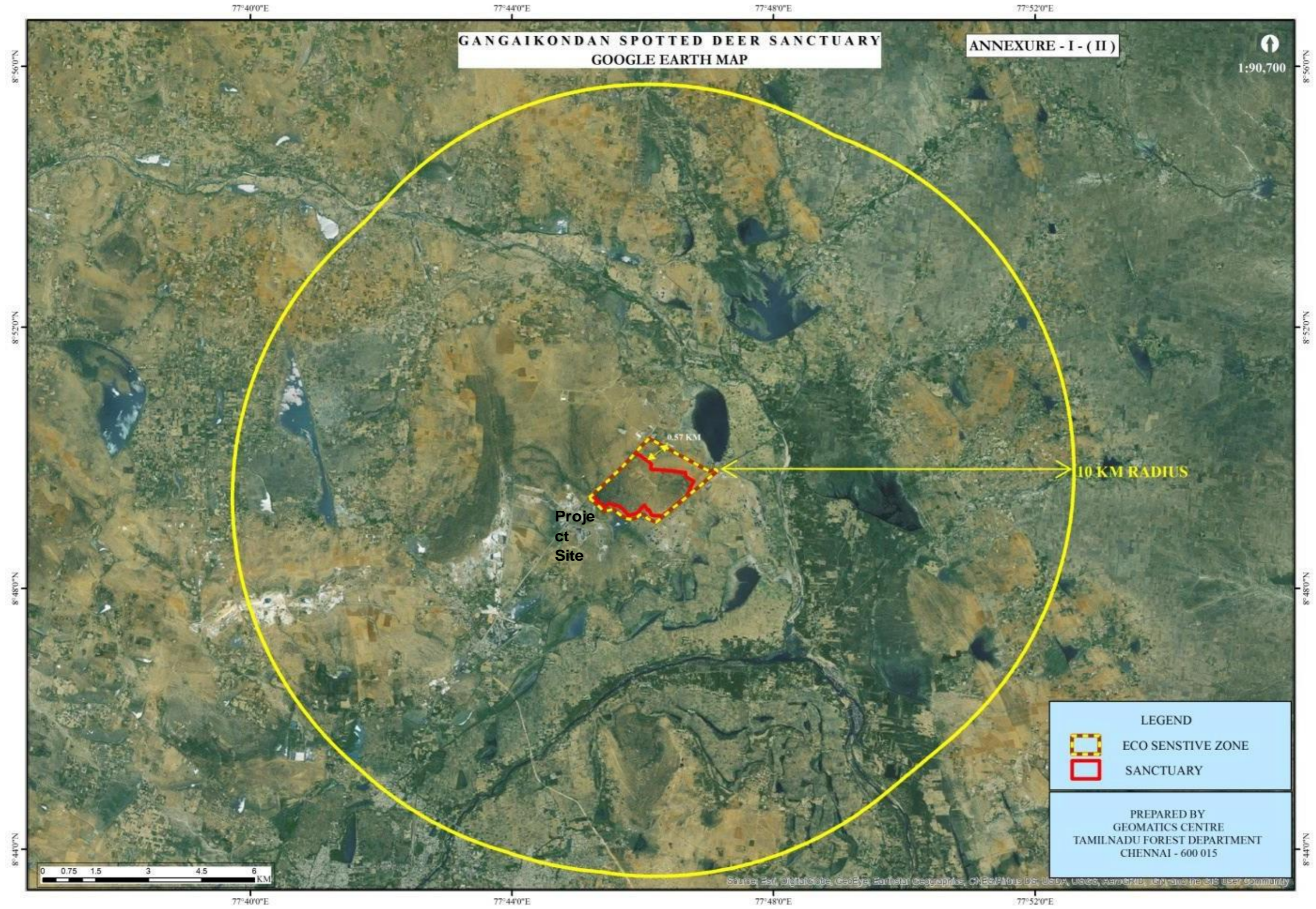
11 This does not apply to the purchase of medical equipment, quality control (measurement) equipment, and any equipment for which ADB considers the radioactive source to be trivial and adequately shielded.

12 This does not apply to the purchase and use of bonded asbestos cement sheeting where the asbestos content is less than 20%.

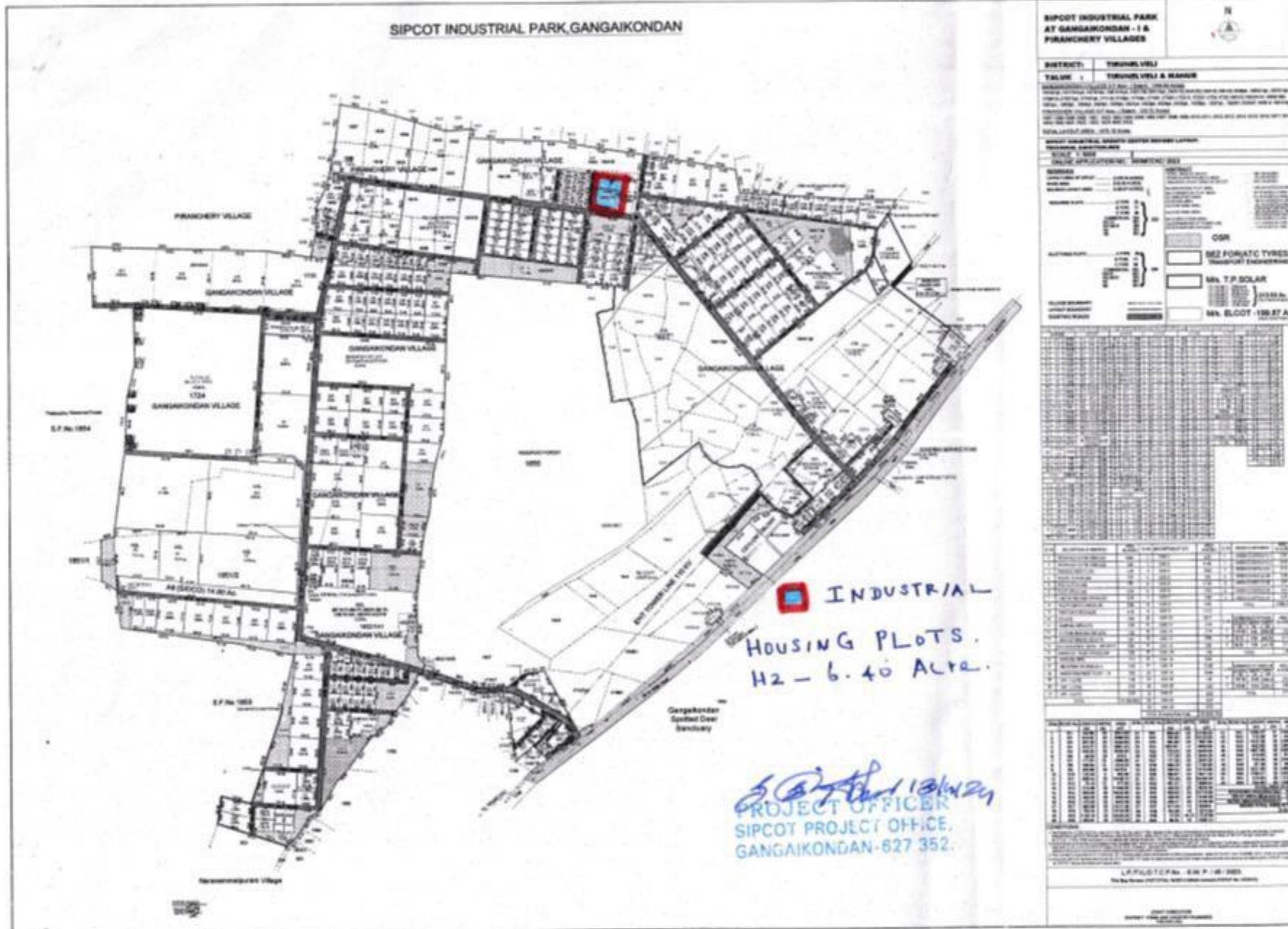
**Annexure 7: Eco-Sensitive Zoning, Gangaikondan Spotted Deer Sanctuary**







Annexure 8: Project Site Location in Layout Plan of SIPCOT, Gangaikondan



## Annexure 9: Land Registration Document



**P-III/SIP-GKN/TNIHPL/2024**

**Dated: 12.09.2024**

M/s.Tamil Nadu Industrial Housing Pvt. Ltd.,  
19-A, Rukmani Lakshmipathy Road,  
Post Box No.7223, Egmore,  
Chennai – 600 008.

Sir,

**Sub:** SIPCOT Industrial Park, Gangaikondan – Plot No.H-2 pt.1 measuring 2.07 acres earmarked for Industrial Housing Facility - Request for "In-Principle" allotment – Approval accorded - Reg.

**Ref:** Your letter dt.29.08.2024

**&&&&&**

With reference to your letter cited above, we are pleased to inform that we are agreeable to consider your request for "In-Principle" allotment of Plot No.H-2 pt.1 measuring 2.07 acres at SIPCOT Industrial Park, Gangaikondan for the establishment of Industrial Housing Facilities on usual terms & conditions and at the prevailing rate of allotment at the time of issuing of firm allotment.

Yours faithfully,  
Sd/--  
**MANAGING DIRECTOR**

**Copy to:**

1. The Project Officer,  
SIPCOT Industrial Park,  
**Gangaikondan.**
2. Allotment Cell

**/ BY MAIL /**

**/ FORWARDED BY ORDER /**

  
**GENERAL MANAGER (P-I)**

**State Industries Promotion Corporation of Tamil Nadu Limited**  
**(A Government of Tamil Nadu Undertaking)**

CIN | U74999TN1971SGC005967

Regd. Office : 19-A, Rukmani Lakshmipathy Road, Post Box No. 7223, Egmore, Chennai - 600 008.  
Phone : 4526 1777, Fax : 4526 1796 Website : www.sipcot.tn.gov.in

## 12. Abbreviations

<b>BMTPC</b>	Building Materials and Technology Promotion Council	<b>INR</b>	Indian National Rupees
<b>CPCB</b>	Central Pollution Control Board	<b>KWH</b>	Kilo Watt Hour
<b>BUA</b>	Built-up Area	<b>KVA</b>	Kilo Volt Ampere
<b>DG set</b>	Diesel Generator set	<b>KWH</b>	Kilo Watt Hour
<b>EIA</b>	Environmental Impact Assessment	<b>LPG</b>	Liquified Petroleum Gas
<b>E&amp;S</b>	Environmental and Social	<b>NABL</b>	National Accreditation Board for Testing and Calibration Laboratories
<b>EHS</b>	Environmental, Health & Safety	<b>NOC</b>	No Objection Certificate
<b>EMC</b>	Environmental Management Centre LLP	<b>NGO</b>	Non-Governmental Organization
<b>EPF</b>	Employee Provident Fund	<b>OHS</b>	Occupational Health and Safety
<b>ESAP</b>	Environmental and Social Action Plan	<b>PPE</b>	Personal Protective Equipment
<b>ESGDD</b>	Environmental Social and Governance Due Diligence	<b>PM</b>	Particulate Matter
<b>ESGMS</b>	Environmental, Social and Governance Management System	<b>PMC</b>	Project Management Consultant
<b>ESA</b>	Ecological Sensitive Area	<b>PUC</b>	Pollution Under Control
<b>ESI</b>	Employee State Insurance	<b>RCC</b>	Reinforced Cement Concrete
<b>EWS</b>	Economically Weaker Sections	<b>TNPCB</b>	Tamil Nadu Pollution Control Board
<b>FSI</b>	Floor Space Index	<b>TIDCO</b>	Tamil Nadu Industrial Development Corporation
<b>HR</b>	Human Resources	<b>TNIFMC</b>	Tamil Nadu Infrastructure Fund Management Corporation Limited
<b>HSE</b>	Health, Safety and Environment	<b>TNIHPL</b>	Tamil Nadu Working Women's Hostels Corporation



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